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The following investigation was conducted by SA [redacted] in the Washington Metropolitan Field Office of the FBI on October 18, 1991:

[redacted]

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[redacted]

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JUL 15 1992
FBI - ATLANTA
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FD-350 (Rev. 5-8-87)

Pg. B-1

(Indicate page, name of newspaper, city and state.)
Atlanta Journal - Constitution

Date: 9-8-91
Edition:

Title: Investigators Looking at Pharaon's Finances

Character:
or
Classification:
Submitting Office:

Indexing:

INDEX

(Mount Clipping in Space Below)

Investigators looking at Pharaon's finances

Banker's empire is heavily in debt

By Elizabeth Kurylo and Bob Luke
Staff writers

Ghaith R. Pharaon, the Saudi Arabian financier who allegedly helped a rogue bank secretly build a financial empire, appears to be unloading his U.S. investments, even as federal agencies in Atlanta probe his business affairs in one of the largest local investigations in recent memory.

Investigators are discovering that the Harvard-educated investor, who seduced Georgia's movers and shakers in the 1980s with business deals and elaborate parties at his estate near Savannah, is rich on paper but deep in debt.

By the end of the 1980s, Mr. Pharaon reportedly had become one of the largest borrowers from the scandal-ridden Bank of Credit and Commerce International, leaving some investigators wondering just who really owns the financial empire he established.

In Atlanta, the Justice Department, the FBI, the Internal Revenue Service and banking regulators are trying to unravel Mr. Pharaon's business ties as part of a wide-ranging national investigation into the bank's affairs.

The Justice Department was criticized in congressional hearings this summer for ignoring evidence of the bank's wrongdoing. But federal authorities in Atlanta say the case is now their top priority.

"We're giving this case primary attention," said Joe D. Whitley, U.S. attorney in Atlanta. He would not discuss specific aspects of the Georgia investigation.

Federal investigators also are questioning the bank's relationships with former President Jimmy Carter, former U.S. budget director Bert Lance and former Atlanta Mayor Andrew Young. Mr. Carter received more than $8 million in charitable contributions from the bank. Mr. Young and Mr. Lance, who both were BCCI consultants, received substantial bank loans.

"We'll be looking at the facts and following them where they lead us, not presupposing any individual engaged in any misconduct until we can support that with the facts," Mr. Whitley said.

A lavish life mixed with charity

Investigators are following a trail that disappears into a frustrating legal fog of offshore tax havens, holding companies and limited partnerships. But Mr. Pharaon has emerged as the common denominator in Georgia.

Mr. Pharaon was a stylish deal-maker who commuted by private jet and relaxed on a $10 million yacht, balancing lavish displays of personal wealth against equally generous charitable giving.

Now some of his choicest U.S. acquisitions are on the block. In Richmond Hill near Savannah, Mr. Pharaon's InterRedec employees are aggressively shedding some of his investments.

His American Southern Insurance Co., a $33 million Georgia-based firm, will be sold in the next several weeks. Dooley E. Culbertson, InterRedec's chief executive, said he would sell the firm's 718-room Ramada Resort hotel near Walt Disney World for $43 million.

In New York earlier this year, Mr. Pharaon's DLF Finance Inc., which traded in the debt of Third World countries, was liquidated. And last week in California, the Independence Bank of Encino, which regulators say Mr. Pharaon secretly acquired for BCCI in 1985, hired a firm of investment bankers to find a buyer.

Banks only part of global empire

No one knows the full extent of his U.S. holdings, but financial records filed in 1984 placed his wealth at $743.3 million, mostly in stocks, bonds and investments.

But he also owed $236.3 million. More than half was to a syndicate of

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FBI/DOJ

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

Company controlled by key BCCI figure to sell Atlanta insurer

Fuquas own 43% of purchasing firm

By Robert Luke
Staff writer

J.B. Fuqua and his family own 43% of Vista Resources, which has agreed to buy American Southern Insurance.

A company controlled by Saudi businessman Ghaith R. Pharaon — a key figure in the worldwide Bank of Credit and Commerce International scandal — is selling Atlanta-based American Southern Insurance Co. for $33 million.

The buyer is Vista Resources Inc., which is 43 percent owned by Atlanta tycoon J.B. Fuqua and his family. Vista, whose shares are traded on the New York Stock Exchange, currently has leather tanning interests.

The proposed transaction is expected to be completed by Sept. 30, if Georgia insurance regulators approve, according to Samuel W. Norwood III, Vista's president and chief executive.

"It's a good company that's been around for a long time and occupies a good niche in property and casualty insurance," said Mr. Norwood, referring to American Southern, which was founded 50 years ago and was bought by Mr. Pharaon in 1985.

"We think it's a propitious time to be buying" property and casualty insurers, said Mr. Norwood, observing that the industry is near its cyclical low point as far as profitability. "We're not economic forecasters, but we think that industry will turn up."

American Southern, which insures commercial fleets of cars and trucks and has tangible assets of $68 million, last year earned $3.9 million on revenue of $44.5 million.

(Indicate page, name of newspaper, city and state.) 01
The Atlanta Journal
Atlanta, Ga.
Date: Aug. 6, 1991
Edition: Tuesday

Title:

Character:
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Classification:
Submitting Office:

Indexing:

p1

194A-AT-67917-68

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JAN 14 1992
FBI - ATLANTA

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FBI/DOJ

BCCI: Key figure in scandal is selling Atlanta-based insurer

▶ Continued from D1

BCCI $288 million. And the majority owner of BCCI, Sheik Zayed al-Nahyan of Abu Dhabi, is trying to collect, The Associated Press reported last week.

American Southern, licensed in 13 Southern and Midwestern states, is owned by InterRedec Inc., which is controlled by Mr. Pharaon, said Mr. Champlin, indicating the sale likely will be approved.

Vista had considered buying American Southern two years ago, Mr. Norwood said.

"We had some discussions at that time, but that didn't lead to anything," he said. "Then it came up again several weeks ago when it was brought to us by Robinson-Humphrey," said Mr. Norwood, referring to the Atlanta-based securities firm.

"We've been seriously negotiating for six to eight weeks," said Rod Dowling, a Robinson-Humphrey Company Inc. managing director.

3 former Fuqua officers

Both Mr. Norwood and Mr. Dowling are former officers of Fuqua Industries Inc., as is Dooley Culbertson, chief executive of InterRedec.

InterRedec is based in Richmond Hill, Ga., near Savannah.

"That would certainly explain how the Fuquas would be informed so quickly" about American Southern, Mr. Champlin observed.

Mr. Dowling said he approached Mr. Culbertson, a friend and fellow director at Atlanta-based Superior TeleTec Inc., about American Southern.

"Vista has been looking at insurance companies for a while," Mr. Dowling said. "InterRedec buys and sells companies for investment purposes, and they've been quite successful at it."

Regulators surprised

Georgia insurance regulators, who were notified of the proposed deal last Friday, said they were surprised by the move.

"We had talked to officials of [American Southern] early last week about Mr. Pharaon's problems, and nothing was communicated to us that he was interested in selling the company," said Dan Champlin, director of regulatory services at the Office of Insurance Commissioner.

Mr. Champlin said the insurance commissioner, Tim Ryles, was concerned about Mr. Pharaon's possible involvement in American Southern's operations.

That concern arose after the Federal Reserve Board moved last month to ban Mr. Pharaon from any future involvement in U.S. banking.

The Saudi businessman, who maintains a home near Savannah, is alleged to have acted as a front for BCCI in illegally acquiring control of several U.S. banks, including the former National Bank of Georgia. NBG currently operates as First American Bank of Georgia.

BCCI was indicted last week on fraud charges by a grand jury in New York. Last month, bank regulators halted BCCI's operations in eight countries.

Mr. Champlin said American Southern's chairman, Roy Thompson Jr., assured him last week that Mr. Pharaon, the son of Saudi King Fahd's physician and a BCCI stockholder, "had nothing to do with the active management of the company."

'Absentee owner'

"Apparently, they've had little if any contact with him over the years," Mr. Champlin said. "He was an absentee owner."

Mr. Pharaon reportedly owes

Please see **BCCI, D8** ▶

Memorandum

To : SAC, ATLANTA (194A-AT-67917) Date 3/10/92

From : SA [redacted] b6 b7C

Subject: UNSUBS; POSSIBLE CORRUPTION OF GEORGIA STATE LEGISLATORS
CSLPO
OO: AT

[redacted] b6 b7C furnished the following information re insurance companies [redacted]

1. American Southern Insurance Co.
2. Ellis Brokerage Insurance Services
3. American Southern Insurance Group, Inc.
4. American Specialty Insurance Co.
5. Tri-Star Insurance Co.

[redacted] advised that all of the above are registered Georgia companies, however, American Specialty, which owns Tri-Star, only operated in the state of California. This company has never broken even, according to [redacted] and quit writing insurance toward the end of 1990. This company provided small commercial business insurance for service stations and small retail stores. The company showed a terrible loss ratio, and was put into receivership by the Georgia and California Insurance Commissioners. This company [redacted] CHAMPLIN said that [redacted] b6 b7C

[redacted] advised that the other insurance companies listed are in good condition, the books appear to be in good order, and there are no indicators of anything unusual going on. The assets of these companies were checked out and they do exist. He said that Vista Resources, Inc. of Atlanta has filed an application to acquire American Specialty Insurance Co.

He advised that American Southern Insurance is located at 3715 Northside Parkway, Building 400, Atlanta, Ga. The chairman of the firm is Roy S. Thompson, telephone 266-9599. American Specialty is located at 3760 Cahuenga Boulevard West, Studio City, Ca. 91604. [redacted]

For further information regarding this matter, [redacted] b6 b7C [redacted] was interviewed in New York, N.Y. on 10-22-91. He was an [redacted] He advised that the Georgia insurance companies [redacted] were run by an [redacted] team, and were operated "cleanly". However, the California companies had problems and were run poorly. He said that these companies were operate[illegible]

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AMERICAN EXCESS & SURPLUS COMPANY, INC.

AMERICAN INDEMNITY ASSURANCE

AMERICAN MARINE AND GENERAL INSURANCE COMPANY, LTD.

AMERICAN SOUTHERN INSURANCE COMPANY

196A-MO-36026*

AMERICAN SOUTHERN UNDERWRITING AGENCY, INC.

AMERICAN TRADE INSURANCE COMPANY

AMERICAN TRANSPORTATION INSURANCE COMPANY

AMERICAN TRUST INSURANCE COMPANY, LTD.

ANGLO ATLANTIC INVESTMENT PLC

196A-MO-36026*

APEX PLACEMENT INSURANCE COMPANY

ARIES UNDERWRITING MANAGEMENT

ATLANTIC AND PACIFIC INTERNATIONAL ASSURANCE COMPANY, INC.

ATLANTIC COAST DOMESTIC INSURANCE COMPANY

AUBURN COMPANY, LTD.

AUBURN INSURANCE COMPANY, LTD.

196A-MO-36026*

BROKERAGE MANAGEMENT ACCEPTANCE CORPORATION

BUSH DUNLAP, INC.

196A-MO-36026*

BUSH MC KENZIE, INC.

CAPITAL INVESTMENT, INC. [redacted]

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SUBJECT: [redacted] MAJOR CASE #70, FBW; MF; RICO - MONEY LAUNDERING; OO MOBILE. b7E

REMOTEL TO THE BUREAU, ALL FIELD OFFICES AND ALL LEGATS, DATED FEBRUARY 10, 1993.

THE FOLLOWING IS A LIST OF KNOWN COMPANIES ASSOCIATED WITH SUBJECTS [redacted] b6 b7C

AMERICAN AND SOUTHERN COMPAGNIE BELGE DE REASSURANCE

AMERICAN ATLANTIC INSURANCE COMPANY

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FEDERAL BUREAU OF INVESTIGATION
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APEX PLACEMENT INSURANCE COMPANY

ARIES UNDERWRITING MANAGEMENT

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AUBURN INSURANCE COMPANY, LTD.

BROKERAGE MANAGEMENT ACCEPTANCE CORPORATION

BUSH DUNLAP, INC.

BUSH MC KENZIE, INC.

CAPITAL INVESTMENT, INC. [redacted] b6 b7C

CARIBBEAN EXCESS INSURANCE COMPANY

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CITE: //3490//

SUBJECT: [redacted]; MAJOR CASE #70, FBW; MF; RICO - MONEY LAUNDERING; OO MOBILE. b7E

REMOTEL TO THE BUREAU, ALL FIELD OFFICES AND ALL LEGATS, DATED FEBRUARY 10, 1993.

THE FOLLOWING IS A LIST OF KNOWN COMPANIES ASSOCIATED WITH SUBJECTS [redacted] b6 b7C

AMERICAN AND SOUTHERN COMPAGNIE BELGE DE REASSURANCE

AMERICAN ATLANTIC INSURANCE COMPANY

196A-MO-36026-2

FEB 1 2 1993

[redacted] b6 b7C

CARE issued cease and desist in Nevada

The Nevada Division of Insurance issued a cease and desist order on Sept. 15, 1994, to Dr. Richard E. Busch, William A. Rose, Chiropractic Association for Research and Education (CARE), Insurance Company of Great Britain and Professional Indemnity Corporation.

The Nevada Division of Insurance received an application from Chiropractic Protective, Inc., A RRG, as a domestic risk retention group for chiropractors. The Division of Insurance instructed Dr. Richard E. Busch and Mrs. Jean I. Busch, in the presence of their attorney, to cease further unauthorized insurance business and to take care of any enforcement actions by other states before their application would be considered. In connection with their application, the Division of Insurance received additional information that CARE and the *American Chiropractor* magazine, entities controlled or directed by Dr. Busch, continued to solicit insurance business. It also appears that CARE changed names and is doing business as usual.

Solicitation material shows an address for CARE of 2020 Pennsylvania Ave., S.W.-Suite 675, Washington, DC.

The California Department of Insurance and Washington Insurance Department have also ordered Professional Indemnity to cease activities in their states (see *Special Report* Vol. IV, Nos. 2, 3 and 4).

Trial set for international fraudster

Grahame P. Sanders, wanted by the Florida Department of Insurance in connection with its investigation of Provident Capital Indemnity, Ltd., pled not guilty to charges of multiple fraud and conspiracy in connection with his operation of Griffin Insurance & Reinsurance Co., Ltd. Trial originally scheduled to begin in January has been postponed until February. Sanders' bond, set at $100,000, was posted by Lloyd D. Hutchinson, who identified himself as a limited partner of Provident Capital.

Other defendants in the Griffin case, Gary L. White and Thomas Reid Methvin, pled guilty and face a maximum sentence of five years; both are scheduled to be sentenced Feb. 10, 1995. Gene Lambert was acquitted (see related story in *Special Report* Vol. IV, No. 5).

Additional Teale associates are charged

In the continuing saga of the massive Alan Teale insurance fraud, federal agents are continuing their investigation of associates connected to Teale, who died in prison late last year while serving a 17-year sentence. In a bid for a lighter sentence for both he and his wife Charlotte Rentz, Teale was providing investigators with details of his fraud empire. Since Teale's death, Rentz, who received a 13-year sentence, is supplying information although published reports state that she has not made a deal with U.S. authorities for a sentence reduction (see *Special Report* Vol. I, Nos. 2, 4; Vol. II, Nos. 2, 6; Vol. III, Nos. 1, 6; Vol. IV, Nos. 2, 3, 4, 6; and Vol. V. Nos. 2, 3, 4 and 5).

Stephen Coker

A 35-count indictment against Stephen D. Coker has been handed down by a federal grand jury in Mobile, Ala. The indictment charges racketeering, conspiracy, mail and wire fraud and tax evasion. The suit alleges that Coker masterminded a web of bogus insurance companies, brokerages and claims offices that fleeced consumers out of millions of dollars in premiums and unpaid claims. The indictment alleges that Coker conspired with Teale to create fake reinsurance companies in Belgium. Teale also rented $5 million in assets to Coker to capitalize his companies.

According to the indictment, the scams began in 1988 when Coker bought British & American Casualty Co., Ltd., of the British Virgin Islands from Steven Weicholz and siphoned off $1 million through a sham reinsurance agreement with American Southern Insurance Company, Ltd. One of Coker's management firms collected more than $30 million in California auto premiums, funneling part of the money to a Belgium-based reinsurer Coker had set up with Teale. This money was shifted to bank accounts in the Cayman Islands and Bahamas. Every few months Coker and his friends would vacation in the islands and bring back just less than $10,000 each to avoid federal money laundering laws. Once they arrived at the Miami airport, Coker would collect the cash from his friends.

After state regulators banished Teale's companies, Teale used Coker's companies as a front to continue selling bogus insurance. When the indictment was handed down, Coker was out of the country and is considered a fugitive.

John Lindsey/Willard Hayne/ Richard Jeffers

Others named in the indictment but not charged are John R. Lindsey, a bookkeeper and co-owner of several of Coker's companies including Brokerage Management Corporation, a Mobil agency that did business as The Insurors; Willard W. Hayne, Lindsey's uncle and a silent partner in The Insurors; and Richard Jeffers, an executive with The Insurors. Jeffers Investments Corporation has been affiliated with British Indemnity Group, Inc., through The Insurors. Coker produced business for Teale and controlled or managed Victoria Insurance Company; American Trust Insurance Company, Ltd.; Apex Placement Insurance Company, Ltd.; Regency Insurance Company, Ltd.; Philadelphia Reinsurance, Ltd.; Northern Commercial Fire & General Insurance Company, Ltd.; Wilmington Marine & General Insurance Company, Ltd.; United States & Continental

continued on page 11

SPECIAL
CONFIDENTIAL
REPORT

January 1995
Volume VI, Number 1

National Association of Insurance Commissioners

Martin Bramson captured

International fugitive Martin Bramson was arrested Jan. 19, 1995, by the Liechtenstein State Police while attempting to cross the border into Liechtenstein from Austria. At the time of his arrest, he was accompanied by his brother Carl and they had in their possession several million Swiss franks and four kilograms of gold.

Martin has been an international fugitive since October 1991 when he fled from house arrest while awaiting trial on federal charges in connection with one of the nation's largest insurance fraud schemes. Members of the Bramson family were involved in the fraud schemes since the early 1980s. Sept. 12, 1990, armed with warrants issued by a New Jersey federal court, FBI agents conducted a coordinated strike of the Bramson operations in four states and the District of Columbia, arresting Martin, his brother Leonard and other associates in their insurance operations. To date, seven defendants have pled guilty to charges stemming from the schemes, including Leonard and his father Norman. The Bramson patriarch also fled court jurisdiction in October 1991, but was apprehended after he and Martin were featured on "America's Most Wanted" in July 1993.

The Bramsons set up more than 50 bogus insurance companies in island countries throughout the world, specializing primarily in the sale of cut-rate medical malpractice coverage where claims were never defended or paid beyond a doctor's $5,000 deductible. Premium monies collected through the companies usually passed through the New World Bank in Anguilla, which Leonard owned, but in fact, was merely an account within another bank. The money went from there to more than 240 bank accounts that the Bramsons had established throughout the world.

The best known of the Bramson companies were International Bahamian Insurance Company (IBI), Professional Risk Insurers Management Exclusive Company (PRIME), Casualty Assurance Risk Insurance Brokerage Company (CARIB) and Trans-Pacific Insurance Company. Complaints from state insurance regulators eventually led to the federal investigation. The U.S. Attorney's office is initiating extradition proceedings for Martin (see related story in "Indictment and convictions" article on page 17).

The life of Riley

Ferrell Travis Riley, the subject of his own GAO report and mentioned in the Energy and Commerce Sub-committee on Oversight and Investigations report by Rep. John Dingell, has been arrested by federal authorities in Kansas City, Mo. Riley, 52, and Cheryll S. Coon, 48, were arrested Nov. 21, 1994, on charges contained in a 16-count federal indictment. The indictment includes violations under the RICO act and charges of mail fraud, conspiracy, money laundering, obstruction of justice and tax fraud. Riley and Coon have been the subject of numerous regulatory actions along with companies they owned or controlled: Meadowlark Insurance Company, Meadowlark's successor Commercial Indemnity Assurance Company, M&M Management Corporation and Magnolia Acceptance Corporation.

The indictment alleges that Riley purported to be a consultant to these companies and was not listed as an officer or director of any of them, but he actually controlled their operations. Coon, also known as Cheryll S.C. Wise, was an officer of the companies. Initially, her primary duties were to handle financial and accounting matters, later to handle overall office operations.

continued on page 2

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The information included in the NAIC's **Special Report** *is confidential and is intended to be used solely for regulatory purposes. The information is compiled from various sources to assist regulators in fulfilling their regulatory obligations and is intended to be used as a resource by regulators in conducting their own investigations or examinations. The use of this report or any information contained therein for any other purpose is improper and unauthorized.*

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FROM: [redacted]
SUBJECT: [redacted]
DATE: SEP 18 '91 9:59 FROM WHITE-COLLAR-CRIME PAGE.002
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Director's Secty

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The Washington Post
The Washington Times
Daily News (New York)
The New York Times
The Wall Street Journal
The Chicago Tribune
The Los Angeles Times
The Christian Science Monitor
USA Today

Date SEP 18 1991

Page D-1

Financier Pharaon's U.S. Assets Frozen

Fed Seeks to Fine Saudi $37 Million for Role in Calif. Bank Deal

By Mark Potts
Washington Post Staff Writer

The Justice Department yesterday froze the U.S. assets of Saudi Arabian financier Ghaith R. Pharaon and the Federal Reserve proposed fining him $37 million for his role in helping the Bank of Credit and Commerce International (BCCI) to secretly take over Independence Bank of Encino, Calif.

The value of the assets, which the government claimed as collateral for the fine, was not immediately clear. Pharaon, who has close ties to the Saudi Arabian royal family, has extensive U.S. holdings in insurance, real estate, petroleum, cable television and other areas.

The Fed's action came a day after directors and management of Independence—most of them appointed by Pharaon—filed a $42 million suit accusing Pharaon and the bank's former chairman of racketeering, alleging that they were fronts for BCCI in the takeover of the bank.

The Fed alleged that Pharaon acted as a front man in Luxembourg-based BCCI's 1985 takeover of the bank, falsely representing himself as its owner when in fact BCCI had negotiated the takeover, financed the purchase, controlled the bank's stock, appointed a BCCI executive as chairman of Independence and had a hand in the hiring of other officials.

"Pharaon's secret, undisclosed arrangement with BCCI concerning Independence permitted BCCI to conceal its ownership of the bank in regulatory filings," the Fed said in its 32-page complaint.

The arrangement was similar to the one that BCCI allegedly used with Pharaon and several other investors to secretly take over Washington's First American Bankshares Inc.

The Fed has asked that Pharaon and BCCI be barred from the U.S. banking business for their roles in the First American takeover.

Pharaon also has been accused by the Fed of acting as the front for BCCI in the takeover of the National Bank of Georgia and as an investor in the now-failed CenTrust Bank in Miami.

BCCI was shut down by regulators around the world in July because of huge losses and questionable operating practices. The bank and its top executives have been charged with fraud, larceny and money laundering by New York officials.

Pharaon, who lives in France and Saudi Arabia, could not be located for comment yesterday. His New York attorney, Richard Lawler, did not return telephone calls seeking comment.

InterRedec Inc., the Richmond Hill, Ga.-based holding company for Pharaon's U.S. assets, said in a statement that it believed the freeze "will not have any adverse effect on its business operations." InterRedec is part of Pharaon's Saudi-based holding company, Saudi Research & Development Corp. Ltd.

The Fed charges that BCCI arranged for Pharaon to buy Independence Bank on its behalf, since American regulators were concerned that BCCI was too lightly regulated to be a responsible owner of a U.S. bank.

Pharaon purchased Independence for $23 million in 1985, but part of the deal was financed by BCCI in exchange for 85 percent of Independence's stock.

BCCI later paid off a loan to Phar-

See PHARAON, D2, Col. 6

GHAITH R. PHARAON
... role in BCCI takeover cited

FD-350 (Rev. 5-8-81)

(Indicate page, name of newspaper, city and state.)

(Mount Clipping in Space Below)

Date: 9-18-91
Edition:
WALL ST. JOURNAL

Title:

Character:
or
Classification:
Submitting Off

Indexing:

Fed Seeks to Fine Pharaon $37 Million, Citing Saudi's Alleged Links to BCCI

By Peter Truell
Staff Reporter of The Wall Street Journal

WASHINGTON—The Federal Reserve sought to fine Ghaith Pharaon $37 million for alleged breaches of U.S. banking laws, and it moved to freeze his U.S. assets.

The Fed alleges that Mr. Pharaon, a flamboyant Saudi Arabian businessman, acted as a front man for Bank of Credit & Commerce International, helping it illegally acquire Independence Bank of Encino, Calif. Mr. Pharaon bought Independence in June 1985 for about $23 million. But the Fed says he secretly holds 85% of Independence Bank's stock for the scandal-ridden BCCI, a unit of BCCI Holdings (Luxembourg) S.A.

The Fed sought earlier this year to ban Mr. Pharaon and eight other people associated with BCCI from the U.S. banking business. It said yesterday that it wouldn't impose fines on the other individuals pending the outcome of a current Justice Department investigation.

Richard Lawler, Mr. Pharaon's New York lawyer, didn't return telephone calls, but in recent weeks he has insisted that his client has done nothing wrong. Mr. Pharaon has maintained that he bought and owns Independence Bank himself. His current whereabouts are uncertain, although former associates said recently that he was sailing his yacht off the coast of Greece.

Order for Freeze Obtained

Acting on the Fed's behalf, the U.S. attorney for the southern district of New York obtained a temporary restraining order yesterday morning freezing Mr. Pharaon's assets pending a hearing tomorrow.

Assistant U.S. Attorney Thomas Zaccaro said the Justice Department had stopped Mr. Pharaon's planned sale of American Southern Insurance Co. to Fuqua Industries Inc. The $35 million sale was scheduled to occur today. Mr. Zaccaro said he didn't know what assets Mr. Pharaon holds in the U.S.

Separately, the directors of Independence filed a federal racketeering suit against Mr. Pharaon and Independence's former chairman, Kemal Shoaib. The suit, filed in federal court in Los Angeles, seeks $42 million. The directors of Independence, a medium-sized retail bank that currently is seeking to bolster its capital by as much as $27 million, had no prior knowledge of BCCI's alleged ownership, the suit said.

Banking regulators in several nations seized BCCI July 5, alleging a history of misdeeds. On July 29, the Manhattan district attorney indicted the bank and its two top officers for fraud, grand larceny and false accounting. That same day, the Fed also sought to impose a $200 million fine on the rogue bank. Since then, the Justice Department has brought a racketeering suit against some of the bank's top officers in federal court in Tampa, Fla.

The Fed charges that Mr. Pharaon signed an agreement in May 1985 to serve as a nominee for ICIC Overseas, a BCCI unit. BCCI and ICIC, which the Fed said operated as a single entity, "intentionally and deliberately" concealed their ownership and control of Independence from the Fed from 1985 until 1991, the U.S. attorney for the Southern District of New York charged.

Curbs on Control

Under the Bank Holding Company Act of 1956, no company, individual or group may control 25% or more of the voting shares of a bank without Fed approval; nor may any bank holding company acquire control—directly or indirectly—of more than 5% of the voting shares of any bank without the Fed's prior approval.

In an affidavit filed in the southern district court yesterday, Thomas Baxter, counsel for the New York Fed, said the Fed had difficulty serving Mr. Pharaon or his lawyer with a subpoena. Mr. Pharaon, in a June 10 letter to Fed counsel Richard Small, said he had been advised by his attorneys not to provide any deposition, Mr. Baxter's affidavit said. Mr. Pharaon wrote that he didn't understand "all these technicalities" and said he had instructed his counsel "to try to work out a solution" that would protect his rights and respond to the Fed's request for information, the Fed official said.

The Fed remains concerned about Mr. Pharaon's ability to move his money out of the U.S. Mr. Pharaon has other assets in addition to American Southern, including an interest in a small California insurance company and property in Richmond Hill, Ga.

"There is a substantial risk that Pharaon will attempt to liquidate his assets and move the proceeds offshore beyond the jurisidiction of this court," Mr. Baxter said. Mr. Pharaon isn't a U.S. citizen, and isn't likely to enter the U.S. in the foreseeable future, he added.

Moreover, "some of Pharaon's assets have been dissipated since [he] learned that he might be a target of the [Fed's] enforcement proceeding," Mr. Baxter said. In June, soon after the Fed had attempted to subpoena him, Mr. Pharaon sold his 80% interest in DLF Finance Co., a debt trading company, for "more than $1 million," Mr. Baxter said.

Jonathan Moses in New York contributed to this article.

BNL Unit Chairman Quits On Allegations of BCCI Tie

By a Wall Street Journal *Staff Reporter*

MILAN, Italy—Alfred Hartmann resigned as chairman of Lavoro Bank AG, the Zurich, Switzerland, subsidiary of Italy's state-owned Banca Nazionale del Lavoro. The move followed allegations that BNL had been linked through him to the Bank of Credit & Commerce International.

In a statement, Mr. Hartmann, who also was chairman of BCCI's Swiss unit, firmly denied acting as a link between the two banks, both of which have been mired in scandal.

BCCI, controlled by BCCI Holdings (Luxembourg) S.A., was seized by international regulators in early July amid allegations of widespread fraud, money-laundering and arms financing. BNL is still recovering from the unauthorized loan of $3 billion to Iraq by its Atlanta branch in 1989.

BNL didn't give any reason for the executive's departure, but a senior official of Lavoro Bank said Mr. Hartmann resigned in order "not to further fuel suspicions of connections between one bank and the other." Mr. Hartmann couldn't be reached for comment.

Mr. Hartmann had been chairman of Banque de Commerce & Placement S.A., the Swiss subsidiary of BCCI. He resigned from that post after the seizure of BCCI.

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Pharaon's U.S. Assets Are Frozen

PHARAON, From D1

aon from his other major lender, First National Bank of Boston, and took control of the rest of Independence's stock.

The suit filed by the board and management of Independence says that they were similarly misled by Pharaon about the ownership of the bank.

Fulvio Dobrich, the bank's current chairman, said Independence's board and management hopes to recapitalize the bank so that it can run independently of its current ownership.

"My reaction to the action taken by the Federal Reserve is that I hope it assists us in the process of recapitalizing the bank and severing our relationship with the existing shareholder," Dobrich said. "We're not sure who the hell that shareholder is."

The Harvard-educated Pharaon, 50, was a high-flying financier in this country during the late 1970s and 1980s, buying banks, insurance companies and oil wells. But he reportedly has run into financial problems in recent years.

A month ago, Pharaon announced plans to sell one of his U.S. companies, American Southern Insurance Co., for $33 million to Vista Resources Inc., a New York-based leather-goods concern.

J.B. Fuqua, Vista's chairman, said yesterday that he still expects the transaction to close as scheduled at the end of this month.

"Instead of Pharaon getting the money, the government will get it, I guess," Fuqua said. "The government will get the money and we'll get the insurance company."

11/22 WSJ

New Questions Raised on BCCI Entity, Capcom, During Testimony by Agent

By Peter Truell
Staff Reporter of The Wall Street Journal

WASHINGTON – The testimony of a government undercover agent raised new questions about a mysterious BCCI-related brokerage entity called Capcom Financial Services Ltd., which traded tens of billions of dollars in the Chicago financial markets in the late 1980s.

The agent, Robert Mazur, formerly of the Customs Service, said Capcom had a "gross transaction rate" totaling roughly $90 billion in an eight-month period. A number of investigators suspect that Capcom played a role as part of the efforts by BCCI and its backers to launder drug profits and obtain political power and influence in the U.S.

London-based Capcom, which had some of the same shareholders as the Bank of Credit & Commerce International, was operated by Syed Ziauddin Akbar, the former head of BCCI's treasury operation. "We came to learn that it was [Mr. Akbar's] plan to launder drug proceeds through the transactions of Capcom," Mr. Mazur testified.

Mr. Mazur, the main undercover agent in a sting operation against BCCI that led to the bank's indictment in federal court in Tampa, Fla., in October 1988, testified from behind a screen with a voice modulator. He said he has received threats on his life and the lives of his family because of his role in the sting, known as Operation C-Chase. The Senate panel heard how Mr. Mazur had been told by Colombian drug operatives that if he turned out to be a federal agent, there would be "no hole in the world deep enough to hide him."

Mr. Mazur detailed how Mr. Akbar planned to use so-called mirror-image trading at Capcom to create accounts that would use several different shell corporations—foreign corporations established in various sanctuaries of secrecy-to launder huge sums. This would be achieved by placing orders to both buy and sell a commodity at the exact same time, insuring no loss or gain, incurring fees that would be related to those transactions, and then disbursing funds through a third-party broker.

Because these transactions would be scrambled among many billions of dollars worth of transactions, "it would take forever for anyone to ever find it," Mr. Mazur said.

Capcom is also linked to Tele-Communications Inc., the nation's largest cable company, whose chairman, Bob Magness, and senior vice president, Larry Romrell, sat on the board of Capcom during the latter half of the 1980s. Among their fellow directors was Sheik Kamal Adham, who according to company papers owned as much as 17% of Capcom. Mr. Adham was also a major shareholder in BCCI and First American Bankshares Inc. of Washington, BCCI's secretly owned U.S. affiliate. BCCI is a unit of BCCI Holdings (Luxembourg) S.A. Mr. Adham, speaking through his U.S. lawyer, has denied wrongdoing.

Mr. Romrell had a small investment in Capcom and sat on the company's board from 1984 to 1988, according to John Head, a spokesman for him. He was introduced to "some of the Arabian principals of Capcom" through "friends of friends of friends," Mr. Head adds.

Mr. Head says Mr. Romrell resigned from Capcom as soon as he learned about the money-laundering indictments brought against both it and BCCI in October 1988. Even though Mr. Romrell attended a few Capcom board meetings in London, Mr. Head says, the proceedings were conducted mostly in Arabic and Urdu, and Mr. Romrell "frankly didn't understand most of what went on."

A TCI spokesman says Mr. Magness won't comment on his previous involvement with Capcom, but adds that "we aren't aware of any business dealings of any kind between TCI and Capcom, or any related entity."

Mr. Mazur explained how Amjad Awan, a senior bank officer, told him that BCCI used its Washington counsel, Clark Clifford, to try to "find out as much as they could about the potential activities of the Senate subcommittee" that was investigating the bank. He added that BCCI appeared to have a close relationship with First American, and that after laundering funds BCCI "would pass them through First American."

Mr. Mazur also accused Justice Department officials of letting investigative leads slip between their fingers through inaction. "A lot of follow-up in contacting witnesses and reviewing records was lost that might otherwise have benefitted the case," he said.

In addition, Mr. Mazur told the panel how in September 1988, BCCI had recommended that he and other money-laundering customers close their accounts in Panama because of the likelihood of Senate subpoenas relating to BCCI's operations there. The Senate Foreign Relations Subcommittee on narcotics, terrorism and international relations, before which Mr. Mazur testified yesterday, was at that time beginning to investigate BCCI because of

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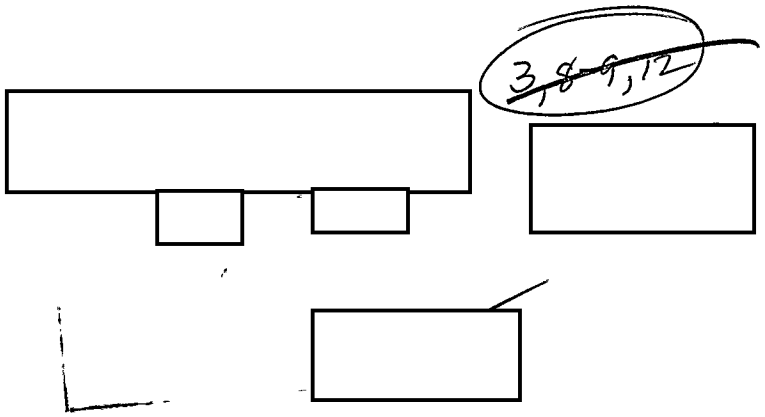

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the banks and run them due to U.S. law. Former secretary of defense Clark Clifford is one of the persons who is working on behalf of BCCI to gain control of these U.S. banks."

When asked to comment on this statement, lawyers representing BCCI in the drug-money case said that the document "mischaracterizes the referenced conversation of Mr. Awan." Altman says that Awan was wrong.

THE FIRST AMERICAN STORY TURNS ON a classic Washington question: What did the Fed know and when did it know it?

The deal to buy First American was approved because Clifford, Altman, and the Middle Eastern investors made certain representations and promises to the Federal Reserve and other bank regulators. In trying to evaluate whether the deal was proper even now, the questions that must be asked are: How complete and accurate were their representations? Were the promises kept?

Clifford and Altman have portrayed the owners of First American as "among the most substantial, respected individuals in the Middle East." At least several of them, however, are far more controversial than that. At least two of them have been accused of accepting questionable payments from American companies, one is the former intelligence chief of a repressive regime, and one heads the country that took the lead in embargoing oil to the U.S. in 1973 and is also a key financial backer of the PLO.

The Federal Reserve, however, apparently overlooked such matters. "I don't recall those issues being raised at the time at all," says a former Fed official who was involved in the deliberations. "The PLO was never mentioned. But it seems to me that if they were raised in a new proceeding, that might be the kind of thing that the Federal Reserve would take cognizance of.

"There was nothing concrete that would justify denial. There wasn't a requirement that you find them to be substantial, reputable persons of good character and standing. You just had to find that they weren't disreputable."

The only glancing reference to the PLO seems to have come in a set of questions submitted by Manfred Ohrenstein, the Democratic leader of the New York State Senate, who asked whether "any of the stockholders or the organizations for which they act as representatives" were "affiliated in any way with any international terrorist organizations" or providing them with "any financial assistance." Altman's one-word reply to both questions: "No."

Clifford minimized the role of BCCI in the deal, and the Fed apparently believed him. At least one Fed document suggests profound ignorance about the investors' ties to that bank. A letter from a Fed official to Representative Rosenthal, who was trying to get at the question of ownership and control, contains this statement: "Staff has no knowledge of loans from or other involvement in the affairs of BCCI on the part of Applicants' principals [the Arab investors]."

But the reality is that BCCI orchestrated the initial purchases of Financial General's stock and financed at least some of those purchases, that the "Applicants" also owned a significant interest in BCCI, and that BCCI's president was to be the principal "adviser" to those "Applicants" on matters relating to First American.

Clifford told the Fed that the bank would be run by a board of respected U.S citizens and that the Arabs would merely be passive investors. He became the chairman of its board and appointed several friends and associates as directors.

Clifford's own account of the events that led to First American's acquisition of National Bank of Georgia, however, suggests that the Middle Eastern owners have been more than passive investors. There is also evidence of some sort of ongoing relationship between First American and BCCI. It remains unclear whether First American is a "sister institution" to BCCI or whether the banks have simply made a cozy exchange of talent. Perhaps the best example of the exchange of talent has been the relationship of Clifford, Altman, and their law firm to the key players in this story.

Earlier this year, as prosecutors were cutting a deal with BCCI on the drug-money indictment, the Fed was reportedly talking with First American officials and expressing renewed concern over the shareholder overlap and transactions between the two institutions. According to the *Financial Times*, the Fed "accepted their promise that the two banks will have no future dealings."

A source at First American told the *Times* that in the past, "there was some business done with BCCI, but it was very small, extremely small."

The quote is reminiscent of Altman's assertion that the ownership overlap between First American and BCCI is "not as great as you might think," when in fact the overlap is considerable.

In a recent interview with *Regardie's*, Altman denied that the Fed and First American can have had any meetings or discussions regarding BCCI since October 1988, when BCCI was indicted. Yet a September 1989 letter from First American's attorneys to *Regardie's* notes: "Following the period last fall when BCCI and several of its officers were indicted on money-laundering charges in Florida, the Federal Reserve expressly confirmed again that BCCI had no involvement with the management of First American and that all prior representations about this relationship were fully correct."

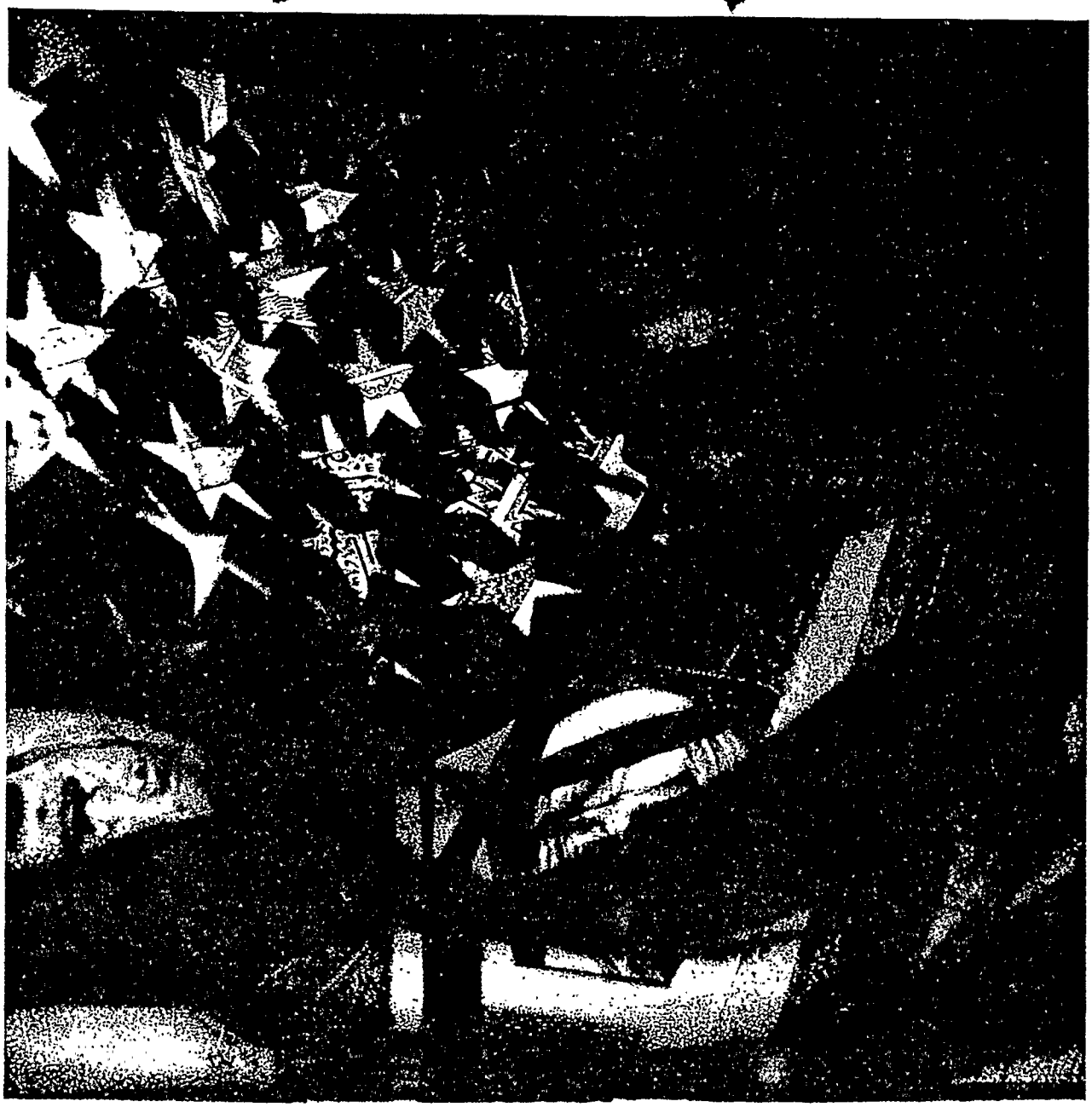
And in a July 1989 interview with *Regardie's*, Altman said: "The reason I know that it [the business between BCCI and First American] is quite insignificant is that after the events of last October, the Federal Reserve came and reviewed our relationship to ensure that all of the commitments we had made to the Fed had been honored, and in the context of that they audited our business."

And what if BCCI were found to be exerting control over First American? The legal implications could be serious. Lawyers who specialize in banking law say that this would mean that the acquisition of Financial General was an "illegal takeover," since the investors who applied to the Fed for permission to buy the company would have been front men. Anyone who carried out such a scheme would be violating a long list of federal laws, including the Bank Holding Company Act, securities laws, and Title 18, Section 1001 of the U.S. Code, which makes it a felony to make false statements to a government agency.

Has the Fed ever done a thorough investigation of Financial American's shareholders and their links to BCCI? Or has it simply relied on assurances from the men in charge that everything's all right?

If nothing else, the First American case shows why there should be more sunshine on banks, not less. Whose interest does it serve to keep the ownership of First American secret? Not the depositors' and not the taxpayers'. With foreigners increasingly buying into U.S. banks, this case sets a bad precedent.

What was good for the Fed nine years ago may not be good enough today. Lingering questions about the owners of First American and the bank's refusal to answer them provide ample reason for the Fed—or for Congress—to take another look. ■



THE COMMERCIALS OPEN WITH SHOTS OF FADED PHOTOGRAPHS FROM FAMILY ALBUMS. AS ONE PORTRAIT DISSOLVES INTO THE NEXT, THE VIEWER HEARS SOMEONE

relate his family's version of the American immigrant saga. He describes how an ancestor came to this country imbued with the dreams of most immigrants: a better life, religious or political freedom. The final image is a group shot of the immigrant's descendants. The speaker then identifies his family—the Rogers family of Fairfax, for example, or the Portner family of Silver Spring. Other versions of the commercial have featured such notable Washingtonians as columnist Robert Novak and restaurateur Duke Zeibert. The commercials—a skillful blend of patriotism, nostalgia, and family values—end with a voice-over: "Nearly every family can trace its heritage to one bold first American. We salute the spirit of the first Americans who made this country their own. We're First American—the bank for all Americans."

It's one of the most emotional series of television commercials ever done for a bank—and an indication of the lengths to which First American Bank has gone to capitalize on the patriotic connotations of its name. Its logo, for example, incorporates the Stars and Stripes. In another television spot, the voice-over promotes the bank's "All-American CD" and "All-American Money Market Account" as a fife-and-drum corps pipes up in the background. A few years ago the bank's ads featured the ubiquitous Willard Scott clowning in the guise of such great Americans as George Washington.

Playing sentimental overtures to the American dream is a chestnut of the ad business, but in First American's case the imagery belies at best a certain insecurity and at worst a pattern of deception. The reason: First American Bankshares, the bank's holding company, is 100 percent foreign-owned.

With $11.5 billion in assets, First American Bankshares is the largest bank holding company in the Washington area—about 50 percent larger than second-place Riggs National Corporation. Yet of all the banking giants in the region, First American remains the most mysterious. A group of foreign investors acquired the company in 1982 after one of the longest, costliest, and most acrimonious takeover battles in U.S. history. The board of directors immediately jettisoned the holding company's name,

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Larry Gurwin, *a Washington writer, has reported on international finance in the United States, Europe, and Asia for 13 years. He's a former correspondent for* Institutional Investor *and a past winner of the Overseas Press Club of America's award for best international business story.*

AND THE OWNERS ARE...

Sheikh Zayed bin Sultan al-Nahayan and family; Abu Dhabi Investment Authority. Zayed, the absolute ruler of oil-rich Abu Dhabi and the president of the United Arab Emirates, owns 11.76 percent of First American Bankshares. He was the first Arab leader to use oil as a political weapon during the 1973 Arab-Israeli war, has channeled millions of dollars to the PLO, and recently branded the United States "our number-two enemy" (after Israel). Zayed's eldest son and heir apparent, Crown Prince Khalifa, owns from 5 to 10 percent of First American; the Abu Dhabi Investment Authority, which Zayed's family controls, owns another 5 to 10 percent. Zayed and six relatives own 25.23 percent of BCCI; ADIA owns 10.42 percent. The family's estimated net worth in 1989: $1.5 billion.

STAKE IN FIRST AMERICAN: 21.76%-31.76% STAKE IN BCCI: 35.65%

Kamal Adham; Adham Corporation. Adham, a hugely wealthy and powerful Saudi Arabian businessman, has been described as "the godfather of Middle Eastern intelligence." As the late King Faisal's right-hand man, he was in charge of the country's intelligence and security services at a time when the royal family was ruthlessly suppressing political opposition. Over the years the ultrasecretive Adham also parlayed his political connections into huge "commissions" as an agent for such major corporations as Boeing and Lockheed. Estimated net worth in 1981: $255 million.

STAKE IN FIRST AMERICAN: 17.63%-22.63% STAKE IN BCCI: 2.94%

Khalid Salem Bin Mahfouz and brothers. In 1986 Khalid Bin Mahfouz, one of Saudi Arabia's most prominent businessmen, bought into First American and, with his four brothers, into BCCI. Soon after he joined BCCI's board of directors. The Bin Mahfouz family also controls National Commercial Bank, the largest bank in Saudi Arabia. The family's estimated net worth in 1989: $1.5 billion.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 20%

Faisal Saud al-Fulaij. From 1964 to 1977 Fulaij was the chairman of Kuwait Airways, the state-owned airline. In the late 1970s the Federal Trade Commission identified him as the recipient of at least $300,000 in bribes from Boeing; Fulaij denied the allegation. Fulaij paid for his first block of First American stock with a $3.55 million unsecured loan from the Kuwait International Finance Company, a BCCI affiliate that he chaired. Estimated net worth in 1981: $70 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 1.53%

Mohammed M. Hammoud. Hammoud is identified on the First American shareholder list only as a resident of Lebanon. Net worth: unknown.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI[2]: 3.56%

Abdul Raouf Khalil. In documents filed with the Federal Reserve Board in 1981, Khalil is described as a Saudi businessman "engaged in the maintenance of communications, computer, and electronic projects." In 1986 the *Arab News* identified him as an owner of Saudi Security and Technical Services Company. Estimated net worth in 1981: $50 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI[2]: 3.08%

Ali Mohammed Shorafa. In documents filed with the Fed in 1981, Shorafa is described as the "director general of the presidential court" in Abu Dhabi. (In October of the same year columnist Jack Anderson named an "Ali Shorafa" of Abu Dhabi as the silent partner and financial backer of a little-known company called Tersam, which had won an exclusive contract to ship American arms to Egypt in the wake of the 1979 Camp David peace accords.) Net worth: unknown.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI[2]: 0.57%

Sheikh Humaid bin Rashid al-Naomi. Sheikh Humaid is the crown prince and deputy ruler of Ajman, the tiniest member of the United Arab Emirates. "Ajman has no visible source of significant revenues other than those which come directly from the federal government into the ruler's account in the local bank," the *Financial Times* noted in 1986. Estimated net worth in 1981: $50 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 0%

Sheikh Hamad bin Mohammed al-Sharqi. Sheikh Hamad has been the ruler of Fujaira, another member of the UAE, since the death of his father in 1975. Estimated net worth in 1981: $45 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 0%

TOTAL STAKE IN FIRST AMERICAN: 98.25% TOTAL STAKE IN BCCI: 67.33%

[1] *Ownership percentages are derived from a First American list dated December 31, 1988 and a BCCI list dated October 31, 1988*

[2] *These shareholders are listed by BCCI as Mohammed Hammoud, Rauf Khalil, and Ali Shorafa.*

PHOTOGRAPHS AP/WIDE WORLD PHOTOS

Financial General Bankshares, and replaced it with First American, a name that had been used by some of its subsidiary banks.

Since then First American has gone to extraordinary lengths to conceal the names and backgrounds of its foreign owners. Its lawyers persuaded the Federal Reserve Board to withhold from the public all documents that listed the company's shareholders—a seven-year veil of secrecy that was lifted only when *Regardie's* convinced the Fed that it should reverse its policy. And when the company was sued by some former shareholders of its Virginia subsidiary, its lawyers asked that the jury not be told the names or nationalities of the company's owners—or even that the company was foreign-owned.

After an in-depth investigation, *Regardie's* has learned that First American may have good reason to mask its foreign connections. Some of its major shareholders have backgrounds that could alienate or anger some of its customers and employees as well as invite renewed scrutiny by federal and state authorities.

Kamal Adham, First American's biggest shareholder, was the chief of Saudi Arabia's intelligence agency for more than a decade. During his tenure, political opponents of the ruling al-Saud family were tortured or killed, according to human rights organizations. As the head of the secret police, he played a key role in suppressing opposition to the regime. He was also a close adviser to the royal palace and a high-ranking government official at a time when Saudi Arabia had become the largest contributor to the Palestine Liberation Organization. Adham juggled his government service with a career as a businessman, from which he earned hundreds of millions of dollars. Much of his work has consisted of collecting "commissions" from defense contractors and other foreign companies that had done business in the Middle East.

Sheikh Zayed bin Sultan al-Nahayan, the ruler of Abu Dhabi and the president of the United Arab Emirates, is another leading shareholder of First American Bankshares. When Arab oil-producing nations cut off oil to the United States in 1973 (because of American support for Israel), Abu Dhabi was the first country to declare an embargo. Zayed is a major contributor to the PLO and a business partner of Libyan leader Moammar Qaddafi.

Faisal Saud al-Fulaij, a Kuwaiti businessman and another prominent shareholder, allegedly lined his pockets by taking bribes from Boeing Company when he was the chairman of Kuwait Airways. The Federal Trade Commission alleged that he accepted at least $300,000 in payoffs from Boeing. Fulaij has denied the allegation.

What's more, the investors who own First American Bankshares also own a controlling interest in Bank of Credit and Commerce International, a Luxembourg bank that has numbered among its clients former Panamanian dictator Manuel Antonio Noriega, who's awaiting trial in Florida on federal drug charges. In January of this year BCCI pleaded guilty in Florida to federal criminal charges that it had laundered drug money. Five BCCI officers are on trial on similar charges.

Both First American and BCCI say that there's absolutely no connection between the two institutions other than some overlapping shareholders. Robert Altman, the top executive of First American and a lawyer for BCCI, told the *Washington Post* in October 1988 that "the overlap is not as great as you might think."

Regardie's has determined, however, that the ties between First American and BCCI are much closer than either institution would have the public and bank regulators believe. Here are just a few of the links:

- BCCI used First American's Washington bank to transfer at least $500,000 worth of Noriega's funds from 1985 to 1987, according to government sources.
- Agha Hasan Abedi, BCCI's founder and president, orchestrated the takeover of First American.
- Shortly after the takeover bid was launched, Abedi told a reporter that if the bid succeeded BCCI would probably run First American.
- First American's shareholders include borrowers from BCCI, personal friends of Abedi's, a director of BCCI, and a longtime executive of the BCCI group.
- Government investigators disclosed in 1988 that a senior BCCI official had told an undercover agent that BCCI owns and controls First American.
- First American's shareholders and their families control more than two-thirds of BCCI's outstanding shares.
- Moreover, the two men who claim to run First American—Clark Clifford, the éminence grise of Washington's power brokers, and Robert Altman, his protégé at the law firm Clifford & Warnke—have represented BCCI for 12 years. When a U.S. Senate subcommittee investigated the BCCI-Noriega connection in 1988, Altman handled the negotiations with the committee. Clifford, then the chairman of First American Bankshares, and Altman, then the president of First American Corporation, also assisted BCCI in the drug-money case.

The relationship between the two banks is so close, some sources within BCCI say, that many employees regard the U.S. institution as an affiliate—a member of "the BCCI group." A few go so far as to say that First American may be secretly—and illegally—controlled by BCCI, with the Middle Eastern shareholders acting as front men. *Regardie's*, however, has found no evidence that this is the case.

In an effort to determine exactly who owns Washington's biggest bank holding company, *Regardie's* conducted dozens of interviews, reviewed court documents from some of the takeover-related litigation, and examined documents obtained from the Federal Reserve Board through the Freedom of Information Act. When it approved the acquisition nine years ago, the Fed wasn't fully aware of the controversial backgrounds of the foreign investors and the extent of their relationships with BCCI. It approved the deal based on assertions by Clifford and Altman that the leading investors were well-known businessmen with impeccable credentials. ▸

THE NORIEGA CONNECTION

In the mid 1980s Amjad Awan, who was Manuel Noriega's personal banker at BCCI, worked around the corner from First American's Washington headquarters. According to information obtained by government investigators, Awan managed the transfer of millions of dollars for Noriega through BCCI's global network, through several Swiss banks, and through First American Bank in Washington.

Regardie's has learned that at least $500,000 was transferred from several of Noriega's BCCI accounts into a BCCI account at First American. Additional amounts totaling more than $250,000 were wired simply to "BCCI Washington." In some cases, investigators say, Noriega himself signed letters that ordered the transfers to First American.

Awan later told a federal undercover agent that he considered First American to be under the control of BCCI.

In a statement to *Regardie's*, First American said that it "has never had any banking relationship of any kind with Manuel Noriega, nor has it ever knowingly handled any funds of Manuel Noriega." BCCI declined comment.

PHOTOGRAPH UPI/BETTMANN NEWSPHOTOS

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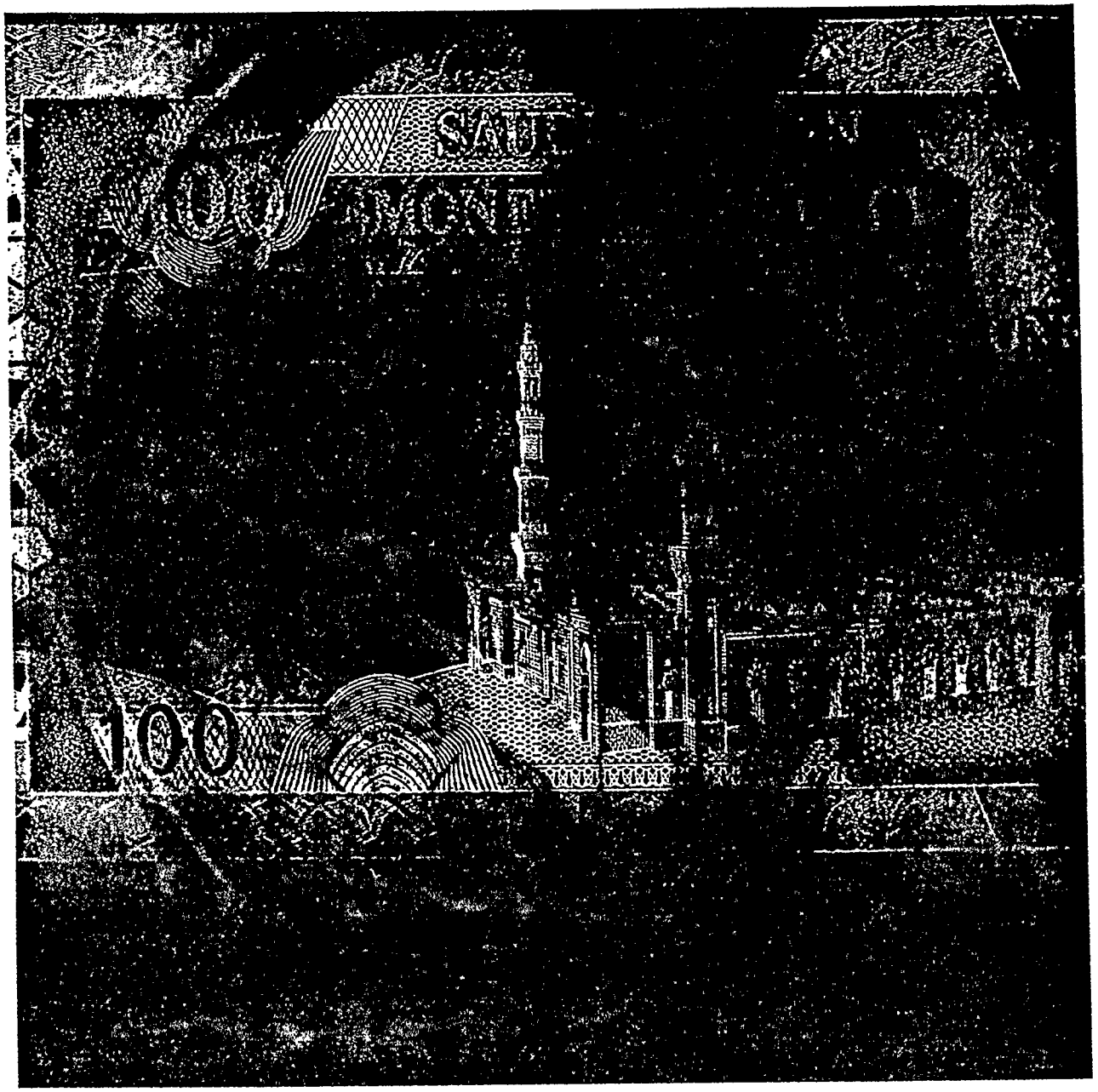
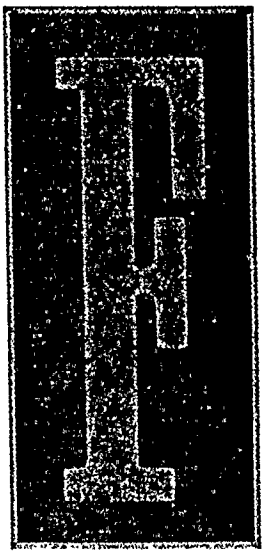
Sheikh Zayed (right), the First American shareholder who's called the United States the "number-two enemy" of the Arab world (Israel is number one), has embraced Moammar Qaddafi for more than political reasons. Their governments are partners in Arab Banking Corporation, which recently opened a branch in New York City.





INANCIAL GENERAL BANKSHARES, AS FIRST AMERICAN USED TO BE KNOWN, TRACES ITS ROOTS BACK TO THE MORRIS PLAN, A PIONEERING CONSUMER-LENDING BUSI-

ness. Arthur Morris, its founder, began his banking career around the turn of the century by making small installment loans to working people—a practice virtually unknown at the time. In 1910 he founded the first "Morris Plan" bank: Fidelity Loan & Trust Company of Norfolk, Virginia. Within 10 years Morris Plan banks were operating in 37 states. In the 1940s and 1950s the company became a financial conglomerate, with interests in such areas as insurance and mortgage banking.

Financial General was an institution with special privileges, a holding company ahead of its time. Although federal banking law sharply restricted interstate banking, Financial General, thanks to a grandfather clause, enjoyed an immensely valuable exemption. By the mid 1970s it controlled banks in Georgia, Maryland, New York, Tennessee, Virginia, and the District of Columbia.

In January 1975 Financial General installed a dynamic Georgia banker as the president of its National Bank of Georgia. During the next few years he would buy control of NBG, leave the bank for one of the most powerful posts in the federal government, quit the government in the midst of a financial scandal, sell NBG to an Arab investor, and then join forces with Arab investors in a scheme to accumulate stock in the bank's former parent company.

The banker's name: T. Bertram Lance.

Bert Lance began his banking career in 1951 as a teller at Calhoun National Bank, a small rural bank that had been founded by his wife's grandfather. Seven years later he and a group of investors bought control of the bank, and he ultimately became its chairman.

Lance backed Jimmy Carter in his 1970 campaign for governor and was later put in charge of reorganizing the state's government. In 1975, shortly after Carter had left the statehouse, Lance and a group of investors bought control of National Bank of Georgia from Financial General Bankshares.

Lance never fit the image of the conservative banker. His lending policies were very liberal—particularly, it was later alleged, when the borrowers were his friends and relatives. Lance's bank was the biggest single lender to Jimmy Carter's peanut warehouse, which once owed NBG $4.7 million. Moreover, he apparently found it difficult to draw a clear line between his personal financial affairs and the affairs of the bank. For example, he financed his purchase of NBG's stock with loans from two big New York banks and then arranged for NBG to open correspondent banking accounts with them. ▸

WHO'S BEHIND THE BANK

In response to questions from *Regardie's*, First American officials say that they will not comment on the names or backgrounds of the bank's owners, contending that it is not "a legitimate area of inquiry."

In one of several letters to the magazine, John W. Vardaman, Jr., an attorney with Williams & Connolly, said, "During the acquisition proceedings for First American, the various bank regulatory authorities, including the Federal Reserve, carefully examined the reputation, character and resources of the investors. . . . Similar allegations to the type you have referenced—i.e., the alleged receipt of questionable payments or support for certain groups and their activities—were considered. The banking agencies found the shareholders to be substantial, reputable persons of good character and standing."

Robert Altman, the chairman of the bank's holding company, said in an interview, "We're not in possession of facts about what their other operations are. We don't know what their political philosophies are, what their personal dealings are."

Regarding First American's relationship with BCCI, bank officials adamantly deny that they are either owned or controlled by the European bank. "This allegation is absolutely false and would, if disseminated, cause serious injury to First American," Vardaman said.

"Practically no business is done" between the two banks, he said.

First American officials wouldn't comment specifically about the common shareholders of the two institutions, except to say that the First American shareholders are "passive" and "are not active in the management of the bank."

A spokesman for BCCI also said that there's no connection with First American. "Certain of the shareholders that own First American have minority stock interests in BCCI," the statement read. "The larger shareholders of First American have relatively small interests in BCCI. The two organizations have different controlling groups of shareholders."

HOW THE BANK DOES

If First American's ownership is controversial, its management seems to be anything but. On the contrary, the bank appears to be a sober, not particularly well-performing institution that's caused little notice in the Washington banking community, other than the past year's shake-up of the bank's top managers.

Clark Clifford, the chairman of First American Bankshares, the bank's holding company, recently stepped down. He was replaced by Robert Altman, who'd been the president of First American Corporation. Jack Beddow, a longtime employee of the bank, has taken over as the president and chief operating officer. He replaced Robert Stevens, who was brought in at the time of the takeover.

Fred Bollerer, the former president of Houston's troubled First City National Bank, was brought in last year to head First American Metro Corporation, the subsidiary that runs the DC, Maryland, and Virginia banks. He replaced Milton Drewer, the bank's best-known executive in the local business community, who retired.

One reason for the changes may be the bank's lackluster performance. In *Business Week* magazine's recent scoreboard, First American was tied for last place with Riggs National Corporation among the area's eight largest banks. First American's return on assets, a key industry standard, was .61 percent, compared to First Virginia Banks's 1.39 percent and Sovran Financial's 1.14 percent. In 1989 the bank earned $61 million for its shareholders, down 11 percent from the previous year.

At the same time, regulators seem to be content with the way First American is run. "The bank is sound and well capitalized; it has no major problems," said Sidney Bailey, Virginia's commissioner of financial institutions, about the Virginia subsidiary. "We have had no criticism of the management and no evidence of interference or attempt to influence the policy of the bank by the Middle Eastern investors."

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When Carter was elected president in 1976, thanks in part to Lance's support, he appointed Lance to be the director of the Office of Management and Budget. But Lance's loose banking practices soon caught up with him and triggered the first scandal of the Carter administration. He was gone by August 1977.

After years of litigation, the Lancegate affair finally concluded in February 1986. In a settlement with the Comptroller of the Currency, Lance agreed to pay a $50,000 civil fine to the U.S. Treasury. He was also barred from serving as an employee, officer, or director—or otherwise participating in the affairs—of any federally insured bank without the written permission of the appropriate banking agencies. (The story ended on a farcical note: Lance, according to columnist Jack Anderson, paid the $50,000 fine with a rubber check. The hapless Georgia banker eventually paid the fine.)

At the time of his resignation, Lance was in desperate financial straits. He was more than $5 million in debt, and his most valuable asset—his stock in National Bank of Georgia—had plummeted in value. His only hope was to sell the stock at well above the market price. Hope soon arrived in the person of Agha Hasan Abedi, the president of Bank of Credit and Commercial International.

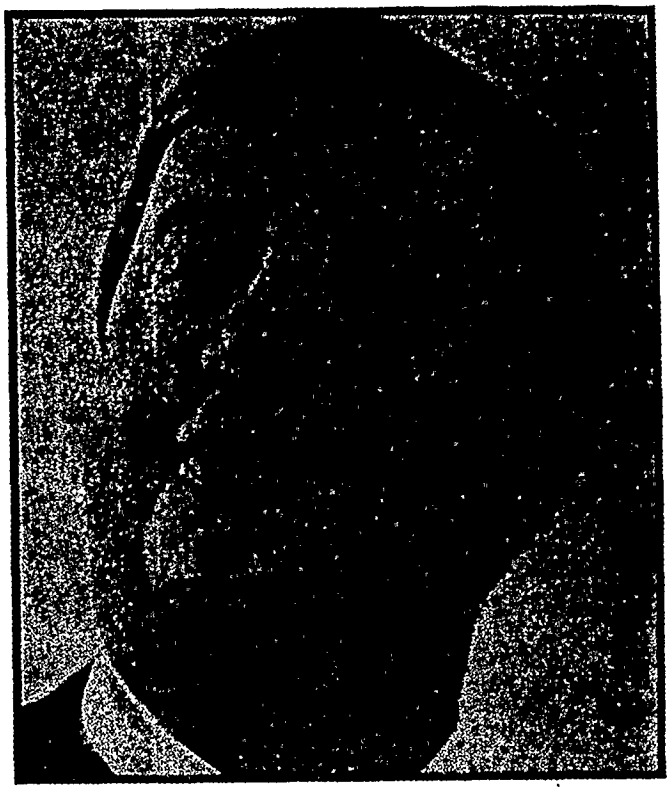
IT'S HARD TO IMAGINE A MORE UNLIKELY pair of bankers than Bert Lance and Agha Hasan Abedi.

Abedi was born 67 years ago in Lucknow, India and moved to Pakistan when the country was founded in 1947. He embarked on a career in banking, and in 1959 he cofounded United Bank Limited, which soon became one of the largest banks in Pakistan.

But Abedi was always more than a simple banker. He had an understanding of politics and a knack for making friends in high places. In the 1960s, long before the oil shock created overnight millionaires and billionaires, he courted Arab officials, notably Sheikh Zayed, the ruler of Abu Dhabi, and Sheikh Rashid bin Said al-Maktoum, the ruler of Dubai. (In 1971 Abu Dhabi and Dubai created a federation with five other sheikhdoms called the United Arab Emirates, with Zayed as its president and Rashid as its prime minister.)

Abedi's Arab connections proved to be invaluable when the Pakistani government nationalized the banking industry in 1972. Abedi moved to Europe and founded BCCI, signing up Zayed, Rashid, and other prominent Arabs as shareholders. Armed with this list of VIPs, he managed to persuade Bank of America, the world's largest bank, to buy a large stake as well, which gave BCCI instant credibility.

Today BCCI's main office is in London, but its legal headquarters is Luxembourg. Abedi has run BCCI from the start, and his management team is made up largely of Pakistani bankers. In recent years, however, he's suffered from serious health problems: he had a heart transplant operation in March 1988. His longtime deputy, a fellow Pakistani named Swaleh Naqvi, is now BCCI's chief executive.



BERT LANCE was President Jimmy Carter's banker and best friend, but by 1977 he was out of the White House and flat broke. Agha Hasan Abedi of BCCI rescued him from his financial plight, hired him as a consultant, and then triggered a hostile and protracted battle for control of First American Bankshares.

Although Abedi's bank started with only $2.5 million in capital, it has grown to be the world's fifth-largest privately held bank. During the late 1970s it was the fastest-growing bank in Britain and was touting itself as the fastest-growing bank in the world. Its total assets soared from $200 million in 1973 to $2.2 billion in 1977. During the same period its network of offices grew from 19 branches in five countries to 146 branches in 32 countries. By the end of 1988 it had more than $20 billion in assets, some 14,000 employees, and 417 offices in 73 countries.

Abedi, according to BCCI insiders, was obsessed with growth. As one source puts it: "Their objective—and they said so openly—was to become the largest bank in the world by the year 2000." With the zeal of an evangelist seeking souls, Abedi exhorted his employees to bring in deposits. He also established a vast international network, with branches and subsidiaries across the globe—even in poverty-stricken African countries that were ignored by other banks.

No banker with Abedi's ambitions, however, could ignore the world's largest economy: the United States'. While BCCI could open branches in the United States, a major acquisition would offer the quickest route to growth.

Lance and Abedi are believed to have met in October 1977 in a Washington hotel. Lance wanted to sell some of his stock in the National Bank of Georgia, and Abedi was a potential buyer.

It would have been illegal, however, for BCCI to buy the stock. Because Bank of America was a large shareholder in BCCI (it pulled out in 1980), such a deal would have violated the ban on interstate banking. But even with Bank of America out of the picture, BCCI was going to be a hard sell to U.S. regulators. Whenever a bank piles on assets very quickly, regulators wonder whether it's being prudently managed. Another cause for concern was that BCCI is incorporated in Luxembourg, which isn't noted for tough banking regulation. Luxembourg also lacks a central bank, which means that no institution is responsible for acting as a lender of last resort if BCCI suffers liquidity problems.

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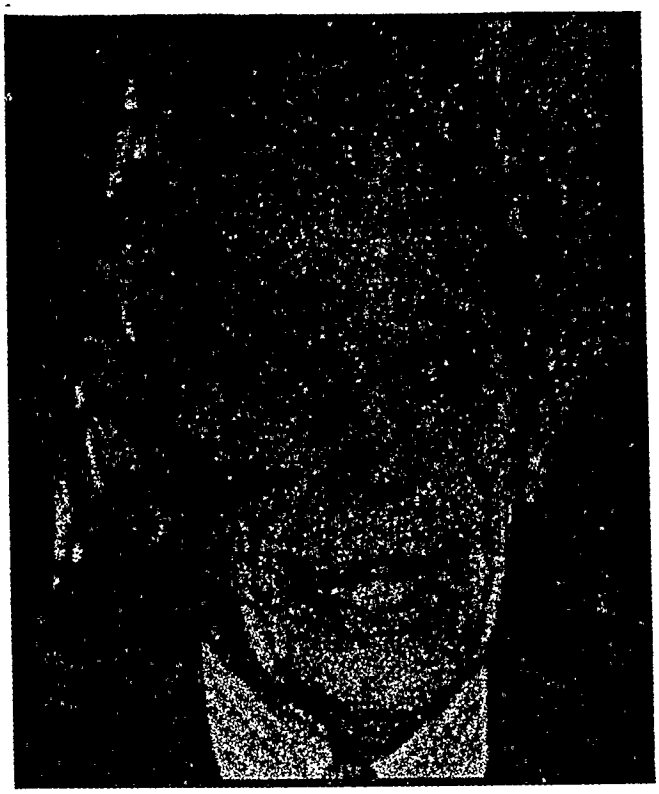
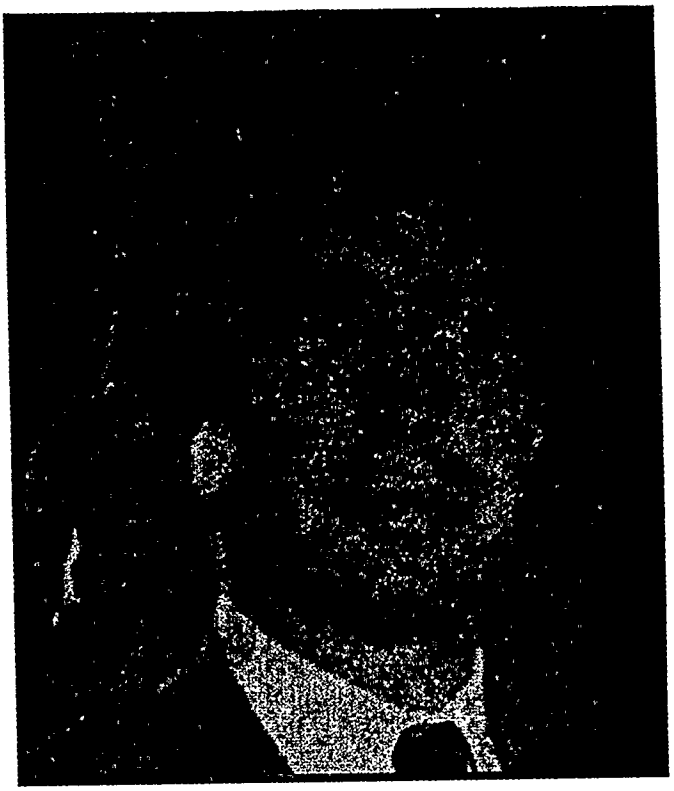


When Abedi and his Middle Eastern clients were charged with violating U.S. securities laws in connection with their stock purchases, they hired Lance's supremely well-connected lawyer, CLARK CLIFFORD. After he got Abedi and the Arab investors out of legal trouble, guess who wound up as the chairman of First American?



First American's Arab owners now rely on ROBERT ALTMAN, Clifford's protégé, as their man in Washington. Altman runs the show, tries to keep their names out of the news, and works on the side as a lawyer for BCCI. Four months ago BCCI pleaded guilty to criminal charges that it had laundered drug money.

The Bank of England later sent clear signals that it regarded BCCI as something less than a blue-chip institution. In 1978 it forbade BCCI from opening any new branches in the United Kingdom.

Although BCCI itself couldn't buy Lance's bank stock, one of its *clients* could, and Abedi quickly found one. In late 1977 Ghaith Pharaon, a Saudi businessman, agreed to buy 60 percent of Lance's stock at $20 a share. A few weeks earlier the stock had been trading for about $10 a share. Pharaon later acquired 100 percent of NBG.

Lance and Pharaon portrayed the deal as a routine investment, but skeptics abounded. Of the roughly 15,000 banks in the United States, it seemed odd that Pharaon happened to choose a bank that was owned by a close friend, political supporter, and lender to President Carter—and that he would pay top dollar for it. Pharaon, *Business Week* noted, seemed to be "bailing him out to curry favor with President Carter."

Abedi, it was later revealed, did more for Lance than arrange the NBG deal. He also hired him as a consultant and arranged to repay his biggest debt: about $3.5 million that he owed to the First National Bank of Chicago.

One of Lance's duties was to recommend investment prospects to Abedi. And this he did. During the discussions about NBG, Abedi learned that stock was available in a much larger institution: Financial General Bankshares, NBG's erstwhile parent. Some sources speculate that Lance wanted Abedi's help to gain control of Financial General, install himself as its president or chairman, and thus recover from the humiliation of the Lancegate affair. It didn't go unnoticed that FGB's headquarters on 15th Street was just around the corner from the White House.

BY EARLY 1977 A GROUP OF ABOUT 20 investors, led by J. William Middendorf II, a onetime investment banker who'd served as the secretary of the navy under presidents Nixon and Ford, had gained control of Financial General Bankshares. But Middendorf found rough seas in his first months as its chairman and president, and some dissident shareholders began to plot his ouster.

One of them was Jackson Stephens, the head of Stephens, Incorporated, a large securities firm based in Little Rock, Arkansas, who joined up with Lance. According to a complaint later filed by the Securities and Exchange Commission, they recommended to Abedi "that BCCI purchase or recommend FGB common stock to its clients."

At first Abedi wasn't interested, but he soon changed his mind. On December 1 he gave the green light. The shares were to be bought on behalf of BCCI clients.

Abedi's approval touched off a frantic buying spree carried out by Lance, Stephens, and Eugene Metzger, a Washington lawyer. They spent millions of dollars to collect blocks of FGB's stock in private purchases from large individual investors as well as on the open market. By early February 1978 they had purchased about 20 percent of Financial General on behalf of four BCCI clients.

On February 7 Lance met with FGB's top executives: B. Francis Saul II, who'd replaced Middendorf as the chairman the previous month, and Middendorf, who'd retained the title of president. What Lance said at the meeting is disputed. According to Middendorf and Saul, Lance said that he represented a group of investors related to BCCI who'd acquired 20 percent of FGB's stock and that

PHOTOGRAPHS: AP/WIDE WORLD PHOTOS

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BCCI wanted eventual control of the company.

"Lance said that he was acting as a representative of Abedi and BCCI," Saul later said in an affidavit. "Moreover, Lance stated that BCCI 'always wants control.' "

Two days after the meeting, Financial General announced that an unidentified foreign bank had bought a large block of FGB's stock "and may be seeking to obtain control of the company." When newspaper reports appeared the next day, however, Lance called Saul to say that there had been a misunderstanding. The buyers, Lance said, weren't acting as members of a group under the direction of BCCI but were merely acting as individual investors.

Abedi had orchestrated the buy-up of FGB's stock very smoothly—except for one detail. If the investors were acting as a group, they were in flagrant violation of U.S. securities laws. Any investor or investment group that buys 5 percent of the stock of a publicly held company is required to make a public disclosure by filing a 13-D form with the SEC. In what some viewed as a transparent attempt to evade the law, each of the four BCCI clients had bought slightly less than 5 percent of Financial General's stock.

The purchases triggered two lawsuits, one filed by Financial General on February 17, 1978, and the other filed by the SEC a month later. The defendants in the SEC complaint included BCCI, Abedi, Lance, Stephens, Metzger, and the four investors in whose names the stock had been acquired: Kamal Adham; Sheikh Sultan bin Zayed al-Nahayan, one of Sheikh Zayed's sons; Abdullah Darwaish of Abu Dhabi, a financial adviser who represented another of Zayed's sons; and Faisal Saud al-Fulaij.

The BCCI defendants found themselves in immediate need of legal help, and they chose the Washington lawyer whom Lance had retained when the Lancegate affair exploded: Clark Clifford.

LIKE MANY OTHER ASPECTS OF THE First American saga, the story behind Clifford's involvement is a matter of some dispute. In 1984 Robert Altman, Clifford's partner, told a reporter for the *Washington Post* that the relationship didn't come about via Bert Lance but stemmed from the firm's "international practice." In a recent interview with *Regardie's*, however, Altman said, "I think Mr. Lance recommended this firm."

Whatever the case, Abedi and the Arabs had chosen not only a top-flight lawyer but one with superb political connections.

Clifford, who's now 83 years old, came to national prominence during the presidency of Harry Truman. Although his title was counsel to the president, he was described

Former president Jimmy Carter has lobbied U.S. senators to sell arms to Saudi Arabia and has met with Yassir Arafat, the chairman of the PLO. Have his intimate ties to BCCI, a major Arab-owned bank, shaped his view of the world?

First American Bankshares and Bank of Credit and Commerce International are more than casual acquaintances; they're two banks with a close relationship. But why? What's in it for the Middle Eastern owners of First American? Is the bank simply an investment, or is it something more? Given that the BCCI clients who bought First American include current and former officials of Arab governments, the most obvious question becomes: Are there any political motives behind their investments in the U.S. banking industry?

So far there's no indication that First American has been used as a tool to acquire political influence. There are, however, some connections between the bank's owners and American politicians.

When BCCI helped to rescue Bert Lance from his financial plight, there was widespread speculation that the bank or its Arab owners were trying to get close to Jimmy Carter. Not surprisingly, Lance and his newfound friends claimed that they were involved in routine business dealings with absolutely no political strings attached.

Those denials ring hollow today. In the years since Carter's departure from the White House, Agha Hasan Abedi, who's BCCI's founder and president, and former president Carter have become close friends; Abedi has channeled large donations to the Carter Presidential Center and to Global 2000, Carter's pet project, of which Carter and Abedi are the co-chairmen. (BCCI is the organization's largest donor.) Global 2000's British office is located in BCCI's headquarters building in London.

Abedi and Carter have traveled to a number of countries on BCCI's corporate plane. When Abedi was hospitalized in 1988, Carter not only vis-

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PHOTOGRAPH: AP/WIDE WORLD PHOTOS

as the most powerful figure on the White House staff. He later served as an adviser to presidents Kennedy, Johnson (whom he also served for a year as the secretary of defense), and Carter.

Clifford's political connections have led some observers to view him as a sort of high-class lobbyist/fixer. It's an image that he evidently regards as distasteful. "There is one point I wish to make clear," he once said. "This firm has no influence of any kind in Washington. If you want to employ someone who has influence, you will have to go somewhere else.... What we do have is a record of working with the various departments and agencies of the government, and we have their respect and confidence, and that we consider to be a valuable asset."

In representing the Middle Eastern investors, Clifford led a large team of lawyers that included takeover specialists from New York and Washington lawyers who had years of experience in dealing with bank regulators. His right-hand man was Altman, who'd just turned 31. The two men are so close that Altman has frequently been described as Clifford's "alter ego."

A consent agreement with the SEC was quickly negotiated. Without admitting or denying guilt, the defendants promised not to violate securities laws in the future. The Middle Eastern investors also agreed to make a tender offer of $15 a share to all of Financial General's shareholders.

The consent decree touched off one of the longest and most controversial corporate takeover battles in U.S. history. The management of Financial General Bankshares, led by Saul, fiercely resisted the takeover attempt. In addition to suing Lance and his Middle Eastern associates, it dug up plenty of dirt on BCCI, much of which found its way into the press. One of the most damaging disclosures was that BCCI had made more than $80 million in loans to "insiders"—companies and individuals that were connected to the bank. (Bank regulators have always frowned on insider lending.) Financial General's lawyers also unearthed a document from Bank of America that called BCCI's loan-loss reserves inadequate—a charge that BCCI disputed.

The two sides eventually signed an acquisition agreement in July 1980. But the deal still had to be approved by the Federal Reserve Board, which would make its decision after it heard the views of federal and state bank regulatory authorities.

WHEN A LARGE BANK HOLDING COMPANY is taken over, the new owner is usually an existing bank. In this case, however, Financial General was to be purchased by dummy companies that were owned by individual investors, none of whom was a banker. A further complication was that all the investors

ited him but arranged for a renowned heart specialist, Norman Shumway of Stanford University, to fly to Britain to treat him.

Prominent Arabs have also provided support for Carter's projects, including King Fahd of Saudi Arabia (some of whose relatives are BCCI shareholders) and Adnan Khashoggi, the scandal-plagued arms dealer. Khashoggi is a former client of Clark Clifford's; a friend of First American's biggest shareholder, Kamal Adham; and a client of BCCI's. In connection with his dealing arms to Iran, Khashoggi transmitted $12 million through BCCI's Monte Carlo branch.

Carter doesn't seem to be the sort of man who'd become a mouthpiece for foreign governments, but even the most honorable man will listen sympathetically to the opinions of close friends. And in recent years Carter seems to have moved closer to the Arab point of view. In 1983, for example, he spoke movingly about the plight of Palestinians in the Israeli-occupied West Bank but said nothing about human rights abuses by Arab regimes. In 1986 he lobbied senators to sell arms to Saudi Arabia. And last year he sharply criticized Salman Rushdie for offending Moslems in *The Satanic Verses*.

Another U.S. politician who's popular in the Arab community is Andrew Young, the former mayor of Atlanta. Young served as Carter's ambassador to the United Nations until August 1979, when he was forced to resign for holding unauthorized talks with the PLO. Because of the incident, he's widely viewed in the Arab world as a kind of martyr to America's pro-Israel lobby. During a visit to Saudi Arabia and the United Arab Emirates in 1983, he was accorded VIP treatment. Part of his travel and hotel expenses was paid by the government of the United Arab Emirates, which is run by Sheikh Zayed bin Sultan al-Nahayan, another of First American's leading shareholders. According to a report in the *Atlanta Journal*, Young's hotel bill in Dubai was paid by the National Bank of Georgia, which was then owned by Ghaith Pharaon, a BCCI shareholder. A former NBG official, however, denies it.

There's also a connection between BCCI and Jesse Jackson, the American politician with the most positive image in the Arab world. In one of the more curious developments of the 1988 presidential campaign, Clark Clifford and Bert Lance sponsored a breakfast meeting between Jackson and a group of mainstream Democrats—a meeting that helped to dispel Jackson's image as a radical. Clifford praised Jackson and said that if he were elected, he'd bring to Washington "the best brains the party and the country have to offer." After the breakfast, according to a campaign aide, "Jackson frequently told reporters that Clark Clifford was among his 'top policy advisers.'"

Another prominent Democrat who gave a boost to the Jackson campaign is Fred Dutton, a former aide to John Kennedy who promoted Jackson's vice presidential prospects in an op-ed piece for the *Los Angeles Times*. Dutton has been a registered foreign agent for Saudi Arabia for more than a decade and is considered its leading advocate in Washington. One of Dutton's Saudi contacts is Kamal Adham. In *The American House of Saud*, a book on Saudi lobbying, Steven Emerson writes that when Dutton was angling to get the Saudi contract, he made it clear that he wanted to report to Adham.

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were residents of foreign countries. Could U.S. regulators effectively monitor the new owners?

The regulators also wanted to know what role, if any, BCCI would play in Financial General. Questions about BCCI were raised by the Federal Reserve Board, the Federal Reserve Bank of Richmond, the Office of the Comptroller of the Currency, and Virginia's commissioner of financial institutions.

The lawyers for the Middle Eastern investors had their work cut out for them. They'd have to convince the Fed that Financial General would be run by Americans who had solid banking credentials. And this is exactly what Clifford and Altman did. "The lawyers," says one source, "proposed that there be a buffer in the form of a blue-ribbon board of directors, and the shareholders would basically agree to take a walk." BCCI, they said, would have no involvement in the management of Financial General, although it could act as an "investment adviser" to the Middle Eastern owners.

Clifford and Altman discussed this formula with bank regulators at an extraordinary April 1981 meeting at the Federal Reserve's headquarters. *Regardie's* has obtained a transcript of the meeting through the Freedom of Information Act. Although some passages have been censored, it appears that the missing information deals with the personal finances and business holdings of the Middle Eastern investors.

If the takeover were approved, Clifford said to the regulators, control of Financial General would be vested in a board of directors that would consist of distinguished U.S. citizens, including former senator Stuart Symington. Clifford had managed Symington's 1956 presidential campaign and had enlisted his old friend's legal services during the takeover battle. To run the company on a day-to-day basis, he said, the directors would choose "a top, very well regarded commercial banker [as] president and CEO"—someone with 25 or 30 years' experience.

As for BCCI, Clifford said: "There is no function of any kind on the part of BCCI. I know of no present relationship. I know of no planned future relationship that exists." Referring to the dummy companies that would be used as vehicles for the acquisition, Altman said that "there is no connection between those entities and BCCI in terms of ownership or other relationship."

On the positive side, Clifford said that the Middle Eastern investors planned to inject additional equity into Financial General. There is, he said, "a growing feeling among many thoughtful and experienced Americans that it is in the interest of our country . . . to bring back to the United States as many of the dollars as we can that through the years we send over to the OPEC countries."

One regulator who asked tough questions at the meeting was Sidney Bailey, Virginia's commissioner of financial institutions, who opposed the takeover. Among other things, he expressed skepticism that the proposed takeover was nothing more than a routine investment. Were there political considerations behind a bid to acquire a bank in the U.S. capital?

"I felt like a voice in the wilderness," Bailey says. "The Fed paid little attention to what I had to say."

Four months after the meeting, the Fed officially approved the takeover.

IN APRIL 1982 THE MIDDLE EASTERN investors made a tender offer for the remaining shares of Financial General. Four months later the name of the holding company was changed from Financial General Bankshares to First American Bankshares. (Some of the subsidiaries had already adopted the First American name; most of the others have since followed suit.)

The new owners installed a new board of directors made up of prominent Americans, many of whom had close ties to Clifford. Altman and Symington joined the board, the latter as the vice chairman. The distinguished American chosen to be the chairman of the board: Clark Clifford.

And what about the seasoned banker who was to serve as the president of the company? That part of the understanding with the Federal Reserve was fulfilled by the appointment of Robert Stevens, the former chairman of BancOhio Corporation, a large bank holding company based in Columbus. But in an unusual twist, a new corporate entity, First American Corporation, was placed at the top of the organizational chart, with Altman as its president. Thus, of the four top positions at First American, only one was held by a banker. (Stevens retired last July and was succeeded by Jack Beddow, a veteran First American executive. Clifford also retired recently and was succeeded by Altman.)

In addition to being First American's top executives, Clifford and Altman are among the company's top lawyers. They have steered a lucrative share of the company's legal work to Clifford & Warnke, a fourth of whose 18 lawyers handle bank-related matters.

Over the past eight years the long and controversial battle for control of First American has faded from memory. The Middle Eastern investors and their links to BCCI and Lance are seldom mentioned in the press. It's probably a safe bet that most of the company's customers assume that First American is U.S.-owned—a misconception reinforced by its name and flag-waving advertising campaign.

AS A BANK HOLDING COMPANY, FIRST American Bankshares is required to provide detailed ownership information to the Federal Reserve Board. When *Regardie's* first tried to find out who owns First American through the Freedom of Information Act, however, the Fed declined to grant the request.

Among the documents that the Fed *did* provide were two letters from a lawyer for the Middle Eastern investors requesting that the Fed not disclose their names to the public.

Further evidence of First American's touchiness about the subject of its ownership was displayed when the company was defending itself from a lawsuit in 1988. The Middle Eastern investors, in taking over the company in 1982, didn't acquire 100 percent ownership of all the banking subsidiaries. In 1987 First American Bankshares decided to buy out the minority shareholders in First American of Maryland and First American of Virginia at a price of $42 a share. Several of the Maryland bank's investors complained that the price was too low and took advantage of a state appraisal system to win a higher price. In Virginia, which has no such appraisal system, the dissenting shareholders went to court. In September 1988 a federal jury in Alexandria awarded the investors $60 a share.

During the discovery phase of the case, lawyers for the plaintiffs met stiff resistance when they tried to determine who owned the company. When the question was put to Altman during a deposition, he steadfastly refused to provide any names. When the plaintiffs' attorneys persisted, Altman's lawyer snapped that the identity of the owners was "none of your business." When specific names were put to Altman, however, he did confirm their status as shareholders.

In a pretrial motion, First American's lawyers went so far as to ask the judge to forbid

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the plaintiffs' lawyers from mentioning in court the names or nationalities of the company's shareholders—or even that the bank was foreign-owned. They argued that it was irrelevant to the case, largely because Clifford and Altman ran the company; the owners played no role, they said, in setting the $42-a-share price to be paid to minority shareholders. They also claimed that the disclosure that the bank is Arab-owned could stir up prejudice in some of the jurors.

The unusual requests to the Federal Reserve and to the judge in Alexandria underscore how sensitive First American is about its foreign connections. One of the stated reasons for the sensitivity—the possibility of anti-Arab prejudice—may have some validity. Another reason—that the Arab investors have absolutely no influence over the company—isn't so convincing.

The owners may give Altman and Clifford considerable autonomy, but as their employers they have the right to fire them whenever they want. Furthermore, how can the public be assured that the owners have no influence as long as their identities remain secret?

Potential customers and employees also have a legitimate interest in knowing who owns First American. Should they decide that the owners are objectionable people, for example, they might well decide not to deal with the company.

There's another important reason that the identities of First American's owners are a matter of public interest. The takeover was highly controversial. How does the public know that the Fed did its job properly if it refuses to say who was permitted to buy the company?

Among the first group of documents obtained by *Regardie's* from the Federal Reserve is a letter from Paul Volcker, who was then the Fed's chairman, to the late Benjamin Rosenthal, a Democratic congressman from New York. The letter is dated November 16, 1982, about three months after the Fed approved the takeover. In the letter Volcker says that the Fed had recently received a Freedom of Information Act request for shareholder information, that the disclosure had been deemed "appropriate," and that "a response is being prepared to that request that will include the shareholder information."

When the Federal Reserve refused to provide shareholder information to *Regardie's*, the magazine protested the ruling and brought Volcker's letter to the attention of the Fed's lawyers. The Fed then reversed itself, saying that it would release the names of the shareholders, along with each one's percentage ownership in the bank, in 10 days. Before the 10-day period had expired, however, First American complained, which led the Fed to deliver yet a third decision. This time the Fed agreed to release the names of the investors who held at least 5 percent of the stock, but it would only reveal the exact percentages for those investors who held 10 percent or more. These nine investors account for all but 1.75 percent of First American's stock.

The list (see page 69) reveals that First American's biggest shareholder is Kamal Adham, who owned 12.63 percent of the company at the end of 1988. In addition, Adham Corporation Limited owned a block of between 5 and 10 percent. The other owners included Sheikh Zayed (11.76 percent); Sheikh Khalifa bin Zayed al-Nahayan, one of Zayed's sons and the crown prince of Abu Dhabi; the Abu Dhabi Investment Authority, which Zayed controls; Faisal Saud al-Fulaij; Abdul Raouf Khalil of Saudi Arabia; Mashriq Holding Company, the personal holding company of Sheikh Hamad bin Mohammed al-Sharqi, the ruler of Fujaira, which is a member of the United Arab Emirates; Ali Mohammed Shorafa of the UAE; Sheikh Humaid bin Rashid al-Naomi, the crown prince and deputy ruler of Ajman, another UAE member state; Khalid Salem Bin Mahfouz of Saudi Arabia; and Mohammed Hammoud of Lebanon.

These are the names that First American has gone to such great lengths to conceal from the public.

An examination of the investors' backgrounds suggests that First American may have good reason to suppress their names—not because some customers and employees may be prejudiced against Arabs in general but because some Americans may take a dim view of some of these particular Arabs.

WHEN CLIFFORD AND ALTMAN MET with bank regulators at the Federal Reserve in April 1981, they were accompanied by Kamal Adham and three other investors. After describing Adham as "a prominent businessman in Saudi Arabia," Clifford lavished praise on him. "I have come to have the deepest respect for his character, for his reputation, for his honor, and for his integrity," Clifford said. "I'm proud to be an associate of his."

Throughout the proceedings, Clifford referred to Adham as "His Excellency"—a term that isn't generally applied to Saudi sheikhs. In Saudi Arabia, the term *sheikh* isn't a title of nobility but simply an honorific for a respected person—roughly equivalent to referring to a distinguished Spaniard as "Don." Taking their cue from Clifford, the regulators began to refer to Adham as "His Excellency."

Clifford recounted what he described as a recent conversation with B. F. Saul, the chairman of Financial General. "He [Saul] had occasion to go to London, maybe more than once," Clifford said. "He had occasion to go to the Middle East, the Persian Gulf countries. I remember later on his talking with me, and he said, 'I have looked into the reputation, particularly of the leader of the group, of His Excellency Sheikh Kamal Adham.' And he said, 'It's difficult to recall a time when I have heard such universal commendation for an international businessman. I hear it in London. I've heard the most commendatory comments. I've heard about him in countries of the Persian Gulf. I have not heard one whisper of criticism against this man.' And he said, 'I feel perfectly comfortable about this group, headed by this man, coming in and taking over our banks.'"

(Saul disputed Clifford's account in a recent interview with *Regardie's*: "I never did go to the Middle East to meet him. I think I met Kamal Adham in Washington once. I don't think I ever met him in London. I met him for 20 minutes. I did not try to make a judgment whether they should own a bank. That was something for the Federal Reserve to do. All I was concerned about was whether this was in the best interest of the shareholders, and I thought it was. I didn't know these people.")

When it was Adham's turn to speak, "His Excellency" provided some background information on himself. He said that he'd studied at English schools in the Middle East, including Victoria College in Cairo, and that he spoke "English, Arabic, and Turkish as well as some French and Italian." As for his business career, he said that he had "interests in a number of business enterprises, ranging from general contracting to manufacturing plants."

This portrait of Adham was incomplete. Long before he appeared at the Fed, newspaper stories had described him as Saudi Arabia's former intelligence chief. He'd held that post until 1977 and had served as a royal adviser until early 1979—two years after he started to buy stock in Financial General.

As far as can be discerned from the censored transcript of the meeting, there was no discussion of Adham's government ca-

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reer nor of how he'd earned his fortune.

Born in Turkey in 1929, Adham is the half-brother of Iffat, the favorite wife of the late King Faisal, who ruled Saudi Arabia from 1964 until his death in 1975. Adham and the much older Faisal were extremely close. During Faisal's years in power, Adham was one of the most powerful men in Saudi Arabia. David Holden and Richard Johns, the authors of *The House of Saud*, an authoritative book on Saudi Arabia, described Adham as Faisal's "closest confidant and adviser" and his "right-hand man."

Adham's most important role was to help the king set up an intelligence organization to protect the royal family from enemies at home and abroad. In the early 1960s he was put in charge of the Foreign Liaison Bureau and, in Holden and Johns's words, "given general supervision over the General Intelligence Directorate, the internal security service."

On the home front, the Saudi regime faced threats from several sources, including dissident members of the al-Saud family, foreigners who lived in the kingdom, Nasserites, religious zealots, and rebellious members of the armed forces. In 1969, for example, there were at least two coup attempts.

Faisal was capable of using brutal methods to suppress opposition. Some of his opponents, in the words of an authority on the kingdom, "were mercilessly hunted, and, when caught, they were tortured and imprisoned for lengthy periods." Some of the officers who were arrested in the wake of a 1969 coup plot were tortured by the secret police; a few of them died in prison. The repression continued into the 1970s and 1980s. In its 1977 human rights report, Amnesty International said that it knew of 200 political prisoners by name.

When it came to the kingdom's external relations, Adham acted as Saudi Arabia's liaison with the CIA, French intelligence, and other foreign spy agencies. He developed such close ties with Anwar Sadat that he was known as Saudi Arabia's "Mr. Egypt." One way that the Saudis cultivated Sadat was by showering money on him. As part of an effort to encourage Sadat to expel Soviet military advisers from Egypt, Adham channeled enormous sums—"hundreds of millions of dollars," according to one source—to Cairo.

The "subsidies" to Egypt illustrate how Saudi Arabia has used money as an instrument of foreign policy. "The Saudis don't have much to offer by way of manpower and military assets," says William Quandt of the Brookings Institution, an authority on Saudi Arabia. "What they have to offer is money."

One important beneficiary of Saudi largess has been the Palestine Liberation Organization. Saudi Arabia is widely acknowledged to be the PLO's biggest financial backer. In his 1981 book on Saudi Arabia, *The Kingdom*, Robert Lacey wrote: "Increasing Saudi subsidies to the PLO since 1973 have given the organization currency reserves estimated at over a billion dollars—larger than those of many Third World countries—and most inhabitants of the Kingdom are proud that Saudi oil revenues should be supporting the cause of their Palestinian brothers."

Despite his governmental responsibilities, Adham found time to engage in business activities during the 1960s and 1970s—and with impressive results. In 1981 he told the Federal Reserve Board that his net worth was $255 million.

Business acumen no doubt played a role in Adham's success. Also important, though, were his political connections. His business career is almost a textbook case of how highly placed Saudis profit from their connections.

One of Adham's first important business ventures involved oil. In the late 1950s and early 1960s Saudi Arabia's oil minister was Abdullah Tariki, an aggressive, U.S.-educated petroleum engineer. In Tariki's view, the "Seven Sisters"—the leading international oil companies—had long been taking advantage of Saudi Arabia and other oil-producing countries. Tariki did his best to extract more money from the companies, even to the point of opening negotiations with a Japanese company. (In a move that would later turn the world upside down, Tariki and his Venezuelan counterpart teamed up to found OPEC in 1960.)

But Tariki and the Japanese weren't the only parties involved in the discussions. The Japanese had engaged a well-connected Saudi as their agent: Kamal Adham. Adham's precise role in the deal is a matter of some dispute. It's clear, however, that Tariki complained vociferously that Adham was undercutting his negotiating clout. Many years later Tariki reportedly said that he'd managed to get the Japanese to cancel a secret 2 percent commission to Adham—which was to be paid on top of the commission that Adham was openly receiving. But Adham had the last laugh. In 1962 Tariki was dismissed and forced into exile, while Adham went on to become one of the most powerful men in the kingdom.

Adham has counted among his clients U.S. and European companies that manufacture arms. In the mid 1960s Kermit Roosevelt, an agent for Northrop Corporation, found that Adham appeared to be representing three foreign defense contractors simultaneously—and was trying to sign up Northrop. In a letter to Northrop, Roosevelt said he understood that Adham "already has a piece of the Lightning deal, the Mirage deal, and the Lockheed deal and is trying to complete the square by an arrangement with Northrop." Roosevelt concluded that it was probably a good idea for Northrop to engage Adham. "Without him," he said, "we are going to be weakly represented."

The Egyptian connections that Adham had acquired in his role as intelligence chief were of great value when he did business in that country. "Adham was the main intermediary in the deals whereby Saudi Arabia bought French weapons on behalf of Egypt," Holden and Johns wrote. "The commissions from these sales, including the Mirage aircraft, were understood to have been channeled through his company, Arcan."

One of Adham's American clients in the 1970s was Boeing Company, according to reports in the *Wall Street Journal*. Adham, the *Journal* said, received large commissions from Boeing in exchange for promoting sales of its jets. His link to Boeing came to light in the mid 1970s, when U.S. government agencies investigated "questionable payments" made by Boeing and other U.S. companies to Americans and foreigners, including government officials.

The SEC and the Federal Trade Commission charged that Boeing had made tens of millions of dollars in questionable payments in connection with foreign aircraft sales. Both cases were settled in 1978 with a consent arrangement. In connection with the SEC settlement, Boeing filed a report in which it admitted making such payments, although certain names and details were deleted. One such deal involved the sale of $137 million worth of aircraft to a customer in Egypt. In connection with that transaction, Boeing paid $8.7 million to corporations in Liechtenstein; Boeing said it believed that the ultimate recipients were individuals who'd arranged or provided financing for the sale.

The names of those individuals were deleted from the Boeing report. The *Wall*

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Street Journal filled in some of the blanks in a June 1978 article, based on interviews with U.S. government sources. Boeing was assisted, the paper said, by Adham and Mahdi al-Tajir, a diplomat from the United Arab Emirates. Mahdi al-Tajir had encouraged Sheikh Zayed to lend Egypt up to $90 million to finance the aircraft purchases, U.S. officials said, while Adham had used his influence with the Egyptian government to ensure that Boeing would be the supplier. Over the years, the *Journal* said, "Boeing has paid millions of dollars in commissions to Mr. Adham and Ambassador Tajir."

Adham invested much of the money he earned as an agent for foreign companies in conventional businesses, among them First American. Another bank in his investment portfolio is Allied Arab Bank, a London-based institution. He's its biggest shareholder; his partners are his friend Mahdi al-Tajir and Britain's Barclays Bank.

Documents obtained by *Regardie's* from the Federal Reserve show that an SEC official told the Fed that the names of two of the Middle Eastern investors had come up in the Boeing investigation. In a letter to the SEC asking for more information, the two investors are referred to, but their names were excised from the version released to *Regardie's*. They are described as "Mr. _____ of Saudi Arabia and Mr. _____ of Kuwait." If the *Wall Street Journal*'s reporting is correct, the Saudi in question is Kamal Adham.

There is no doubt about the identity of the other investor: only one Kuwaiti was involved in the takeover. He is Faisal Saud al-Fulaij, another major shareholder in First American.

From 1964 to 1977 Fulaij served as the chairman of Kuwait Airways, the state-owned airline. For an airline executive, he accumulated an impressive fortune—$70 million, according to a document filed with the Fed in 1981. In the late 1970s the Federal Trade Commission identified him as the recipient of at least $300,000 in bribes. The commission's draft complaint said: "The payment, at the direction of a Boeing Co. officer, was made through a fictitious Swiss consulting firm." Fulaij has denied the allegation.

Since the late 1970s Fulaij has been the chairman of Kuwait International Finance Company, which has been listed in BCCI's annual reports as an affiliate. Fulaij told the Federal Reserve that he was also the president of Kuwait Sanitary Wares Company, which, he said, "manufactured plumbing and ceramic equipment."

INVESTORS FROM ABU DHABI—SHEIKH Zayed, his son Sheikh Khalifa, the Abu Dhabi Investment Authority, and Ali Shorafa—own a large chunk of First American. Because Zayed is the absolute ruler of Abu Dhabi, the Abu Dhabi Investment Authority, a government investment fund, is widely regarded as his personal property.

Sheikh Zayed came to power in 1966 by deposing Sheikh Shakhbut, his older brother. Shakhbut reportedly had peculiar attitudes about the proper way to invest money. There have long been rumors that he didn't believe in banks and kept gold bullion and millions of dollars in cash at home. He was eventually persuaded to put some of his money in the bank, the story goes, when he learned that rats had nibbled away a fortune in bank notes.

Shakhbut had refused to spend the sheikhdom's oil wealth to raise the living standards of his people. Thus, when Zayed replaced him, the change in power was widely welcomed.

Zayed, unlike his brother, is a big spender. He's spent vast sums on lavish construction projects, some of which are regarded as white elephants. The largest chunk of the sheikhdom's money, however, has gone into his pocket. *Fortune* magazine has estimated that Zayed is worth about $1.5 billion—not including the billions of dollars in assets held by the Abu Dhabi Investment Authority. The ADIA is a joint owner—along with the Libyan Treasury Secretariat and the Kuwait Ministry of Finance—of the Arab Banking Corporation, one of the Arab world's largest banks.

Zayed has a large family to support. In the late 1970s it was reported that he'd been married as many as 14 times—although, of course, he's presumably never had more than four wives at any one time (the limit under Islamic law). He reportedly has 22 daughters and 19 sons.

His wealth derives from Abu Dhabi's oil revenues, which shot up dramatically after the 1973-74 OPEC price increase. Around the same time, a number of Arab countries cut off shipments of oil to the United States, along with a few other countries, to punish them for their support of Israel during the 1973 Yom Kippur War. Abu Dhabi was the first Arab country to declare an embargo against the United States.

Over the years Zayed has also channeled tens of millions of dollars to the PLO. He's been an outspoken critic of the United States and its relationship with Israel. "Israel is our number-one enemy," he told reporters last December, "and America is our number-two enemy." Two days later he reportedly met with PLO leader Yassir Arafat and assured him of his support for the Palestinian uprising on the Israeli-occupied West Bank.

Up until sometime in late 1981 or early 1982, the man in charge of managing Zayed's personal fortune was Abdullah Darwaish. As "Chairman/Director General of the Department of Personal Affairs of H.R.H. Ruler of Abu Dhabi and Chairman of the Abu Dhabi Investment Company," he'd acquired shares of Financial General as a sort of trustee for Zayed's young son Mohammed.

In March 1982, several months before the takeover was consummated, Sheikh Zayed brought two suits in U.S. courts charging that Darwaish had been involved in an elaborate scheme to defraud him of $96 million. Darwaish had already been under house arrest in Abu Dhabi for several months; his chief deputy, Riaz Saleem Aslam, had been jailed there in late 1981.

"Documents filed in that case," the *Washington Post*'s Jerry Knight reported in August 1982, "indicate Darwaish's troubles in Abu Dhabi were known weeks and perhaps months before he and his partners bought control of Financial General but were never disclosed to bank officials, stockholders, or regulatory agencies.

"Neither the Securities and Exchange Commission, which regulates corporate acquisitions, nor the Federal Reserve Board, which has authority over bank holding companies, has been informed of Darwaish's troubles in Abu Dhabi, sources at the two agencies said."

The same day that the story appeared, Michael Bradfield, the general counsel to the Federal Reserve Board, wrote to Clark Clifford to ask for more information. Clifford responded in a letter dated August 16. In it he stressed that Darwaish owned no shares in the company but was merely representing Zayed's son Mohammed, and he added that Mohammed would be handling his own investments in the future. He denied that any information had been withheld from regulatory agencies. In one passage he branded the *Post*'s story "inaccurate, misleading, unwarranted, and irresponsible" and

said that he had informed Benjamin Bradlee, the executive editor, of "the gross inaccuracies in the article." The *Post*, however, published no correction, letter to the editor, or follow-up article.

One important issue was lost in the shuffle. The formal tender offer for Financial General Bankshares, filed with the SEC on March 3, 1982, listed Abdullah Darwaish as one of the three controlling shareholders in the takeover group (along with Adham and Fulaij) and described him as the chairman of the Abu Dhabi Investment Company and the chairman of Sheikh Zayed's Department of Personal Affairs. At the time, however, he'd already been stripped of his official duties and placed under house arrest.

In March 1989 the New York Court of Appeals ruled unanimously that Zayed couldn't press his claim because he'd refused to be deposed in the case. Riaz Aslam, Darwaish's deputy, was reportedly still languishing in an Abu Dhabi prison. As for Darwaish, *Regardie's* has been unable to ascertain his whereabouts.

Khalid Salem Bin Mahfouz, one of Saudi Arabia's most prominent businessmen, first bought shares in First American in 1986. His family controls the largest bank in Saudi Arabia, National Commercial Bank, and has a net worth estimated to be more than $1.5 billion. Khalid's father is the bank's founder; Khalid and his brothers run it.

Like many of Saudi Arabia's super-rich, the Bin Mahfouz family has benefited from royal patronage. King Saud granted permission to establish the bank in 1954. Another apparent privilege was granted much more recently. In the late 1970s the Saudi government ordered the nation's private-sector banks to sell stock to the public. Only one bank didn't do so, presumably because of a special exemption: National Commercial.

First American was by no means Bin Mahfouz's first investment in the United States. In 1977 he teamed up with former treasury secretary John Connally, Texas banker Fredrick Erck, and Ghaith Pharaon to buy Main Bank, a small bank in Houston, Texas. The following year Connally introduced Bin Mahfouz to Nelson Bunker Hunt and his brother, Herbert, who were on the lookout for partners as part of their effort to corner the world's silver market. In 1979, according to British journalist Stephen Fay, the Hunts and Bin Mahfouz established an offshore company to serve as a vehicle for silver investments, but the silver scheme collapsed, and Bin Mahfouz was rumored to have suffered huge losses.

ASIDE FROM BEING WEALTHY ARABS, Kamal Adham and the other principal owners of First American Bankshares have one thing in common: all of them are closely associated with BCCI.

At least seven of First American's 10 apparent shareholders also own stock in BCCI, according to BCCI's latest available list of shareholders, which is dated October 31, 1988. The Abu Dhabi contingent—Zayed, his relatives, the Abu Dhabi Investment Authority, and Ali Shorafa—accounts for the biggest block of BCCI shares. Bin Mahfouz and his brothers owned 20 percent of BCCI. (They reportedly bought their stock in BCCI at about the same time that Bin Mahfouz invested in First American.)

The owners of First American are connected to BCCI in many other ways. All of them have been described as "BCCI clients," in the sense that the bank provides investment advice to them. Sheikh Zayed is a close friend of Abedi's and a partner with BCCI in its UAE subsidiary, Bank of Credit and Commerce (Emirates). Adham has been a BCCI depositor and borrower. Fulaij is a longtime executive of the BCCI group; when he first bought stock in Financial General, he was the chairman of Kuwait International Finance Company, a BCCI affiliate. (BCCI owns 49 percent of KIFCO.) BCCI's annual reports show that Fulaij served on the board of BCCI's Italian subsidiary, Italfinance International S.p.A., from 1982 to 1986. Bin Mahfouz has served on BCCI's board of directors.

These close ties to BCCI and Abedi, its president, raise an obvious question: What is the relationship between First American Bankshares and BCCI?

ABEDI'S KNACK FOR FORGING POLITIcal connections has been controversial, partly because BCCI has sometimes employed highly questionable techniques. The bank has entered into business partnerships with political figures, provided jobs for them and their offspring, paid their travel expenses, and given them loans.

In many of the countries in which BCCI has made powerful friends, it has received certain privileges or outperformed other foreign banks. BCCI spokesmen say this is a coincidence; other bankers are skeptical.

The United Arab Emirates, for example, has been described as the most overbanked country in the world; it has a huge number of branches that serve a population of less than 1.5 million. In 1982 the UAE decreed that foreign banks would be limited to eight branches apiece. BCCI managed to get around the rule by setting up a separate bank, Bank of Credit and Commerce (Emirates). It didn't go unnoticed that Sheikh Zayed and his relatives own stock in both BCCI and BCCE.

Many foreign banks have abandoned Nigeria in recent years, amid complaints that economic travails and government restrictions have made it extraordinarily difficult for them to generate profits. But BCCI's 40 percent-owned Nigerian subsidiary has been expanding rapidly and making so much money that it's now one of its most profitable units. The chairman—and one of the shareholders—of BCCI's Nigerian subsidiary is Ibrahim Dasuki, a wealthy businessman who's so close to Nigerian president Ibrahim Babangida that he's been described as Babangida's "political godfather."

BCCI's most impressive political connections were forged in Pakistan during the 10-year rule of Mohammad Zia ul-Haq, the repressive dictator who died in 1988. Sources in Pakistan say that Abedi was one of Zia's closest friends and a key adviser. BCCI hired a long list of senior Pakistani officials who'd served under Zia.

BCCI's image has also suffered because of its involvement in flight capital—money moved abroad by people who live in unstable countries. Most flight capital is exported by rich people in Third World countries, and they usually have to violate foreign exchange controls to accumulate their money abroad.

Most big banks are happy to accept deposits from customers who've smuggled the money abroad, but they generally avoid violating exchange controls. In at least six developing countries, officers of BCCI have been accused of exchange-control violations; they've been found guilty in three of them.

But all of BCCI's previous controversies have been dwarfed by the issue of drug money.

One former BCCI customer who was allegedly involved in the drug trade is Manuel Noriega, the former Panamanian dictator. In February 1988 Noriega was indicted in Miami and Tampa on federal drug charges. Around the time of the indictments, two convicted traffickers testified at Senate hearings that they'd dealt with Noriega—and with BCCI—in Panama. One of the traffickers, Leigh Bruce Ritch, testified that he'd been referred to BCCI by Cesar Rodriguez, one of Noriega's closest associates. The traffickers' testimony was buttressed by José Blandon, a former Panamanian diplomat. ▸

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BCCI, according to Blandon, had been used for money laundering by both Rodriguez and Enrique Pretelt, another associate of Noriega's, who at the time was under indictment in the United States on drug charges.

In the wake of the Noriega hearings, the Senate Subcommittee on Terrorism, Narcotics, and International Operations, chaired by John Kerry of Massachusetts, launched a secret inquiry into BCCI. On September 30, 1988, the Kerry committee deposed Amjad Awan, BCCI's country manager for Panama from 1981 to 1984. Awan, who'd acted as Noriega's personal banker, said that the dictator had channeled millions of dollars through his BCCI account, most of the deposits had been in cash. Noriega had been so pleased with the service he'd received, according to Awan, that he'd made a personal appeal to Abedi not to transfer Awan from Panama. Abedi had gone ahead with the transfer anyway, but Awan had assured Noriega that "I would be available to him whenever he needed me."

Kerry's subcommittee wasn't the only unit of the U.S. government that was taking a close look at BCCI. At the same time that Awan was testifying, he and several of his BCCI colleagues were the targets of an undercover investigation of money laundering that had been launched in 1986 by the U.S. Customs Service. A customs agent posing as a money launderer had channeled millions of dollars in cocaine money through BCCI. Awan was one of several BCCI officers who'd allegedly been eager to help out.

In early October 1988 a federal grand jury in Tampa returned an indictment against BCCI and nine of its employees, including Awan. BCCI and eight of the bankers were charged with laundering about $14 million in cocaine money.

When the indictment was unsealed, U.S. Customs Commissioner William von Raab called BCCI "an institution that was prostituting itself to money laundering."

In April 1989 a federal grand jury in Tampa returned a superseding indictment against BCCI. The new indictment alleged that BCCI officers were involved in laundering drug money as far back as 1983—three years before U.S. Customs launched the investigation that led to the original indictment. The new indictment also alleged that the laundering of drug money was part of BCCI's corporate strategy BCCI and its Colombian subsidiary, it said, implemented "a corporate strategy for increasing BCCI's deposits by encouraging placements of cash from whatever sources, specifically including 'flight capital,' 'black market capital,' and the proceeds of drug sales, in conscious disregard of the currency regulations, tax laws, and antidrug laws of the United States and of other nations."

BCCI settled the case last January with a plea bargain. It and an affiliate pleaded guilty to money-laundering charges and forfeited $15 million: in exchange, prosecutors dropped the charges against BCCI's Luxembourg holding company as well as BCCI's Colombian subsidiary. Five officers of BCCI are now on trial in Tampa, and the U.S government is seeking to extradite another BCCI officer from London. British authorities are expected to put still another BCCI official on trial in that country

WHAT EXACTLY IS THE RELATIONSHIP between First American Bankshares and the bank that the U.S. government has branded a corporate criminal?

The official version is that there is none. The two shareholder groups overlap to a certain extent, officials of First American Bankshares say, and BCCI provides advice to some of the Arab investors—and that's about it.

"BCCI has not been involved at any time in *any* respect in the establishment of policy or in the control or management of First American or any of its subsidiaries," one of First American's lawyers said in a letter to *Regardie's*. "This has been confirmed by the management of First American and reaffirmed in regular bank examinations."

The official version of the relationship, however, shouldn't be accepted at face value. BCCI officials and lawyers for First American's owners have made numerous questionable statements over the years. In at least a few cases, BCCI officers have given false information to reporters.

Some of the most egregious examples are from early 1978, when it was first reported that BCCI might have been behind Bert Lance's efforts to buy shares of Financial General. On February 13, the *New York Times* reported that BCCI officials "flatly denied making any purchases of or having any involvement in efforts to acquire Financial General stock." According to the *Times*, Dildar Rizvi, a BCCI official, "said that he had spoken today with Mr. Abedi, who also denied any connection with efforts to purchase Financial General stock." A little more than a month later Rizvi (who is now one of BCCI's most senior officials) told a reporter for the *Washington Post* that Bert Lance "was paid nothing by the bank"; Allaudin Shaik, another BCCI executive, said that Lance had "received absolutely no loans from BCCI or loans arranged by BCCI."

All of these statements were later proven false. Abedi himself, in fact, later admitted that BCCI had lent Lance about $3 5 million.

During and after the takeover battle, the BCCI "clients" and their lawyers also made numerous questionable statements about the deal. Clark Clifford, for example, provided this extraordinarily terse account of Lance's role during the April 1981 meeting at the Federal Reserve: "At one time he did own a few shares of stock. He sold the stock Retired from participation in it." And Altman recently told *Regardie's* that Lance hadn't had "any significant role in the acquisition."

In fact, however, Lance had been a paid financial adviser to BCCI, had helped to collect the stock, and had approached the management of Financial General on the investors' behalf

In a 1979 deposition, and again at the Fed meeting in 1981, Adham said that the stock had been recommended to him by a friend who worked at the Saudi embassy in Washington. "Mr. [Hassan] Yassin advised me that the stock had become available for purchase in Financial General and that this company might provide an attractive investment opportunity," he told the Fed in 1981. "I asked BCCI to evaluate this property for me and advise me as to its suitability as an investment."

Three years earlier, however, U.S. District Court Judge Oliver Gasch had found in a civil suit that it was Abedi who had recommended the Financial General stock to Adham.

At the Fed meeting, Clifford, Altman, and Adham went to great lengths to portray the share buy-up as a routine investment. Adham and his partners weren't members of a group involved in a secret scheme to acquire control of the company, they said, but simply ordinary investors in the U.S stock market.

The assertion that BCCI wasn't involved in the takeover—that the buyers were merely several unrelated investors who happened to be customers of BCCI—had already been demolished by Gasch, who'd agreed with the SEC that the shareholders were acting as a group to take over Financial General in violation of securities law He'd found that Abedi had essentially put together the deal, assem-

bling a group of investors and instructing Lance and others to buy stock for them.

There can be little doubt that Abedi was interested in acquiring a foothold in the United States. But major legal and regulatory obstacles stood in his way. In fact, BCCI had run into trouble with state banking regulators three years before the Financial General battle. In 1975 a BCCI client had tried to acquire the Bank of Chelsea, a small institution in New York City. But after he'd made it clear that BCCI would be involved in running the bank, New York State bank regulators withheld their approval.

At a December 1, 1977 meeting that was attended by Lance and others, Abedi, the SEC said, "discussed the possibility of acquisition of control of both FGB and NBG by Ghaith Pharaon." Pharaon's lawyer said that since his client already owned part of National Bank of Georgia (a transaction that was reportedly financed by BCCI), this could violate restrictions on interstate banking. The Financial General stock would have to be bought by someone else. Abedi immediately came up with four other BCCI clients. These four investors and the ones who joined them later were more than simply "BCCI clients." They included BCCI stockholders, joint-venture partners, friends of Abedi's, and, perhaps most important, borrowers from the BCCI group

Fulaij, for example, told the SEC that he'd paid for his stock with a $3.55 million unsecured loan from Kuwait International Finance Company, a BCCI affiliate. Fulaij was its chairman.

Fulaij wasn't the only borrower. Adham has borrowed from the bank, and other members of the group may have done so. When Financial General's management was fighting the takeover, its lawyers filed a sworn affidavit that they'd seen a Bank of America document that revealed that BCCI had made loans to two of the four Middle Eastern investors

Moreover, the names of the two shell companies that were set up as a vehicle for the acquisition of Financial General bore a striking resemblance to that of BCCI: a Dutch company called Credit and Commerce American Investment, which in turn was owned by a Netherlands Antilles company called Credit and Commerce American Holdings.

When a Federal Reserve official asked about the similarity, Clifford replied: "I think generally the term 'credit' and the term 'commerce' are terms that are used extensively in the Persian Gulf in financial affairs. . . . I know of no additional reasoning behind it." Clifford was mistaken. The only major Arab-owned bank with those words in its name is Bank of Credit and Commerce International.

THE PUBLIC RECORD SHOWS THAT BCCI masterminded the Financial General investment, provided loans and consulting fees to Lance (who facilitated the takeover), brought in close associates of the bank as investors, and financed the stock purchase of at least one of those investors. While none of this proves that the two institutions have been linked to each other since the takeover, *Regardie's* has found that there are a number of ongoing connections.

Before BCCI opened a branch in New York, it depended heavily on the services of correspondent banks in that city. One correspondent was First American Bank of New York—a seemingly unusual choice, since it's a relatively small, obscure institution. Odd, that is, unless BCCI regarded it as a sort of sister bank. An official at a major New York bank who's had dealings with BCCI says that when BCCI's employees made business trips to New York, they used desks and phones at First American.

There are also personnel connections. At least two of BCCI's senior officials have held posts at First American Bank of New York. Aijaz Afridi left his job as a general manager of BCCI's Swiss subsidiary to become the executive vice president of FABNY, only to return to run BCCI's Spanish subsidiary. Khusro Elley, who ran BCCI's representative office in New York, also left for a senior position at FABNY.

A source at BCCI's Spanish subsidiary says that before Afridi arrived there, employees were informed that he was a senior BCCI official who'd been posted to First American of New York "at the request of Mr. Abedi" and that Abedi had now transferred him to Spain. After Afridi arrived in Spain, this source says, he frequently referred to First American as a member of the BCCI group.

Neither Elley nor Afridi, however, completely severed his ties to BCCI while working for First American. Public records show that both men used BCCI mortgages to buy houses in the wealthy suburb of Scarsdale. Afridi received his mortgage in December 1983, just months before he'd joined First American. Elley's mortgage was granted in July 1984, while he was a First American employee. Real estate records don't indicate the interest rate on Elley's mortgage, but Afridi's was granted on what appear to be

FIRST AMERICAN

extremely generous terms, including no down payment.

PERHAPS THE MOST OBVIOUS ONGOING connection between First American and BCCI, however, is their common law firm: Clifford & Warnke. The firm began to work for BCCI in early 1978, when Abedi and the bank were sued for violating U.S. securities laws in connection with the acquisition of shares in Financial General.

Two years ago, when Senator Kerry investigated BCCI's ties to Noriega, Clifford and Altman dealt with his subcommittee on BCCI's behalf. Clifford, according to a subcommittee source, had discussions with Kerry as well as with the chairman of the Foreign Relations Committee, Senator Claiborne Pell of Rhode Island.

Following BCCI's indictment on drug charges in October 1988, Clifford and Altman played an important role behind the scenes, recommending defense lawyers, monitoring the case as it unfolded, and even approving BCCI's responses to press inquiries.

Altman has also lobbied on Capitol Hill on BCCI's behalf. In January, shortly before the proposed settlement was announced, he and three other lawyers for BCCI met with Senator Orrin Hatch of Utah. Hatch has told *Regardie's* that Altman and his colleagues strongly defended the plea bargain.

The arguments were evidently persuasive. After other senators criticized the plea bargain as a slap on the wrist, Hatch defended the deal on the floor of the Senate. He also minimized BCCI's relationship with Noriega, lumped BCCI together with banks that had been found guilty of less-serious charges (failure to file currency-transaction reports), and said—incorrectly—that none of the individual defendants who'd been indicted were senior officials of BCCI.

All the while, of course, Clifford and Altman have been running First American. It's a curious and awkward relationship that not only undercuts First American's claim that it's wholly independent but also presents potential conflicts of interest. Aren't there times when the interests of First American and BCCI are at odds? How do Clifford and Altman resolve such conflicts? Do they do what's best for First American or what's best for BCCI? Or doesn't it matter?

Altman says that he doesn't see a conflict. "It's not unusual that a law firm represents more than one client in an industry," he says. "We are not the primary lawyer for BCCI. We [First American] do very different kinds of business. They are an international bank; we are a regional bank."

As the chairman of First American Bankshares, couldn't Altman avoid even the appearance of a conflict of interest by simply dropping another bank that he describes as a minor client?

"I'm not anxious to distance myself from BCCI," Altman says. "I'm not defensive about it."

Clifford and Altman aren't the only lawyers used by BCCI, but they have a great deal of contact with the bank's top management, according to a BCCI insider. He says that Altman was in constant communication with BCCI officials. Altman says that he talked to Abedi "infrequently." When *Regardie's* asked Altman how often he talks to Abedi's deputy, Swaleh Naqvi, who essentially runs BCCI, Altman declined to comment.

Moreover, Altman claims that he and Clifford have very little contact with First American's Middle Eastern owners. For example, he stated in a deposition that he hadn't bothered to tell them when he'd decided to spend about $30 million to buy the remaining public stock in First American's Virginia subsidiary. There hadn't been, he insisted, a single meeting, letter, telex—not even a phone call. In one motion, lawyers for First American stated, "The evidence in this case is undisputed that those foreign nationals played absolutely no role in the merger transaction, and indeed, did not even know about it until after it had been consummated."

Shareholders who are so remote from a company that they're not consulted about a $30 million transaction are more than simply "passive" investors. "Comatose" might be a more accurate term.

First American is by no means the only ostensibly independent company with close ties to BCCI. Attock Oil Company, a London-based refining and trading firm, has in recent years acquired several U.S. properties. Abedi arranged the acquisition of Attock Oil in 1979, and a source close to the company says that its owners include Adham, Pharaon, and Fulaij. According to published reports, Pharaon has been the chairman of the company and Adham a director. Its main bank is BCCI.

Capcom Financial Services, a commodities and money-management firm, was indicted in Tampa as a codefendant in the BCCI money-laundering case. A source close to the company says that its leading shareholders include at least two of First American's shareholders, Adham and Abdul Khalil, as well as S. Z. A. Akbar, Capcom's managing director. Akbar is related by marriage to Naqvi, BCCI's chief executive, and before joining Capcom he was BCCI's chief trader. He was also indicted in the Florida case.

Then there's the case of National Bank of Georgia. After BCCI arranged Pharaon's acquisition of the bank in late 1977, Pharaon became an absentee owner. In 1979 he hired Roy P. M. Carlson, a former executive of Bank of America, to run NBG. Carlson had been responsible for monitoring B of A's investment in BCCI.

Carlson wasn't the only NBG official with links to BCCI. Three Pakistani bankers were recruited from BCCI to help Carlson run the bank. The most senior of them was Tariq Jamil, whose title was assistant to the chairman. A few years ago Jamil returned to BCCI as a senior official of its Hong Kong subsidiary.

In 1987 First American bought back its former subsidiary from Pharaon, who was in deep financial trouble. It paid $255 million for the Georgia bank in what Altman describes as "an arm's-length transaction."

At the time, however, Clark Clifford indicated that Pharaon's ties to the owners of First American may have had something to do with the transaction. "Our investors encouraged us to consider the purchase," he said. "They had known of the ownership being in the hands of Pharaon. They encouraged us to do it." Pharaon has himself acknowledged the importance of his ties to the owners of First American. "These are people we have been associated with for a long time," he said, referring to Adham and Fulaij. "We've had many contacts with them, so we know them. They said we should speak to [First American's] management in Washington, which we did, and that's how the deal came through."

Pharaon has invested in other U.S. banks, in at least some cases with BCCI's help. In 1985, for instance, he bought Independence Bank of Encino, California in a transaction that resembled the Georgia deal. Sources familiar with the deal say that the negotiations were handled by BCCI officers and that Pharaon has been a very passive investor. A BCCI executive was installed as the bank's chairman, although in 1989 the top job was taken over by an American banker who has no apparent ties to BCCI. Senior officials of the bank say that there's no connection

with BCCI and that they regard Pharaon as the bank's proprietor.

One characteristic shared by all of these purportedly independent companies is that their senior executives have attended BCCI's annual management conferences. BCCI insiders say that attendees have included officials of Attock Oil, Capcom, National Bank of Georgia, and First American Bankshares.

Altman has also attended several of the conferences. The feeling among the participants, a source says, was that "everyone there was part of the BCCI group." According to sources who have attended these conferences, Altman was there not as a lawyer for BCCI but as the leader of a contingent of First American executives.

"I don't think any other First American people were there," Altman says. Was he there in his capacity as a First American executive or as a BCCI lawyer? "It wasn't specified," he says. "They asked me to come."

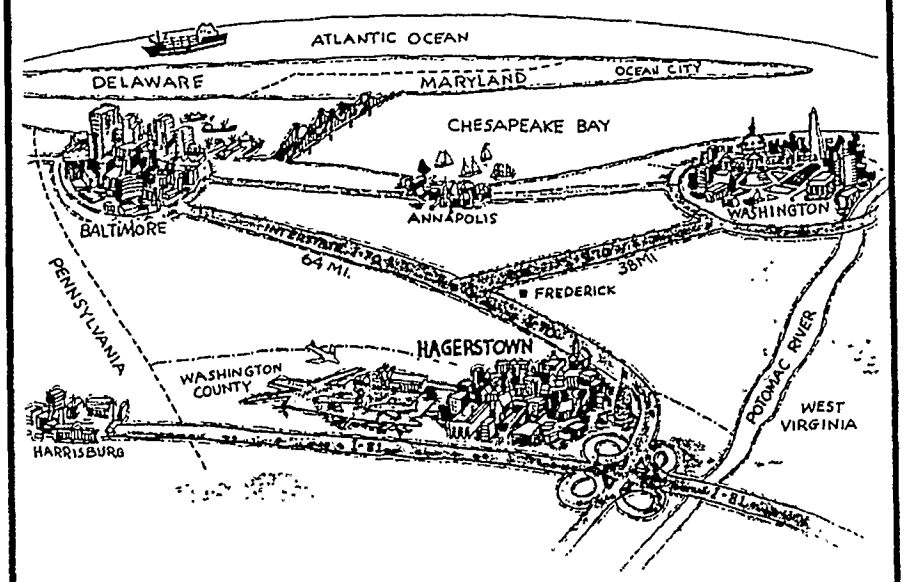
At other meetings, senior executives of BCCI, including Abedi, explicitly reinforced the notion that the firms in attendance were part of the "group." Says a former BCCI executive: "I remember at one meeting, Abedi said, 'We are now one of the largest financial groups in the world, when you take into account the BCC Group, First American, Attock Oil.' He would mention NBG and Independence Bank. He would say when you put them all together, we as a group are so big. He would throw in a figure of $28 billion or $30 billion in assets."

Indeed, a banker who attended several of the management conferences told *Regardie's*, "You'd be damn foolish if you didn't see the handwriting on the wall that someday they could come together." Sources say, in fact, that Abedi not only spoke of First American as an affiliate but that he planned to turn it into an official subsidiary once he got approval from the Federal Reserve. One BCCI source says that Abedi even told various BCCI executives what jobs they'd have in Washington. Altman denies that there was ever any such plan.

During the Florida money-laundering investigation, Amjad Awan described the relationship between BCCI and First American to an undercover federal agent. A government affidavit paraphrases Awan:

"Awan said that BCCI has bought and controls First American Bank and National Bank of Georgia through private individuals. The banks were bought through individual names rather than BCCI because BCCI could not buy

View From the Other Washington



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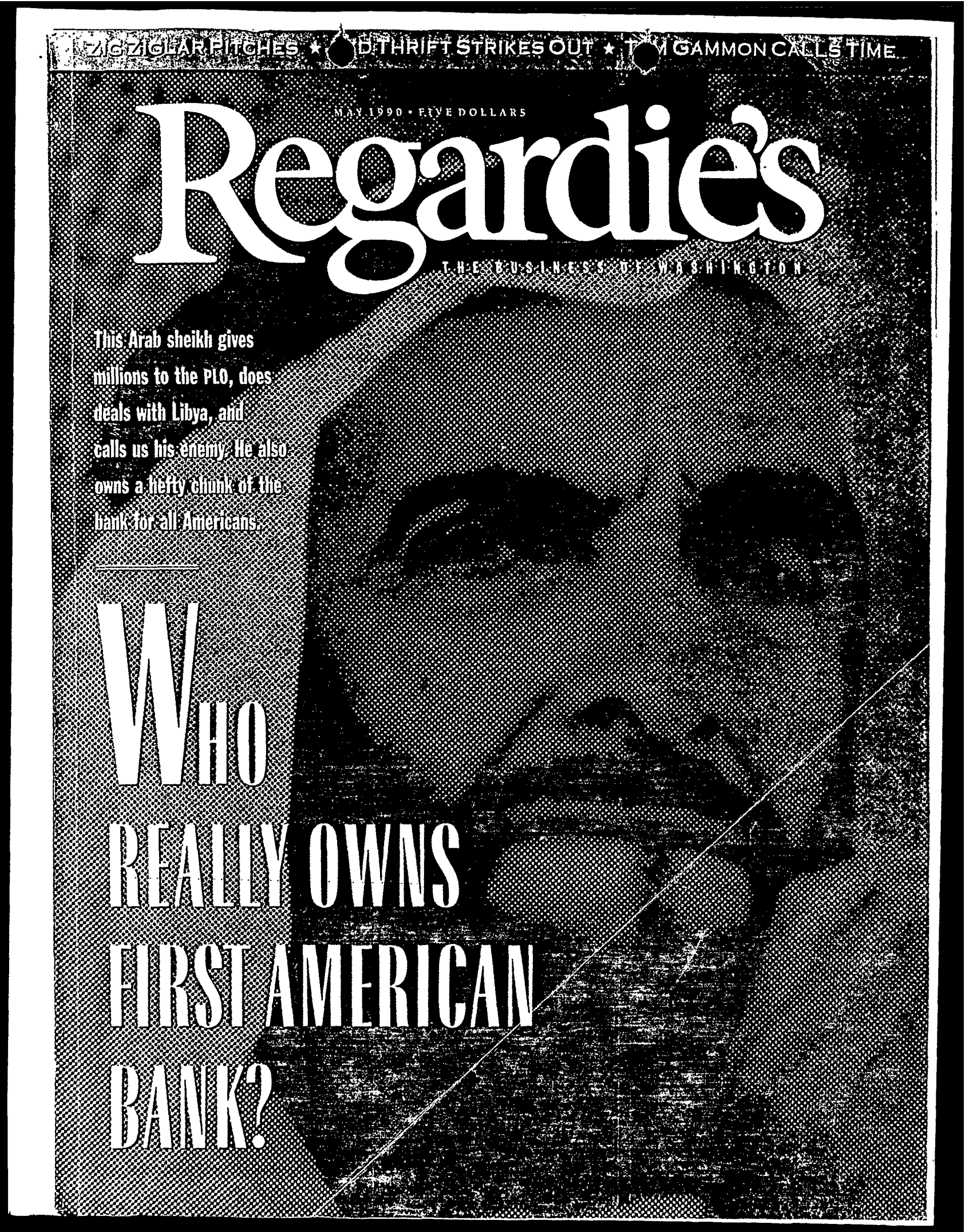

This Arab sheikh gives millions to the PLO, does deals with Libya, and calls us his enemy. He also owns a hefty chunk of the bank for all Americans.

WHO REALLY OWNS FIRST AMERICAN BANK?

Witness Says Clifford, Altman Told of BCCI's U.S. Strategy

ALTMAN, From D1

cause of massive fraud, Clifford and Altman met numerous times with Abedi, who told them he wanted to buy a bank in the United States that would later be combined with BCCI, Rizvi said.

Former defense secretary Clifford said in the same meetings, Rizvi testified, that he thought Abedi's vision was an excellent one and would be well served if Financial General Bankshares, later renamed First American, were linked with BCCI.

Clifford and Altman represented BCCI when it openly made a bid to buy Financial General Bankshares in 1978. When the Federal Reserve rejected the bid, a second attempt by a new group of investors was approved by regulators in 1981 after Clifford and Altman said BCCI would have nothing to do with the ownership or control of the bank.

Rizvi also said that in Clifford's and Altman's presence, Abedi would refer to the investors who purchased what became First American as "friends of BCCI, nominees, BCCI or shareholders of BCCI," while Clifford referred to them as "investors" or "shareholders."

The much-anticipated testimony of Rizvi, 53, had been delayed for several days while Altman's lawyers made many motions to try to limit or exclude the testimony. Rizvi, a slight, soft-spoken man who was educated in Pakistan, will continue his testimony about Altman's role on Wednesday.

Rizvi, who was charged by federal prosecutors in 1991 with using BCCI to launder money, has made a deal with prosecutors to cooperate in the case in exchange for a dismissal of the charges against him.

In court here today, Rizvi painted a portrait of BCCI as a bank that stole its depositors' money. He recounted how in the summer of 1980 he went with BCCI President Swaleh Naqvi to visit Sheik Khalid bin Mahfouz, then head of Saudi Arabia's largest commercial bank and a major BCCI investor. Afterward, Rizvi said, Naqvi told him to transfer more than $146 million to a Mahfouz bank account.

The money, which was taken from depositors' accounts, was put on the bank's books as a loan, Rizvi testified. Asked if he was aware that he was creating false loan documents to cover those payments, Rizvi, after a long pause, replied, "yes."

Mahfouz is the target of a New York state indictment, a civil lawsuit and a Federal Reserve action.

FD-350 (Rev. 5-8-81)

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Witness: BCCI Founder Told Altman, Clifford of 'Vision'

By Sharon Walsh
Washington Post Staff Writer

NEW YORK, April 27—A key witness in the trial of Robert A. Altman today said that beginning in 1978, the founder of the Bank of Credit and Commerce International told Clark M. Clifford and Altman that his "vision" was for BCCI to own a U.S. bank.

Diddar Rahvi, a former top BCCI official, was the first witness in the four-week-old trial with firsthand knowledge of BCCI's inner workings. He is also the first to testify who was present in meetings in New York, London and Washington when Clifford and Altman, who represented BCCI, met with BCCI officials regarding their desire to acquire a U.S. bank.

Altman and Clifford have been charged with fraud in representing to bank regulators that BCCI would have no ownership or control of First American Bankshares Inc., the bank company Clifford and Altman managed. They have denied the charges and said they were misled by BCCI founder Agha Hasan Abedi and his top lieutenants.

Clifford's trial has been delayed indefinitely because of his ill health.

From 1978 until 1990, when regulators around the world closed BCCI be-

See ALTMAN, D2, Col. 5

ROBERT A. ALTMAN
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BCCI's Calif. Bank Is Closed

WASHPOST 1/31/92 P8 C1

State Regulators Shut Independence

By Sharon Walsh
Washington Post Staff Writer

California banking regulators yesterday closed Independence Bank of Encino, one of three U.S. banks that were illegally owned by the Bank of Credit and Commerce International, after federal regulators determined that paying off depositors was less costly than keeping the bank open.

Independence had been teetering for months on the edge of insolvency and probably would have been closed sooner, but regulators waited until BCCI pleaded guilty to an array of crimes.

Because of an unusual plea agreement by BCCI, signed a week ago by U.S. District Judge Joyce Hens Green, the failure of Independence should not cost taxpayers anything. Under the pact, court-appointed liquidators pleaded guilty on behalf of BCCI to charges that included illegal ownership of Independence, First American Bankshares Inc. of Washington and National Bank of Georgia. BCCI forfeited its $550 million in U.S. assets, half of which will be used to prevent the federal bank insurance fund from suffering losses caused by the illegally owned institutions.

First American Bankshares, the District's largest bank holding company, won't be affected by the failure of Independence, banking and regulatory sources said.

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"The seizure of Independence has no effect on First American Bankshares or its customers," said George L. Davis, president of First American. "The banks owned by First American are entirely separate entities."

First American is under orders from the Federal Reserve to sell its shares that are illegally owned by BCCI front men. The bank currently has adequate capital—the cushion of

See INDEPENDENCE, C8, Col. 4

Independence Bank Closed

INDEPENDENCE, From C1

cash to protect against losses—but has also suffered from real estate losses. Davis and other bank officials returned yesterday from Abu Dhabi, where they asked the bank's majority shareholders to invest more capital.

Independence, a small bank in the San Fernando Valley with $555 million in assets, $530 million in deposits and 14 branches, had a portfolio of so many bad real estate loans and such inadequate capital that it was doomed, sources said.

Fulvio Dobrich, chairman of Independence, said yesterday that in recent days he had contacted officials from the Justice Department, the Federal Deposit Insurance Corp., California banking authorities, the Federal Reserve Board and representatives for BCCI's liquidators to get funds to keep the bank open. He said they had not responded.

"The plea agreement clearly states there are funds available to recapitalize Independence and First American," Dobrich said.

The plea agreement says that the fund can be used to recapitalize the banks or to reimburse the bank insurance fund for any losses it incurs from the sale or closing of the institutions.

"The institution isn't the victim of the crime," said Ira Raphaelson, the Justice Department's special counsel for financial institution fraud. "The regulators who were lied to . . . sustained the loss. The fund is to make sure the depositors and taxpayers don't take a loss."

Deposits at Independence, like all federally insured institutions, are protected up to $100,000 per account by the FDIC, but the FDIC said late yesterday that it would fully protect depositors whose accounts exceed that amount. Because of the plea agreement, the bank insurance fund will be reimbursed by the BCCI fund.

All deposits of Independence will be transferred to First Interstate Bank of California in Los Angeles, which will act as the paying agent for depositors of Independence.

Independence already had received emergency cash to keep operating. In December, BCCI's liquidators provided the bank with $5 million to keep it open through December. But bank examiners this week found that the bank needed additional millions for its reserve for loan losses, sources said.

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BCCI's Calif. Bank Is Closed

WASH POST 1/31/92 P8 C1

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By Sharon Walsh
Washington Post Staff Writer

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First American Bankshares, the District's largest bank holding company, won't be affected by the failure of Independence, banking and regulatory sources said.

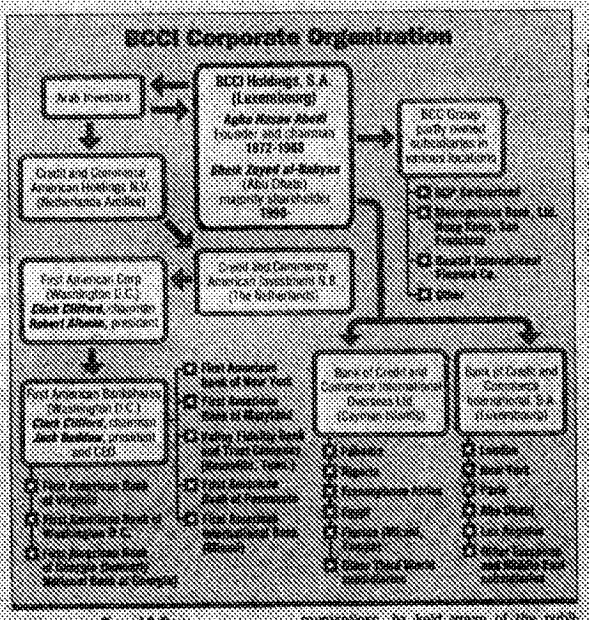
BCCI Scorecard: The Players

By James Rice Anson

Scandal rolls about the Bank of Credit and Commerce International, one of the largest and certainly the strangest privately owned banks in the world. Pakistanis run it; Arab oil sheiks own it; the Duchy of Luxembourg charters it; and until recently it made its home in London. In early 1989, it pleaded guilty to drug money laundering after a long U.S. government sting and a spectacular takedown disguised as a bachelor party for the lead undercover Customs Agent. Then it turned out the bank had been cultivating Washington influence for years, with one of the capital's best known insiders on its payroll.

Now it seems that for nearly a decade, BCCI may have secretly, and illegally, controlled First American Bankshares, the largest bank holding company headquartered in Washington, D.C. The chain, with similarly named subsidiaries in the D.C. region, New York, Georgia and Florida, is held by First American Corp., run by Clark Clifford and Robert Altman. Mr. Clifford helped a group of Arab investors acquire the chain in 1982, after a fourway hostile takeover. As acquisition vehicles, the investors used shell corporations called Credit and Commerce American Holdings, N.V., and Credit and Commerce American Investments, BV. Recent revelations that those shells were purchased with funds from BCCI and then taken as collateral for the loans has fed suspicions that it was BCCI, not the whole transaction was a front to enable BCCI to control a chain of American banks.

Investigations are continuing, but the story may be hard for the newspaper reader to follow. The bank spreads in a confusing global structure. Fraudulent memos spill out in profusion, many familiar and many foreign. The following figures have become involved, whether as goats, dupes or heroes. We offer the list as a guide to the unfolding scandal. As they say, you can't tell the players without a program.



Agha Hasan Abedi

Pakistani banker and visionary. Founded BCCI with Arab backing in 1972, after the Bhutto regime nationalized private banking in Pakistan. An inspiring leader, he attracted a generation of Pakistani bankers disaffected with nationalization. A semi-invalid since a heart transplant in early 1988, he lost control of BCCI in 1990.

Agha Hasan Abedi

Sheikh Zayed al-Nahyan

Illiterate ruler of Abu Dhabi, one of the United Arab Emirates. Very close to Abedi even before the founding of BCCI. Receives up to a billion dollars a month in oil revenues as personal income, most of it handled by BCCI. Recapitalized BCCI in 1990 and now controls an estimate 56% of the stock in BCCI Holdings.

Sheikh Zayed

Clark M. Clifford

Washington lawyer and fixer. Confidant of presidents since 1945. Senior partner at Clifford and Warnke, the ultimate insiders' law firm. Hired in 1978 by Arab investors trying to take over First American Bankshares previous incarnation, the Financial General Bankshares chain. In 1982, he was asked by Kamal Adham to become chairman of First American Bankshares.

Kamal Adham

Saudi investor in BCCI and First American Bankshares. Half-brother of Hind, ex-wife of the late King Faisal of Saudi Arabia and the most influential woman in the Kingdom. As head of Saudi intelligence, he was the late King Faisal's most trusted foreign policy adviser. In a 1978 report on the Boesky "questionable payments" scandal, The Wall Street Journal said that he was paid "many millions of dollars in commissions" by Boesky to persuade the Egyptian government to buy its planes.

Robert Altman

Law partner and protege of Clark Clifford. Handled legal work for BCCI, including defense of BCCI officers at their 1990 Tampa money laundering trial. Married to Linda Carter of TV's "Wonder Woman" series.

Jimmy Carter

The former president. Friend of Agha Hasan Abedi, who contributed heavily to his favorite service organizations.

T. Bertram Lance

Georgia banker and political adviser to Jimmy Carter. Federal budget director until forced to resign in 1977 amid investigation of his banking practices. In 1978, he was paid by BCCI to guide a group of Arab investors that tried to take over Financial General Bankshares in Washington, D.C. Later sold his National Bank of Georgia in Atlanta to Ghaith Pharaon, at one time a major figure in BCCI.

Ghaith Pharaon

Son of Rashad Pharaon, Syrian-born physician and adviser to Ibn Saud, the king who founded Saudi Arabia. Prominent investor and broker with global interests. Bought National Bank of Georgia from Bert Lance in 1978, and sold it to First American Bankshares in 1987. Also bought Independence Bank in Encino, Calif. Now under investigation as a suspected "front man" for BCCI.

Ghaith Pharaon

John F. Kerry

Junior Democratic senator from Massachusetts. As chairman of the Senate Foreign Relations Subcommittee on Terrorism, Narcotics and International Communications, he held many of the publicized hearings on the Nicaraguan contras, Panama's Manuel Noriega and the Iran-Contra affair, which led his staff to begin investigating BCCI in 1988. At the same time, Kerry became chairman of the Democratic Senatorial Campaign Committee, which received large contributions from BCCI insiders, including Clark Clifford. The BCCI investigation lapsed until last March, when Kerry held a day of hearings under the aegis of the Senate Banking Committee.

David Paul

Miami based chairman of Cropfield Barings, 50% owned by Barings, now possibly the largest of the S&L failures. BCCI is accused of parking a large loan to help keep Cropfield afloat. Ghaith Pharaon was the largest outside shareholder in Cropfield. Paul contributed $10,000 to the DSCC and became its co-chairman while Kerry's subcommittee staff was investigating BCCI.

Jack Blum

Washington lawyer and investigator. Senior staff counsel at Senate investigations, hired by Sen. Kerry's Foreign Relations subcommittee to run the contra-Noriega money laundering hearings. Prepared for public hearings on BCCI in 1988, but Clark Clifford pulled strings with Senate Foreign Relations chairman Claiborne Pell to stall production of crucial documents past the expiration date of Blum's contract with the subcommittee. The hearings were never held.

Robert W. Morgenthau

Manhattan District Attorney. Son of 1930's secretary of the Treasury. U.S. Attorney for Southern District of New York until 1978. First elected district attorney, a county position, in 1974. Opened his own investigation of BCCI and its New York operations in 1989 after a former Kerry staff member told him the federal government was stymied. As a Senate hearing in May, complained about lack of access to federal informants.

Charles McC. Mathias Jr.

Former Republican senator from Maryland. Washington lawyer and one of two outside directors on the six man board of First American Bankshares. Files the seat once held by the late Stuart Symington, former Democratic senator from Missouri.

Charles B. Shuman

Former president and chief executive officer of Kuwait Enterprises, Kuwait. The other outside director of First American Bankshares.

Jamal Khan

Pakistani associate of BCCI money laundering trial in Tampa. Found guilty of perjury and now serving a 30 year sentence. One of Abedi's longest associates. Left Bank of Credit and Commerce International (Overseas) Ltd. (Cayman Islands) to assist Abedi in founding BCCI. Reportedly handled real estate for Pakistan's immigrant Muhajir Koreshi, Zayed's President Alan Ladaki and others.

Manuel Noriega

Panama's dictator of Panama, deposed by U.S. military operation in 1989. Received cash in Miami Beach hotel on drug smuggling charges. Kept secret account in BCCI for payments to military colleagues. Pleads innocent to charges.

Nora Gorrin

Latina president of Paris from 1981 to 1986. During the term, he played hardball at millions of dollars of Paris's central bank reserves with BCCI in Panama, in shady deals that Paris's auditors in Washington at Paris's behalest. A few months before this arrangement, and in connection with other BCCI accounts, property held by members of the Gorrin family.

Carlos Menem

President of Argentina. Responsible for scandal over alleged money laundering by his former brother-in-law, the Yoma family. Also under attack for alleged favoritism to BCCI shareholder Ghaith Pharaon who is acting for Argentine diplomats.

Shareholders in First American Bankshares

These are some of the figures who contributed to or solicited investors during the Senate Committee on Financial Control Commission in 1978. No investigation was ever taken against them to find were not, but as interest and whether they were in indicted and convicted by BCCI.

Kamal Adham

See above.

Faisal Saud al-Faisal

Chairman of state owned Kuwait Airways from 1961 to 1977. Indicted by Federal Trade Commission in 1978 for an overbilling of $46,000 in airline tours. Pleaded guilty and was fined $5,000. Chairman of Kuwait International Finance Company, a BCCI affiliate which, according to Kerry staff's Washington business manager, gave $20 in unexplained fees of $1.2 million to buy First American stock.

Khalid Bin Mahfouz

Saudi scion of banking and Mahfouz, founder of Saudi Arabian al Commercial Bank, the Kingdom's largest private bank and one of the world's top 1,000 banks. Mahfouz family purchased owned 20% of BCCI and Khalid sat on the board of directors of BCCI (Overseas) Ltd. In 1986, the family sold its shares to Sheikh Zayed.

Abdulaziz Kamhawi

Until 1985, head of Abu Dhabi's Private Department, which handled Sheik Zayed's personal investments. Fired that year and joined BCCI. Quit several years later after the bank lost millions in uncovered losses in foreign trades. Has hired an investor in financial General (now First American) takeover in late 80s.

Mike Abramowitz

Other former investors identified during the four year takeover of Financial General Bankshares included Mohammed al-Fayed, a Lebanese business figure whose wife is known, Abdul Raouf Kadhi, a Saudi real estate and commercial investor, Adnan Khashoggi, a Saudi businessman, Ali Reza Seyed Shaykh, an Iran Shah Pahlavi associate, Sheik Hamad bin Essa al-Khalifa, ruler of the emirate of Bahrain, Sheik Mohammed bin Rashid al-Maktoum, ruler of Dubai, one of the United Arab Emirates, and Sheik Hamad bin Isa al-Khalifa, ruler of Bahrain, all of whom have invested in BCCI (Overseas) Ltd.

Other BCCI Figures

Ghassan Tarzi al-Shakarchi

Successor to Ghassan Shakarchi as Sheik Zayed's Private Investment Agent. Also has been granted by Sheik Zayed broad powers of attorney to manage all of BCCI Holdings' assets in the U.S. on behalf of directors of BCCI Holdings (U.K.).

Kabir Lalani

Manager of a BCCI subsidiary in Abu Dhabi. Named acting chief executive officer in 1990 after resignations of Abedi and Swaleh Naqvi. Abedi's stand-in as CEO shortly before Lalani's appointment, BCCI moved headquarters from London to Abu Dhabi.

Mr. Adams is writing a book about BCCI.

Elderly Are Loath to Sell the Family Homestead

As families grow older, they often find that their wealth consists mainly of their house. Some of the elderly find this a single problem: They sell the house and move into an apartment or otherwise cut down their investment in housing. They wind up with money that they can invest in the market or simply the cash to enjoy their lives.

But there are problems. Many people have grown accustomed to their houses, their friends, their old neighborhoods. They don't want to move.

[illegible] circumstances, there would be little change in housing wealth on average," they write.

That conclusion is based on data from the Retirement History Survey, a venture organized by the Social Security Administration and conducted by the Bureau of the Census. The survey covered families headed by people between the ages of 58 and 63 in 1969. The families were interviewed every two years between 1969 and 1978. Then the survey was dropped, apparently partly because of concerns about privacy, concerns that hadn't been so common in 1969.

of home in many areas. And even if the exemption is adequate, the homeowner must remember that this is a one-time affair. If the move turns out to be a mistake, the next time there will be no exemption.

There are other reasons why most elderly homeowners have no interest in withdrawing the equity in their homes, either by getting a reverse mortgage or by selling the house.

The Yeah-Wise study notes that most of the elderly simply have no great need for liquidity. Their incomes generally are

FD-350 Rev. 5-8-87

Indicate page, name of newspaper, city and state.

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Date 6-13-91
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WALL ST. JOURNAL

Title:
BCCI SCORECARD:
THE PLAYERS

Character.
or
Classification:
Submitting Office

Indexing.

b6
b7A
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See attached article

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FD-350 (Rev. 5-8-81)

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(Indicate page, name of newspaper, city and state.)

Date: 7/15/91
Edition: Wall Street Journal

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Classification:
Submitting Office:

Indexing:

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Fed Seeks to Bar BCCI Leaders And Pharaon

By Peter Truell
Staff Reporter of The Wall Street Journal

WASHINGTON—The Federal Reserve sought to bar from U.S. banking three former top officers of BCCI Holdings (Luxembourg) S.A. and Saudi Arabian investor Ghaith Pharaon for BCCI's alleged illegal acquisition of Independence Bank of Encino, Calif.

The Fed, which has referred the matter to the U.S. Justice Department for possible criminal prosecution, said it has deferred assessing any civil penalties against BCCI, which was seized by regulators in several countries on July 5, and the individuals involved pending completing of the Justice Department inquiry. The Fed plans to hold a hearing in September before determining any enforcement action.

Meanwhile, government and congressional investigators are starting to focus on BCCI's links to the Central Intelligence Agency and also to the Iran-Contra affair. It has been clear for months that the CIA maintained accounts at the bank, which were used to finance covert activity.

In 1984, using Mr. Pharaon as a front man, BCCI's officers illegally acquired Independence Bank for about $23 million, according to the Fed. "Secret arrangements" were made by senior officials of BCCI to have Mr. Pharaon acquire Independence Bank on behalf of BCCI, the Fed alleged, and "to conceal the transaction from the Federal Deposit Insurance Corp., the Federal Reserve and state regulators in violation of the Bank Holding Company Act and other laws."

The three former BCCI officers concerned are Agha Hasan Abedi, the bank's founder and chairman; his protege Swaleh Naqvi, chief executive; and Kemal Shoaib, a senior officer who became chairman of Independence.

The Fed charged that BCCI, acting through one of its Cayman Islands units, International Credit & Investment Co. (Overseas), agreed under contract with Mr. Pharaon that he would hold 85% of the stock of Independence as a fiduciary for ICIC. In addition, the Fed charged that Mr. Pharaon made false statements in regard to his dealings representing himself as the true buyer of Independence.

Mr. Pharaon, who has homes in the U.S., France, Saudi Arabia and Pakistan, has recently declined to return telephone messages. His New York attorney Richard Lawler said in a telephone interview Thursday that Mr. Pharaon has done nothing wrong, but he declined to comment further. Mr. Lawler didn't return a telephone call made after the Fed released details of its planned enforcement action late Friday.

The other three men couldn't be reached for comment. Mr. Abedi, who retired from the bank after suffering heart trouble in 1988, is in Pakistan; Mr. Naqvi is in Abu Dhabi, and Mr. Shoaib is in London, according to former colleagues. A lawyer at Patton, Boggs & Blow, the Washington law firm that has recently represented BCCI, declined on Friday to comment to questions concerning BCCI, instead referring calls to the bank's receiver in the Cayman Islands. The receiver, however, said he couldn't comment until he had reviewed all the relevant paperwork.

Independence Bank's chief executive Fulvio Dobrich said yesterday that since his arrival at the bank more than a year ago, neither he nor the directors "have received any directives from either Mr. Pharaon or BCCI." He added that media coverage linking the bank through Mr. Pharaon to BCCI "has done very considerable damage to Independence." He said the attention has caused "loss of customers, inability to attract prospective customers, loss of funding and trading facilities, and loss of employees." He also said that it has scared away potential investors from the bank.

BCCI, a $20 billion private bank that was seized by regulators in Britain, the U.S. and five other nations on July 5, has come under increasing scrutiny in recent years. The Bank of England, which orchestrated the international seizure of BCCI, cited "widespread fraud going back many years," as the reason for closing the bank's British operations.

BCCI, which also covertly held a stake in the parent of First American Bankshares Inc., Washington's largest bank-holding company, has come under increasing scrutiny in recent years for a growing number of alleged illegal acts, including money-laundering, violating various banking and foreign-exchange regulations, and involvement with arms and drug smugglers.

Meanwhile, investigators are focusing on BCCI's links with intelligence agencies and the Iran-Contra affair. A Senate investigation of BCCI led by Sen. John Kerry (D., Mass.) will hold hearings later this month to look into the bank's ties to intelligence agencies, as well as the bank's considerable relationships with the central banks of many developing nations, especially in Africa and Latin America.

In recent years, it has been alleged that the CIA and other intelligence agencies used BCCI to make secret payments and that the bank had a role in helping to hide covert shipments of weapons to Iran.

Some circumstances have attracted the interest of investigators. For example, Rahim Irvani, an Iranian associate of BCCI who fled his country after the 1979 Iranian revolution, apparently set up a consultancy with former CIA Director Richard Helms in Washington in 1980, Senate investigators contend. Mr. Irvani couldn't be reached for comment yesterday.

Separately, Senate investigators are intrigued that Tampa District Attorney Robert Genzman, who negotiated BCCI's guilty plea to money-laundering charges in January 1990, had previously served as associate minority counsel on the House Select Committee to investigate covert arms transactions with Iran. Mr. Genzman couldn't be reached for comment over the weekend.

BI/DOJ

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FEDERAL BUREAU OF INVESTIGATION
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Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/17/91

From : SSA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et al
FIF; FAG
(OO:WMFO)

Sub A.....Outgoing Teletypes/Fax
Sub C.....1As
Sub D.....FD-302s and Inserts
Sub F.....Financial Matters
Sub G.....Atlanta - (National Bank of Georgia/BCCI)
Sub H.....Bulky Exhibit Forms (FD-192)
Sub I.....Ghaith R. Pharaon - Interredec, Inc.
Sub L.....Los Angeles (Independence Bank - BCCI)
Sub M.....Miami - (Centrust/BCCI activity)
Sub N.....Results of Customs [redacted] Joint, Money-laundering Investigation in Middle District of Florida b7E
Sub O.....Results of Investigation by Board of Governors of the Federal Reserve System
Sub P.....Press Coverage
Sub Q.....Subpoena
Sub R.....Incoming Teletypes/Fax
Sub S.....Airtels
Sub T.....All other banks (Main Bank/Houston, Bank of the Commonwealth/Detroit)

The purpose of this memo is to open new sub files as noted below.

Sub L - Los Angeles (Independence Bank - BCCI)
Sub T - All other banks (Main Bank/Houston, Bank of the Commonwealth/Detroit).

1 - Main
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ZIG ZIGLAR PITCHES ★ D THRIFT STRIKES OUT ★ T M GAMMON CALLS TIME

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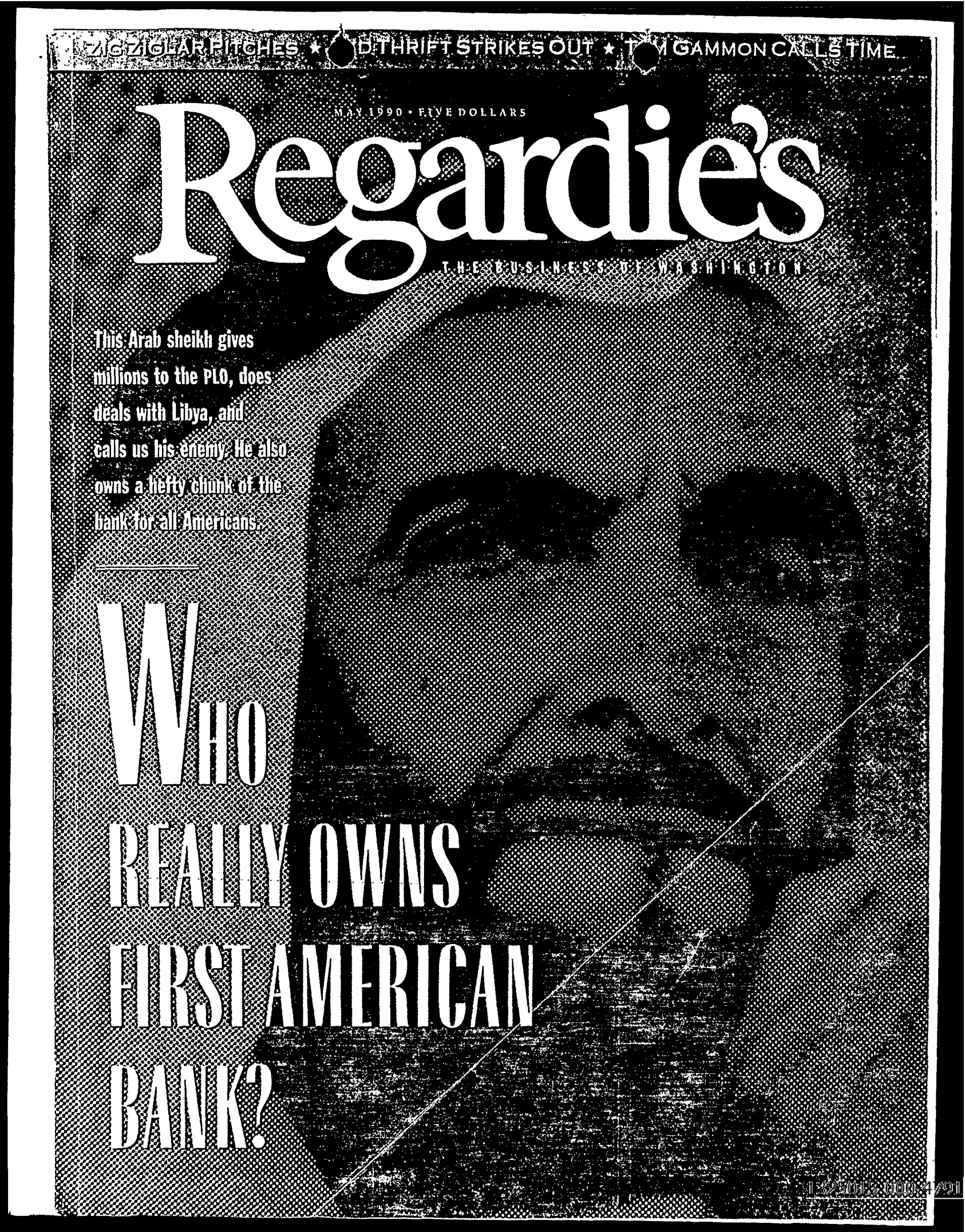
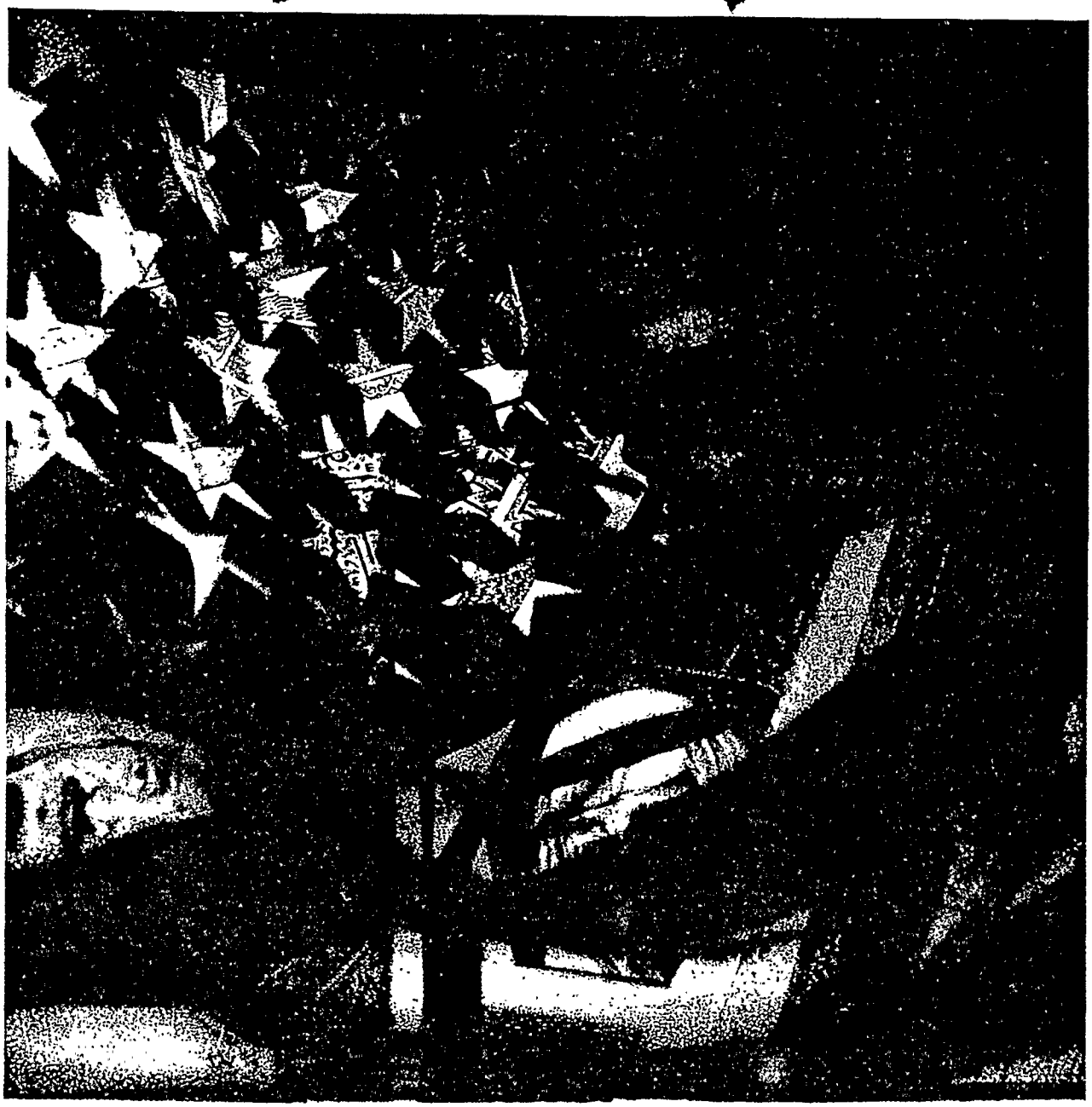
Regardie's

THE BUSINESS OF WASHINGTON



This Arab sheikh gives millions to the PLO, does deals with Libya, and calls us his enemy. He also owns a hefty chunk of the bank for all Americans.

WHO REALLY OWNS FIRST AMERICAN BANK?



THE COMMERCIALS OPEN WITH SHOTS OF FADED PHOTOGRAPHS FROM FAMILY ALBUMS. AS ONE PORTRAIT DISSOLVES INTO THE NEXT, THE VIEWER HEARS SOMEONE

1325015-000-4792

relate his family's version of the American immigrant saga. He describes how an ancestor came to this country imbued with the dreams of most immigrants: a better life, religious or political freedom. The final image is a group shot of the immigrant's descendants. The speaker then identifies his family—the Rogers family of Fairfax, for example, or the Portner family of Silver Spring. Other versions of the commercial have featured such notable Washingtonians as columnist Robert Novak and restaurateur Duke Zeibert. The commercials—a skillful blend of patriotism, nostalgia, and family values—end with a voice-over: "Nearly every family can trace its heritage to one bold first American. We salute the spirit of the first Americans who made this country their own. We're First American—the bank for all Americans."

It's one of the most emotional series of television commercials ever done for a bank—and an indication of the lengths to which First American Bank has gone to capitalize on the patriotic connotations of its name. Its logo, for example, incorporates the Stars and Stripes. In another television spot, the voice-over promotes the bank's "All-American CD" and "All-American Money Market Account" as a fife-and-drum corps pipes up in the background. A few years ago the bank's ads featured the ubiquitous Willard Scott clowning in the guise of such great Americans as George Washington.

Playing sentimental overtures to the American dream is a chestnut of the ad business, but in First American's case the imagery belies at best a certain insecurity and at worst a pattern of deception. The reason: First American Bankshares, the bank's holding company, is 100 percent foreign-owned.

With $11.5 billion in assets, First American Bankshares is the largest bank holding company in the Washington area—about 50 percent larger than second-place Riggs National Corporation. Yet of all the banking giants in the region, First American remains the most mysterious. A group of foreign investors acquired the company in 1982 after one of the longest, costliest, and most acrimonious takeover battles in U.S. history. The board of directors immediately jettisoned the holding company's name,

Larry Gurwin, *a Washington writer, has reported on international finance in the United States, Europe, and Asia for 13 years. He's a former correspondent for* Institutional Investor *and a past winner of the Overseas Press Club of America's award for best international business story.*

AND THE OWNERS ARE...

Sheikh Zayed bin Sultan al-Nahayan and family; Abu Dhabi Investment Authority. Zayed, the absolute ruler of oil-rich Abu Dhabi and the president of the United Arab Emirates, owns 11.76 percent of First American Bankshares. He was the first Arab leader to use oil as a political weapon during the 1973 Arab-Israeli war, has channeled millions of dollars to the PLO, and recently branded the United States "our number-two enemy" (after Israel). Zayed's eldest son and heir apparent, Crown Prince Khalifa, owns from 5 to 10 percent of First American; the Abu Dhabi Investment Authority, which Zayed's family controls, owns another 5 to 10 percent. Zayed and six relatives own 25.23 percent of BCCI; ADIA owns 10.42 percent. The family's estimated net worth in 1989: $1.5 billion.

STAKE IN FIRST AMERICAN: 21.76%-31.76% STAKE IN BCCI: 35.65%

Kamal Adham; Adham Corporation. Adham, a hugely wealthy and powerful Saudi Arabian businessman, has been described as "the godfather of Middle Eastern intelligence." As the late King Faisal's right-hand man, he was in charge of the country's intelligence and security services at a time when the royal family was ruthlessly suppressing political opposition. Over the years the ultrasecretive Adham also parlayed his political connections into huge "commissions" as an agent for such major corporations as Boeing and Lockheed. Estimated net worth in 1981: $255 million.

STAKE IN FIRST AMERICAN: 17.63%-22.63% STAKE IN BCCI: 2.94%

Khalid Salem Bin Mahfouz and brothers. In 1986 Khalid Bin Mahfouz, one of Saudi Arabia's most prominent businessmen, bought into First American and, with his four brothers, into BCCI. Soon after he joined BCCI's board of directors. The Bin Mahfouz family also controls National Commercial Bank, the largest bank in Saudi Arabia. The family's estimated net worth in 1989: $1.5 billion.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 20%

Faisal Saud al-Fulaij. From 1964 to 1977 Fulaij was the chairman of Kuwait Airways, the state-owned airline. In the late 1970s the Federal Trade Commission identified him as the recipient of at least $300,000 in bribes from Boeing; Fulaij denied the allegation. Fulaij paid for his first block of First American stock with a $3.55 million unsecured loan from the Kuwait International Finance Company, a BCCI affiliate that he chaired. Estimated net worth in 1981: $70 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 1.53%

Mohammed M. Hammoud. Hammoud is identified on the First American shareholder list only as a resident of Lebanon. Net worth: unknown.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI[2]: 3.56%

Abdul Raouf Khalil. In documents filed with the Federal Reserve Board in 1981, Khalil is described as a Saudi businessman "engaged in the maintenance of communications, computer, and electronic projects." In 1986 the *Arab News* identified him as an owner of Saudi Security and Technical Services Company. Estimated net worth in 1981: $50 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI[2]: 3.08%

Ali Mohammed Shorafa. In documents filed with the Fed in 1981, Shorafa is described as the "director general of the presidential court" in Abu Dhabi. (In October of the same year columnist Jack Anderson named an "Ali Shorafa" of Abu Dhabi as the silent partner and financial backer of a little-known company called Tersam, which had won an exclusive contract to ship American arms to Egypt in the wake of the 1979 Camp David peace accords.) Net worth: unknown.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI[2]: 0.57%

Sheikh Humaid bin Rashid al-Naomi. Sheikh Humaid is the crown prince and deputy ruler of Ajman, the tiniest member of the United Arab Emirates. "Ajman has no visible source of significant revenues other than those which come directly from the federal government into the ruler's account in the local bank," the *Financial Times* noted in 1986. Estimated net worth in 1981: $50 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 0%

Sheikh Hamad bin Mohammed al-Sharqi. Sheikh Hamad has been the ruler of Fujaira, another member of the UAE, since the death of his father in 1975. Estimated net worth in 1981: $45 million.

STAKE IN FIRST AMERICAN: 5%-10% STAKE IN BCCI: 0%

TOTAL STAKE IN FIRST AMERICAN: 98.25% TOTAL STAKE IN BCCI: 67.33%

[1] *Ownership percentages are derived from a First American list dated December 31, 1988 and a BCCI list dated October 31, 1988*

[2] *These shareholders are listed by BCCI as Mohammed Hammoud, Rauf Khalil, and Ali Shorafa.*

PHOTOGRAPHS AP/WIDE WORLD PHOTOS

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Financial General Bankshares, and replaced it with First American, a name that had been used by some of its subsidiary banks.

Since then First American has gone to extraordinary lengths to conceal the names and backgrounds of its foreign owners. Its lawyers persuaded the Federal Reserve Board to withhold from the public all documents that listed the company's shareholders—a seven-year veil of secrecy that was lifted only when *Regardie's* convinced the Fed that it should reverse its policy. And when the company was sued by some former shareholders of its Virginia subsidiary, its lawyers asked that the jury not be told the names or nationalities of the company's owners—or even that the company was foreign-owned.

After an in-depth investigation, *Regardie's* has learned that First American may have good reason to mask its foreign connections. Some of its major shareholders have backgrounds that could alienate or anger some of its customers and employees as well as invite renewed scrutiny by federal and state authorities.

Kamal Adham, First American's biggest shareholder, was the chief of Saudi Arabia's intelligence agency for more than a decade. During his tenure, political opponents of the ruling al-Saud family were tortured or killed, according to human rights organizations. As the head of the secret police, he played a key role in suppressing opposition to the regime. He was also a close adviser to the royal palace and a high-ranking government official at a time when Saudi Arabia had become the largest contributor to the Palestine Liberation Organization. Adham juggled his government service with a career as a businessman, from which he earned hundreds of millions of dollars. Much of his work has consisted of collecting "commissions" from defense contractors and other foreign companies that had done business in the Middle East.

Sheikh Zayed bin Sultan al-Nahayan, the ruler of Abu Dhabi and the president of the United Arab Emirates, is another leading shareholder of First American Bankshares. When Arab oil-producing nations cut off oil to the United States in 1973 (because of American support for Israel), Abu Dhabi was the first country to declare an embargo. Zayed is a major contributor to the PLO and a business partner of Libyan leader Moammar Qaddafi.

Faisal Saud al-Fulaij, a Kuwaiti businessman and another prominent shareholder, allegedly lined his pockets by taking bribes from Boeing Company when he was the chairman of Kuwait Airways. The Federal Trade Commission alleged that he accepted at least $300,000 in payoffs from Boeing. Fulaij has denied the allegation.

What's more, the investors who own First American Bankshares also own a controlling interest in Bank of Credit and Commerce International, a Luxembourg bank that has numbered among its clients former Panamanian dictator Manuel Antonio Noriega, who's awaiting trial in Florida on federal drug charges. In January of this year BCCI pleaded guilty in Florida to federal criminal charges that it had laundered drug money. Five BCCI officers are on trial on similar charges.

Both First American and BCCI say that there's absolutely no connection between the two institutions other than some overlapping shareholders. Robert Altman, the top executive of First American and a lawyer for BCCI, told the *Washington Post* in October 1988 that "the overlap is not as great as you might think."

Regardie's has determined, however, that the ties between First American and BCCI are much closer than either institution would have the public and bank regulators believe. Here are just a few of the links:

- BCCI used First American's Washington bank to transfer at least $500,000 worth of Noriega's funds from 1985 to 1987, according to government sources.
- Agha Hasan Abedi, BCCI's founder and president, orchestrated the takeover of First American.
- Shortly after the takeover bid was launched, Abedi told a reporter that if the bid succeeded BCCI would probably run First American.
- First American's shareholders include borrowers from BCCI, personal friends of Abedi's, a director of BCCI, and a longtime executive of the BCCI group.
- Government investigators disclosed in 1988 that a senior BCCI official had told an undercover agent that BCCI owns and controls First American.
- First American's shareholders and their families control more than two-thirds of BCCI's outstanding shares.
- Moreover, the two men who claim to run First American—Clark Clifford, the éminence grise of Washington's power brokers, and Robert Altman, his protégé at the law firm Clifford & Warnke—have represented BCCI for 12 years. When a U.S. Senate subcommittee investigated the BCCI-Noriega connection in 1988, Altman handled the negotiations with the committee. Clifford, then the chairman of First American Bankshares, and Altman, then the president of First American Corporation, also assisted BCCI in the drug-money case.

The relationship between the two banks is so close, some sources within BCCI say, that many employees regard the U.S. institution as an affiliate—a member of "the BCCI group." A few go so far as to say that First American may be secretly—and illegally—controlled by BCCI, with the Middle Eastern shareholders acting as front men. *Regardie's*, however, has found no evidence that this is the case.

In an effort to determine exactly who owns Washington's biggest bank holding company, *Regardie's* conducted dozens of interviews, reviewed court documents from some of the takeover-related litigation, and examined documents obtained from the Federal Reserve Board through the Freedom of Information Act. When it approved the acquisition nine years ago, the Fed wasn't fully aware of the controversial backgrounds of the foreign investors and the extent of their relationships with BCCI. It approved the deal based on assertions by Clifford and Altman that the leading investors were well-known businessmen with impeccable credentials. ▸

THE NORIEGA CONNECTION

In the mid 1980s Amjad Awan, who was Manuel Noriega's personal banker at BCCI, worked around the corner from First American's Washington headquarters. According to information obtained by government investigators, Awan managed the transfer of millions of dollars for Noriega through BCCI's global network, through several Swiss banks, and through First American Bank in Washington.

Regardie's has learned that at least $500,000 was transferred from several of Noriega's BCCI accounts into a BCCI account at First American. Additional amounts totaling more than $250,000 were wired simply to "BCCI Washington." In some cases, investigators say, Noriega himself signed letters that ordered the transfers to First American.

Awan later told a federal undercover agent that he considered First American to be under the control of BCCI.

In a statement to *Regardie's*, First American said that it "has never had any banking relationship of any kind with Manuel Noriega, nor has it ever knowingly handled any funds of Manuel Noriega." BCCI declined comment.

PHOTOGRAPH UPI/BETTMANN NEWSPHOTOS

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Sheikh Zayed (right), the First American shareholder who's called the United States the "number-two enemy" of the Arab world (Israel is number one), has embraced Moammar Qaddafi for more than political reasons. Their governments are partners in Arab Banking Corporation, which recently opened a branch in New York City.

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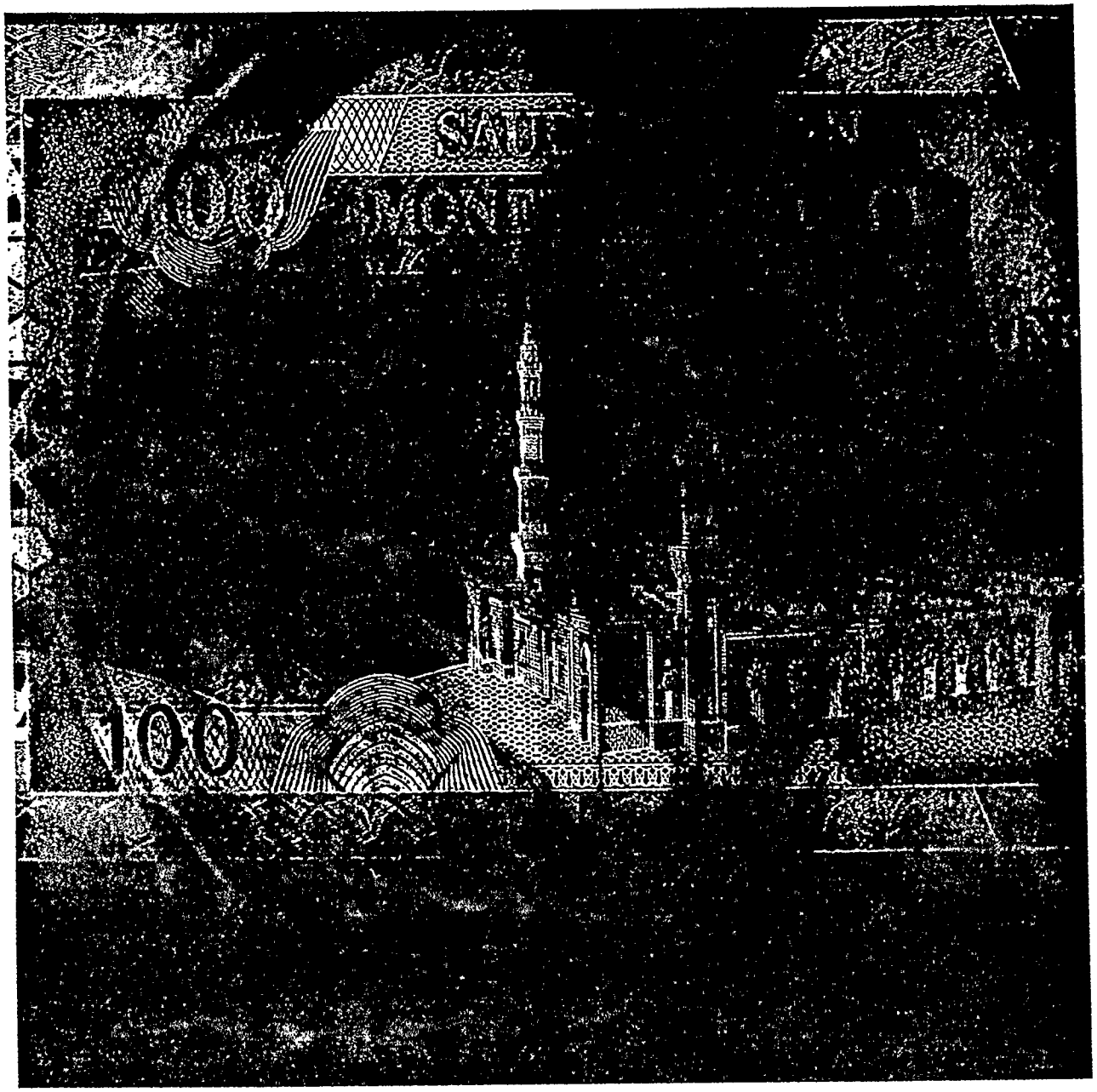

THE FINANCIAL GENERAL BANKSHARES, AS FIRST AMERICAN USED TO BE KNOWN, TRACES ITS ROOTS BACK TO THE MORRIS PLAN, A PIONEERING CONSUMER-LENDING BUSI-

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ness. Arthur Morris, its founder, began his banking career around the turn of the century by making small installment loans to working people—a practice virtually unknown at the time. In 1910 he founded the first "Morris Plan" bank: Fidelity Loan & Trust Company of Norfolk, Virginia. Within 10 years Morris Plan banks were operating in 37 states. In the 1940s and 1950s the company became a financial conglomerate, with interests in such areas as insurance and mortgage banking.

Financial General was an institution with special privileges, a holding company ahead of its time. Although federal banking law sharply restricted interstate banking, Financial General, thanks to a grandfather clause, enjoyed an immensely valuable exemption. By the mid 1970s it controlled banks in Georgia, Maryland, New York, Tennessee, Virginia, and the District of Columbia.

In January 1975 Financial General installed a dynamic Georgia banker as the president of its National Bank of Georgia. During the next few years he would buy control of NBG, leave the bank for one of the most powerful posts in the federal government, quit the government in the midst of a financial scandal, sell NBG to an Arab investor, and then join forces with Arab investors in a scheme to accumulate stock in the bank's former parent company.

The banker's name: T. Bertram Lance.

Bert Lance began his banking career in 1951 as a teller at Calhoun National Bank, a small rural bank that had been founded by his wife's grandfather. Seven years later he and a group of investors bought control of the bank, and he ultimately became its chairman.

Lance backed Jimmy Carter in his 1970 campaign for governor and was later put in charge of reorganizing the state's government. In 1975, shortly after Carter had left the statehouse, Lance and a group of investors bought control of National Bank of Georgia from Financial General Bankshares.

Lance never fit the image of the conservative banker. His lending policies were very liberal—particularly, it was later alleged, when the borrowers were his friends and relatives. Lance's bank was the biggest single lender to Jimmy Carter's peanut warehouse, which once owed NBG $4.7 million. Moreover, he apparently found it difficult to draw a clear line between his personal financial affairs and the affairs of the bank. For example, he financed his purchase of NBG's stock with loans from two big New York banks and then arranged for NBG to open correspondent banking accounts with them. ▸

WHAT THE BANK SAYS

In response to questions from *Regardie's*, First American officials say that they will not comment on the names or backgrounds of the bank's owners, contending that it is not "a legitimate area of inquiry."

In one of several letters to the magazine, John W. Vardaman, Jr., an attorney with Williams & Connolly, said, "During the acquisition proceedings for First American, the various bank regulatory authorities, including the Federal Reserve, carefully examined the reputation, character and resources of the investors. . . . Similar allegations to the type you have referenced—i.e., the alleged receipt of questionable payments or support for certain groups and their activities—were considered. The banking agencies found the shareholders to be substantial, reputable persons of good character and standing."

Robert Altman, the chairman of the bank's holding company, said in an interview, "We're not in possession of facts about what their other operations are. We don't know what their political philosophies are, what their personal dealings are."

Regarding First American's relationship with BCCI, bank officials adamantly deny that they are either owned or controlled by the European bank. "This allegation is absolutely false and would, if disseminated, cause serious injury to First American," Vardaman said.

"Practically no business is done" between the two banks, he said.

First American officials wouldn't comment specifically about the common shareholders of the two institutions, except to say that the First American shareholders are "passive" and "are not active in the management of the bank."

A spokesman for BCCI also said that there's no connection with First American. "Certain of the shareholders that own First American have minority stock interests in BCCI," the statement read. "The larger shareholders of First American have relatively small interests in BCCI. The two organizations have different controlling groups of shareholders."

HOW THE BANK DOES

If First American's ownership is controversial, its management seems to be anything but. On the contrary, the bank appears to be a sober, not particularly well-performing institution that's caused little notice in the Washington banking community, other than the past year's shake-up of the bank's top managers.

Clark Clifford, the chairman of First American Bankshares, the bank's holding company, recently stepped down. He was replaced by Robert Altman, who'd been the president of First American Corporation. Jack Beddow, a longtime employee of the bank, has taken over as the president and chief operating officer. He replaced Robert Stevens, who was brought in at the time of the takeover.

Fred Bollerer, the former president of Houston's troubled First City National Bank, was brought in last year to head First American Metro Corporation, the subsidiary that runs the DC, Maryland, and Virginia banks. He replaced Milton Drewer, the bank's best-known executive in the local business community, who retired.

One reason for the changes may be the bank's lackluster performance. In *Business Week* magazine's recent scoreboard, First American was tied for last place with Riggs National Corporation among the area's eight largest banks. First American's return on assets, a key industry standard, was .61 percent, compared to First Virginia Banks's 1.39 percent and Sovran Financial's 1.14 percent. In 1989 the bank earned $61 million for its shareholders, down 11 percent from the previous year.

At the same time, regulators seem to be content with the way First American is run. "The bank is sound and well capitalized; it has no major problems," said Sidney Bailey, Virginia's commissioner of financial institutions, about the Virginia subsidiary. "We have had no criticism of the management and no evidence of interference or attempt to influence the policy of the bank by the Middle Eastern investors."

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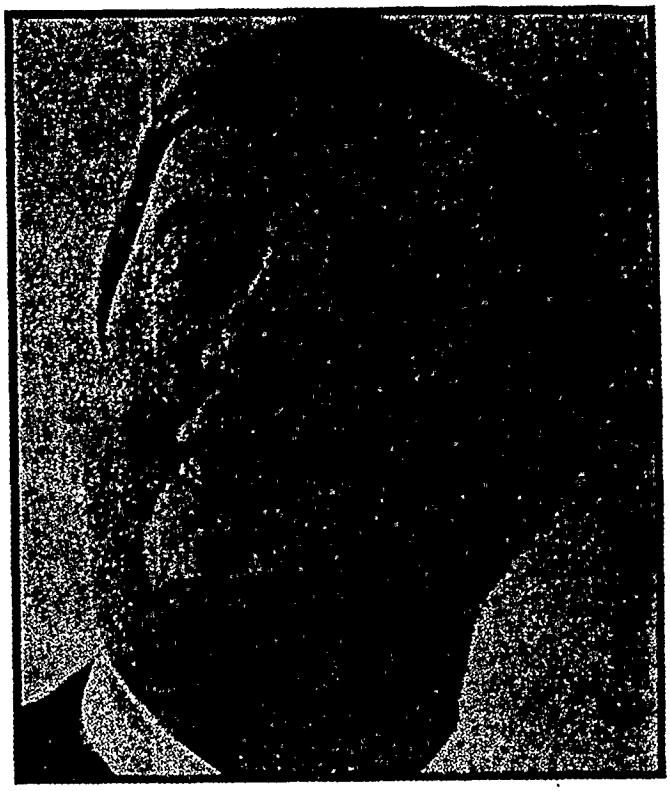
When Carter was elected president in 1976, thanks in part to Lance's support, he appointed Lance to be the director of the Office of Management and Budget. But Lance's loose banking practices soon caught up with him and triggered the first scandal of the Carter administration. He was gone by August 1977.

After years of litigation, the Lancegate affair finally concluded in February 1986. In a settlement with the Comptroller of the Currency, Lance agreed to pay a $50,000 civil fine to the U.S. Treasury. He was also barred from serving as an employee, officer, or director—or otherwise participating in the affairs—of any federally insured bank without the written permission of the appropriate banking agencies. (The story ended on a farcical note: Lance, according to columnist Jack Anderson, paid the $50,000 fine with a rubber check. The hapless Georgia banker eventually paid the fine.)

At the time of his resignation, Lance was in desperate financial straits. He was more than $5 million in debt, and his most valuable asset—his stock in National Bank of Georgia—had plummeted in value. His only hope was to sell the stock at well above the market price. Hope soon arrived in the person of Agha Hasan Abedi, the president of Bank of Credit and Commercial International.



BERT LANCE was President Jimmy Carter's banker and best friend, but by 1977 he was out of the White House and flat broke. Agha Hasan Abedi of BCCI rescued him from his financial plight, hired him as a consultant, and then triggered a hostile and protracted battle for control of First American Bankshares.

IT'S HARD TO IMAGINE A MORE UNLIKELY pair of bankers than Bert Lance and Agha Hasan Abedi.

Abedi was born 67 years ago in Lucknow, India and moved to Pakistan when the country was founded in 1947. He embarked on a career in banking, and in 1959 he cofounded United Bank Limited, which soon became one of the largest banks in Pakistan.

But Abedi was always more than a simple banker. He had an understanding of politics and a knack for making friends in high places. In the 1960s, long before the oil shock created overnight millionaires and billionaires, he courted Arab officials, notably Sheikh Zayed, the ruler of Abu Dhabi, and Sheikh Rashid bin Said al-Maktoum, the ruler of Dubai. (In 1971 Abu Dhabi and Dubai created a federation with five other sheikhdoms called the United Arab Emirates, with Zayed as its president and Rashid as its prime minister.)

Abedi's Arab connections proved to be invaluable when the Pakistani government nationalized the banking industry in 1972. Abedi moved to Europe and founded BCCI, signing up Zayed, Rashid, and other prominent Arabs as shareholders. Armed with this list of VIPs, he managed to persuade Bank of America, the world's largest bank, to buy a large stake as well, which gave BCCI instant credibility.

Today BCCI's main office is in London, but its legal headquarters is Luxembourg. Abedi has run BCCI from the start, and his management team is made up largely of Pakistani bankers. In recent years, however, he's suffered from serious health problems: he had a heart transplant operation in March 1988. His longtime deputy, a fellow Pakistani named Swaleh Naqvi, is now BCCI's chief executive.

Although Abedi's bank started with only $2.5 million in capital, it has grown to be the world's fifth-largest privately held bank. During the late 1970s it was the fastest-growing bank in Britain and was touting itself as the fastest-growing bank in the world. Its total assets soared from $200 million in 1973 to $2.2 billion in 1977. During the same period its network of offices grew from 19 branches in five countries to 146 branches in 32 countries. By the end of 1988 it had more than $20 billion in assets, some 14,000 employees, and 417 offices in 73 countries.

Abedi, according to BCCI insiders, was obsessed with growth. As one source puts it: "Their objective—and they said so openly—was to become the largest bank in the world by the year 2000." With the zeal of an evangelist seeking souls, Abedi exhorted his employees to bring in deposits. He also established a vast international network, with branches and subsidiaries across the globe—even in poverty-stricken African countries that were ignored by other banks.

No banker with Abedi's ambitions, however, could ignore the world's largest economy: the United States'. While BCCI could open branches in the United States, a major acquisition would offer the quickest route to growth.

Lance and Abedi are believed to have met in October 1977 in a Washington hotel. Lance wanted to sell some of his stock in the National Bank of Georgia, and Abedi was a potential buyer.

It would have been illegal, however, for BCCI to buy the stock. Because Bank of America was a large shareholder in BCCI (it pulled out in 1980), such a deal would have violated the ban on interstate banking. But even with Bank of America out of the picture, BCCI was going to be a hard sell to U.S. regulators. Whenever a bank piles on assets very quickly, regulators wonder whether it's being prudently managed. Another cause for concern was that BCCI is incorporated in Luxembourg, which isn't noted for tough banking regulation. Luxembourg also lacks a central bank, which means that no institution is responsible for acting as a lender of last resort if BCCI suffers liquidity problems.

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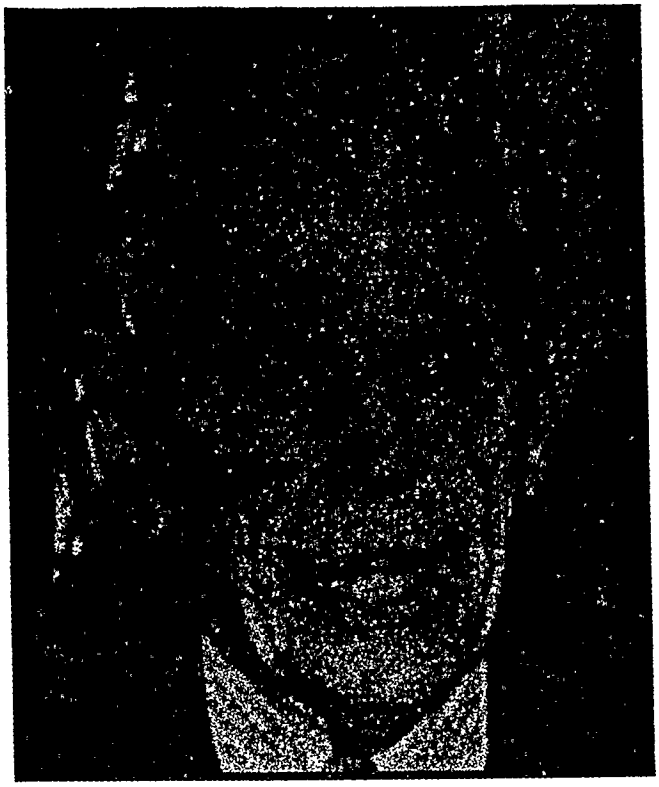
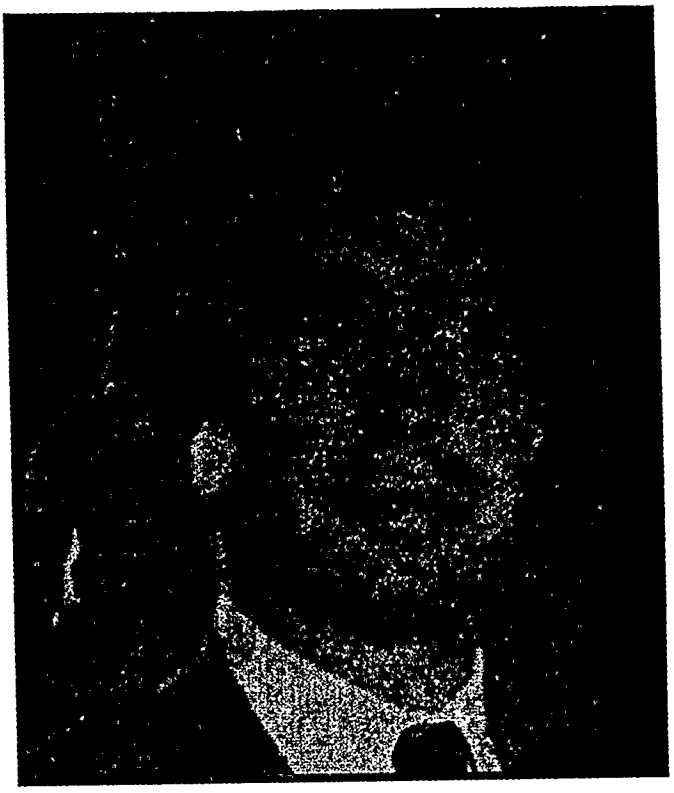


When Abedi and his Middle Eastern clients were charged with violating U.S. securities laws in connection with their stock purchases, they hired Lance's supremely well-connected lawyer, CLARK CLIFFORD. After he got Abedi and the Arab investors out of legal trouble, guess who wound up as the chairman of First American?



First American's Arab owners now rely on ROBERT ALTMAN, Clifford's protégé, as their man in Washington. Altman runs the show, tries to keep their names out of the news, and works on the side as a lawyer for BCCI. Four months ago BCCI pleaded guilty to criminal charges that it had laundered drug money.

The Bank of England later sent clear signals that it regarded BCCI as something less than a blue-chip institution. In 1978 it forbade BCCI from opening any new branches in the United Kingdom.

Although BCCI itself couldn't buy Lance's bank stock, one of its *clients* could, and Abedi quickly found one. In late 1977 Ghaith Pharaon, a Saudi businessman, agreed to buy 60 percent of Lance's stock at $20 a share. A few weeks earlier the stock had been trading for about $10 a share. Pharaon later acquired 100 percent of NBG.

Lance and Pharaon portrayed the deal as a routine investment, but skeptics abounded. Of the roughly 15,000 banks in the United States, it seemed odd that Pharaon happened to choose a bank that was owned by a close friend, political supporter, and lender to President Carter—and that he would pay top dollar for it. Pharaon, *Business Week* noted, seemed to be "bailing him out to curry favor with President Carter."

Abedi, it was later revealed, did more for Lance than arrange the NBG deal. He also hired him as a consultant and arranged to repay his biggest debt: about $3.5 million that he owed to the First National Bank of Chicago.

One of Lance's duties was to recommend investment prospects to Abedi. And this he did. During the discussions about NBG, Abedi learned that stock was available in a much larger institution: Financial General Bankshares, NBG's erstwhile parent. Some sources speculate that Lance wanted Abedi's help to gain control of Financial General, install himself as its president or chairman, and thus recover from the humiliation of the Lancegate affair. It didn't go unnoticed that FGB's headquarters on 15th Street was just around the corner from the White House.

BY EARLY 1977 A GROUP OF ABOUT 20 investors, led by J. William Middendorf II, a onetime investment banker who'd served as the secretary of the navy under presidents Nixon and Ford, had gained control of Financial General Bankshares. But Middendorf found rough seas in his first months as its chairman and president, and some dissident shareholders began to plot his ouster.

One of them was Jackson Stephens, the head of Stephens, Incorporated, a large securities firm based in Little Rock, Arkansas, who joined up with Lance. According to a complaint later filed by the Securities and Exchange Commission, they recommended to Abedi "that BCCI purchase or recommend FGB common stock to its clients."

At first Abedi wasn't interested, but he soon changed his mind. On December 1 he gave the green light. The shares were to be bought on behalf of BCCI clients.

Abedi's approval touched off a frantic buying spree carried out by Lance, Stephens, and Eugene Metzger, a Washington lawyer. They spent millions of dollars to collect blocks of FGB's stock in private purchases from large individual investors as well as on the open market. By early February 1978 they had purchased about 20 percent of Financial General on behalf of four BCCI clients.

On February 7 Lance met with FGB's top executives: B. Francis Saul II, who'd replaced Middendorf as the chairman the previous month, and Middendorf, who'd retained the title of president. What Lance said at the meeting is disputed. According to Middendorf and Saul, Lance said that he represented a group of investors related to BCCI who'd acquired 20 percent of FGB's stock and that

PHOTOGRAPHS: AP/WIDE WORLD PHOTOS

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BCCI wanted eventual control of the company.

"Lance said that he was acting as a representative of Abedi and BCCI," Saul later said in an affidavit. "Moreover, Lance stated that BCCI 'always wants control.' "

Two days after the meeting, Financial General announced that an unidentified foreign bank had bought a large block of FGB's stock "and may be seeking to obtain control of the company." When newspaper reports appeared the next day, however, Lance called Saul to say that there had been a misunderstanding. The buyers, Lance said, weren't acting as members of a group under the direction of BCCI but were merely acting as individual investors.

Abedi had orchestrated the buy-up of FGB's stock very smoothly—except for one detail. If the investors were acting as a group, they were in flagrant violation of U.S. securities laws. Any investor or investment group that buys 5 percent of the stock of a publicly held company is required to make a public disclosure by filing a 13-D form with the SEC. In what some viewed as a transparent attempt to evade the law, each of the four BCCI clients had bought slightly less than 5 percent of Financial General's stock.

The purchases triggered two lawsuits, one filed by Financial General on February 17, 1978, and the other filed by the SEC a month later. The defendants in the SEC complaint included BCCI, Abedi, Lance, Stephens, Metzger, and the four investors in whose names the stock had been acquired: Kamal Adham; Sheikh Sultan bin Zayed al-Nahayan, one of Sheikh Zayed's sons; Abdullah Darwaish of Abu Dhabi, a financial adviser who represented another of Zayed's sons; and Faisal Saud al-Fulaij.

The BCCI defendants found themselves in immediate need of legal help, and they chose the Washington lawyer whom Lance had retained when the Lancegate affair exploded: Clark Clifford.

LIKE MANY OTHER ASPECTS OF THE First American saga, the story behind Clifford's involvement is a matter of some dispute. In 1984 Robert Altman, Clifford's partner, told a reporter for the *Washington Post* that the relationship didn't come about via Bert Lance but stemmed from the firm's "international practice." In a recent interview with *Regardie's*, however, Altman said, "I think Mr. Lance recommended this firm."

Whatever the case, Abedi and the Arabs had chosen not only a top-flight lawyer but one with superb political connections.

Clifford, who's now 83 years old, came to national prominence during the presidency of Harry Truman. Although his title was counsel to the president, he was described

Former president Jimmy Carter has lobbied U.S. senators to sell arms to Saudi Arabia and has met with Yassir Arafat, the chairman of the PLO. Have his intimate ties to BCCI, a major Arab-owned bank, shaped his view of the world?

First American Bankshares and Bank of Credit and Commerce International are more than casual acquaintances; they're two banks with a close relationship. But why? What's in it for the Middle Eastern owners of First American? Is the bank simply an investment, or is it something more? Given that the BCCI clients who bought First American include current and former officials of Arab governments, the most obvious question becomes: Are there any political motives behind their investments in the U.S. banking industry?

So far there's no indication that First American has been used as a tool to acquire political influence. There are, however, some connections between the bank's owners and American politicians.

When BCCI helped to rescue Bert Lance from his financial plight, there was widespread speculation that the bank or its Arab owners were trying to get close to Jimmy Carter. Not surprisingly, Lance and his newfound friends claimed that they were involved in routine business dealings with absolutely no political strings attached.

Those denials ring hollow today. In the years since Carter's departure from the White House, Agha Hasan Abedi, who's BCCI's founder and president, and former president Carter have become close friends; Abedi has channeled large donations to the Carter Presidential Center and to Global 2000, Carter's pet project, of which Carter and Abedi are the co-chairmen. (BCCI is the organization's largest donor.) Global 2000's British office is located in BCCI's headquarters building in London.

Abedi and Carter have traveled to a number of countries on BCCI's corporate plane. When Abedi was hospitalized in 1988, Carter not only vis-

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as the most powerful figure on the White House staff. He later served as an adviser to presidents Kennedy, Johnson (whom he also served for a year as the secretary of defense), and Carter.

Clifford's political connections have led some observers to view him as a sort of high-class lobbyist/fixer. It's an image that he evidently regards as distasteful. "There is one point I wish to make clear," he once said. "This firm has no influence of any kind in Washington. If you want to employ someone who has influence, you will have to go somewhere else.... What we do have is a record of working with the various departments and agencies of the government, and we have their respect and confidence, and that we consider to be a valuable asset."

In representing the Middle Eastern investors, Clifford led a large team of lawyers that included takeover specialists from New York and Washington lawyers who had years of experience in dealing with bank regulators. His right-hand man was Altman, who'd just turned 31. The two men are so close that Altman has frequently been described as Clifford's "alter ego."

A consent agreement with the SEC was quickly negotiated. Without admitting or denying guilt, the defendants promised not to violate securities laws in the future. The Middle Eastern investors also agreed to make a tender offer of $15 a share to all of Financial General's shareholders.

The consent decree touched off one of the longest and most controversial corporate takeover battles in U.S. history. The management of Financial General Bankshares, led by Saul, fiercely resisted the takeover attempt. In addition to suing Lance and his Middle Eastern associates, it dug up plenty of dirt on BCCI, much of which found its way into the press. One of the most damaging disclosures was that BCCI had made more than $80 million in loans to "insiders"—companies and individuals that were connected to the bank. (Bank regulators have always frowned on insider lending.) Financial General's lawyers also unearthed a document from Bank of America that called BCCI's loan-loss reserves inadequate—a charge that BCCI disputed.

The two sides eventually signed an acquisition agreement in July 1980. But the deal still had to be approved by the Federal Reserve Board, which would make its decision after it heard the views of federal and state bank regulatory authorities.

WHEN A LARGE BANK HOLDING COMPANY is taken over, the new owner is usually an existing bank. In this case, however, Financial General was to be purchased by dummy companies that were owned by individual investors, none of whom was a banker. A further complication was that all the investors

ited him but arranged for a renowned heart specialist, Norman Shumway of Stanford University, to fly to Britain to treat him.

Prominent Arabs have also provided support for Carter's projects, including King Fahd of Saudi Arabia (some of whose relatives are BCCI shareholders) and Adnan Khashoggi, the scandal-plagued arms dealer. Khashoggi is a former client of Clark Clifford's; a friend of First American's biggest shareholder, Kamal Adham; and a client of BCCI's. In connection with his dealing arms to Iran, Khashoggi transmitted $12 million through BCCI's Monte Carlo branch.

Carter doesn't seem to be the sort of man who'd become a mouthpiece for foreign governments, but even the most honorable man will listen sympathetically to the opinions of close friends. And in recent years Carter seems to have moved closer to the Arab point of view. In 1983, for example, he spoke movingly about the plight of Palestinians in the Israeli-occupied West Bank but said nothing about human rights abuses by Arab regimes. In 1986 he lobbied senators to sell arms to Saudi Arabia. And last year he sharply criticized Salman Rushdie for offending Moslems in *The Satanic Verses*.

Another U.S. politician who's popular in the Arab community is Andrew Young, the former mayor of Atlanta. Young served as Carter's ambassador to the United Nations until August 1979, when he was forced to resign for holding unauthorized talks with the PLO. Because of the incident, he's widely viewed in the Arab world as a kind of martyr to America's pro-Israel lobby. During a visit to Saudi Arabia and the United Arab Emirates in 1983, he was accorded VIP treatment. Part of his travel and hotel expenses was paid by the government of the United Arab Emirates, which is run by Sheikh Zayed bin Sultan al-Nahayan, another of First American's leading shareholders. According to a report in the *Atlanta Journal*, Young's hotel bill in Dubai was paid by the National Bank of Georgia, which was then owned by Ghaith Pharaon, a BCCI shareholder. A former NBG official, however, denies it.

There's also a connection between BCCI and Jesse Jackson, the American politician with the most positive image in the Arab world. In one of the more curious developments of the 1988 presidential campaign, Clark Clifford and Bert Lance sponsored a breakfast meeting between Jackson and a group of mainstream Democrats—a meeting that helped to dispel Jackson's image as a radical. Clifford praised Jackson and said that if he were elected, he'd bring to Washington "the best brains the party and the country have to offer." After the breakfast, according to a campaign aide, "Jackson frequently told reporters that Clark Clifford was among his 'top policy advisers.'"

Another prominent Democrat who gave a boost to the Jackson campaign is Fred Dutton, a former aide to John Kennedy who promoted Jackson's vice presidential prospects in an op-ed piece for the *Los Angeles Times*. Dutton has been a registered foreign agent for Saudi Arabia for more than a decade and is considered its leading advocate in Washington. One of Dutton's Saudi contacts is Kamal Adham. In *The American House of Saud*, a book on Saudi lobbying, Steven Emerson writes that when Dutton was angling to get the Saudi contract, he made it clear that he wanted to report to Adham.

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were residents of foreign countries. Could U.S. regulators effectively monitor the new owners?

The regulators also wanted to know what role, if any, BCCI would play in Financial General. Questions about BCCI were raised by the Federal Reserve Board, the Federal Reserve Bank of Richmond, the Office of the Comptroller of the Currency, and Virginia's commissioner of financial institutions.

The lawyers for the Middle Eastern investors had their work cut out for them. They'd have to convince the Fed that Financial General would be run by Americans who had solid banking credentials. And this is exactly what Clifford and Altman did. "The lawyers," says one source, "proposed that there be a buffer in the form of a blue-ribbon board of directors, and the shareholders would basically agree to take a walk." BCCI, they said, would have no involvement in the management of Financial General, although it could act as an "investment adviser" to the Middle Eastern owners.

Clifford and Altman discussed this formula with bank regulators at an extraordinary April 1981 meeting at the Federal Reserve's headquarters. *Regardie's* has obtained a transcript of the meeting through the Freedom of Information Act. Although some passages have been censored, it appears that the missing information deals with the personal finances and business holdings of the Middle Eastern investors.

If the takeover were approved, Clifford said to the regulators, control of Financial General would be vested in a board of directors that would consist of distinguished U.S. citizens, including former senator Stuart Symington. Clifford had managed Symington's 1956 presidential campaign and had enlisted his old friend's legal services during the takeover battle. To run the company on a day-to-day basis, he said, the directors would choose "a top, very well regarded commercial banker [as] president and CEO"—someone with 25 or 30 years' experience.

As for BCCI, Clifford said: "There is no function of any kind on the part of BCCI. I know of no present relationship. I know of no planned future relationship that exists." Referring to the dummy companies that would be used as vehicles for the acquisition, Altman said that "there is no connection between those entities and BCCI in terms of ownership or other relationship."

On the positive side, Clifford said that the Middle Eastern investors planned to inject additional equity into Financial General. There is, he said, "a growing feeling among many thoughtful and experienced Americans that it is in the interest of our country . . . to bring back to the United States as many of the dollars as we can that through the years we send over to the OPEC countries."

One regulator who asked tough questions at the meeting was Sidney Bailey, Virginia's commissioner of financial institutions, who opposed the takeover. Among other things, he expressed skepticism that the proposed takeover was nothing more than a routine investment. Were there political considerations behind a bid to acquire a bank in the U.S. capital?

"I felt like a voice in the wilderness," Bailey says. "The Fed paid little attention to what I had to say."

Four months after the meeting, the Fed officially approved the takeover.

IN APRIL 1982 THE MIDDLE EASTERN investors made a tender offer for the remaining shares of Financial General. Four months later the name of the holding company was changed from Financial General Bankshares to First American Bankshares. (Some of the subsidiaries had already adopted the First American name; most of the others have since followed suit.)

The new owners installed a new board of directors made up of prominent Americans, many of whom had close ties to Clifford. Altman and Symington joined the board, the latter as the vice chairman. The distinguished American chosen to be the chairman of the board: Clark Clifford.

And what about the seasoned banker who was to serve as the president of the company? That part of the understanding with the Federal Reserve was fulfilled by the appointment of Robert Stevens, the former chairman of BancOhio Corporation, a large bank holding company based in Columbus. But in an unusual twist, a new corporate entity, First American Corporation, was placed at the top of the organizational chart, with Altman as its president. Thus, of the four top positions at First American, only one was held by a banker. (Stevens retired last July and was succeeded by Jack Beddow, a veteran First American executive. Clifford also retired recently and was succeeded by Altman.)

In addition to being First American's top executives, Clifford and Altman are among the company's top lawyers. They have steered a lucrative share of the company's legal work to Clifford & Warnke, a fourth of whose 18 lawyers handle bank-related matters.

Over the past eight years the long and controversial battle for control of First American has faded from memory. The Middle Eastern investors and their links to BCCI and Lance are seldom mentioned in the press. It's probably a safe bet that most of the company's customers assume that First American is U.S.-owned—a misconception reinforced by its name and flag-waving advertising campaign.

AS A BANK HOLDING COMPANY, FIRST American Bankshares is required to provide detailed ownership information to the Federal Reserve Board. When *Regardie's* first tried to find out who owns First American through the Freedom of Information Act, however, the Fed declined to grant the request.

Among the documents that the Fed *did* provide were two letters from a lawyer for the Middle Eastern investors requesting that the Fed not disclose their names to the public.

Further evidence of First American's touchiness about the subject of its ownership was displayed when the company was defending itself from a lawsuit in 1988. The Middle Eastern investors, in taking over the company in 1982, didn't acquire 100 percent ownership of all the banking subsidiaries. In 1987 First American Bankshares decided to buy out the minority shareholders in First American of Maryland and First American of Virginia at a price of $42 a share. Several of the Maryland bank's investors complained that the price was too low and took advantage of a state appraisal system to win a higher price. In Virginia, which has no such appraisal system, the dissenting shareholders went to court. In September 1988 a federal jury in Alexandria awarded the investors $60 a share.

During the discovery phase of the case, lawyers for the plaintiffs met stiff resistance when they tried to determine who owned the company. When the question was put to Altman during a deposition, he steadfastly refused to provide any names. When the plaintiffs' attorneys persisted, Altman's lawyer snapped that the identity of the owners was "none of your business." When specific names were put to Altman, however, he did confirm their status as shareholders.

In a pretrial motion, First American's lawyers went so far as to ask the judge to forbid

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the plaintiffs' lawyers from mentioning in court the names or nationalities of the company's shareholders—or even that the bank was foreign-owned. They argued that it was irrelevant to the case, largely because Clifford and Altman ran the company; the owners played no role, they said, in setting the $42-a-share price to be paid to minority shareholders. They also claimed that the disclosure that the bank is Arab-owned could stir up prejudice in some of the jurors.

The unusual requests to the Federal Reserve and to the judge in Alexandria underscore how sensitive First American is about its foreign connections. One of the stated reasons for the sensitivity—the possibility of anti-Arab prejudice—may have some validity. Another reason—that the Arab investors have absolutely no influence over the company—isn't so convincing.

The owners may give Altman and Clifford considerable autonomy, but as their employers they have the right to fire them whenever they want. Furthermore, how can the public be assured that the owners have no influence as long as their identities remain secret?

Potential customers and employees also have a legitimate interest in knowing who owns First American. Should they decide that the owners are objectionable people, for example, they might well decide not to deal with the company.

There's another important reason that the identities of First American's owners are a matter of public interest. The takeover was highly controversial. How does the public know that the Fed did its job properly if it refuses to say who was permitted to buy the company?

Among the first group of documents obtained by *Regardie's* from the Federal Reserve is a letter from Paul Volcker, who was then the Fed's chairman, to the late Benjamin Rosenthal, a Democratic congressman from New York. The letter is dated November 16, 1982, about three months after the Fed approved the takeover. In the letter Volcker says that the Fed had recently received a Freedom of Information Act request for shareholder information, that the disclosure had been deemed "appropriate," and that "a response is being prepared to that request that will include the shareholder information."

When the Federal Reserve refused to provide shareholder information to *Regardie's*, the magazine protested the ruling and brought Volcker's letter to the attention of the Fed's lawyers. The Fed then reversed itself, saying that it would release the names of the shareholders, along with each one's percentage ownership in the bank, in 10 days. Before the 10-day period had expired, however, First American complained, which led the Fed to deliver yet a third decision. This time the Fed agreed to release the names of the investors who held at least 5 percent of the stock, but it would only reveal the exact percentages for those investors who held 10 percent or more. These nine investors account for all but 1.75 percent of First American's stock.

The list (see page 69) reveals that First American's biggest shareholder is Kamal Adham, who owned 12.63 percent of the company at the end of 1988. In addition, Adham Corporation Limited owned a block of between 5 and 10 percent. The other owners included Sheikh Zayed (11.76 percent); Sheikh Khalifa bin Zayed al-Nahayan, one of Zayed's sons and the crown prince of Abu Dhabi; the Abu Dhabi Investment Authority, which Zayed controls; Faisal Saud al-Fulaij; Abdul Raouf Khalil of Saudi Arabia; Mashriq Holding Company, the personal holding company of Sheikh Hamad bin Mohammed al-Sharqi, the ruler of Fujaira, which is a member of the United Arab Emirates; Ali Mohammed Shorafa of the UAE; Sheikh Humaid bin Rashid al-Naomi, the crown prince and deputy ruler of Ajman, another UAE member state; Khalid Salem Bin Mahfouz of Saudi Arabia; and Mohammed Hammoud of Lebanon.

These are the names that First American has gone to such great lengths to conceal from the public.

An examination of the investors' backgrounds suggests that First American may have good reason to suppress their names—not because some customers and employees may be prejudiced against Arabs in general but because some Americans may take a dim view of some of these particular Arabs.

WHEN CLIFFORD AND ALTMAN MET with bank regulators at the Federal Reserve in April 1981, they were accompanied by Kamal Adham and three other investors. After describing Adham as "a prominent businessman in Saudi Arabia," Clifford lavished praise on him. "I have come to have the deepest respect for his character, for his reputation, for his honor, and for his integrity," Clifford said. "I'm proud to be an associate of his."

Throughout the proceedings, Clifford referred to Adham as "His Excellency"—a term that isn't generally applied to Saudi sheikhs. In Saudi Arabia, the term *sheikh* isn't a title of nobility but simply an honorific for a respected person—roughly equivalent to referring to a distinguished Spaniard as "Don." Taking their cue from Clifford, the regulators began to refer to Adham as "His Excellency."

Clifford recounted what he described as a recent conversation with B. F. Saul, the chairman of Financial General. "He [Saul] had occasion to go to London, maybe more than once," Clifford said. "He had occasion to go to the Middle East, the Persian Gulf countries. I remember later on his talking with me, and he said, 'I have looked into the reputation, particularly of the leader of the group, of His Excellency Sheikh Kamal Adham.' And he said, 'It's difficult to recall a time when I have heard such universal commendation for an international businessman. I hear it in London. I've heard the most commendatory comments. I've heard about him in countries of the Persian Gulf. I have not heard one whisper of criticism against this man.' And he said, 'I feel perfectly comfortable about this group, headed by this man, coming in and taking over our banks.'"

(Saul disputed Clifford's account in a recent interview with *Regardie's*: "I never did go to the Middle East to meet him. I think I met Kamal Adham in Washington once. I don't think I ever met him in London. I met him for 20 minutes. I did not try to make a judgment whether they should own a bank. That was something for the Federal Reserve to do. All I was concerned about was whether this was in the best interest of the shareholders, and I thought it was. I didn't know these people.")

When it was Adham's turn to speak, "His Excellency" provided some background information on himself. He said that he'd studied at English schools in the Middle East, including Victoria College in Cairo, and that he spoke "English, Arabic, and Turkish as well as some French and Italian." As for his business career, he said that he had "interests in a number of business enterprises, ranging from general contracting to manufacturing plants."

This portrait of Adham was incomplete. Long before he appeared at the Fed, newspaper stories had described him as Saudi Arabia's former intelligence chief. He'd held that post until 1977 and had served as a royal adviser until early 1979—two years after he started to buy stock in Financial General.

As far as can be discerned from the censored transcript of the meeting, there was no discussion of Adham's government ca-

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reer nor of how he'd earned his fortune.

Born in Turkey in 1929, Adham is the half-brother of Iffat, the favorite wife of the late King Faisal, who ruled Saudi Arabia from 1964 until his death in 1975. Adham and the much older Faisal were extremely close. During Faisal's years in power, Adham was one of the most powerful men in Saudi Arabia. David Holden and Richard Johns, the authors of *The House of Saud*, an authoritative book on Saudi Arabia, described Adham as Faisal's "closest confidant and adviser" and his "right-hand man."

Adham's most important role was to help the king set up an intelligence organization to protect the royal family from enemies at home and abroad. In the early 1960s he was put in charge of the Foreign Liaison Bureau and, in Holden and Johns's words, "given general supervision over the General Intelligence Directorate, the internal security service."

On the home front, the Saudi regime faced threats from several sources, including dissident members of the al-Saud family, foreigners who lived in the kingdom, Nasserites, religious zealots, and rebellious members of the armed forces. In 1969, for example, there were at least two coup attempts.

Faisal was capable of using brutal methods to suppress opposition. Some of his opponents, in the words of an authority on the kingdom, "were mercilessly hunted, and, when caught, they were tortured and imprisoned for lengthy periods." Some of the officers who were arrested in the wake of a 1969 coup plot were tortured by the secret police; a few of them died in prison. The repression continued into the 1970s and 1980s. In its 1977 human rights report, Amnesty International said that it knew of 200 political prisoners by name.

When it came to the kingdom's external relations, Adham acted as Saudi Arabia's liaison with the CIA, French intelligence, and other foreign spy agencies. He developed such close ties with Anwar Sadat that he was known as Saudi Arabia's "Mr. Egypt." One way that the Saudis cultivated Sadat was by showering money on him. As part of an effort to encourage Sadat to expel Soviet military advisers from Egypt, Adham channeled enormous sums—"hundreds of millions of dollars," according to one source—to Cairo.

The "subsidies" to Egypt illustrate how Saudi Arabia has used money as an instrument of foreign policy. "The Saudis don't have much to offer by way of manpower and military assets," says William Quandt of the Brookings Institution, an authority on Saudi Arabia. "What they have to offer is money."

One important beneficiary of Saudi largess has been the Palestine Liberation Organization. Saudi Arabia is widely acknowledged to be the PLO's biggest financial backer. In his 1981 book on Saudi Arabia, *The Kingdom*, Robert Lacey wrote: "Increasing Saudi subsidies to the PLO since 1973 have given the organization currency reserves estimated at over a billion dollars—larger than those of many Third World countries—and most inhabitants of the Kingdom are proud that Saudi oil revenues should be supporting the cause of their Palestinian brothers."

Despite his governmental responsibilities, Adham found time to engage in business activities during the 1960s and 1970s—and with impressive results. In 1981 he told the Federal Reserve Board that his net worth was $255 million.

Business acumen no doubt played a role in Adham's success. Also important, though, were his political connections. His business career is almost a textbook case of how highly placed Saudis profit from their connections.

One of Adham's first important business ventures involved oil. In the late 1950s and early 1960s Saudi Arabia's oil minister was Abdullah Tariki, an aggressive, U.S.-educated petroleum engineer. In Tariki's view, the "Seven Sisters"—the leading international oil companies—had long been taking advantage of Saudi Arabia and other oil-producing countries. Tariki did his best to extract more money from the companies, even to the point of opening negotiations with a Japanese company. (In a move that would later turn the world upside down, Tariki and his Venezuelan counterpart teamed up to found OPEC in 1960.)

But Tariki and the Japanese weren't the only parties involved in the discussions. The Japanese had engaged a well-connected Saudi as their agent: Kamal Adham. Adham's precise role in the deal is a matter of some dispute. It's clear, however, that Tariki complained vociferously that Adham was undercutting his negotiating clout. Many years later Tariki reportedly said that he'd managed to get the Japanese to cancel a secret 2 percent commission to Adham—which was to be paid on top of the commission that Adham was openly receiving. But Adham had the last laugh. In 1962 Tariki was dismissed and forced into exile, while Adham went on to become one of the most powerful men in the kingdom.

Adham has counted among his clients U.S. and European companies that manufacture arms. In the mid 1960s Kermit Roosevelt, an agent for Northrop Corporation, found that Adham appeared to be representing three foreign defense contractors simultaneously—and was trying to sign up Northrop. In a letter to Northrop, Roosevelt said he understood that Adham "already has a piece of the Lightning deal, the Mirage deal, and the Lockheed deal and is trying to complete the square by an arrangement with Northrop." Roosevelt concluded that it was probably a good idea for Northrop to engage Adham. "Without him," he said, "we are going to be weakly represented."

The Egyptian connections that Adham had acquired in his role as intelligence chief were of great value when he did business in that country. "Adham was the main intermediary in the deals whereby Saudi Arabia bought French weapons on behalf of Egypt," Holden and Johns wrote. "The commissions from these sales, including the Mirage aircraft, were understood to have been channeled through his company, Arcan."

One of Adham's American clients in the 1970s was Boeing Company, according to reports in the *Wall Street Journal*. Adham, the *Journal* said, received large commissions from Boeing in exchange for promoting sales of its jets. His link to Boeing came to light in the mid 1970s, when U.S. government agencies investigated "questionable payments" made by Boeing and other U.S. companies to Americans and foreigners, including government officials.

The SEC and the Federal Trade Commission charged that Boeing had made tens of millions of dollars in questionable payments in connection with foreign aircraft sales. Both cases were settled in 1978 with a consent arrangement. In connection with the SEC settlement, Boeing filed a report in which it admitted making such payments, although certain names and details were deleted. One such deal involved the sale of $137 million worth of aircraft to a customer in Egypt. In connection with that transaction, Boeing paid $8.7 million to corporations in Liechtenstein; Boeing said it believed that the ultimate recipients were individuals who'd arranged or provided financing for the sale.

The names of those individuals were deleted from the Boeing report. The *Wall*

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Street Journal filled in some of the blanks in a June 1978 article, based on interviews with U.S. government sources. Boeing was assisted, the paper said, by Adham and Mahdi al-Tajir, a diplomat from the United Arab Emirates. Mahdi al-Tajir had encouraged Sheikh Zayed to lend Egypt up to $90 million to finance the aircraft purchases, U.S. officials said, while Adham had used his influence with the Egyptian government to ensure that Boeing would be the supplier. Over the years, the *Journal* said, "Boeing has paid millions of dollars in commissions to Mr. Adham and Ambassador Tajir."

Adham invested much of the money he earned as an agent for foreign companies in conventional businesses, among them First American. Another bank in his investment portfolio is Allied Arab Bank, a London-based institution. He's its biggest shareholder; his partners are his friend Mahdi al-Tajir and Britain's Barclays Bank.

Documents obtained by *Regardie's* from the Federal Reserve show that an SEC official told the Fed that the names of two of the Middle Eastern investors had come up in the Boeing investigation. In a letter to the SEC asking for more information, the two investors are referred to, but their names were excised from the version released to *Regardie's*. They are described as "Mr. _____ of Saudi Arabia and Mr. _____ of Kuwait." If the *Wall Street Journal*'s reporting is correct, the Saudi in question is Kamal Adham.

There is no doubt about the identity of the other investor: only one Kuwaiti was involved in the takeover. He is Faisal Saud al-Fulaij, another major shareholder in First American.

From 1964 to 1977 Fulaij served as the chairman of Kuwait Airways, the state-owned airline. For an airline executive, he accumulated an impressive fortune—$70 million, according to a document filed with the Fed in 1981. In the late 1970s the Federal Trade Commission identified him as the recipient of at least $300,000 in bribes. The commission's draft complaint said: "The payment, at the direction of a Boeing Co. officer, was made through a fictitious Swiss consulting firm." Fulaij has denied the allegation.

Since the late 1970s Fulaij has been the chairman of Kuwait International Finance Company, which has been listed in BCCI's annual reports as an affiliate. Fulaij told the Federal Reserve that he was also the president of Kuwait Sanitary Wares Company, which, he said, "manufactured plumbing and ceramic equipment."

INVESTORS FROM ABU DHABI—SHEIKH Zayed, his son Sheikh Khalifa, the Abu Dhabi Investment Authority, and Ali Shorafa—own a large chunk of First American. Because Zayed is the absolute ruler of Abu Dhabi, the Abu Dhabi Investment Authority, a government investment fund, is widely regarded as his personal property.

Sheikh Zayed came to power in 1966 by deposing Sheikh Shakhbut, his older brother. Shakhbut reportedly had peculiar attitudes about the proper way to invest money. There have long been rumors that he didn't believe in banks and kept gold bullion and millions of dollars in cash at home. He was eventually persuaded to put some of his money in the bank, the story goes, when he learned that rats had nibbled away a fortune in bank notes.

Shakhbut had refused to spend the sheikhdom's oil wealth to raise the living standards of his people. Thus, when Zayed replaced him, the change in power was widely welcomed.

Zayed, unlike his brother, is a big spender. He's spent vast sums on lavish construction projects, some of which are regarded as white elephants. The largest chunk of the sheikhdom's money, however, has gone into his pocket. *Fortune* magazine has estimated that Zayed is worth about $1.5 billion—not including the billions of dollars in assets held by the Abu Dhabi Investment Authority. The ADIA is a joint owner—along with the Libyan Treasury Secretariat and the Kuwait Ministry of Finance—of the Arab Banking Corporation, one of the Arab world's largest banks.

Zayed has a large family to support. In the late 1970s it was reported that he'd been married as many as 14 times—although, of course, he's presumably never had more than four wives at any one time (the limit under Islamic law). He reportedly has 22 daughters and 19 sons.

His wealth derives from Abu Dhabi's oil revenues, which shot up dramatically after the 1973-74 OPEC price increase. Around the same time, a number of Arab countries cut off shipments of oil to the United States, along with a few other countries, to punish them for their support of Israel during the 1973 Yom Kippur War. Abu Dhabi was the first Arab country to declare an embargo against the United States.

Over the years Zayed has also channeled tens of millions of dollars to the PLO. He's been an outspoken critic of the United States and its relationship with Israel. "Israel is our number-one enemy," he told reporters last December, "and America is our number-two enemy." Two days later he reportedly met with PLO leader Yassir Arafat and assured him of his support for the Palestinian uprising on the Israeli-occupied West Bank.

Up until sometime in late 1981 or early 1982, the man in charge of managing Zayed's personal fortune was Abdullah Darwaish. As "Chairman/Director General of the Department of Personal Affairs of H.R.H. Ruler of Abu Dhabi and Chairman of the Abu Dhabi Investment Company," he'd acquired shares of Financial General as a sort of trustee for Zayed's young son Mohammed.

In March 1982, several months before the takeover was consummated, Sheikh Zayed brought two suits in U.S. courts charging that Darwaish had been involved in an elaborate scheme to defraud him of $96 million. Darwaish had already been under house arrest in Abu Dhabi for several months; his chief deputy, Riaz Saleem Aslam, had been jailed there in late 1981.

"Documents filed in that case," the *Washington Post*'s Jerry Knight reported in August 1982, "indicate Darwaish's troubles in Abu Dhabi were known weeks and perhaps months before he and his partners bought control of Financial General but were never disclosed to bank officials, stockholders, or regulatory agencies.

"Neither the Securities and Exchange Commission, which regulates corporate acquisitions, nor the Federal Reserve Board, which has authority over bank holding companies, has been informed of Darwaish's troubles in Abu Dhabi, sources at the two agencies said."

The same day that the story appeared, Michael Bradfield, the general counsel to the Federal Reserve Board, wrote to Clark Clifford to ask for more information. Clifford responded in a letter dated August 16. In it he stressed that Darwaish owned no shares in the company but was merely representing Zayed's son Mohammed, and he added that Mohammed would be handling his own investments in the future. He denied that any information had been withheld from regulatory agencies. In one passage he branded the *Post*'s story "inaccurate, misleading, unwarranted, and irresponsible" and

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said that he had informed Benjamin Bradlee, the executive editor, of "the gross inaccuracies in the article." The *Post*, however, published no correction, letter to the editor, or follow-up article.

One important issue was lost in the shuffle. The formal tender offer for Financial General Bankshares, filed with the SEC on March 3, 1982, listed Abdullah Darwaish as one of the three controlling shareholders in the takeover group (along with Adham and Fulaij) and described him as the chairman of the Abu Dhabi Investment Company and the chairman of Sheikh Zayed's Department of Personal Affairs. At the time, however, he'd already been stripped of his official duties and placed under house arrest.

In March 1989 the New York Court of Appeals ruled unanimously that Zayed couldn't press his claim because he'd refused to be deposed in the case. Riaz Aslam, Darwaish's deputy, was reportedly still languishing in an Abu Dhabi prison. As for Darwaish, *Regardie's* has been unable to ascertain his whereabouts.

Khalid Salem Bin Mahfouz, one of Saudi Arabia's most prominent businessmen, first bought shares in First American in 1986. His family controls the largest bank in Saudi Arabia, National Commercial Bank, and has a net worth estimated to be more than $1.5 billion. Khalid's father is the bank's founder; Khalid and his brothers run it.

Like many of Saudi Arabia's super-rich, the Bin Mahfouz family has benefited from royal patronage. King Saud granted permission to establish the bank in 1954. Another apparent privilege was granted much more recently. In the late 1970s the Saudi government ordered the nation's private-sector banks to sell stock to the public. Only one bank didn't do so, presumably because of a special exemption: National Commercial.

First American was by no means Bin Mahfouz's first investment in the United States. In 1977 he teamed up with former treasury secretary John Connally, Texas banker Fredrick Erck, and Ghaith Pharaon to buy Main Bank, a small bank in Houston, Texas. The following year Connally introduced Bin Mahfouz to Nelson Bunker Hunt and his brother, Herbert, who were on the lookout for partners as part of their effort to corner the world's silver market. In 1979, according to British journalist Stephen Fay, the Hunts and Bin Mahfouz established an offshore company to serve as a vehicle for silver investments, but the silver scheme collapsed, and Bin Mahfouz was rumored to have suffered huge losses.

ASIDE FROM BEING WEALTHY ARABS, Kamal Adham and the other principal owners of First American Bankshares have one thing in common: all of them are closely associated with BCCI.

At least seven of First American's 10 apparent shareholders also own stock in BCCI, according to BCCI's latest available list of shareholders, which is dated October 31, 1988. The Abu Dhabi contingent—Zayed, his relatives, the Abu Dhabi Investment Authority, and Ali Shorafa—accounts for the biggest block of BCCI shares. Bin Mahfouz and his brothers owned 20 percent of BCCI. (They reportedly bought their stock in BCCI at about the same time that Bin Mahfouz invested in First American.)

The owners of First American are connected to BCCI in many other ways. All of them have been described as "BCCI clients," in the sense that the bank provides investment advice to them. Sheikh Zayed is a close friend of Abedi's and a partner with BCCI in its UAE subsidiary, Bank of Credit and Commerce (Emirates). Adham has been a BCCI depositor and borrower. Fulaij is a longtime executive of the BCCI group; when he first bought stock in Financial General, he was the chairman of Kuwait International Finance Company, a BCCI affiliate. (BCCI owns 49 percent of KIFCO.) BCCI's annual reports show that Fulaij served on the board of BCCI's Italian subsidiary, Italfinance International S.p.A., from 1982 to 1986. Bin Mahfouz has served on BCCI's board of directors.

These close ties to BCCI and Abedi, its president, raise an obvious question: What is the relationship between First American Bankshares and BCCI?

ABEDI'S KNACK FOR FORGING POLITIcal connections has been controversial, partly because BCCI has sometimes employed highly questionable techniques. The bank has entered into business partnerships with political figures, provided jobs for them and their offspring, paid their travel expenses, and given them loans.

In many of the countries in which BCCI has made powerful friends, it has received certain privileges or outperformed other foreign banks. BCCI spokesmen say this is a coincidence; other bankers are skeptical.

The United Arab Emirates, for example, has been described as the most overbanked country in the world; it has a huge number of branches that serve a population of less than 1.5 million. In 1982 the UAE decreed that foreign banks would be limited to eight branches apiece. BCCI managed to get around the rule by setting up a separate bank, Bank of Credit and Commerce (Emirates). It didn't go unnoticed that Sheikh Zayed and his relatives own stock in both BCCI and BCCE.

Many foreign banks have abandoned Nigeria in recent years, amid complaints that economic travails and government restrictions have made it extraordinarily difficult for them to generate profits. But BCCI's 40 percent-owned Nigerian subsidiary has been expanding rapidly and making so much money that it's now one of its most profitable units. The chairman—and one of the shareholders—of BCCI's Nigerian subsidiary is Ibrahim Dasuki, a wealthy businessman who's so close to Nigerian president Ibrahim Babangida that he's been described as Babangida's "political godfather."

BCCI's most impressive political connections were forged in Pakistan during the 10-year rule of Mohammad Zia ul-Haq, the repressive dictator who died in 1988. Sources in Pakistan say that Abedi was one of Zia's closest friends and a key adviser. BCCI hired a long list of senior Pakistani officials who'd served under Zia.

BCCI's image has also suffered because of its involvement in flight capital—money moved abroad by people who live in unstable countries. Most flight capital is exported by rich people in Third World countries, and they usually have to violate foreign exchange controls to accumulate their money abroad.

Most big banks are happy to accept deposits from customers who've smuggled the money abroad, but they generally avoid violating exchange controls. In at least six developing countries, officers of BCCI have been accused of exchange-control violations; they've been found guilty in three of them.

But all of BCCI's previous controversies have been dwarfed by the issue of drug money.

One former BCCI customer who was allegedly involved in the drug trade is Manuel Noriega, the former Panamanian dictator. In February 1988 Noriega was indicted in Miami and Tampa on federal drug charges. Around the time of the indictments, two convicted traffickers testified at Senate hearings that they'd dealt with Noriega—and with BCCI—in Panama. One of the traffickers, Leigh Bruce Ritch, testified that he'd been referred to BCCI by Cesar Rodriguez, one of Noriega's closest associates. The traffickers' testimony was buttressed by José Blandon, a former Panamanian diplomat. ▸

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BCCI, according to Blandon, had been used for money laundering by both Rodriguez and Enrique Pretelt, another associate of Noriega's, who at the time was under indictment in the United States on drug charges.

In the wake of the Noriega hearings, the Senate Subcommittee on Terrorism, Narcotics, and International Operations, chaired by John Kerry of Massachusetts, launched a secret inquiry into BCCI. On September 30, 1988, the Kerry committee deposed Amjad Awan, BCCI's country manager for Panama from 1981 to 1984. Awan, who'd acted as Noriega's personal banker, said that the dictator had channeled millions of dollars through his BCCI account, most of the deposits had been in cash. Noriega had been so pleased with the service he'd received, according to Awan, that he'd made a personal appeal to Abedi not to transfer Awan from Panama. Abedi had gone ahead with the transfer anyway, but Awan had assured Noriega that "I would be available to him whenever he needed me."

Kerry's subcommittee wasn't the only unit of the U.S. government that was taking a close look at BCCI. At the same time that Awan was testifying, he and several of his BCCI colleagues were the targets of an undercover investigation of money laundering that had been launched in 1986 by the U.S. Customs Service. A customs agent posing as a money launderer had channeled millions of dollars in cocaine money through BCCI. Awan was one of several BCCI officers who'd allegedly been eager to help out.

In early October 1988 a federal grand jury in Tampa returned an indictment against BCCI and nine of its employees, including Awan. BCCI and eight of the bankers were charged with laundering about $14 million in cocaine money.

When the indictment was unsealed, U.S. Customs Commissioner William von Raab called BCCI "an institution that was prostituting itself to money laundering."

In April 1989 a federal grand jury in Tampa returned a superseding indictment against BCCI. The new indictment alleged that BCCI officers were involved in laundering drug money as far back as 1983—three years before U.S. Customs launched the investigation that led to the original indictment. The new indictment also alleged that the laundering of drug money was part of BCCI's corporate strategy BCCI and its Colombian subsidiary, it said, implemented "a corporate strategy for increasing BCCI's deposits by encouraging placements of cash from whatever sources, specifically including 'flight capital,' 'black market capital,' and the proceeds of drug sales, in conscious disregard of the currency regulations, tax laws, and antidrug laws of the United States and of other nations."

BCCI settled the case last January with a plea bargain. It and an affiliate pleaded guilty to money-laundering charges and forfeited $15 million: in exchange, prosecutors dropped the charges against BCCI's Luxembourg holding company as well as BCCI's Colombian subsidiary. Five officers of BCCI are now on trial in Tampa, and the U.S government is seeking to extradite another BCCI officer from London. British authorities are expected to put still another BCCI official on trial in that country

WHAT EXACTLY IS THE RELATIONSHIP between First American Bankshares and the bank that the U.S. government has branded a corporate criminal?

The official version is that there is none. The two shareholder groups overlap to a certain extent, officials of First American Bankshares say, and BCCI provides advice to some of the Arab investors—and that's about it.

"BCCI has not been involved at any time in *any* respect in the establishment of policy or in the control or management of First American or any of its subsidiaries," one of First American's lawyers said in a letter to *Regardie's*. "This has been confirmed by the management of First American and reaffirmed in regular bank examinations."

The official version of the relationship, however, shouldn't be accepted at face value. BCCI officials and lawyers for First American's owners have made numerous questionable statements over the years. In at least a few cases, BCCI officers have given false information to reporters.

Some of the most egregious examples are from early 1978, when it was first reported that BCCI might have been behind Bert Lance's efforts to buy shares of Financial General. On February 13, the *New York Times* reported that BCCI officials "flatly denied making any purchases of or having any involvement in efforts to acquire Financial General stock." According to the *Times*, Dildar Rizvi, a BCCI official, "said that he had spoken today with Mr. Abedi, who also denied any connection with efforts to purchase Financial General stock." A little more than a month later Rizvi (who is now one of BCCI's most senior officials) told a reporter for the *Washington Post* that Bert Lance "was paid nothing by the bank"; Allaudin Shaik, another BCCI executive, said that Lance had "received absolutely no loans from BCCI or loans arranged by BCCI."

All of these statements were later proven false. Abedi himself, in fact, later admitted that BCCI had lent Lance about $3 5 million.

During and after the takeover battle, the BCCI "clients" and their lawyers also made numerous questionable statements about the deal. Clark Clifford, for example, provided this extraordinarily terse account of Lance's role during the April 1981 meeting at the Federal Reserve: "At one time he did own a few shares of stock. He sold the stock Retired from participation in it." And Altman recently told *Regardie's* that Lance hadn't had "any significant role in the acquisition."

In fact, however, Lance had been a paid financial adviser to BCCI, had helped to collect the stock, and had approached the management of Financial General on the investors' behalf

In a 1979 deposition, and again at the Fed meeting in 1981, Adham said that the stock had been recommended to him by a friend who worked at the Saudi embassy in Washington. "Mr. [Hassan] Yassin advised me that the stock had become available for purchase in Financial General and that this company might provide an attractive investment opportunity," he told the Fed in 1981. "I asked BCCI to evaluate this property for me and advise me as to its suitability as an investment."

Three years earlier, however, U.S. District Court Judge Oliver Gasch had found in a civil suit that it was Abedi who had recommended the Financial General stock to Adham.

At the Fed meeting, Clifford, Altman, and Adham went to great lengths to portray the share buy-up as a routine investment. Adham and his partners weren't members of a group involved in a secret scheme to acquire control of the company, they said, but simply ordinary investors in the U.S stock market.

The assertion that BCCI wasn't involved in the takeover—that the buyers were merely several unrelated investors who happened to be customers of BCCI—had already been demolished by Gasch, who'd agreed with the SEC that the shareholders were acting as a group to take over Financial General in violation of securities law He'd found that Abedi had essentially put together the deal, assem-

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bling a group of investors and instructing Lance and others to buy stock for them.

There can be little doubt that Abedi was interested in acquiring a foothold in the United States. But major legal and regulatory obstacles stood in his way. In fact, BCCI had run into trouble with state banking regulators three years before the Financial General battle. In 1975 a BCCI client had tried to acquire the Bank of Chelsea, a small institution in New York City. But after he'd made it clear that BCCI would be involved in running the bank, New York State bank regulators withheld their approval.

At a December 1, 1977 meeting that was attended by Lance and others, Abedi, the SEC said, "discussed the possibility of acquisition of control of both FGB and NBG by Ghaith Pharaon." Pharaon's lawyer said that since his client already owned part of National Bank of Georgia (a transaction that was reportedly financed by BCCI), this could violate restrictions on interstate banking. The Financial General stock would have to be bought by someone else. Abedi immediately came up with four other BCCI clients. These four investors and the ones who joined them later were more than simply "BCCI clients." They included BCCI stockholders, joint-venture partners, friends of Abedi's, and, perhaps most important, borrowers from the BCCI group

Fulaij, for example, told the SEC that he'd paid for his stock with a $3.55 million unsecured loan from Kuwait International Finance Company, a BCCI affiliate. Fulaij was its chairman.

Fulaij wasn't the only borrower. Adham has borrowed from the bank, and other members of the group may have done so. When Financial General's management was fighting the takeover, its lawyers filed a sworn affidavit that they'd seen a Bank of America document that revealed that BCCI had made loans to two of the four Middle Eastern investors

Moreover, the names of the two shell companies that were set up as a vehicle for the acquisition of Financial General bore a striking resemblance to that of BCCI: a Dutch company called Credit and Commerce American Investment, which in turn was owned by a Netherlands Antilles company called Credit and Commerce American Holdings.

When a Federal Reserve official asked about the similarity, Clifford replied: "I think generally the term 'credit' and the term 'commerce' are terms that are used extensively in the Persian Gulf in financial affairs. . . . I know of no additional reasoning behind it." Clifford was mistaken. The only major Arab-owned bank with those words in its name is Bank of Credit and Commerce International.

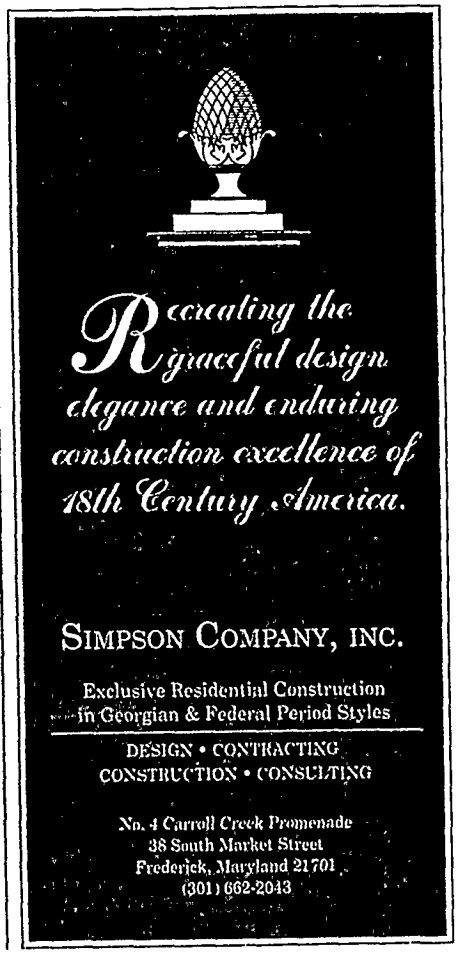
THE PUBLIC RECORD SHOWS THAT BCCI masterminded the Financial General investment, provided loans and consulting fees to Lance (who facilitated the takeover), brought in close associates of the bank as investors, and financed the stock purchase of at least one of those investors. While none of this proves that the two institutions have been linked to each other since the takeover, *Regardie's* has found that there are a number of ongoing connections.

Before BCCI opened a branch in New York, it depended heavily on the services of correspondent banks in that city. One correspondent was First American Bank of New York—a seemingly unusual choice, since it's a relatively small, obscure institution. Odd, that is, unless BCCI regarded it as a sort of sister bank. An official at a major New York bank who's had dealings with BCCI says that when BCCI's employees made business trips to New York, they used desks and phones at First American.

There are also personnel connections. At least two of BCCI's senior officials have held posts at First American Bank of New York. Aijaz Afridi left his job as a general manager of BCCI's Swiss subsidiary to become the executive vice president of FABNY, only to return to run BCCI's Spanish subsidiary. Khusro Elley, who ran BCCI's representative office in New York, also left for a senior position at FABNY.

A source at BCCI's Spanish subsidiary says that before Afridi arrived there, employees were informed that he was a senior BCCI official who'd been posted to First American of New York "at the request of Mr. Abedi" and that Abedi had now transferred him to Spain. After Afridi arrived in Spain, this source says, he frequently referred to First American as a member of the BCCI group.

Neither Elley nor Afridi, however, completely severed his ties to BCCI while working for First American. Public records show that both men used BCCI mortgages to buy houses in the wealthy suburb of Scarsdale. Afridi received his mortgage in December 1983, just months before he'd joined First American. Elley's mortgage was granted in July 1984, while he was a First American employee. Real estate records don't indicate the interest rate on Elley's mortgage, but Afridi's was granted on what appear to be



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extremely generous terms, including no down payment.

PERHAPS THE MOST OBVIOUS ONGOING connection between First American and BCCI, however, is their common law firm: Clifford & Warnke. The firm began to work for BCCI in early 1978, when Abedi and the bank were sued for violating U.S. securities laws in connection with the acquisition of shares in Financial General.

Two years ago, when Senator Kerry investigated BCCI's ties to Noriega, Clifford and Altman dealt with his subcommittee on BCCI's behalf. Clifford, according to a subcommittee source, had discussions with Kerry as well as with the chairman of the Foreign Relations Committee, Senator Claiborne Pell of Rhode Island.

Following BCCI's indictment on drug charges in October 1988, Clifford and Altman played an important role behind the scenes, recommending defense lawyers, monitoring the case as it unfolded, and even approving BCCI's responses to press inquiries.

Altman has also lobbied on Capitol Hill on BCCI's behalf. In January, shortly before the proposed settlement was announced, he and three other lawyers for BCCI met with Senator Orrin Hatch of Utah. Hatch has told *Regardie's* that Altman and his colleagues strongly defended the plea bargain.

The arguments were evidently persuasive. After other senators criticized the plea bargain as a slap on the wrist, Hatch defended the deal on the floor of the Senate. He also minimized BCCI's relationship with Noriega, lumped BCCI together with banks that had been found guilty of less-serious charges (failure to file currency-transaction reports), and said—incorrectly—that none of the individual defendants who'd been indicted were senior officials of BCCI.

All the while, of course, Clifford and Altman have been running First American. It's a curious and awkward relationship that not only undercuts First American's claim that it's wholly independent but also presents potential conflicts of interest. Aren't there times when the interests of First American and BCCI are at odds? How do Clifford and Altman resolve such conflicts? Do they do what's best for First American or what's best for BCCI? Or doesn't it matter?

Altman says that he doesn't see a conflict. "It's not unusual that a law firm represents more than one client in an industry," he says. "We are not the primary lawyer for BCCI. We [First American] do very different kinds of business. They are an international bank; we are a regional bank."

As the chairman of First American Bankshares, couldn't Altman avoid even the appearance of a conflict of interest by simply dropping another bank that he describes as a minor client?

"I'm not anxious to distance myself from BCCI," Altman says. "I'm not defensive about it."

Clifford and Altman aren't the only lawyers used by BCCI, but they have a great deal of contact with the bank's top management, according to a BCCI insider. He says that Altman was in constant communication with BCCI officials. Altman says that he talked to Abedi "infrequently." When *Regardie's* asked Altman how often he talks to Abedi's deputy, Swaleh Naqvi, who essentially runs BCCI, Altman declined to comment.

Moreover, Altman claims that he and Clifford have very little contact with First American's Middle Eastern owners. For example, he stated in a deposition that he hadn't bothered to tell them when he'd decided to spend about $30 million to buy the remaining public stock in First American's Virginia subsidiary. There hadn't been, he insisted, a single meeting, letter, telex—not even a phone call. In one motion, lawyers for First American stated, "The evidence in this case is undisputed that those foreign nationals played absolutely no role in the merger transaction, and indeed, did not even know about it until after it had been consummated."

Shareholders who are so remote from a company that they're not consulted about a $30 million transaction are more than simply "passive" investors. "Comatose" might be a more accurate term.

First American is by no means the only ostensibly independent company with close ties to BCCI. Attock Oil Company, a London-based refining and trading firm, has in recent years acquired several U.S. properties. Abedi arranged the acquisition of Attock Oil in 1979, and a source close to the company says that its owners include Adham, Pharaon, and Fulaij. According to published reports, Pharaon has been the chairman of the company and Adham a director. Its main bank is BCCI.

Capcom Financial Services, a commodities and money-management firm, was indicted in Tampa as a codefendant in the BCCI money-laundering case. A source close to the company says that its leading shareholders include at least two of First American's shareholders, Adham and Abdul Khalil, as well as S. Z. A. Akbar, Capcom's managing director. Akbar is related by marriage to Naqvi, BCCI's chief executive, and before joining Capcom he was BCCI's chief trader. He was also indicted in the Florida case.

Then there's the case of National Bank of Georgia. After BCCI arranged Pharaon's acquisition of the bank in late 1977, Pharaon became an absentee owner. In 1979 he hired Roy P. M. Carlson, a former executive of Bank of America, to run NBG. Carlson had been responsible for monitoring B of A's investment in BCCI.

Carlson wasn't the only NBG official with links to BCCI. Three Pakistani bankers were recruited from BCCI to help Carlson run the bank. The most senior of them was Tariq Jamil, whose title was assistant to the chairman. A few years ago Jamil returned to BCCI as a senior official of its Hong Kong subsidiary.

In 1987 First American bought back its former subsidiary from Pharaon, who was in deep financial trouble. It paid $255 million for the Georgia bank in what Altman describes as "an arm's-length transaction."

At the time, however, Clark Clifford indicated that Pharaon's ties to the owners of First American may have had something to do with the transaction. "Our investors encouraged us to consider the purchase," he said. "They had known of the ownership being in the hands of Pharaon. They encouraged us to do it." Pharaon has himself acknowledged the importance of his ties to the owners of First American. "These are people we have been associated with for a long time," he said, referring to Adham and Fulaij. "We've had many contacts with them, so we know them. They said we should speak to [First American's] management in Washington, which we did, and that's how the deal came through."

Pharaon has invested in other U.S. banks, in at least some cases with BCCI's help. In 1985, for instance, he bought Independence Bank of Encino, California in a transaction that resembled the Georgia deal. Sources familiar with the deal say that the negotiations were handled by BCCI officers and that Pharaon has been a very passive investor. A BCCI executive was installed as the bank's chairman, although in 1989 the top job was taken over by an American banker who has no apparent ties to BCCI. Senior officials of the bank say that there's no connection

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with BCCI and that they regard Pharaon as the bank's proprietor.

One characteristic shared by all of these purportedly independent companies is that their senior executives have attended BCCI's annual management conferences. BCCI insiders say that attendees have included officials of Attock Oil, Capcom, National Bank of Georgia, and First American Bankshares.

Altman has also attended several of the conferences. The feeling among the participants, a source says, was that "everyone there was part of the BCCI group." According to sources who have attended these conferences, Altman was there not as a lawyer for BCCI but as the leader of a contingent of First American executives.

"I don't think any other First American people were there," Altman says. Was he there in his capacity as a First American executive or as a BCCI lawyer? "It wasn't specified," he says. "They asked me to come."

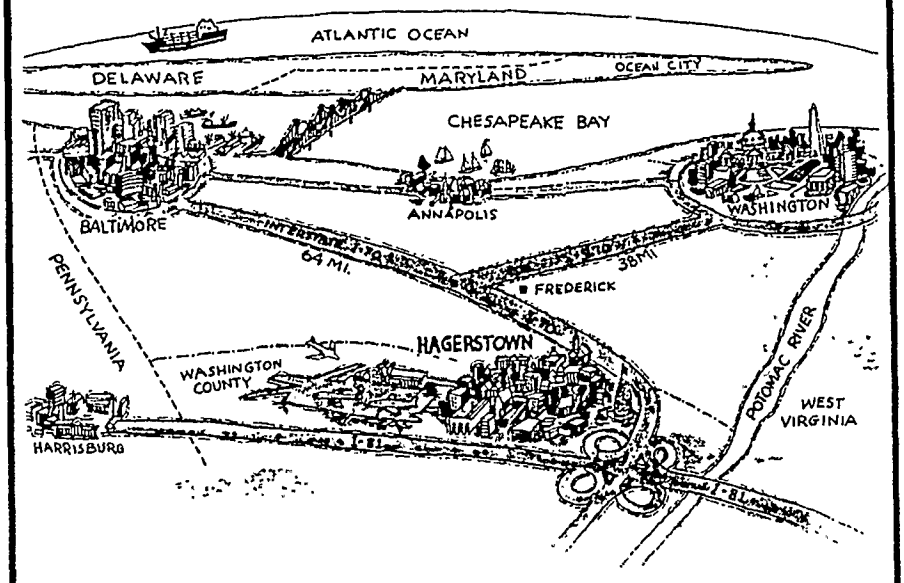
At other meetings, senior executives of BCCI, including Abedi, explicitly reinforced the notion that the firms in attendance were part of the "group." Says a former BCCI executive: "I remember at one meeting, Abedi said, 'We are now one of the largest financial groups in the world, when you take into account the BCC Group, First American, Attock Oil.' He would mention NBG and Independence Bank. He would say when you put them all together, we as a group are so big. He would throw in a figure of $28 billion or $30 billion in assets."

Indeed, a banker who attended several of the management conferences told *Regardie's*, "You'd be damn foolish if you didn't see the handwriting on the wall that someday they could come together." Sources say, in fact, that Abedi not only spoke of First American as an affiliate but that he planned to turn it into an official subsidiary once he got approval from the Federal Reserve. One BCCI source says that Abedi even told various BCCI executives what jobs they'd have in Washington. Altman denies that there was ever any such plan.

During the Florida money-laundering investigation, Amjad Awan described the relationship between BCCI and First American to an undercover federal agent. A government affidavit paraphrases Awan:

"Awan said that BCCI has bought and controls First American Bank and National Bank of Georgia through private individuals. The banks were bought through individual names rather than BCCI because BCCI could not buy

View From the Other Washington



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the banks and run them due to U.S. law. Former secretary of defense Clark Clifford is one of the persons who is working on behalf of BCCI to gain control of these U.S. banks."

When asked to comment on this statement, lawyers representing BCCI in the drug-money case said that the document "mischaracterizes the referenced conversation of Mr. Awan." Altman says that Awan was wrong.

THE FIRST AMERICAN STORY TURNS ON a classic Washington question: What did the Fed know and when did it know it?

The deal to buy First American was approved because Clifford, Altman, and the Middle Eastern investors made certain representations and promises to the Federal Reserve and other bank regulators. In trying to evaluate whether the deal was proper even now, the questions that must be asked are: How complete and accurate were their representations? Were the promises kept?

Clifford and Altman have portrayed the owners of First American as "among the most substantial, respected individuals in the Middle East." At least several of them, however, are far more controversial than that. At least two of them have been accused of accepting questionable payments from American companies, one is the former intelligence chief of a repressive regime, and one heads the country that took the lead in embargoing oil to the U.S. in 1973 and is also a key financial backer of the PLO.

The Federal Reserve, however, apparently overlooked such matters. "I don't recall those issues being raised at the time at all," says a former Fed official who was involved in the deliberations. "The PLO was never mentioned. But it seems to me that if they were raised in a new proceeding, that might be the kind of thing that the Federal Reserve would take cognizance of.

"There was nothing concrete that would justify denial. There wasn't a requirement that you find them to be substantial, reputable persons of good character and standing. You just had to find that they weren't disreputable."

The only glancing reference to the PLO seems to have come in a set of questions submitted by Manfred Ohrenstein, the Democratic leader of the New York State Senate, who asked whether "any of the stockholders or the organizations for which they act as representatives" were "affiliated in any way with any international terrorist organizations" or providing them with "any financial assistance." Altman's one-word reply to both questions: "No."

Clifford minimized the role of BCCI in the deal, and the Fed apparently believed him. At least one Fed document suggests profound ignorance about the investors' ties to that bank. A letter from a Fed official to Representative Rosenthal, who was trying to get at the question of ownership and control, contains this statement: "Staff has no knowledge of loans from or other involvement in the affairs of BCCI on the part of Applicants' principals [the Arab investors]."

But the reality is that BCCI orchestrated the initial purchases of Financial General's stock and financed at least some of those purchases, that the "Applicants" also owned a significant interest in BCCI, and that BCCI's president was to be the principal "adviser" to those "Applicants" on matters relating to First American.

Clifford told the Fed that the bank would be run by a board of respected U.S citizens and that the Arabs would merely be passive investors. He became the chairman of its board and appointed several friends and associates as directors.

Clifford's own account of the events that led to First American's acquisition of National Bank of Georgia, however, suggests that the Middle Eastern owners have been more than passive investors. There is also evidence of some sort of ongoing relationship between First American and BCCI. It remains unclear whether First American is a "sister institution" to BCCI or whether the banks have simply made a cozy exchange of talent. Perhaps the best example of the exchange of talent has been the relationship of Clifford, Altman, and their law firm to the key players in this story.

Earlier this year, as prosecutors were cutting a deal with BCCI on the drug-money indictment, the Fed was reportedly talking with First American officials and expressing renewed concern over the shareholder overlap and transactions between the two institutions. According to the *Financial Times*, the Fed "accepted their promise that the two banks will have no future dealings."

A source at First American told the *Times* that in the past, "there was some business done with BCCI, but it was very small, extremely small."

The quote is reminiscent of Altman's assertion that the ownership overlap between First American and BCCI is "not as great as you might think," when in fact the overlap is considerable.

In a recent interview with *Regardie's*, Altman denied that the Fed and First American can have had any meetings or discussions regarding BCCI since October 1988, when BCCI was indicted. Yet a September 1989 letter from First American's attorneys to *Regardie's* notes: "Following the period last fall when BCCI and several of its officers were indicted on money-laundering charges in Florida, the Federal Reserve expressly confirmed again that BCCI had no involvement with the management of First American and that all prior representations about this relationship were fully correct."

And in a July 1989 interview with *Regardie's*, Altman said: "The reason I know that it [the business between BCCI and First American] is quite insignificant is that after the events of last October, the Federal Reserve came and reviewed our relationship to ensure that all of the commitments we had made to the Fed had been honored, and in the context of that they audited our business."

And what if BCCI were found to be exerting control over First American? The legal implications could be serious. Lawyers who specialize in banking law say that this would mean that the acquisition of Financial General was an "illegal takeover," since the investors who applied to the Fed for permission to buy the company would have been front men. Anyone who carried out such a scheme would be violating a long list of federal laws, including the Bank Holding Company Act, securities laws, and Title 18, Section 1001 of the U.S. Code, which makes it a felony to make false statements to a government agency.

Has the Fed ever done a thorough investigation of Financial American's shareholders and their links to BCCI? Or has it simply relied on assurances from the men in charge that everything's all right?

If nothing else, the First American case shows why there should be more sunshine on banks, not less. Whose interest does it serve to keep the ownership of First American secret? Not the depositors' and not the taxpayers'. With foreigners increasingly buying into U.S. banks, this case sets a bad precedent.

What was good for the Fed nine years ago may not be good enough today. Lingering questions about the owners of First American and the bank's refusal to answer them provide ample reason for the Fed—or for Congress—to take another look. ■

1325015-000-4811

Title and Character of Case:

HIDDEN INTERESTS
MC #38

Date Property Acquired: Source from which Property Acquired:
1B25

09/30/1992

Anticipated Disposition: Acquired By: Case Agent:

[redacted] b6 b7C

Grand Jury Material - NO (Disseminate only pursuant to Rule 6(e))

Description of Property: Date Entered
1B 33

1B33(14) BOXES OF BCCI COMPUTER TAPES INDIVIDUALLY LISTED.
THESE BOXES WERE PART OF LARGER LIST 1B25(SEE ATTACHED LIST)
**********BOX ONE OF FOURTEEN**********
*****
ACCT FILES # 018508 # 122196 # 123525 # 028511 #018406
#018611

Barcode: E0423650 Location: ECR1 U201 SB 10/13/1992

29B-WF-171994
1B 33
NOV 13

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

Title and Character of Case:

HIDDEN INTERESTS
MC #38

Date Property Acquired: 11/27/1992

Source from which Property Acquired:
TOCHE ROSS INC

Anticipated Disposition:

Acquired By:

Case Agent:

b6
b7C

Grand Jury Material - NO (Disseminate only pursuant to Rule 6(e))

Description of Property:
1B 37

Date Entered

1B37 2 BROWN ENVELOPES CONTAINING COMPUTERIZED LISTING OF INDIVIDUALS CLAIMING $50000 US OR MORE AGAINST BCCI OVERSEAS

Barcode: E0433329 Location: ECR1 U201 SB 12/01/1992

DNA
note
location
change

29B-WF-171994

SEARCHED
SERIALIZED
NOV 13 1997

1B
37

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

Inventory of Bulky Nonevidentiary Property
FD-192a (1-5-89)

Date 9/28/98

Title and Character of Case
Major Case 38
Hidden Interests.

FILE NO. 29B-WF-171994
OO: WFO

b6
b7C

Date Acquired	Acquired From:
1/27/92	[redacted]
To Be Returned ☐ Yes ☐ No	See Serial [redacted]

☐ Yes ☒ No Grand Jury Material - Disseminate Only Pursuant to Rule 6(e), Federal Rules of Criminal Procedure

☐ Yes ☒ No Property To Be Forfeited To The U.S. Government

Description of Property (Be Specific)

1 of 3 Boxes
Doc. regarding [redacted]

b6
b7C

29B-WF-171994 - 1C4

For Administrative Use:

Location of Property: _____

Control Number: _____

(File Copy)

BLOCKSTAMP

1325015-000-4814

ITEM	REMARKS

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: Source from which Property Acquired:
VOLUNTEERED
10/01/1998

Anticipated Disposition: Acquired By: Case Agent:

[redacted] b6 b7C

Description of Property: Date Entered
1D 1

TAPE RECORDING RECEIVED FROM U.S. CUSTOMS SERVICE

Barcode: E1505679 Location: ELSUR 1 S147 10/06/1998

29B-WF-171994
MDD

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

1325015-000-4816

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: 10/01/1998

Source from which Property Acquired: VOLUNTEERED

Anticipated Disposition:

Acquired By: [redacted]

Case Agent: [redacted]

b6
b7C

Description of Property:

Date Entered

1D 2

TAPE RECORDING RECEIVED FROM U.S. CUSTOMS SERVICE

Barcode: E1505680 Location: ELSUR 1 S147 10/06/1998

29B-WF-171994
MOD

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: Source from which Property Acquired:
WF-S 171994
10/01/1997

Anticipated Disposition: Acquired By: Case Agent:

[redacted]

b6
b7C

Description of Property: Date Entered
1D 3

TAPE RECORDING RECEIVED FROM U.S. CUSTOMS SERVICE

Barcode: E1507560 Location: ELSUR 2 NFICAB48A DRAWER 1 10/06/1998

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

29B-WF-171994

1325015-000-4818

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: Source from which Property Acquired:
UNITED STATES CUSTOMS SERVICE (USCS)

10/01/1998

Anticipated Disposition: Acquired By: Case Agent:

[redacted] b6 b7C

Description of Property: Date Entered
1D 4

TAPE RECORDING RECEIVED FROM USCS IN 1989

Barcode: E1486389 Location: ELSUR 1 S147 10/07/1998

29B-WF-171994

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

1D4

1325015-000-4619

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: 10/01/1998

Source from which Property Acquired:
UNITED STATES CUSTOMS SERVICE (USCS)

Anticipated Disposition:

Acquired By:

Case Agent:

[redacted]

b6
b7C

Description of Property:

Date Entered

1D 5

TAPE RECORDING RECEIVED FROM USCS IN 1989

Barcode: E1486388 Location: ELSUR 1 S147 10/07/1998

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

29B-WF-171994

1D5

1325015-000-4820

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: 10/01/1998

Source from which Property Acquired:
UNITED STATES CUSTOMS SERVICE (USCS)

Anticipated Disposition:

Acquired By:

Case Agent:

b6
b7C

Description of Property:

Date Entered

1D 6

TAPE RECORDING RECEIVED FROM USCS IN 1989

Barcode: E1486387 Location: ELSUR 1 S147 10/07/1998

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

29B-WF-171994

1D6

1325015-000-4821

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: 10/01/1998

Source from which Property Acquired: USCS

Anticipated Disposition:

Acquired By:

Case Agent:

[redacted] b6 b7C

Description of Property: Date Entered
1D 7

TAPE RECORDING RECEIVED FROM US CUSTOMS SERVICE

Barcode: E1278956 Location: ELSUR 1 S147 10/07/1998

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

29B-WF-171994
1D7

1325015-000-4822

Title and Character of Case:

HIDDEN INTERESTS
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Date Property Acquired: 10/01/1998

Source from which Property Acquired: USCS

Anticipated Disposition:

Acquired By:

Case Agent:

[redacted]

b6
b7C

Description of Property:

Date Entered

1D 8

TAPE RECORDING RECEIVED FROM US CUSTOMS SERVICE

Barcode: E1278957 Location: ELSUR 1 S147 10/07/1998

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

29B-WF-171994 RMM

1D 8

1325015-000-4823

Title and Character of Case:

HIDDEN INTERESTS
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Date Property Acquired: 10/01/1998

Source from which Property Acquired: VOLUNTEERED

Anticipated Disposition:

Acquired By:

Case Agent:

b6
b7C

Description of Property: Date Entered
1D 11

TAPE RECORDING RECEIVED FROM U.S. CUSTOMS SERVICE

Barcode: E1501714 Location: ELSUR 1 S147 10/09/1998

EV/EL-PTM

29B-WF-171994 1D 11

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

S147

RMN

1325013-000-4824

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: 10/01/1998

Source from which Property Acquired: VOLUNTEERED

Anticipated Disposition: Acquired By: Case Agent:

[redacted] b6 b7C

Description of Property: Date Entered
1D 12

TAPE RECORDING RECEIVED FROM U.S.CUSTOMS SERVICE'

Barcode: E1501715 Location: ELSUR 1 S147 10/09/1998

EV/EL-PIM

29B-WF-171994 1B 12

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

S147

BM

1325015-000-4825

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: 10/01/1998

Source from which Property Acquired:
VOLUNTEERED TAPE -USCS

Anticipated Disposition:

Acquired By:

Case Agent:

b6
b7C

Description of Property:
1D 13

Date Entered

TAPE RECORDING RECEIVED FROM U.S. CUSTOMS SERVICE

Barcode: E1443477 Location: ELSUR 1 S147 10/10/1998

29B-WF-171994

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

1D 13 10-10-98
PE

1325015-000-4826

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: 10/01/1998

Source from which Property Acquired: VOLUNTEERED TAPE-USCS

Anticipated Disposition:

Acquired By:

Case Agent:

b6
b7C

Description of Property:

Date Entered

1D 14

TAPE RECORDING RECEIVED FROM U.S. CUSTOMS SERVICE

Barcode: E1443478 Location: ELSUR 1 S147 10/10/1998

29B-WF-171994

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

1014 10-10-98
PE

1325013-000-4827

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: Source from which Property Acquired:
VOLUNTEERED TAPE - USCS

10/01/1998

Anticipated Disposition: Acquired By: Case Agent:

[redacted] b6 b7C

Description of Property: Date Entered
1D 15

TAPE RECORDING RECEIVED FROM U.S. CUSTOMS SERVICE

Barcode: E1443479 Location: ELSUR 1 S147 10/10/1998

29B-WF177994

Case Number: 29B-WF-171994
Owning Office: WASHINGTON FIELD

1D15 10-10-98

PE

1325018-000-4828

FD-350 (Rev. 5-8-81)

(Indicate page, name of newspaper, city and state.) A-1
THE WASHINGTON POST

Date: 2/3/91
Edition:

Title: "Who Controls First American Bankshares

Character: FAG
or
Classification:
Submitting Office: WMFO

Indexing:

4,6-12

(Mount Clipping in Space Below)

Who Controls First American Bankshares?

After 9 Years, Questions Linger on Foreign Ties

By Jim McGee
Washington Post Staff Writer

Ever since the Federal Reserve Board approved the takeover of First American Bankshares by foreign investors nine years ago, there has been talk in the banking world that the Washington-based company had fallen under the control of an aggressive and high-flying Persian Gulf bank, the Bank of Credit and Commerce International (BCCI).

Over the last decade, First American has expanded dramatically, growing to 183 branches in the Washington area alone. A hallmark of its growth was a catchy advertising campaign, including "First American Stories"—homey tales about immigrant families that end with the bank's distinctive red logo and a voice pronouncing, "We're First American. The bank for all Americans."

Then in 1988, First American's name came up unexpectedly in a criminal case in Tampa. Evidence showed that BCCI executives had helped Panamanian leader Manuel Antonio Noriega launder drug money through an account at First American. First American officials said the bank had no knowledge of the transactions; no charges were filed against First American.

The Federal Reserve, which has primary responsibility for regulating the ownership of bank holding companies, reacted by trying to find out about the relationship between BCCI and First American, just as it did when it approved the takeover in 1981. But the inquiry ended with the same result as the previous one: The board noted, for the record, that it had allowed new investors from Kuwait, Saudi Arabia and the United Arab Emirates to acquire the company only after being promised "that BCCI would not be involved in the management."

But documents and interviews in New York, London and Washington suggest that BCCI and First American have had an extensive, long-term relationship that appears contrary to what regulators say they understood it would be.

For example, BCCI's president participated in the hiring of three First American executives. BCCI executives helped negotiate two important First American acquisitions. BCCI helped finance First American's impressive expansion as it grew to be the nation's 51st largest bank

See FIRST AMERICAN, A28, Col. 2

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THE WASHINGTON POST

Agha Hasan Abedi, a hard-driving banker from Pakistan, founded BCCI, one of the world's largest private banks, in 1972. Regulators' interest in the relationship between BCCI and First American has been rekindled in recent months.

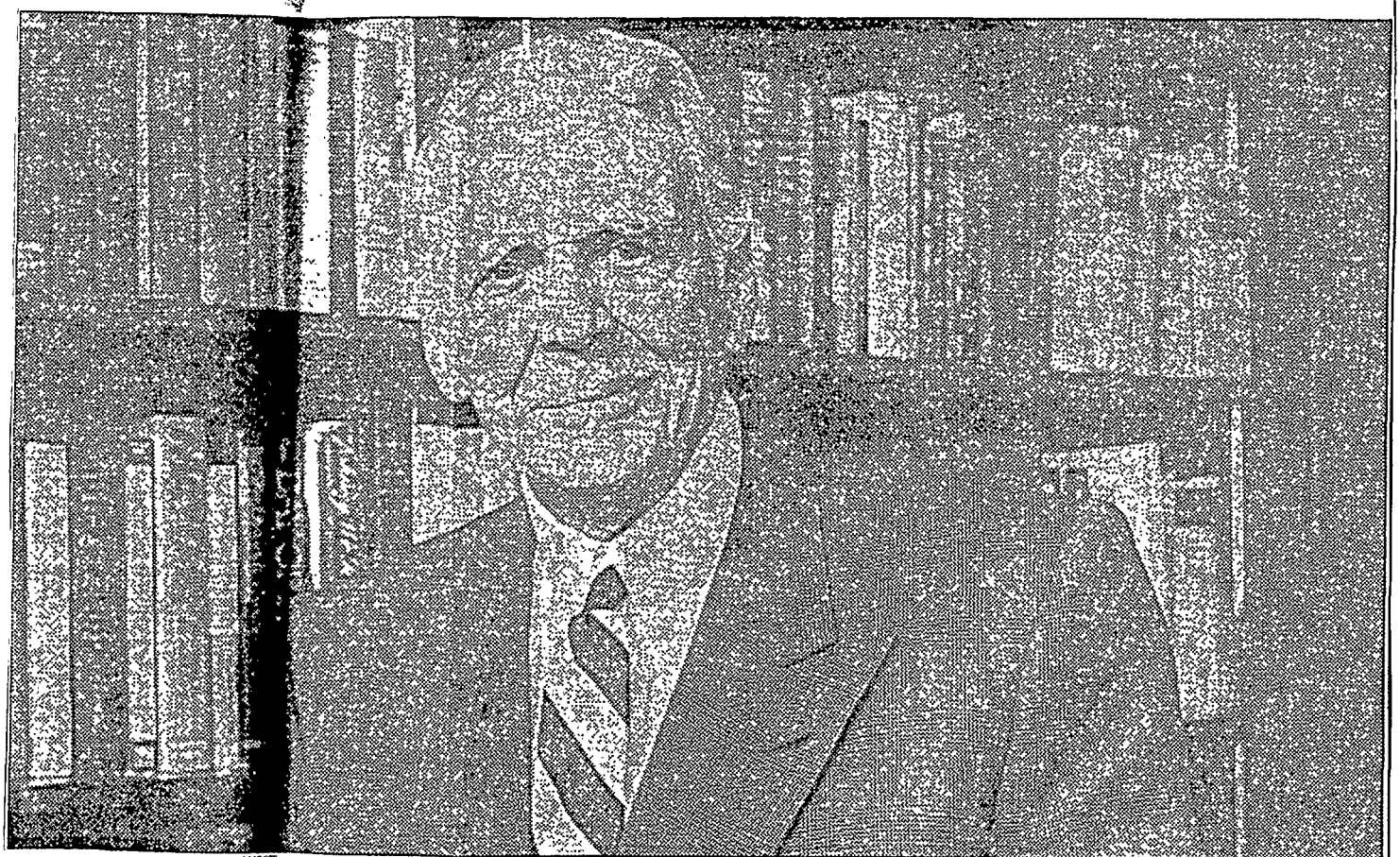
AGHA HASAN ABEDI, FROM A 1985 BCCI BROCHURE

Questions About Control

1325015-000-4835

THE WASHINGTON POST

Clark M. Clifford, the towering figure in Washington legal and political circles who has been First American's chairman since 1981, declares that "there has been no participation, directly or indirectly," by the Persian Gulf bank BCCI in First American's business.



CLARK M. CLIFFORD IN 1988, BY LARRY MORRIS—THE WASHINGTON POST

First American's Foreign Ties

1325015-000-4836

TRACING THE ROOTS OF A U.S. BANK

1972

The Bank of Credit and Commerce International (BCCI) is founded by Agha Hasan Abedi, a banker from Pakistan, backed by money from the ruling family of the United Arab Emirates.

1975

FINANCIAL GENERAL BANKSHARES

BCCI, seeking a presence in U.S. banking, tries and fails to acquire a small New York bank owned by Financial General Bankshares, a holding company based in Washington, D.C.

1977

BCCI helps organize a hostile takeover attempt of Financial General, acting on behalf of four longtime clients from the Middle East; other participants in the takeover effort include Bert Lance, former director of the Office of Management and Budget under President Jimmy Carter. BCCI also helps Saudi financier Ghaith R. Pharaon, a longtime client, acquire the National Bank of Georgia from Lance.

Ghaith R. Pharaon, far right, and Bert Lance at a news conference in Atlanta in 1977

UNITED PRESS INTERNATIONAL

FIRST AMERICAN, from A1

holding company, with eight subsidiaries in six states and the District. On a regular basis, First American Chairman Clark M. Clifford and First American President Robert A. Altman flew to New York and London to brief senior BCCI executives.

Whether the particulars of BCCI's role add up to an improper "controlling influence" over First American—as defined by federal law—is a determination that the Federal Reserve could make only after a formal inquiry. In the cautious, button-down realm of American banking regulation, any hidden influence is cause for possible action. The influence does not have to extend to all operations. "This is not a technicality," said Virgil Mattingly, the board's general counsel.

If the Federal Reserve were to conclude that BCCI had exercised a controlling influence over First American, it could take a range of actions, including the extreme measure of forcing shareholders to sell the $11 billion holding company and its subsidiaries in Virginia, Maryland, the District, New York, Tennessee, Georgia and Florida—a type of sanction that the board has invoked only rarely in its history.

The board's interest in the relationship between the two banks has been rekindled in recent months, in part because the Manhattan district attorney's office has opened its own investigation. A bank regulator questioned in the Manhattan inquiry said prosecutors are probing whether New York State banking officials—who also approved the takeover of First American in a separate proceeding in 1981—were misled into believing that BCCI would have no influence over First American's operation.

The Federal Reserve, which relied on those same commitments in approving the takeover, is closely monitoring the New York investigation. "We have been in communication with the district attorney in New York and we have provided certain information," Mattingly said.

Whatever the outcome, investigators must wrestle at some point with the unequivocal statements of Clifford, a towering figure in Washington's legal and political circles who has served as First American's chairman since the 1981 takeover. His law firm, Clifford & Warnke, has done millions of dollars in legal work for both BCCI and First American.

Clifford declared that BCCI has not exercised any control over First American, now or in the past. "There has been no participation, directly or indirectly, by BCCI," Clifford said during more than 15 hours of interviews with The Washington Post over several months.

From the outset, he said, First American's shareholders made clear to the Fed that they intended to use BCCI as their investment adviser. To comply with the shareholders' wishes, Clifford said he has periodically briefed BCCI's top executives about First American's performance and strategic planning.

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1978

The Securities and Exchange Commission files civil charges against BCCI and the other members in the takeover group, accusing them of failing to make the proper disclosures required by law. BCCI hires former secretary of defense Clark M. Clifford to defend it. Some Financial General shareholders file a lawsuit to stop the takeover. The SEC charges are settled and the lawsuit is dropped when the takeover group agrees to make a public tender offer for the outstanding shares. The Financial Times of London, reporting on an interview with the BCCI president, says Abedi asserts he is "not sure yet who will make the offer, but whoever makes it and if it succeeds, BCCI will probably manage Financial General."

1980

Financial General's shareholders agree to sell. Clifford attends a celebratory lunch in London with Abedi and the new controlling shareholder of Financial General, Sheik Kamal Adham, the former chief of Saudi intelligence. At the lunch, Adham asks Clifford to run the holding company, according to Clifford, and promises him "total authority." Adham and the other investors seek Federal Reserve Board approval of their takeover of Financial General.

1981

Federal regulators and their counterparts in the states where Financial General has subsidiaries hold up approval of the takeover while they try to find out more about the relationship between BCCI and the new company, to be named First American Bankshares. At a special hearing, Clifford and Adham assure the regulators that BCCI will have no involvement in the management of the holding company. The takeover is approved; Clifford becomes chairman.

He described this as a limited, arms-length relationship that conforms to the formal assurances he gave the Federal Reserve at a special hearing in April 1981. Clifford appeared as both lawyer for the shareholders and as prospective chairman of the new holding company. "The representation we made was that BCCI would not manage or control First American," Clifford said. "At no time did we say that we would not have some contact with" BCCI.

He seemed mystified that questions keep cropping up about the relationship between BCCI and First American; he rejected the possibility that BCCI executives may have influenced First American without his knowledge. But he remained unshaken in his view that the facts will show that he—not BCCI—has been in charge of First American for the past nine years.

"I value the reputation I have for honesty and character," he said, offering to testify under oath that BCCI has never influenced his running of First American. "I have not dissembled in any way. Others, who are enemies of BCCI, who perhaps do not wish First American well, have attempted to assemble circumstantial evidence to disprove what I have told you."

Figuring Out BCCI

It was not the prospect of First American being controlled by a foreign bank that worried U.S. banking regulators in 1981; it was control by this particular foreign bank.

To begin with, the regulators never felt comfortable that they understood BCCI. It was chartered in Luxembourg, headquartered in London and operated through a complex corporate structure that included subsidiaries all over the world,

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1983

First American decides to expand its New York operations by buying two Manhattan branches from Bankers Trust Co. for $3 million; it creates an international banking operation in Manhattan funded by a $100 million infusion of capital.

1986

First American agrees to purchase the National Bank of Georgia from a corporation controlled by Pharaon, once BCCI's largest shareholder.

1988

BCCI is indicted on charges of helping Panamanian leader Manuel Antonio Noriega launder drug money through various U.S. banks, including First American. BCCI pleads guilty to the charges and pays a $14 million fine; no charges are filed against First American, which says it had no knowledge of the transactions.

1989

Because of the BCCI prosecution, the Federal Reserve holds up First American's application to acquire the Bank of Escambia in Pensacola, Fla. After conducting a special inquiry into the relationship of the two banks and finding no evidence of BCCI exerting any improper influence over First American, the Federal Reserve approves the application.

1990

Two business publications, Regardie's and the Wall Street Journal, publish articles that note the extent to which BCCI and First American have shareholders in common. Clifford and First American President Robert A. Altman reiterate their long-standing position that BCCI has no influence over First American. During extensive interviews with Washington Post reporters, Clifford and Altman say that BCCI serves only as a "communications link" with First American's foreign investors.

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including such offshore banking havens as the Cayman Islands and the Bahamas. Its investors came primarily from the Persian Gulf states of Abu Dahbi, Saudi Arabia and Kuwait.

BCCI

Founded in 1972 by Agha Hasan Abedi, a hard-driving banker from Pakistan who had financial backing from the ruling family of the United Arab Emirates, BCCI skyrocketed quickly into the ranks of the world's largest private banks. Until recent losses forced some cutbacks, it boasted of $20 billion in assets and 400 offices in 73 nations.

Unlike most large financial institutions, however, BCCI's far-flung network of banks was not regulated on a consolidated basis by any central bank, which meant its deposits were not guaranteed by a government. And that's what concerned U.S. regulators.

Then, too, there was BCCI's tarnished record when it came to First American. In 1977, BCCI helped organize a hostile takeover bid for First American's predecessor, Financial General Bankshares. A federal judge later ruled that he was persuaded that BCCI had intended, by buying shares for several clients and its own shareholders, to exert "influence on the management" of Financial General.

The Securities and Exchange Commission also accused BCCI and others of secretly acting as a group without disclosing their intentions, buying stock privately and thus depriving others of important knowledge that might affect the value of their stock. Admitting no wrongdoing, the accused group settled the suit by agreeing to make an open offer for the outstanding shares of Financial General.

The takeover succeeded; Financial General's principal stockholders agreed to sell.

But when the new shareholders' application to acquire Financial General arrived at the Federal Reserve's stately offices in October 1980, it raised eyebrows among banking regulators in Washington and in those states where Financial General had subsidiaries.

"I could not for the life of me figure out what the relationship was between BCCI and their investors and [First American's Virginia subsidiary]," said Sidney Bailey, Virginia's commissioner of financial institutions. New York banking regulators feared that "the Arab investors might have been acting for BCCI," said Geofredo Rodriquez, a New York regulator.

For years, BCCI had coveted a presence in the United States, specifically in New York, money center for international transactions. In the mid-1970s, BCCI had tried and failed to acquire a New York bank. Without an American subsidiary, BCCI could only open representative offices, which are restricted in the kinds of transactions they can handle.

Sorting this out fell to the Fed, which has had primary jurisdiction over bank holding companies since the 1930s, in the days when most banks were small, local institutions. Generally, the board reviews and approves applications without hearings; the board's investigative capabilities are small compared to the more enforcement-oriented Comptroller of the Currency. "There is a certain degree of accepting facts at face value," said Donald E. Kline, the Federal Reserve's associate director of supervision and regulation.

To clear the air, the board's professional staff decided to convene a special hearing so that regulators from different agencies could question Clifford, Altman and the new investors. "We wanted to establish that BCCI was not going to be acquiring a controlling interest in First American," Kline said.

'Passive Investors'

It was a large group that gathered on April 23, 1981, for an "informal private hearing" in Room B 1215 at the Federal Reserve's headquarters at 20th and Constitution NW. Sixteen regulators, including four state banking regulators, listened as Clifford introduced the four prospective new owners of the holding company.

First was the lead investor, Sheik Kamal Adham, former head of the Saudi Arabian intelligence service. He was followed by Faisal Saud Fallaj, the long-time chairman of Kuwait Airways, Abdul Raouf Khalil, a Saudi Arabian real estate investor, and Saved Gohary, a Saudi Arabian businessman.

They took turns in describing their ambitions for the company, which they planned to call First American Bankshares to correspond to names of its subsidiaries. The bank would continue to be "an American company," they stressed.

Adham said they would be "passive investors." The "ultimate management of the company," he said, would be left to Clifford and a board of directors with several distinguished Americans, including former senator Stuart Symington (now deceased) and Elwood R. Quesada, a retired Air Force lieutenant general.

Adham bristled at the suggestion that he was acting as a front for BCCI. "We don't need anybody to use us, to be a cover for them," he declared. "We are doing it for ourselves."

He said BCCI was his banker and that he often relied on it for investment advice. For example, he said, he had turned to BCCI in 1977 to decide whether to buy shares in Financial General during the earlier hostile takeover.

But some regulators still weren't satisfied. Near the end of the day-long hearing, Lloyd W. Bostian Jr. of the Federal Reserve's Richmond office, asked: "What precisely is their [BCCI] function, if any, in this proposal at the present time?"

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Clifford stepped in. "None," he said. "There is no function of any kind on the part of BCCI. . . . I know of no present relationship. I know of no planned future relationship that exists."

Given such categorial assertions, the board had no reason to probe further. As the hearing concluded, the Federal Reserve's deputy general counsel, Robert Mannion, summarized his understanding: "It is represented in the application that BCCI is no longer involved in this particular proposal, although BCCI may continue to offer advice to individual investors."

On August 25, 1982, the Federal Reserve approved the takeover. The Comptroller of the Currency also signed off, providing its own version of the relationship. "It has now been represented to us that BCCI will have no involvement with the management and other affairs, nor will BCCI be involved in the financing arrangements," wrote Comptroller official C.F. Muckenfuss at the time.

New York state regulators insisted on holding their own hearing. According to Rodriguez, they would have rejected the application but for assurances that BCCI was, as he put it, "out of the picture."

Briefings in London

Whatever BCCI's relationship to First American, it was not out of the picture, according to information gathered from interviews and documents.

After the takeover, Clifford and Altman flew periodically to London for meetings with Abedi, BCCI's president. Occasionally, Adham sat in, too. "This relationship developed naturally," Clifford said, "but an effort has been made to make it appear sinister."

Clifford and Abedi knew each other well. They first met during the 1978 takeover fight, when BCCI had hired Clifford and his firm to represent it. For several years during the takeover battle, Clifford flew to London regularly to discuss BCCI legal business and the takeover plans. "Sometimes we were going over once a month," he said.

The two men—Clifford, the venerable Washington lawyer, and Abedi, the cultured Pakistani banker—could not have come from more different backgrounds.

Clifford, then in his late 70s, was a tall, courtly man whose features seemed chiseled in granite. He had built a career around public service and the law, serving as a top adviser to President Harry Truman and as secretary of defense in President Lyndon Johnson's Cabinet. After years of representing corporations, he decided in the twilight of his career that he wanted to run one. When Adham asked him to take on the chairmanship during a meeting with Abedi, he jumped at the chance. Now 84, he retains the energy and persuasiveness of lawyers half his age.

Abedi, by contrast, was a survivor. He had lost one bank in Pakistan to nationalization, then turned right around and created BCCI. His business instincts told him that BCCI had a ready-made market in the Third World, where credit was often scarce and many Western banks were reluctant to lend. (Abedi, 69, is now ill and declined through a spokesman to be interviewed for this article. In October, he resigned as BCCI president.)

Both men relied upon proteges. Clifford left day-to-day operations of First American to Altman, his partner at Clifford & Warnke. Abedi relied on Swaleh Naqvi, his second-in-command. "Naqvi sat in a lot with Abedi," Clifford said. "Abedi was the dreamer, the conceptualist, and Naqvi was the numbers man."

By 1982, according to Clifford, he was traveling to London "four or five times a year." Clifford said that he and Altman briefed BCCI executives on First American's recent performance, its budgets and any major plans for expansion. "We kept our investors informed through Abedi," Clifford said.

Once or twice a year, Abedi visited New York, where BCCI had a representative office. On those occasions, Clifford or Altman traveled to Manhattan and met Abedi at his preferred hotel, the Helmsley Palace.

Adham said BCCI is "in the middle to convey suggestions from Washington to the owners who are in the gulf." Then, he said, "We ask him [Abedi], 'What's your opinion?' . . . When he says it is a good move, people in the gulf listen to him."

Bank regulators such as Bailey said they were surprised to learn of these extensive discussions involving BCCI and Abedi. "I received positive, absolute assurances that there would be no such relationship with BCCI," Bailey said.

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Advice From Abedi

Abedi's presence was most visibly felt in New York, where BCCI had always wanted a presence of its own. He played a major role in the hiring of Bruno Richter as chief executive officer of First American's New York subsidiary, according to Richter.

In the spring of 1983, Richter said in an interview, he was working at the Bank of America when he was approached by a BCCI executive, Khasuro Elley. At first, Richter said, he thought they were looking him over for a BCCI job. He met three times with Abedi, once in New York and then twice in London; at the second meeting, he said, Abedi "asked me if I want to consider joining First American."

At the end of their third meeting, Abedi told him, "We want you to meet with Clifford and Altman in Washington," according to Richter.

Clifford and Altman then offered him the job. Upon taking over, Richter said, he discovered that BCCI had considerable input over certain management decisions, especially the hiring of key personnel. On Abedi's recommendation, he hired a former BCCI employee, Aijaz Afridi, as his executive vice president. Richter said he wanted to attract as much business as he could from BCCI's subsidiaries and asked Abedi to "send me one of your people."

At Altman's request, Richter said, he sent another top choice, David Palmer, to London to meet Abedi. "They were checking out my resume," Palmer said of his visit to BCCI headquarters. He said he was offered a job on his return to New York.

Kline, the Federal Reserve official, said he did not understand why BCCI would participate in the hiring of key personnel: "I don't see there would be any role of BCCI in selecting the managers of individual subsidiaries."

Robert G. Stevens, the holding company's chief executive officer for seven years, said that he met Abedi at Clifford's law office when he was being interviewed for the top management position. Stevens said Clifford told him Abedi was "an adviser to the investors and he would therefore have an interest in who they were hiring as president."

Clifford said, "I thought it would be appropriate if Abedi met Stevens" so the BCCI president could "see the kind of man we were bringing in to be CEO of the holding company." But he added: "Mr. Abedi did not screen Mr. Stevens."

Stevens said he had little contact with Abedi or BCCI during his time at First American. "There certainly wasn't any relationship with BCCI at my level," Stevens said. "Whether there was a relationship at BCCI and Clifford's level, I don't know."

Asking For Money

In determining whether a bank has a "controlling influence" over another bank, the Federal Reserve also looks for signs of involvement in how a bank raises and spends capital. In this area, too, there seems to be a difference between what happened and what regulators expected.

Adham said in an interview that he borrowed money from BCCI for some of the capital to buy shares in First American's parent holding company, Credit and Commerce American Holdings NV (CCAH). The shares themselves secured the BCCI loans.

Clifford said he was unaware that any of the money was borrowed from BCCI. "I do not know what the financial relationship was with the shareholders and BCCI. We were never told that."

There were six infusions of new capital over seven years: $12 million; $89 million; $45 million; $190 million; $15 million and $50 million. Clifford said the money typically arrived from the shareholders' accounts at BCCI and that First American then issued new shares, sending them directly to the shareholders or to BCCI for distribution. (CCAH also borrowed $20 million from a BCCI subsidiary, records show, earmarked for "growth and expansion." Altman said it was a routine loan of money used as working capital for First American.)

The takeover application seemed to rule out this kind of role for BCCI, saying: "Neither is it a lender, nor will it be, with respect to the acquisition by any of the investors of shares in the holding company.

Kline of the Federal Reserve said: "That is a very clear-cut statement," which he interpreted to mean that BCCI was "not going to loan to anyone to buy the shares." Altman disagreed, saying that statement was limited to the purchase of shares during the takeover itself.

Clifford described how the capital infusions took place. "On those rare instances when we had to go to [the investors] for money, we would make the case and, each time, we got the support of Kamal Adham and of Abedi."

But, Clifford stressed, this did not mean Abedi or BCCI had any control over the money. "We make all the decisions," he reiterated.

Quesada, who retired from CCAH's board last year, had a different perception. "They [Clifford and Altman] would go to BCCI with the capitalization amount and make sure they wanted to invest," he said. "See, they were the owners of the bank, so naturally we would have to go to them for consent on matters of major magnitude. Just like an American company."

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Quesada, during three interviews last fall, said he always understood that BCCI had "a controlling influence of First American Bank in Washington." According to Quesada, who served on the board until last year, BCCI had the authority to give consent to First American's plans, including expenditures. "Or withhold it," Quesada said. "They had that option."

Clifford said Quesada's perception was wrong. "I don't know how in the world he ever got that idea."

Yesterday, Quesada called The Post after talking with Altman and said that he had left the wrong impression during the interviews. "If I said what you said I have, and I may have, then I misinformed you."

BCCI, for its part, has given two responses: In a statement to The Post in September, BCCI said it "does not own any shares of First American, nor does it control, or manage First American in any way." Asked last week for any additional comment, a BCCI attorney responded yesterday: "At the direction of BCCI's new management, a review of BCCI's relationship with a number of financial institutions is underway. BCCI is therefore unable to comment on the matter at this time."

Expanding in New York

Soon after the takeover was complete, First American turned its attention to building up its New York subsidiary, which at the time was headquartered in an office at 350 Park Ave. in Manhattan. It had no established branches in New York City to serve its customers.

The official record shows that First American bought two branches from Bankers Trust Co. in 1983. According to Bankers Trust officials who handled the sale, however, the initial negotiations were conducted primarily by BCCI's Khasuro Elley.

On March 25, 1983, Elley approached Bankers Trust about buying several branches then for sale. Throughout negotiations that spanned several months, Bankers Trust officials said, they thought they were dealing with BCCI, acting on behalf of a subsidiary. "We understood that he [Elley] was representing the parent as well as First American," said Theodore Kesselman, former chief financial officer at Bankers Trust.

An initial offer—submitted May 5 in the name of First American—was rejected as too low. Ralph Perry, the Bankers Trust official handling negotiations, reported to Kesselman that Elley claimed he could not bid any higher without consulting BCCI officials in London.

Several days later, Elley and Aboli Helmi, a BCCI mergers and acquisitions specialist, met again with Perry. "After he [Elley] saw the numbers and his advisers did his homework, so to speak, I went up to the BCCI office and we sat down and talked about the whole thing," Perry said. ". . . I remember we wrote on a yellow pad some basic principles we agreed upon and initialed it."

The formal $3 million bid for the branches came later from Altman, on First American stationery. Altman said Elley was acting at his direction, not BCCI's. Altman said he "may have" first learned of the Bankers Trust branches from Abedi, who possibly told him "BCCI has looked at this and you may be interested in it."

But Altman added, "That's about as far as it went. He [Abedi] never told us to buy."

Two weeks after the offer, Elley became a senior vice president at First American. He disputed Perry's account, saying Perry did not understand the arrangement he had with First American. "There was a period of transition in which I assisted First American with the acquisition of those branches, while I was still at BCCI, but I had taken the decision to leave BCCI," Elley said. " . . . I can't recall the exact sequence of events."

Clifford, who said he made the decision to pursue and buy the Bankers Trust branches, said he was puzzled by Perry's and Kesselman's account. "The fact is that these people, who have no motive not to be truthful, recall that BCCI was behind the whole deal," Clifford said. "Does that mean that BCCI was necessarily controlling First American? I don't think that logically follows."

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The Bankers Trust purchase was completed just about the time that Richter was hired to head the New York operation. His chief priority was to build an international banking operation. Richter said Abedi was an "adviser to First American" in this area. He said Abedi asked him how much new capital he would need. "I said I wanted $100 million," Richter said. Within a year, he said, $100 million arrived—$89 million in new capital, the rest from the sale of another First American asset.

Clifford disputed Richter's characterization of Abedi's role. He said that First American was merely trying to cultivate BCCI as a client because BCCI could channel foreign banking business into First American. He said he first discussed the capitalization with Adham, who came up with the figure of $100 million. "I think, again, there is a misperception," Clifford said.

The Bankers Trust acquisition demonstrates a gap in the regulatory system: To acquire the two Bankers Trust branches, First American had to file applications with the New York State Banking Department and the FDIC—but not with the Federal Reserve Board.

Those applications summarized the Bankers Trust negotiations, noted the capitalization and mentioned plans to develop a "substantial international banking business." BCCI is not mentioned on the applications.

Kline, the Federal Reserve associate director, said he does not think the 1981 representations about BCCI allow for contacts between BCCI and First American subsidiaries. "Certainly not in terms of influencing the policies or operation of a subsidiary," he said.

A Takeover in Georgia

In 1987, four years after the Bankers Trust deal, First American acquired the National Bank of Georgia (NBG). Here, too, BCCI was involved from beginning to end: helping with the negotiations, arranging for the financing and participating at the closing.

NBG was owned by Saudi financier Ghaith R.Pharaon. He had once been BCCI's largest shareholder and continued to rely upon Abedi for financial advice.

Clifford said the negotiations began with a conversation between himself and Abedi and were thereafter handled by Altman. "I dealt with Pharaon," Altman said. "I dealt with Abedi. . . . I talked to him [Abedi] on the telephone. I informed him of where we were on the deal. I explained to him our bidding. Were we asking for approval to do it? We certainly were not."

Ads Stress History, Heritage and Heroes

'Warm' Campaign Accents U.S. Values

On the television screen Vivian Taylor speaks from the heart of how her parents sacrificed to send her to college. "When people save money the way my parents did, it's an expression of love," she says.

Taylor fades from the screen and next appears the distinctive trademark of 1st American Bank, and with it the gentle, rich voice of a narrator. "We share your values and will help you save for college. We're First American. The bank for all Americans."

Four years ago, the name First American Bank was lost in the din of a crowded marketplace, languishing behind six or eight other local institutions for what marketing experts call "top-of-the-mind" awareness, according to Bruce Genther, a First American spokesman.

But after a clever television advertising campaign, beginning with a series of tongue-in-cheek historical skits that feature TV personality Willard Scott as George Washington and other American heroes, First American's marketing studies show a much improved public awareness of the company.

The ad campaign was designed to convey a "warm and fuzzy" feeling about First American, Genther said. Indeed, one videocassette tape from the company's ad agency has "1st American warm and fuzzies" on the label. A set of commercials about immigrant families ends with this voice-over: "Nearly every family can trace its heritage to one bold 'first American.' We salute the spirit of first Americans who made this country their own."

That First American's holding company is owned by investors from Saudi Arabia, Kuwait and the United Arab Emirates is an irony lost on most customers, Genther said. "We're sensitive to the issue of being foreign-owned. We know that the marketplace knows that . . . we've never shied away from that."

The television commercials were designed by the firm of Goldberg, Marchesano, Kohlman Inc. Carol Marchesano said the ads are designed to get consumers to come to know, like and trust First American. Subliminally, she said, the ads are intended to reach out to low- and middle-income depositors who might feel ignored by other advertising campaigns aimed at more affluent depositors.

Marchesano said the patriotic theme flowed from the company's corporate name. "The name is First American," she said. "So that is the most natural thing for us to promote—those things American, like the family values, like apple pie and the American flag."

—Jim McGee

1325015-000-4844

Altman said Abedi had two limited roles: as a go-between who could persuade Pharaon to take First American's offer over a competing offer and as a "communications link" with the First American shareholders who were providing the $190 million that First American needed to buy NBG.

But BCCI also acted on behalf of First American as pledge agent. This meant that BCCI held the NBG stock during an option period; and then, at closing, was allowed to use the purchase funds to satisfy Pharaon's outstanding loans with BCCI.

Clifford said there was nothing unusual in BCCI's role. "It's the most natural result that one could expect," he said. "BCCI was Pharaon's bank," and both sides were comfortable with BCCI serving as midwife to the transaction.

The application for Federal Reserve approval of the NBG purchase does not mention BCCI and its various roles. If it had, "that would have triggered a red flag for us," Mattingly said.

New and Old Questions

A red flag did go up in September 1988 when a federal agent in Miami caught a BCCI executive on tape in the Noriega money-laundering case.

The executive, Amjad Awan, was secretly recorded as he talked about BCCI's operations in the United States. Awan, who was later convicted of money-laundering and sentenced to 12 years in prison, began describing his view of the relationship between BCCI and First American's shareholders from his vantage point as head of BCCI's Latin American division.

"BCCI was acting as adviser to them," Awan told the federal agent. "But the truth of the matter . . . is that the bank belongs to BCCI. Those guys [the First American investors] are just nominee shareholders."

Clifford dismissed Awan's account, saying Awan had no way of knowing the facts. "I can see how this would grab you," he said. "I can only say he is totally incorrect."

Altman said Awan and other mid-level BCCI officials mistakenly assumed that BCCI controls First American because the two banks have certain investors in common. "I've heard that officers of BCCI have made those statements, that they have this relationship to First American," Altman said. "They don't understand what the situation is."

After the money-laundering charges became public, Federal Reserve officials said, the board delayed a pending First American acquisition in Florida until a "special inquiry" was completed.

On Feb. 16, 1989, the board signed off on the Florida acquisition, concluding that First American had "adhered to their original commitments" in the 1981 hearing. "All we can do is say we looked," Mattingly said.

Turmoil continues at BCCI. Last year, it pleaded guilty in the money-laundering case and paid a $14 million fine. Several managers have gone to prison, scores have resigned or been fired. Recently, the bank announced the resignations of Abedi and Naqvi.

Meanwhile at First American, where the bank is profitable and all seems calm, Clifford and Altman wish the questions would stop. "We think that the Fed totally understands the relationship with BCCI," Altman said.

On a wall inside First American's tastefully furnished board room at its 15th and H streets NW headquarters, is a portrait of Clifford placed directly behind his seat at the conference table. This image—that of a distinguished American presiding over a healthy, well-managed bank—is more than just corporate symbolism; it is the bank's best defense.

"This has been an exceedingly personal operation," said Clifford. "I would not have taken [the job] if I had not been assured that I had total authority to run that bank. And at no time has that authority been interfered with."

Staff researchers Lucy Shackelford and Bruce Brown contributed to this report.

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1325015-000-4845

Television personality Willard Scott as George Washington in scene from one of a series of First American advertising campaign spots featuring tongue-in-cheek historical skits. The commercials end with the slogan, "We're First American. The bank for all Americans."

1325015-000-4846

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/7/91

From : SA [redacted] (C-5) b6 b7C

Subject: UNSUB(S);0
dba CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V.
Netherlands, Antilles;
BF&E; FAG
(OO:WMFO)

On 2/7/91, I attended a meeting at the U.S. Attorney's Office, Washington, D.C., concerning the captioned matter and called by AUSA [redacted] Criminal Division. Others in attendance were: AUSA [redacted] Economic Crimes Unit, USAO, WDC; [redacted] Fraud Section, DOJ, telephone [redacted], also of the DOJ Fraud Section; Assistant District Attorney (ADA) [redacted] Investigations, New York County District Attorney's Office (NYCDAO), One Hogan Place, N.Y., N.Y. 10013, telephone [redacted]; ADA [redacted], NYCDAO. The meeting was called at Chief [redacted] suggestion to determine from the NYCDAO representatives whether the results of an ongoing investigation being conducted by the NYCDAO into the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) have applicability in the captioned matter or, possibly, other federal violations. b6 b7C

ADA [redacted] said the NYCDAO has been investigating BCCI under N.Y.'s "enterprise corruption" statute for several years. In fact, he reported, the ten-year statute of limitations tolls on the suspected violation at the end of this year. The NYCDAO has been in contact with the same attorneys who provided the Federal Reserve Board (FRB) with the information contained in the criminal referral form which initiated the captioned matter; [redacted] all with the firm of Patton Boggs & Blow (PB&B), 2550 M Street, NW, WDC 20037, telephone (202)457-6310. PB&B apparently has been retained by the new ownership of BCCI in response to several ongoing inquiries: the NYCDAO case; the captioned matter; two federal cases (a tax matter and some other kind of criminal matter) in the Southern District of Florida (SDF). [redacted] a b6 b7C

(2)-WMFO

JNR:jnr
(2)

See 2-14-91

29B-WF-171994-4

Draft

2/11/91

[redacted] b6 b7C

1325015-000-4847

criminal attorney, has responded to a plea offer made by NYCDAO by suggesting "a global settlement" of all the pending matters, both state and federal, possibly involving his clients--the current owners of "77.4% of BCCI."

The NYCDAO's investigation indicates that current management and past owners of BCCI are possible targets for other (unspecified) violations within its jurisdiction. The offer NYCDAO extended to Liebman was to allow BCCI to plead the corporation to the "enterprise corruption" charge (which essentially involves a false statement to the state banking regulator), in return for meaningful cooperation in aiding the effort to identify and target the other criminal, state violations. Such a plea (or conviction at trial) would result only in "insignificant" monetary sanctions, ADA [redacted] said. b6 b7C BCCI, however, is trying to avoid having to plead the corporation in a U.S. criminal case because doing so will likely result in revocations of its British and European licenses to operate. Instead, BCCI, through [redacted] has been offering cooperation to expose the alleged perpetrators of "perhaps the biggest swindle ever," which one source has told NYCDAO has caused losses to BCCI at or in excess of $1 billion.

ADAs [redacted] said that, due to grand jury b6 b7C secrecy requirements, they could not disclose the existence or nature of evidence which has been made available to NYCDAO during the course of its investigation, unless the DOJ and/or the USAOs, WDC and SDF, wanted to become parties to that investigation in a joint effort with NYCDAO, preferably conducted through the N.Y. grand jury. In fact, ADA [redacted] requested that such a joint effort be considered. While not foreclosing the possibility of a joint investigation, Chief [redacted] and AUSA [redacted] said they were not prepared to take that step without first approaching [redacted] with a request for cooperation. Both also said they were not inclined to sign on to a "global settlement" which might preclude further investigation/prosecution of federal violations as yet unknown.

ADA [redacted] said that [redacted] has produced some records, b6 b7C such as a redaction of a Price Waterhouse audit of BCCI. However, the new owners of BCCI, when the alleged fraud was discovered, took all the company records to Abu Dhabi. The NYCDAO's proposed agreement, however, requires production of all documents and witnesses, and the means to find correlative evidence. ADA [redacted] did note that the FRB had received a "6E" exemption from the N.Y. court and, thereafter, had received the redaction of the audit report. This was news to Messrs. [redacted] who had attended the meeting at the FRB when the information in the referral form was received from [redacted]. At that time, Chief [redacted] asked the three if there was an audit

1325015-000-4848

report available. The three of them responded at once, but in a somewhat confusing manner: two of them nodding their heads in the affirmative, the other shaking his head in the negative.

Chief [redacted] and AUSA [redacted] agreed that the DOJ and USAO, WDC, would approach [redacted] et al, with a request for full cooperation as an indication of the innocence of their clients. If that approach is rebuffed, then DOJ personnel would be assigned to review and evaluate NYCDAO's evidence, using a "Chinese wall," to decide whether DOJ and the USAOs, WDC and SDF, should "buy into" a joint investigation with NYCDAO. b6 b7C

AUSA [redacted] said the captioned matter should be investigated anyway, given the apparent violation of T. 18, U.S.C., S. 1001. Other possible violations include T. 18, U.S.C., S. 1847 (Bank Holding Act--violation of which is a felony) and T. 18, U.S.C., S. 1005 (False Statements, in this case, made to the FEDERAL RESERVE BOARD). b6 b7C

It is therefore recommended this matter be opened and assigned.

1325015-000-4849

FD-467 (Rev. 2-1-90)

Memorandum

To : Director, FBI Date 2/11/91

From : SAC, WMFO 29B-WF-171994

(Serial # is mandatory)

Subject : Unsub
Allen

1. **Source of Captioned Matter:**

   ☒ A: Federal Supervisory Agency Written Referral
   ☐ B: Financial Institution Written Referral
   ☐ C: Other

2. **Type of Victim Institution:**

   Bank
   ☐ A: FDIC
   ☐ B: OCC
   ☒ C: FRB
   ☐ D: Savings Association
   ☐ E: Credit Union
   ☐ F: Farm Credit Institution

3. **State Victim Institution Located:** (two letter identifier) DC

4. **Type of Subject(s):**

   ☐ A: Insider
   ☒ B: Insider & Outsider
   ☐ C: Outsider
   ☐ D: Unknown

5. A: **Amount of Reported Loss** (before restitution, if any) None known
   B: **Amount of Reported Restitution** (if any) _____

6. **Action taken:**

   ☒ A: case opened _____
   ☐ B: incorporated into pending investigation
   ☐ C: no action due to state or local prosecution
   ☐ D: amount of loss does not meet prosecutive guidelines and is being referred to a state or local law enforcement
   ☐ E: Federal violation in the referral is handled by another Federal agency
   ☐ F: matter was presented to USA and prosecution was declined
   ☐ G: initiation of investigation delayed due to current unavailability of resources

Indication of high dollar loans to officers of First American which were unpaid.

29B-WF-171994-5

Refer to MIOG, Section 29-6.1, for reporting and notification requirements upon receipt of criminal referrals in bank fraud and embezzlement matters.

Searched _____
Serialized FBI/DOJ
Indexed _____
Filed 132E05-000-4850

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/13/91

From : SA [redacted] b6 b7C

Subject: UNSUB(S);
dba CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V.
Netherlands, Antilles;
BF&E; FAG
(OO: WMFO)

On 2/13/91, I telephoned [redacted] b6 b7C to the Board of Governors of the Federal Reserve System (FRS), 20th & C Streets, NW, Washington, D.C., telephone [redacted] concerning the 1/22/91 criminal referral form he filed in the captioned matter. [redacted] said he would be unavailable until 2/19/91, due to the fact he was leaving for London, England, in an hour, as part of his inquiry into the captioned matter. An appointment to interview him was made for 9:30 a.m., 2/19/91.

[redacted], a former AUSA, is one of seven attorneys who staff the Enforcement Unit for the FRS, and essentially do their own investigations--assisted by field examiners who report to them--of apparent violations of FRS regulations. [redacted] was brought in to handle investigations of money laundering and bank secrecy violations. Civil sanctions available to their unit include the imposition of monetary penalties; removal and debarment of individuals involved in violations; cease and desist orders. Criminal matters, when discovered, are referred to law enforcement. b6 b7C

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JNR:jnr
(1)

29B-WF-171994 -6

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SERIALIZED SU FILED SU
FEB 13 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-4851

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/13/91

From : SA [redacted] b6 b7C

Subject: UNSUB(S);
dba CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V.
Netherlands, Antilles;
BF&E; FAG
(OO: WMFO)

AUSA [redacted] called to report she had spoken with [redacted] of the Federal Reserve System (the FED) after my conversation with him. I told AUSA [redacted] of my intention to interview [redacted] on 2/19/91, to obtain any documents containing the alleged false statements reported in the criminal referral form, and to find out what now makes the FED believe the statements are false. AUSA [redacted] then reiterated the concern about the possible "Castigar problem" which she and DOJ Fraud Section Chief [redacted] expressed in the 2/7/91 meeting with the N.Y. County Assistant District Attorney [redacted] and which might arise if the federal government received information or documents derived from the N.Y. County grand jury. b6 b7C

AUSA [redacted] then informed me that [redacted] has other documents which may relate to the captioned matter: b6 b7C

(1) the transcript of a 2/12/91 deposition of [redacted] by the FED;

(2) the transcript(s) of the 1981 hearings where CLARK CLIFFORD, et al, introduced the prospective owners of FINANCIAL GENERAL CORPORATION to the FED;

(3) the forms filed with the FED on a yearly basis by FIRST AMERICAN BANKSHARES;

(4) "several boxes" of documents files--currently at FIRST AMERICAN BANK--provided by [redacted] and possibly relating to such things as "side agreements on loans."

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JNR:jnr
(1)

29B-WF-171994-7

SEARCHED ____ INDEXED ____
SERIALIZED SW FILED SW
FEB 13 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-4852

Memorandum

F

To : SAC, WMFO (29B-WF-171994)(P) Date 2/20/91

From : SA [redacted] b6 b7C

Subject: CHANGED
CLARK M. CLIFFORD; b6 b7C
[redacted]
dba CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V.
Netherlands, Antilles;
BF&E; FAG
(OO: WMFO)

On 2/19/91, I met with [redacted] b6 b7C Division of Banking Supervision and Regulation, Board of Governors of the Federal Reserve System (FRS), 20th & C Streets, NW, Washington, D.C. 20551, telephone [redacted] to discuss the criminal referral form he filed, which initiated the captioned matter. [redacted] formerly an assistant U.S. attorney and, currently, an attorney in the "Enforcement Unit" of the FRS, said he had referred the matter to DOJ in the belief there is a "good criminal case" contained in the findings of his investigation. Essentially, the case is one of an ongoing series of false statements made to the FRS about the ownership and control of FIRST AMERICAN BANKSHARES and its subsidiary, FIRST AMERICAN BANK.

Knowledge of the false statements came to light after the 4/90 money-laundering convictions of the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) in the Middle District of Florida caused the new owners of BCCI to bring in auditors to examine all of its operations. That audit disclosed that BCCI was under-capitalized by about $1 billion, and caused the Abu Dhabi contingent of stockholders, who owned about 35% of BCCI, to seek an infusion of capital from the other owners, mainly some Saudis who owned over 40% of BCCI. When the Saudis refused, the Abu Dhabi contingent bought out the Saudis, thereby becoming majority owners. A subsequent, more extensive audit by the new owners

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(2)

1325015-000-4853

revealed a much larger need for capital, due to a series of questionable loan transactions which resulted, among other things, in BCCI owning at least 58% of the outstanding shares of the company which owns FIRST AMERICAN BANKSHARES: a violation of the Bank Holding Act, T. 12, U.S.C., S. 1847, which prohibits undisclosed, unregistered, foreign ownership of more than 25% of any American bank.

BCCI's ownership of FIRST AMERICAN BANKSHARES came about by virtue of a series of loans BCCI made, beginning as early as 1978, to the "shareholders" of CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. (CCAH), Netherlands, Antilles; a "shell" set up for the purpose of acquiring FIRST AMERICAN BANKSHARES' predecessor, FINANCIAL GENERAL BANKSHARES. Those loans, and others that followed (probably in and after 1982), were of the "non-recourse" variety, secured by shares in CCAH, and were made to subjects [redacted] b6 b7C all comprising the [redacted] in CCAH. Subjects [redacted] and CLIFFORD were [redacted] in CCAH (more on this below), using BCCI loans to purchase their stock. BCCI has now disclosed to the FRS that (1) these loans were never serviced, (2) they were not defaulted (before the new owners took over), and (3) that there seemed to be no correlation between the amount of CCAH shares owned/pledged and the amount of a loan. In assuming control over the collateral--amounting to 58% of the outstanding CCAH shares--BCCI assumed control of FIRST AMERICAN BANKSHARES, thereby committing the felony violation of the Bank Holding Act (T. 12, USC, S. 1847).

"If what BCCI says is true," [redacted] said, "then the CCAH people lied (to the FRS in their original filing and all ensuing, yearly ones) about ever getting financing from BCCI." Included in the "CCAH people" are the captioned subjects, with CLIFFORD, [redacted] comprising four of the five [redacted] CCAH; the fifth being the "trust company" in Curacao, where CCAH is headquartered. In addition, [redacted] FIRST AMERICAN CORPORATION--a Delaware corporation which supposedly owns FIRST AMERICAN BANKSHARES; CLIFFORD is chairman of the board of FIRST AMERICAN BANKSHARES, [redacted]. CLIFFORD and [redacted] law firm which either represents, or has represented, all of the entities involved, from BCCI on down the ladder to FIRST AMERICAN BANK.

According to [redacted], BCCI has disclosed that [redacted] b6 b7C and CLIFFORD's purchases of CCAH stock were made with BCCI loans in 1986 and again in 1987. Documents now in FRS custody reveal that, in 1986, [redacted] borrowed between $4 million and $5 million, and CLIFFORD borrowed about twice that amount, and both used all the proceeds to buy CCAH shares at approximately $2,230 each. In

1325015-000-4854

1987, [redacted] borrowed about $1 million, and CLIFFORD $2 million, again using all of it to buy CCAH shares, this time at approximately $2,240 each. On both occasions, they executed promissory notes, and pledge agreements of the shares as collateral. However, BCCI has found that, in each case, there were "side letters" to CLIFFORD and [redacted] in which BCCI agreed: (1) to disregard the promissory notes and pledge agreements, and automatically renew the loans; (2) that, when either or both were ready to sell the shares, BCCI would find a buyer; (3) that there was no need for either to pay principal or interest (although prior to the 1987 loans, CLIFFORD did pay about $600,000 interest and loaned [redacted] about $350,000 so he could do the same); (4) that when the shares were sold, [redacted] and CLIFFORD would get at least what they had paid for them, plus any profit. b6 b7C

In or about 3/88, [redacted] and CLIFFORD decided to sell their CCAH shares. They were purchased by another CCAH shareholder, [redacted] (see 5/90 Regardie's article, p.69), who paid them $6,800 per share, i.e., about three times the book value. [redacted] realized a profit of about $3 million (although he claims it was about $900,000 after commissions and repayment of CLIFFORD), and CLIFFORD, about $6 million. In December, 1989, still curious about BCCI's role in all of this, the FRS, in the person of [redacted] wrote to [redacted] asking disclosure of any BCCI loans ever used for the purchase of CCAH shares. [redacted] answer did not disclose the loans he and CLIFFORD received. [redacted] now says that, because the loans had been repaid, he thought [redacted] wasn't interested in them. [redacted] believes that such an insider stock deal may be a securities violation.) b6 b7C

The FRS has all CCAH documents, supposedly in the U.S., by virtue of a civil subpoena. [redacted] was unsure whether an "access letter" would suffice for us to examine them, or a subpoena would be required. All the BCCI loan documents are in Abu Dhabi, however, and the FRS is negotiating with BCCI to at most get them to the U.S., or at least to some neutral site for examination. BCCI is also on the verge of agreeing to cease and desist doing business in the U.S., and to put together a divestiture plan. b6 b7C

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.) p. A-5 The Wall Street Journal

Date: 2/20/91
Edition:

Title: "Fed Makes Criminal, Civil Referrals to U.S. Regarding First American Unit."

Character: BF&E; FAG
or
Classification:

Submitting Office: WMFO

Indexing:

Fed Makes Criminal, Civil Referrals To U.S. Regarding First American Unit

By Peter Truell
Staff Reporter of The Wall Street Journal

WASHINGTON—The Federal Reserve has made criminal and civil referrals to the Justice Department concerning possible misrepresentations of the capital and ownership structure behind First American Bankshares Inc., according to people close to the matter.

The Fed's concerns are based on the discovery by regulators that to a significant degree, the ultimate ownership and financing of First American Bankshares and its parent First American Corp. was tied to Bank of Credit & Commerce International, an institution that last year pleaded guilty to money-laundering charges in Tampa, Fla.

Some shareholders in Credit & Commerce American Holdings N.V., a Netherlands Antilles-based holding company for First American, borrowed money from BCCI to finance their shares in the Netherlands Antilles company, and pledged the stock as collateral, according to people close to the matter.

First American, with $11 billion in assets, is the largest bank holding company in the Washington area, and has banking operations in the District of Columbia, New York, Virginia, Maryland, Georgia, Tennessee and Florida. Its chairman is Clark Clifford, who is a prominent figure in Washington political and legal circles. Mr. Clifford also was an adviser to President Harry S. Truman and a defense secretary in the Johnson administration.

The Fed made the referrals to the Justice Department just over two weeks ago, according to people familiar with the matter. Spokesmen for the Fed and the Justice Department declined to comment. Referrals to the department do not necessarily mean that any legal action will be taken.

If bank loans were covertly used to finance First American's capital, it would break regulations and laws regarding disclosure for bank holding companies.

It also could mean that First American Bankshares was in effect a subsidiary of BCCI. If so, that would have caused regulators to be more cautious in their supervision of First American. BCCI, which is often seen as an unorthodox bank, was until recently based in both Luxembourg and the Cayman Islands, tax havens that don't have strong central bank regulators. After reporting hundreds of millions of dollars of losses last year, it moved its headquarters to Abu Dhabi, United Arab Emirates, but still is beset by billions of dollars in problem loans.

First American has asserted that it is an independent bank since at least April 1981, when a group of major Middle Eastern investors represented by Mr. Clifford told the Federal Reserve and other bank regulators that they were "a group of individuals acting as individuals" using their own financial resources to acquire First American's predecessor company. Mr. Clifford and his law partner, Robert Altman, became the bank holding company's chairman and president, respectively, once the investor group completed the takeover in 1982.

However, lawyers involved in the case said that last year, representatives of Abu Dhabi's government found that nonperforming bank loans at BCCI had been used by Middle East investors to purchase stock in Credit & Commerce American Holdings, with the loans secured by the stock.

Abu Dhabi began looking into the matter after its ruler, Sheik Zayed al-Nahyan, effectively took over BCCI last year. "I think that essentially once the new majority shareholders [of BCCI] became aware there were potential problems under U.S. law, they authorized us to go to the U.S. authorities and resolve outstanding issues there may be," said Middleton Martin, a partner at the Washington law firm of Patton, Boggs & Blow, which is representing Sheik Zayed and the Abu Dhabi government. Since Patton Boggs took over responsibility for the case, they have been in continual discussion with the Federal Reserve, Mr. Martin said.

In an interview Friday, Mr. Altman denied that he or Mr. Clifford knew anything about bank loans from BCCI being used for the capital of First American's parent. "I don't have any information regarding any of these alleged financing arrangements," he said. First American, he added, "has been operated properly and responsibly and in compliance with all rules and regulations since 1982 to date." Mr. Altman also said, "I am unaware of the referrals" to the Justice Department, and added that since the takeover, there had been "no interference of any kind by BCCI in the operation of First American either directly or indirectly."

Referring to the 1981 Federal Reserve examination of the bid made for First American's predecessor—Financial General Bankshares Inc.—by the group of Middle Eastern investors, Mr. Altman said, "whatever facts we knew that bore on that [takeover and the financing of it] were presented at that time."

Mr. Clifford didn't return telephone calls seeking comment, but Mr. Altman said that he also spoke for Mr. Clifford.

First American's condition is comparable to other big banks in the Washington area, according to people in and close to the bank. According to unaudited quarterly results for the quarter ended last Sept. 30, filed with the Federal Reserve, First American Bankshares had total assets of $11.15 billion, down from $11.63 billion at June 30. For the first six months of 1990, it had a net loss of $22.8 million, compared with net income of $30.3 million a year earlier, according to a report dated June 30.

The bank holding company, partly as a result of tortuous negotiations with Abu Dhabi, recently received a capital injection of several tens of millions of dollars from the Abu Dhabi government. Because the BCCI loans backed by Credit & Commerce American Holdings stock are nonperforming, Sheik Zayed now has a controlling interest in First American's parent.

The ownership structure behind First American is complicated. First American Bankshares is owned by First American Corp., which in turn is owned by Credit and Commerce American Holdings, which is in turn owned by Credit & Commerce American Investment N.B., Amsterdam, Netherlands. Mr. Altman said there hadn't been changes in CCAH's shareholder register over the past several years. The companies aren't formally affiliated with BCCI, but there is a considerable overlap in shareholders of BCCI and these Dutch and Netherlands Antilles companies.

BCCI has problems of its own, and one of the regulators' first jobs has been to ensure that capital from the Washington bank wasn't used to plug holes elsewhere in the ailing BCCI network. BCCI has moved its headquarters to Abu Dhabi and has shrunk to 359 branches from about 400 a year ago, according to Clement Gagne, a lawyer at Janis, Schuelke & Wechler, which also represents BCCI.

In addition, even after an Abu Dhabi government injection of $1 billion early in 1990, there are considerable amounts of nonperforming loans, which some people close to the bank said total as much as $4 billion to $5 billion.

29B-WF-171994—9

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FEB 25 1991
FBI - WASH. METRO FIELD OFFICE

FD-350 (Rev. 5-8-81)

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(Indicate page, name of newspaper, city and state.) p. A-1 The Washington Post

Date: 2/21/91
Edition:

Title: "Fed Probes Foreign Links to First American Bank

Character: 29B-
or
Classification:
Submitting Office: WMFO

Indexing:

Fed Probes Foreign Links To First American Bank

Overseas Asset Transfers Barred as Safeguard

By Jim McGee
and Joel Glenn Brenner
Washington Post Staff Writers

The Federal Reserve Board yesterday disclosed it is investigating whether the Bank of Credit and Commerce International (BCCI), a foreign bank based in the Persian Gulf, is a secret investor in First American Bankshares Inc. of Washington and said it has issued an order barring any transactions between the two institutions.

Federal Reserve officials have been told that BCCI acquired control of shares in First American's parent company without the approval of state and federal bank regulators, according to informed sources. A senior Fed official said the order is a "precautionary measure put into place to protect the bank [First American] while the Federal Reserve completes its investigation."

The Fed also referred the matter to the Justice Department for review of possible criminal or civil charges, sources said.

First American, the area's largest bank holding company and parent of First American Banks of Washington, Maryland and Virginia, lost a record $182.5 million in 1990 because of the deteriorating commercial real estate market, according to documents that the privately held bank company filed this week with federal banking regulators.

In response to the losses, the second-highest recorded by a local financial institution, First American's longtime chief executive, C. Jackson Ritchie Jr., has been forced to resign

See FIRST AMERICAN, A9, Col. 1

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SERIALIZED SW FILED SW
FEB 25 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-4857
FBI/DOJ

Fed Probes Foreign Link To Local Bank

FIRST AMERICAN, From A1

and nearly 100 employees have been laid off, sources said.

First American President Robert Altman yesterday confirmed the loss and layoffs and said Ritchie resigned on his own initiative.

Sources said the Fed is concerned about possible transfers of funds from First American to BCCI, a Middle East bank that is reportedly suffering from heavy losses.

Last year, BCCI was fined more than $14 million by a U.S. court after pleading guilty to federal charges of money-laundering in a case that documented the movement of funds controlled by former Panamanian leader Manuel Antonio Noriega through a BCCI account at First American.

First American, which operates eight banks with 295 branches in the District, Maryland, Virginia, Tennessee, New York, Georgia and Florida, is organized as a network of holding companies, owned by Credit and Commerce American Holdings (CCAH), based in the Netherlands Antilles.

It is run by two Washington attorneys, Altman and Chairman Clark M. Clifford, a member of former President Lyndon Johnson's cabinet and one of the nation's most prominent attorneys.

A LOOK AT FIRST AMERICAN

FIGURES IN MILLIONS OF DOLLARS

CATEGORY	FIRST AMERICAN CORP.	FIRST AMERICAN BANKS IN D.C. AREA
Assets		
1990	$11,065	$7,075
1989	11,520	NA
Net income (loss)		
1990	(182.5)	(96.7)
1989	58.3	64.6
Troubled real estate loans	336.7	261.6
Provision for loan losses	308.0	248.8

NOTE: Troubled real estate loans are for 1990 and include real estate acquired to satisfy debts, other real estate owned, loans that are past due 90 days and loans that are no longer paying interest or principal. Provision for loan losses is the amount that the bank added to its total reserve against bad loans in 1990.
SOURCE: Federal Reserve.

Altman consented to the order barring transactions between First American and BCCI, saying, "I think it is a prudent step for the Fed to take and one we were willing to take."

Altman, who has repeatedly asserted that neither he nor Clifford is aware of any financial arrangements between BCCI and First American's shareholders, promised to cooperate with the investigation. "We have always conducted business with BCCI on an arms-length basis," Altman said.

Because First American is privately held, the company, with $11 billion in assets, does not publicly disclose its financial performance. But like all bank companies, First American does file summary financial results with the Federal Reserve.

According to these filings, First American has lent more than $1 billion for real estate construction and land development through its various banking subsidiaries, leaving it vulnerable to any downturn in the commercial real estate market.

In 1990, more than half of the bank company's losses came from its banking subsidiaries in the Washington metropolitan area, where the commercial real estate market has been in a deep recession. Included among First American's troubled commercial real estate loans is a $6 million unsecured loan to developer Dominic F. Antonelli Jr., who recently filed for bankruptcy protection from creditors. The First American banks in the District, Maryland and Virginia lost more than $96 million in 1990, compared with earnings of $64 million in 1989. Troubled real estate assets at the three banks totaled more than $100 million at the end of 1990.

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Altman said yesterday that he believes the loss of $139 million recorded by First American Bankshares Inc. reflects the bank company's problems more accurately than the larger loss recorded by First American Corp. He said he expects a profitable year in 1991.

Altman said the 1990 results reflect the bank's forceful measures to write off bad real estate loans and to set aside reserves as protection against possible future problem loans. First American remains in compliance with all federal standards for capital, the financial cushion that protects against any loan losses, he said. The bank company recently received an $80 million addition to its capital from its principal shareholders in Abu Dhabi, Altman added.

According to one First American executive, who declined to be identified, the bank "did everything it could to keep the losses a secret. They even went so far as to keep us from taking notes on the problems at management meetings. They didn't want any written record of the problems."

The Fed's inquiry follows a series of allegations that began more than a year ago suggesting an unusual relationship between BCCI and First American.

A senior Fed official said the board acted because it now has grounds to believe that BCCI might have a substantial ownership interest in First American.

On Feb. 3, The Washington Post reported that BCCI has had an extensive relationship with First American that appears contrary to what federal regulators said they were told when they approved the takeover of First American in 1981.

The Fed and the New York State Bank Board approved the takeover in 1981 after being assured by Clifford that BCCI would have no control or influence over First American.

The Fed approval was based on an application that said of BCCI, "neither is it a lender, nor will it be, with respect to the acquisition by any of the investors" of shares in CCAH.

Sheik Kamal Adham, the controlling shareholder of CCAH, told The Post that some of the money he put into CCAH as capital was borrowed from BCCI through loans secured by his shares in CCAH.

The Feb. 3 article also detailed how BCCI executives participated in the hiring of three First American executives after 1982 and helped negotiate two important First American acquisitions.

The Fed was told last fall that the New York County district attorney's office had "developed evidence that, in fact, BCCI had a controlling interest in CCAH," according to Manhattan District Attorney Robert Morgenthau.

New York County prosecutors also obtained information about large loans from BCCI, which were secured by shares in CCAH.

Those loans, first discovered by the accounting firm of Price Waterhouse, are not paying interest, the prosecutors reported. "We told them that," Morgenthau said in an interview with The Post.

While this criminal investigation progressed, the ruling family of the United Arab Emirates, headed by Sheik Zayed al-Nahyan, acquired full control of BCCI.

Their attorneys, in recent discussions with the Fed, have acknowledged that BCCI owns a substantial portion of CCAH shares, sources said.

"We have gone to the Fed and indicated that the new owners have recently become aware of past actions of former management that may have created certain legal problems in the U.S.," said attorney Middleton Martin, who declined further comment.

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FD-350 (Rev. 5-8-81)

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Fed May Force Sale Of First American

U.S. Probes Legality of Ownership Change

By Joël Glenn Brenner
and Jim McGee
Washington Post Staff Writers

The Federal Reserve Board may require the sale of First American Bankshares Inc., the largest bank holding company in Washington, if it finds that a controlling stake in the company was acquired illegally, sources said yesterday.

Federal Reserve officials are investigating reports that the Bank of Credit and Commerce International (BCCI), a foreign bank based in the Persian Gulf, owns at least 25 percent of the offshore parent of First American Bankshares, stock it obtained without the approval of state and federal banking regulators, according to informed sources. A 25 percent holding would give BCCI control of First American.

BCCI has been owned by the ruling family of the United Arab Emirates since last year. Upon taking control, they told Fed officials they discovered approximately $1 billion in loans by BCCI that were backed by shares in First American's parent company, sources said. Shares controlled outright by BCCI reportedly gave it more than 25 percent control in First American's holding company, Credit and Commerce American Holdings, sources said.

Fed officials were assured nearly a decade ago by Washington attorney Clark M. Clifford that BCCI would not be involved in the ownership or control of First American.

Clifford took over as chairman of First American following Fed approval of the takeover of the bank company by Middle East investors. Banking regulators are concerned about a link between the two banks in part because BCCI is said to be suffering from heavy losses.

On Wednesday, the Fed made public an order barring any transactions between First American and BCCI, which last year was fined more than $14 million after pleading guilty to money laundering charges. Some of the funds moved through a BCCI account at First American.

Analysts said numerous institutions and investors would likely be interested in buying First American shares.

A Fed spokesman would not comment publicly on the investigation or a possible forced sale of First American stock. "If divestiture were required it would be done in an orderly way so as not to injure First American bank," said a senior Fed official.

Banking analysts said yesterday that numerous institutions and wealthy investors would likely be interested in buying shares in First American, which is the 51st-largest in the nation.

Although the market for bank mergers and acquisitions has cooled considerably during the past year as bankers' real estate woes have worsened, analysts said First American's attractive banking franchise could spark a hot bidding contest involving

See FIRST AMERICAN, B8, Col. 5

(Indicate page, name of newspaper, city and state.) p. B-1 The Washington Post

Date: 2/23/91
Edition:

Title: "Fed May Force Sale of First American"

Character: BF & E; FAG
or
Classification:
Submitting Office: WMFO

Indexing:

(X)

ZGB-WF-171994 — 11

SEARCHED ___ INDEXED ___
SERIALIZED SU FILED SU
MAR 14 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-4860

FBI/DOJ

Federal Reserve Board Probes Ownership of First American

FIRST AMERICAN, From B1

sociates Inc. "If they needed to sell, it wouldn't be a problem."

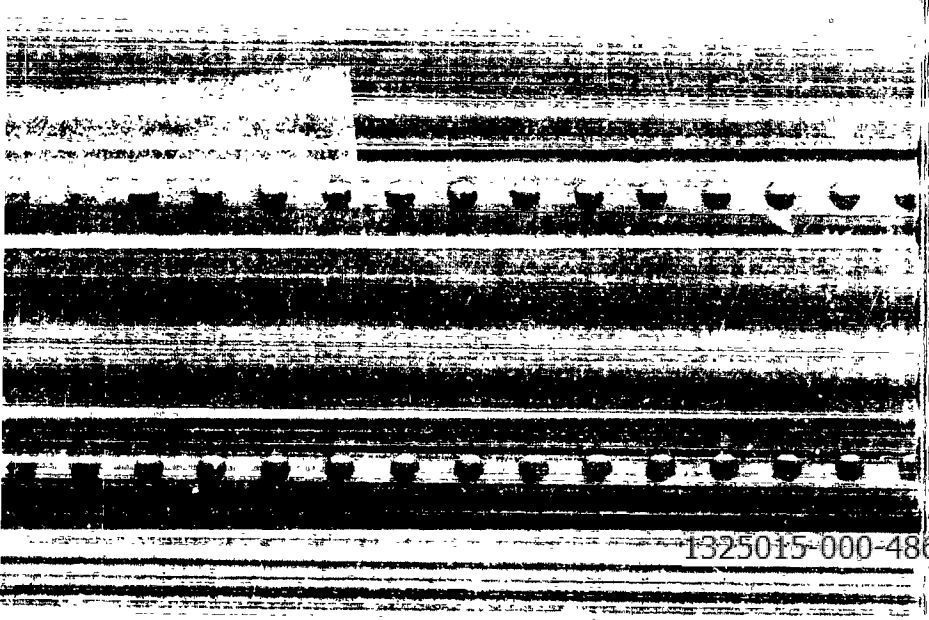
The First American banks of Washington, Maryland and Virginia have combined assets of $7 billion and a network of branches that stretches from Norfolk to Gaithersburg.

In addition to its local presence, First American operates banks in Tennessee, New York, Georgia and Florida. The company has assets of $11 billion.

Although sources said divestiture of ownership is a likely outcome of the Fed's investigation, a sale of shares in the bank company could be complicated by the legal questions surrounding First American's ownership.

Among the local banks that could bid for the company and solidify their positions in the Washington market are C&S/Sovran Corp., Crestar Financial Corp. and Signet Banking Corp.

Among the possible outside bidders for the company, analysts said, are NCNB Corp. of Charlotte, N.C.; First Wachovia Corp. of Winston-Salem, N.C.; and Banc One Corp. of Columbus, Ohio.



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CLOSIN

American

		Mar	Apr	May	Mar	Apr	May
AMR	40	s	s	20⅜	s	s	1/16
59⅝	45	r	s	r	r	s	1/16
59⅝	50	10¼	r	r	⅛	r	1/16
59⅝	55	5¼	r	7	1/16	1¼	2
59⅝	60	1⅞	3⅜	4	2⅜	3¼	4⅜
59⅝	65	½	1½	1⅞	5⅞	r	r
ASA	35	s	s	r	s	s	⅝
42¼	40	3	r	4½	⅝	1¼	2
42¼	45	⅝	1½	2⅛	4	4	4⅞
42¼	50	1/16	½	⅞	r	r	r
42¼	55	s	s	⅜	s	s	r
ASTRs	25	s	s	28⅛	s	s	r
52½	35	13¼	s	13¾	r	s	r
52½	40	11⅜	r	10¾	r	¾	r
52½	45	8¼	r	10¼	⅝	r	2⅞
52½	50	4½	5⅝	6⅜	2	3⅜	4⅜
Allwst	5	1/16	r	1/16	r	r	r
AFamly	17½	6⅛	s	6¾	r	s	r
23½	22½	r	r	2⅜	r	r	r
23½	25	½	⅞	1¼	1⅝	1¾	r
Arkla	17½	r	r	r	r	r	⅜
19	20	r	r	⅝	r	r	r
Bally	5	s	s	1¼	s	s	1⅛
5⅜	7½	s	s	⅜	s	s	2⅞
C&SSov	20	r	r	r	1/16	r	1
20⅜	22½	r	1⅛	1⅛	r	r	r
20⅜	25	r	⅜	1/16	r	r	r
CNA Fn	60	s	s	33¼	s	s	r
89	75	r	r	r	¼	r	r
89	80	12	r	15¼	r	r	r
89	85	r	r	12	r	r	r
89	90	3½	r	9	2¾	r	r
Cadenc	25	r	r	6⅜	r	r	r
30	30	2¼	r	r	1⅞	r	3¼
30	35	r	r	2	r	r	r
CaesrW	15	2⅜	3	3⅜	r	r	r
17½	17½	1/16	1/16	2	⅞	1¼	r
17½	20	¼	¾	1	r	r	r
	47	45	3⅜	5½	6⅛	1¼	r	3⅜
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	47	50	1½	2⅞	3⅜	3¾	r	r
	47	55	⅝	1/16	2⅝	r	r	r
Olin	45	3½	r	r	r	1¼	r	
47¾	50	1	2	2¼	3⅛	r	r	
OshK A	30	r	r	r	⅝	r	r	
31	35	1/16	r	r	r	r	r	
Penney	40	r	s	r	r	s	⅜	
53¼	50	3¾	r	r	½	1¼	1½	
53¼	55	⅝	r	2	r	r	r	
PhilPt	22½	r	r	3¾	r	r	r	
26⅛	25	1¼	r	2¼	1/16	½	¾	
26⅛	30	1/16	¼	⅜	r	r	3½	
Quantm	12½	r	s	6¼	r	s	r	
17⅞	15	r	r	r	1/16	r	⅝	
17⅞	17½	1½	r	2⅜	¾	1¼	1½	
17⅞	20	1/16	1	1½	r	r	r	
Reuter	40	r	r	r	r	r	1/16	
45⅞	45	2¼	3⅛	r	1¼	2⅜	r	
45⅞	50	r	1½	2⅛	r	5	r	
45⅞	55	r	s	1	r	s	r	
RoyDut	75	r	r	r	r	r	1⅜	
78¾	80	r	r	2½	1 1/16	r	r	
78¾	85	r	⅝	r	r	r	r	
SilGph	25	r	s	r	r	s	¼	
39⅞	35	6	r	r	r	r	r	
39⅞	40	2⅝	r	4⅞	1⅞	r	r	
39⅞	45	⅝	1⅝	2¾	r	r	r	
Stanhm	40	⅞	2½	r	1¼	r	r	
Tmplin	30	8½	r	8¾	r	r	r	
38⅞	40	r	1⅝	2⅛	2¼	r	r	
Tennco	40	r	s	8¾	r	s	r	
48¼	45	r	r	5½	r	⅝	r	
48¼	50	1	r	2	r	r	3¼	
48¼	55	⅛	r	⅜	r	r	r	
Torchm	60	r	r	r	5½	r	r	
UniNV	85	r	r	r	r	r	1⅞	
89⅜	90	r	3½	r	r	2⅝	r	
Varian	40	1¾	r	r	r	r	2¼	
Zenith	7½	⅜	r	¾	r	r	r	

		Mar	Apr	Jul	Mar	Apr	Jul
Dig Eq	50	s	26½	r	s	1/16	r
76	55	r	21¾	r	r	⅜	r
76	60	17¼	r	r	⅛	½	1
76	65	11½	12¾	r	1/16	1⅛	2¼
76	70	6⅞	8¾	12¼	⅞	2 1/16	3¾
76	75	3⅞	5⅝	9¼	2½	4	5⅜
76	80	1½	3½	6¼	5½	6	r
Disney	80	s	r	s	s	⅛	s
121½	85	s	r	s	s	1/16	s
121½	90	r	r	r	1/16	⅜	⅞
121½	95	25¾	r	r	r	1/16	1
121½	100	20¾	24⅛	r	⅛	½	1½
121½	105	18½	20½	22¼	¼	¾	r
121½	110	12½	13¾	14⅞	½	1⅜	2⅞
121½	115	8⅜	10¼	13¼	1¼	2⅞	4½
121½	120	4½	7	12⅜	2¾	4⅛	7⅜
121½	125	2⅛	4½	8	5½	7¼	8¾
121½	30	1	3	6¼	9½	8⅜	12¾
du Pnt	35	3⅛	3¾	r	1/16	¾	1½
37⅞	40	⅜	1⅛	2⅛	1 1/16	3¼	3¾
37⅞	45	r	¼	r	r	r	r
FHLM	60	r	12⅞	r	r	r	r
71	65	7	8¼	r	r	r	3¾
71	70	3⅛	5⅝	r	2⅝	r	r
71	75	1⅜	2¾	5⅜	r	r	r
FleetN	10	r	r	r	r	⅛	r
14⅝	15	1/16	¾	1½	r	r	r
GerbPd	60	r	r	4¾	1⅛	r	r
60	65	r	⅞	r	r	r	r
Glenfd	5	r	1⅞	r	r	¼	½
6½	7½	1/16	1/16	¾	1 1/16	1½	r
6½	10	r	r	r	r	r	3¾
GldVly	15	r	r	r	r	r	2⅛
Goodyr	15	s	5½	r	s	r	r
20⅜	17½	2⅞	3	4⅛	⅛	⅜	⅞
20⅜	20	1⅛	1 1/16	2⅝	r	1⅛	1⅝
20⅜	22½	⅜	⅝	1	r	2⅜	2⅝
20⅜	25	s	⅜	s	s	⅝	1
Graing	75	1 1/16	2⅛	r	r	r	r
GtA&P	55	r	r	4	r	r	r

Chic

AirbFr	1
22⅞	2
22⅞	
Amdahl	
15⅞	1
AEP	
AlnGrp	
90½	
90½	
90½	
Amoco	
50¾	
50¾	
AMP	
48⅝	
48⅝	
Baxter	
31⅜	
31⅜	
Blk Dk	
12⅞	12
12⅞	
Boeing	
47¾	
47¾	
47¾	
BolsC	22
26⅜	
26⅜	
CBS	
164¼	
164¼	
164¼	
164¼	
164¼	
Cadenc	
30	

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FD-350 (Rev. 5-8-81)

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(Indicate page, name of newspaper, city and state.) A-24 The New York Times

Date: 3/6/91

Edition:

Title: "Congress Winks at a Bank Scandal"

Character: BF&E; FAG

or

Classification:

Submitting Office: WMFO

Congress Winks at a Bank Scandal

The Federal Reserve Board has finally cracked down on the high-flying Bank of Credit and Commerce International. The bank, based in Luxembourg, has agreed to cut its ties to Washington, D.C.'s largest bank and cease U.S. operations. B.C.C.I. pleaded guilty last year to laundering millions in drug money for, among others, Panama's deposed leader, Manuel Noriega.

While the Fed's order should halt B.C.C.I.'s suspect American activities, it leaves a big mystery: How did this global renegade control a large American bank — First American Bankshares — without the knowledge or approval of Federal authorities? The question deserves far more attention than Congress has seen fit to give it.

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B.C.C.I. was founded in 1972 by an ambitious Pakistani financier with capital from Arab investors and the Bank of America. It grew spectacularly, to $20 billion in assets with more than 300 branches in dozens of countries.

U.S. regulators rejected its bid for two American banks in the mid-1970's, citing inadequate information. But in 1981 the Federal Reserve approved the sale of Washington's First American Bankshares to a group of Middle East investors who used B.C.C.I. loans to buy it.

Federal authorities were suspicious of the B.C.C.I. connection even then, but were assured by Clark Clifford, the prominent Washington lawyer and influential political adviser to Presidents, that there would be no link. Mr. Clifford, whose firm represents B.C.C.I., became chairman of First American Bankshares after the takeover.

Subsequent re-examinations also failed to establish any tie, and both First American and Mr. Clifford still insist that B.C.C.I. has never exercised any control over the bank's management or operations. Since last year B.C.C.I. has been controlled by the ruling Sheik of Abu Dhabi, who put up $1 billion to rescue it from financial difficulties that followed the money-laundering plea.

The matter has been brought to light in the past year by money-laundering investigations in Washington and New York, and by reporters for The Wall Street Journal and The Washington Post. A former Senate staff counsel took information to the Manhattan District Attorney, Robert Morgenthau, last fall when he couldn't arouse interest in Washington. Mr. Morgenthau started an investigation and alerted Washington, and the Fed recently referred its own findings to the Justice Department for possible criminal or civil prosecution.

This may only be a case of one foreign bank evading regulation, as Federal regulators say it is. But it may reveal a loophole for foreign banks that needs plugging. B.C.C.I.'s alleged control of First American Bankshares runs through a holding company in the Cayman Islands. At the least, Congress and the Federal Reserve itself should be asking how the linkage escaped detection for so long. Was it willful concealment, political clout or insufficient probing?

Answers aren't known yet, but it is time to ask. Congress has been singularly uninquisitive.

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MAR 14 1991
FBI - WASH. METRO FIELD OFFICE
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FBI/DOJ

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.) A-1 The Washington Post

Date: 3/5/91
Edition:

Title: "Foreign Bank Must Sell 1st American Stake"

Character: BF 3E; FAG;
or
Classification:
Submitting Office: WMFO

Indexing:

Foreign Bank Must Sell 1st American Stake

By Jim McGee
Washington Post Staff Writer

The Federal Reserve Board yesterday ordered foreign-based Bank of Credit and Commerce International (BCCI) to sell its hidden stake in the parent firm of First American Bankshares, ending a decade of speculation about whether BCCI was a secret owner of Washington's largest bank holding company.

The Fed's order gave BCCI 60 days to submit a written plan for selling the stock, which the Fed would have to approve before any transfer could take place. The 10-page order provided no specific details about BCCI's holding, such as its size, when it was acquired and whether BCCI would have to sell the stock on the open market.

The order leaves in doubt who will ultimately end up owning First American's parent firm, which oversees a valuable franchise with $11 billion in assets with eight subsidiaries in six states and the District. It is the nation's 51st-largest bank holding company, with more than 190 branches in the Washington region alone.

Another part of the Fed's order, however, left no uncertainty. BCCI "voluntarily agreed" to shut down its U.S. operations, including two representative banks in New York and Los Angeles. This action leaves the worldwide banking giant, which has 400 branches in more than 68 countries and assets in excess of $19 billion, with no U.S. outlet.

See BCCI, A6, Col. 2

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MAR 14 1991
FBI - WASH. METRO FIELD OFFICE
1325015-0004864
FBI/DOJ

Bank Must Sell Stake in 1st American

BCCI, From A1

Ordinarily, a divestiture order would spark a flurry of interest among potential bidders, but several bankers contacted yesterday suggested that the Fed's timetable may be too short to allow other banks to mount a bid for the BCCI stake.

"There's very little financial information available about First American and very little understanding of how many shares would ultimately be sold," said a banking consultant who has received several inquiries about the bank. "That makes it tough for anyone to think seriously about purchasing" the stock.

The Fed's order culminated several weeks of intense negotiations with BCCI and its new owner, Sheik Zayed bin Sultan al Nahayan, the ruler of Abu Dhabi. The negotiations began, sources said, after Zayed's attorneys told U.S. regulators that an audit had showed BCCI controlled a substantial percentage of the stock—an apparent violation of federal banking laws because the Fed had never approved any such acquisition.

To order BCCI to sell its stake in First American's parent firm, Credit and Commerce American Holdings (CCAH), the Fed had to be persuaded that BCCI owned at least 25 percent—the legal threshold for a controlling interest, Fed officials said.

The Fed believed for many years that CCAH was owned by several investors from Kuwait, Saudi Arabia and Abu Dhabi, who were longtime clients or shareholders of BCCI. In 1981, after a special hearing, the Fed allowed these investors to acquire First American after getting assurances that BCCI would have no control over the bank's management and operations.

At the time, the investors declared: "BCCI owns no shares of [CCAH] either directly or indirectly, nor will it if the application is approved. Neither is it a lender, nor will it be with respect to the acquisition by any of the investors of . . . CCAH shares."

In a statement yesterday, First American said the bank had no knowledge of how BCCI acquired the stock and noted that the Fed order said nothing about the management of First American. "BCCI has not, directly or indirectly, ever controlled the actual management or operations of First American," the statement said.

In a statement last Friday, First American said: "If the Federal Reserve has been misled or misinformed in any respect regarding the stock ownership of First American . . . First American has been equally misled."

Manhattan District Attorney Robert Morgenthau, who is conducting a grand jury investigation into the matter said yesterday the Fed's order "means false representations, false filings were made to the Superintendent of Banks in New York," when state regulators approved the 1981 takeover of the holding company.

The divestiture order represents a major reversal for BCCI, which has been floundering since it pleaded guilty last year to money-laundering charges and began suffering major loan losses.

BCCI Chief Executive Officer Zafar Iqbal signed the "cease and desist" order yesterday in Abu Dhabi. The order said that BCCI does not admit to any allegation "made or implied" in the document.

BCCI's audit revealed that BCCI had made several loans to CCAH stockholders, who in turn secured the loans with the CCAH stock. The loans became nonperforming, meaning no payments were being made, leaving BCCI with effective control of the stock. Auditors found that the loans were hidden from BCCI's board of directors, according to sources familiar with the audit.

BCCI could, in its written plan, suggest that it sell the CCAH shares to Zayed, a longtime shareholder in both BCCI and CCAH. Zayed could pay off the loans and thus redeem the stock, leaving him in control of CCAH.

But it is unclear if the Fed would approve such a plan. According to one Fed official, Zayed would face questions because of his longtime association with BCCI. If the Fed objected to his ownership, said the official, a more traditional sale would then be likely.

"There is nothing on the table yet," said the official. "The plan could call for transfer to Sheik Zayed, or an outright sale to a third party."

The controversy over First American's ownership, long dormant, became public again recently after a Feb. 3 article in The Washington Post. The article, based on a nine-month inquiry, said that BCCI had had an extensive, long-term involvement in the affairs of First American that was contrary to what bank regulators had originally approved. BCCI participated in the hiring of three key First American executives, helped negotiate two important First American acquisitions and helped finance First American's dramatic expansion.

First American's chairman, Clark Clifford, and its president, Robert Altman, said in interviews with The Post that they had full control of the bank and that BCCI had no ownership, control or influence. They said they had no knowledge of any financial dealings between BCCI and the CCAH shareholders.

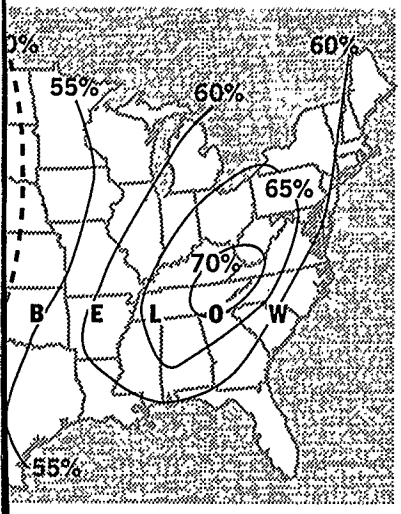
Staff writer Joël Glenn Brenner contributed to this report.

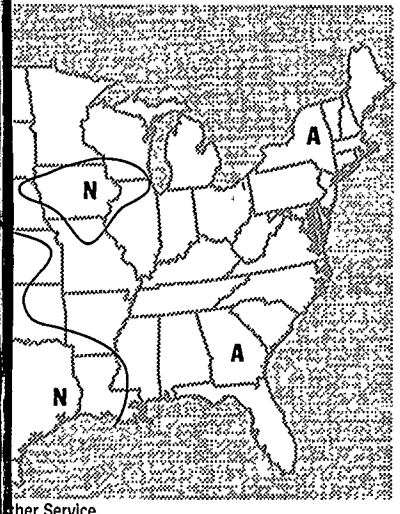
1325015-000-48

VS. REALITY

SUED LAST NOVEMBER

that temperatures would be above





her Service.

THE WASHINGTON POST

This would bring warm Pacific air northward into the western United States and into Canada. Then it would carry frigid arctic air down from Canada to the eastern United States. Or at least that was the idea.

"We polled the oceanographers

Sudafed Poisoning Probe

Investigators Suspect Capsule Tampering Conf

By Malcolm Gladwell
Washington Post Staff Writer

Federal officials probing the cyanide contamination of "Sudafed 12-Hour" capsules reported progress yesterday in investigating how at least five packages of the decongestant sold in the Seattle area came to be spiked with poison.

Investigators say they now believe that the tampering—which has so far resulted in two deaths, one serious illness and a continuing nationwide recall of the product—was specific to three counties of western Washington state and that it was sufficiently amateurish that upon close examination, a contaminated package would be obviously suspect. They also said that the crime appeared to have been facilitated by the failure of anti-tampering precautions taken by the product's manufacturer to alert retailers and consumers.

These conclusions are based on analysis in the past two days of close to 10,000 Sudafed 12-Hour packages sold around the country, as well as close scrutiny of the fourth contaminated Sudafed package discovered in Tacoma. A fifth contaminated package was discovered yesterday afternoon by another Tacoma woman.

Sudafed 12-Hour capsules are supposed to be protected by four tamper-resistant features. The two-part plastic capsules containing the drug are sealed with a band intended to make it obvious if the capsule has been opened.

The capsules are then encased in a "blister pack," consisting of a clear plastic bubble with a tinfoil backing. The end of the cardboard box is also sealed with a safety tab, which would be broken if the package had been

blister packs into different boxes at a later point, possibly even in the stores where they were later sold. Investigators said it is unclear how a capsule could have been removed and then reinserted into a blister pack without damaging it in an obvious way.

The matching serial numbers are the principal reason that investigators believe, for the time being, that the crime was local to the Seattle area. The common number indicated a manufacturing lot that was sent only to stores in the region.

Upon examination of Sudafed 12-Hour capsules boxes from around the nation yesterday, FDA investigators also discovered how the perpetrator may have slipped contaminated blister packs into new boxes. The safety tabs that are supposed to seal the box tops are not always intact.

"In some stores where we looked, the tab had already been broken from jostling and handling," said an FDA official. "Someone might have slipped them into boxes where the tab was alrcady broken."

The fourth Sudafed box handed over to FBI officials Sunday night also yielded important clues. Unlike

University of Virginia
Division of Continuing Educat
New Product I
and Venture A
April 10-11, 19
Washington, D

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 3/5/91

From : SA [redacted] b6 b7C

Subject: CLARK M. CLIFFORD;
Et Al;
BF&E;
FAG;
OO:WMFO

On 2/28/91 I met with Assistant United States Attorney (AUSA) [redacted] Washington, D.C., and D.O.J. Fraud Section [redacted] telephone [redacted], concerning the captioned matter. [redacted] has been assigned by D.O.J. to the USAO, WDC, to assist AUSA [redacted] in the investigation and possible prosecution of the captioned matter. The purpose for this meeting was to discuss possible violations and avenues of investigation with regard to this case. b6 b7C

Administratively, any prosecution of this matter would be brought through the U.S. Attorney's Office, WDC. There apparently are other districts which have an investigative interest in the Bank of Credit and Commerce International (BCCI), those being the Southern District of New York, the Middle District of Florida and the Southern District of Florida. That being the case, D.O.J. will act as a coordinator and facilitator of the investigations in the various districts. Toward that end, a meeting is scheduled for 3/14/91, at which representatives from the USAOs, WDC, SDNY, MDF and SDF will meet with D.O.J. Fraud Section Chief, [redacted] b6 b7C

In addition to the initial indications that false statement violations occurred with regard to the ownership of Credit and Commerce American Holdings, N.V. (CCAH), by BCCI, [redacted] believe that a "thorough look" at the filings and what lies behind them will reveal other violations. Specifically, [redacted] suggested there are possible violations of Title 12, USC Section 3100, which proscribes foreign bank participation in the United States; bank fraud violations associated with any possible loans from First American Bank to BCCI or any related entities; Title 31, USC Section 5314, the Bank Secrecy Act, which requires the reporting of cash transactions exceeding $10,000 and any relationships between U.S. b6 b7C

(2) - WMFO
JNR:das
(2)

29B-WF-171994-14

FBI - WASH. METRO FIELD OFFICE

134-15-000-4867

and foreign banks; federal regulations "T" or "U", which prohibits the borrowing of all or a majority of the money necessary to buy a bank.

Possible sources of information for this investigation were listed as the New York County District Attorney; The Federal Reserve Board; The Bank of England; Price Waterhouse; BCCI.

It was agreed that the first two steps to be taken in this investigation were a commencement of the review of any documents available at the Federal Reserve Board, to be conducted by [redacted] and myself, and an appointment with Federal Reserve Board [redacted] (which has been set for 1:30 PM on 3/13/91), to be attended by AUSA [redacted] and myself.

b6
b7C

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29B-WF-171994
MJB/mjb

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The following investigation was conducted by Investigative Assistant (IA) [redacted] at San Diego, California, on July 28, 1992: b6 b7C

Pacific Bell Telephone Company (PacBell) advised [redacted] that subscriber information on telephone numbers [redacted] and [redacted] was non-published. No further information was obtained. b6 b7C

29B-WF-171994-15

1325015-000-4873

(Indicate page, name of newspaper, city and state.) The Washington Post B-10

Date: 2/28/91
Edition:

Title: "First American Officer Offers Ownership Change Plan"

Character: BF 3E
or
Classification:
Submitting Office: WMFO

Indexing:

298-WF-171994-15

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
MAR 1 1991
FBI - WASH. METRO FIELD OFFICE

FBI/DOJ

(Mount Clipping in Space Below)

1st American Official Offers Ownership Change Plan

SHEIK ZAYED AL-NAHYAN
... could gain controlling interest

By Joël Glenn Brenner
and Jim McGee
Washington Post Staff Writers

As the Federal Reserve Board kept a tight lid on how it would force a change of ownership of First American Bankshares Inc., the largest bank holding company based in Washington, one top First American official said yesterday that he could foresee a way for the ownership to change without putting First American on the market.

The Federal Reserve is expected to require the Bank of Credit and Commerce International (BCCI), a foreign bank based in the Persian Gulf, to divest itself of at least a 25 percent stake in the parent firm of First American, according to sources. The Fed has been investigating reports that BCCI obtained that stock, which gave BCCI control of First American, in violation of state and federal banking laws, sources said.

C. Jackson Ritchie Jr., chairman and chief executive of First American Bank of Washington, said yesterday if the Fed finds BCCI controls First American and forces it to divest its holding, "that does not mean this bank company will be sold." Ritchie said he did not know whether BCCI owns the stock, which he had thought was in the hands of individual investors from the Middle East.

Ritchie predicted that BCCI's controlling interest in First American would be transferred to an individual investor, perhaps Sheik Zayed al-Nahyan, the ruler of Abu Dhabi, who acquired control of BCCI last year. Zayed owns an 11.76 percent stake in First American's parent, according to the most available federal records.

Such a change would require approval from the Fed, which oversees bank holding companies such as First American. The company has $11 billion in assets and ranks as the 51st-largest bank company in the nation.

"This is the most logical outcome, given the circumstances," said Ritchie, who announced last week that he was leaving First American after more than 20 years. "There's no way that this bank company will be sold. . . . This is the clearest possibility."

Fed officials declined to comment on Ritchie's prediction, cautioning that negotiations over the future of First American have not been completed and that Ritchie's scenario is one of several possible outcomes. Last week, the Fed allowed Zayed to increase his stake in First American by putting $81 million in new capital into the bank company.

See FIRST AMERICAN, B14, Col. 1

FD-350 (Rev. 5-8-81)

1325015-000-4874

First American Official Offers Proposal to Change Ownership

FIRST AMERICAN, From B10

Zayed is cooperating with Federal Reserve officials to resolve the ownership question, sources said, and his representatives have acknowledged to the Fed that BCCI owns a controlling interest in First American. BCCI is the world's fifth-largest private bank and has come under scrutiny in recent years after pleading guilty to U.S. money-laundering charges.

A senior Fed official said last week that "if divestiture were required, it would be done in an orderly way so as not to injure First American Bank."

According to sources, BCCI effectively controls First American's parent firm because it holds at least 25 percent of the shares as collateral for numerous loans that are nonperforming, or no longer paying interest. If Zayed repaid those loans on behalf of the borrowers, then he would acquire control of the collateral, in this case the stake in First American.

Ritchie emphasized yesterday that the ownership question does not have any impact on First American's financial condition, saying, "This is a technical matter that should not, in any way, concern First American depositors."

Although the bank company lost a record $182.5 million in 1990 because of the deteriorating commercial real estate market in the Washington area, Ritchie said the bank's overall health is sound. Depositors of First American Bank are protected by federal deposit insurance up to $100,000 per customer account.

First American's most recent financial reports show it meets all regulatory requirements for capital, the financial cushion that protects a bank from losses, and is very "liquid," meaning it has assets on hand that can be readily converted into cash to meet depositor demands. A plan to improve liquidity was initiated 15 months ago, Ritchie said, and records show First American has nearly $2 billion in readily convertible assets.

Publicity surrounding First American's ownership has caused "a minimal" withdrawal of deposits, Ritchie said.

Following recent losses, First American projects a break-even year at best in 1991, Ritchie said. The bank company expects troubled real estate loans to continue to hurt earnings, but it is "doing everything it can to avoid future losses," he said, including laying off about 300 employees in the Washington area and restructuring the local banks to reduce operating expenses by more than $18 million in 1991.

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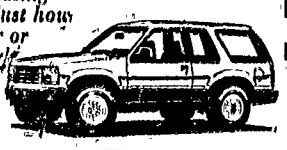

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1325015-000-4876

29B-WF-171994
MJB/mjb

1

The following investigation was conducted by Special Agent (SA) [redacted] at San Diego, California, on September 2, 1992: b6 b7C

Officer [redacted] Postal Police, telephone number [redacted] confirmed [redacted] was currently receiving mail at [redacted] San Diego, California, 92105. b6 b7C

29B-WF-171994-116

1325015-000-4877

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

Bank of Credit and Commerce Is Probed by Manhattan D.A.

By Jim McGee
Washington Post Staff Writer

The foreign-based Bank of Credit and Commerce International (BCCI), already facing allegations that it secretly owns a controlling interest in Washington-based First American Bankshares, is also under investigation for filing annual financial statements that do not appear to account for $3 billion in troubled loans made during the 1980s.

"We're investigating to determine whether false and fraudulent financial statements were filed with the superintendent of banking in New York," said Manhattan District Attorney Robert Morgenthau. "We have allegations to the effect that the financial statements don't accurately reflect the true condition of" BCCI.

Auditors in London discovered the unauthorized loans last year as they sifted through BCCI's books on behalf of BCCI's new owners, the kingdom of the United Arab Emirates and its ruler, Sheik Zayed al-Nahyan. The transactions include loans to BCCI insiders and associates of BCCI's executives that were not disclosed to BCCI's board of directors or its accounting firm, Price Waterhouse, according to sources with knowledge of the auditing.

The transactions broke down into two major categories, the sources said. The auditors found large unsecured loans with inadequate documentation to support them; they also found hundreds of millions of dollars in nonperforming loans—loans that are not earning interest—secured by shares in Credit and Commerce American Holdings (CCAH), the parent corporation of First American Bankshares.

See BCCI, G2, Col. 3

(Indicate page, name of newspaper, city and state.) p. G-1 The Washington Post

Date: 2/27/91
Edition:

Title: "Bank of Credit & Commerce is Probed by Manhattan D.A."

Character: BF & E
or
Classification:
Submitting Office: WMFO

Indexing:

298-WF-171994-16

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
MAR 1 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-4878

FBI/DOJ

N.Y. Official Investigates BCCI Loans

BCCI, From G1

BCCI's new owners eventually told U.S. banking regulators of the discovery, acknowledging in effect that it has a controlling interest in First American Bankshares, according to sources familiar with the discussions.

That admission is a major turnabout. Since 1981, when the U.S. banking regulators allowed a group of Middle Eastern investors to take over First American, First American has maintained that BCCI has no control over it.

Under federal law, it is illegal for any foreign bank to acquire such control without the formal approval of the Federal Reserve Board. Informed sources now say that the Fed is preparing to issue a cease and desist order that requires BCCI to sell its ownership of CCAH shares. "They will not own the bank anymore," said one senior official.

It is not precisely clear what total amount of nonperforming loans is secured by CCAH shares; estimates range from $700 million to well over $1 billion. "We've got to see where the investigation takes us," said one source who is familiar with the current inquiries. "At this stage we don't know."

For bank regulators and criminal investigators, this disclosure sets off a kind of ripple effect: If the BCCI financial statements do not appropriately account for several billion dollars worth of transactions, then BCCI's past financial statements become suspect.

The world banking system relies on financial statements or annual reports, as do various bank regulators such as the Fed or the New York state banking department, which allows BCCI to operate a large business office in the Manhattan financial district.

BCCI's attorneys declined to comment about the new allegations.

The discoveries also raise questions about whether BCCI complied with a 1990 plea bargain agreement reached after BCCI pled guilty in Tampa to federal money laundering charges that arose out of an earlier and separate investigation. Under that agreement, BCCI repeated a pledge to comply with a Federal Reserve consent decree that banned it from filing "false, incomplete, inaccurate or misleading information to the Board of Governors, to any Federal Reserve bank or to any federal or state regulatory authority."

The current inquiries are running along two tracks, criminal and civil. New York prosecutors are conducting extensive investigations of BCCI, and the Justice Department is considering a criminal referral by the Fed.

Meanwhile, the Fed is seeking to resolve the ownership of First American's holding company and has already made public an order barring further transactions between the two banks and requiring that First American cooperate with the various investigations.

The Fed also is concerned about the financial health of First American, which recently reported a record $182 million in losses in 1990, partly because of the declining real estate market and other problems. Sheik Zayed recently agreed to put $80 million in additional capital into First American, which is the 51st-largest bank holding company in the United States with $11 billion in assets and eight subsidiaries in six states and the District.

American bank regulators are closely monitoring the various BCCI inquiries, but a greater regulatory burden lies with the Bank of England. Until recently, BCCI had its world headquarters in London and operated dozens of branches in Great Britain. BCCI was not supervised on a consolidated basis by a single central bank, but it was overseen by a committee of regulators from several countries, including England.

After discovering the unusual transactions at BCCI during the early months of Zayed's ownership, "The Bank of England and Price Waterhouse came to them [in Abu Dhabi] and said there are problem loans" that left BCCI "seriously undercapitalized," according to an informed source. Since that time, Zayed has put $1.2 billion into BCCI.

As lawyers on three continents wrestle with the fallout of BCCI's problems, various sources cautioned that it remains unclear just how deep a financial hole BCCI has fallen into, or how much more capital will be needed. They caution that the Abu Dhabi government effectively guaranteed BCCI.

It is possible, say the sources, that Zayed may be asked to put as much as an additional $2 billion into BCCI after the current inquiries are completed. He also is a potential buyer of the CCAH shares if the Fed requires that the shares be sold, pending Fed approval.

1325015-000-4879

BY PETER ALSBERG—THE WASHINGTON POST

animal skin so it can be tanned into leather. But with slight modifications it can be combined with other chemicals to make a nerve gas. Similarly, a broad spectrum of organophosphorus compounds, used normally to make fertilizers, can also become precursors to chemical weapons.

The administration is acting unilaterally under a number of U.S. export-control laws, but a draft of the restrictions says that the United States will try to get other industrialized nations to

UNDER ONE ROOF?

NBC

FNN

cnbc

	FINANCIAL NEWS NETWORK	CONSUMER NEWS AND BUSINESS CHANNEL
Year founded	1981	1989
Number of cable systems carrying	3,500	1,000
Subscribers	35 million	18 million
1990 revenue	$52.6 million	NA

SOURCE: Company reports.

THE WASHINGTON POST

In a letter to FNN's board of directors yesterday, Dow Jones and Westinghouse said they were "extremely disturbed" by FNN's "unilateral suspension" of sale talks. Peter G. Skinner, senior vice president of Dow Jones, said in a statement, "We are prepared to discuss revising our proposal, but so far FNN has refused to allow us to do so." Skinner did not specify how high the joint venture was willing to go.

Westinghouse and Dow Jones, publisher of the Wall Street Journal and the business news weekly Barron's, reportedly bid $90 million for FNN, a price that includes about $20 million worth of broadcasting equipment. CNBC's $105 million offer does not include the equipment, according to Tessler.

Despite FNN's agreement with CNBC, Tessler acknowledged that Dow Jones and Westinghouse may still have another shot at buying the cable service. FNN is expected to file for bankruptcy court protection within the next two weeks in order to reorganize its battered finances, and bankruptcy law provides for higher offers, he said.

FNN operates the nation's largest financial-news network, reaching 35 million cable TV households with around-the-clock newscasts and sports coverage.

CNBC, which was started by GE and its NBC television subsidiary in 1989 to compete directly with FNN, is carried in 18 million households.

Tom Rogers, president of NBC's

See FNN, G10, Col. 1

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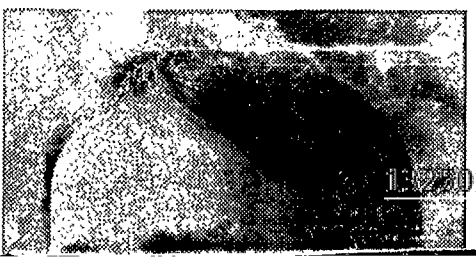

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FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/ROUTINE/

FBI MIAMI/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: CID, WCCS, ECU,

SUBJECT: CLARK M. CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN

HOLDINGS, N.V., NETHERLANDS, ANTILLES; BF&E; FAG; OO:WMFO.

CAPTIONED MATTER INITIATED 2/7/91 BY THIS OFFICE IN RESPONSE TO A CRIMINAL REFERRAL FORM RECEIVED FROM BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEMS (THE FED), WASHINGTON, D.C. (WDC), ALLEGING FALSE STATEMENTS BY CAPTIONED

29B-WF-171994-17

Sec Sec

1325015-000-4881

SUBJECTS WITH REGARD TO OWNERSHIP AND CONTROL OF CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. (CCAH), NETHERLANDS, ANTILLES. AMONG THE HOLDINGS OF CCAH IS FIRST AMERICAN BANKSHARES (FABS), WHICH OWNS, AMONG OTHERS, FIRST AMERICAN BANK, WDC. THE CENTRAL ALLEGATION IS THAT SUBJECTS [redacted] b6 b7C [redacted] WERE MERELY [redacted] BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) IN 1982 WHEN THEY, AS MAJORITY STOCKHOLDERS IN CCAH, [redacted] IN FABS' PREDECESSOR, FINANCIAL GENERAL BANKSHARES (FGB). [redacted] CCAH WAS ESTABLISHED USING LOANS FROM BCCI; LOANS WHICH ATTORNEYS FOR CURRENT OWNERSHIP OF BCCI HAVE ADMITTED TO THE FED WERE NON-PERFORMING AND WHICH WERE COLLATERALIZED BY THE CCAH SHARES.

IN SWORN FILINGS AND TESTIMONY TO THE FED BEGINNING IN 1978, REGARDING THE EFFORTS OF CCAH TO PURCHASE FGB, CLARK M. CLIFFORD (NOTED WDC ATTORNEY, WHO SERVED AS ADVISOR TO PRESIDENTS TRUMAN, KENNEDY, JOHNSON AND CARTER, AND AS SECRETARY OF DEFENSE FOR ONE YEAR IN THE JOHNSON ADMINISTRATION) AND [redacted] (CLIFFORD'S [redacted], b6 b7C SAID THAT THE INDEPENDENT WEALTH OF THE FOUR ARAB INVESTORS, AND NONE OF BCCI'S, WOULD BE USED TO PURCHASE FGB SHARES.

SUBSEQUENTLY, CLIFFORD, [redacted] AND THE OTHER SUBJECTS HAVE b6 b7C
SERVED AS [redacted] OF CCAH AND FABS, RENEWING ON
A YEARLY BASIS THEIR CLAIMS TO THE FED THAT BCCI HAD NO
OWNERSHIP INTEREST AND EXERCISES NO CONTROL OVER CCAH.

KNOWLEDGE OF THE FALSE STATEMENTS CAME TO LIGHT AFTER THE
4/90 MONEY-LAUNDERING CONVICTION OF BCCI IN THE MIDDLE
DISTRICT OF FLORIDA. SHEIK ZAYED BIN SALTAN AL-NAHAYAN, THE
RULER OF ABU DHABI AND LONGTIME INVESTOR IN BCCI; SUBSEQUENTLY
ACQUIRED CONTROL OF BCCI AND ORDERED AN AUDIT. ACCORDING TO
THE FED, THE AUDIT, APPARENTLY DONE BY PRICE WATERHOUSE,
DISCLOSED NON-PERFORMING, BCCI LOANS TO THE FOUR ARAB
"INVESTORS" FOR THE PURPOSE OF PURCHASING CCAH AND FABS
SHARES, AND SIMILAR NON-PERFORMING LOANS TO CLIFFORD AND
[redacted] USED IN 1986 TO PURCHASE THEIR OWN SHARES IN CCAH, b6 b7C
WHICH THEY HELD UNTIL ABOUT 3/88, AND FROM THE SALE OF WHICH
CLIFFORD NETTED ABOUT $6 MILLION AND [redacted], $3 MILLION--
APPROXIMATELY THREE TIMES WHAT EACH HAD PAID FOR HIS SHARES.
ACCORDING TO THE FED, THE TERMS OF CLIFFORD'S AND [redacted]
LOANS WERE MOST FAVORABLE; ALTHOUGH EACH WAS REQUIRED TO SIGN
A PROMISSORY NOTE AND AN ASSIGNMENT OF COLLATERAL--THE CCAH

SHARES--EACH WAS GIVEN A "SIDE LETTER" SAYING THAT NEITHER WAS REQUIRED TO PAY PRINCIPAL OR INTEREST, THAT EACH WAS GUARANTEED A BUYER SHOULD EITHER CHOOSE TO SELL HIS SHARES, AND THAT EACH WAS GUARANTEED A MINIMUM OF WHAT HE HAD PAID FOR THE SHARES, AND WAS ENTITLED TO ANY PROFIT. IN 1990, BY FORECLOSURE ON THE COLLATERAL--ALL OF THE PLEDGED CCAH SHARES--BCCI OPENLY BECAME OWNER OF MORE THAT 58% OF CCAH; A VIOLATION OF TITLE 12, U.S.C., SECTION 1847--THE BANK HOLDING ACT.

ON 3/8/91, DOJ FRAUD SECTION CHIEF [redacted] b6 b7C CONVENED A MEETING IN WDC OF REPRESENTATIVES FROM U.S. ATTORNEY'S OFFICES IN WDC, SOUTHERN DISTRICT OF NEW YORK AND THE MIDDLE AND SOUTHERN DISTRICTS OF FLORIDA TO DISCUSS AND COORDINATE THE PROSECUTIVE INTERESTS OF EACH WITH REGARD TO BCCI. THE WDC REPRESENTATIVE REPORTED TO THIS OFFICE THAT AUSA [redacted], SDF, MIAMI, FLORIDA, TELEPHONE NUMBER [redacted], HAS BEEN CONTACTED BY ONE [redacted] DESCRIBED ONLY AS [redacted] CLARK CLIFFORD. [redacted] CLAIMS TO BE IN POSSESSION OF, AND ANXIOUS TO GIVE TO THE GOVERNMENT, AT LEAST ONE BOX OF DOCUMENTS WHICH ALLEGEDLY BELONGED TO CLIFFORD. SUPPOSEDLY, [redacted] HAS ALSO

SAID THAT THE TRANSFER MUST OCCUR "SOON" OR HE WILL SELL THE DOCUMENTS TO THE HIGHEST BIDDER. THE AUSA, WDC, HAS REQUESTED THAT AN EFFORT BE MADE TO CONTACT [redacted] TAKE CUSTODY OF THE DOCUMENTS AND INTERVIEW HIM. b6 b7C

LEADS.

MIAMI: AT MIAMI, FLORIDA.

WILL CONTACT AUSA [redacted], TELEPHONE NUMBER [redacted] AND ASCERTAIN THE WHEREABOUTS OF [redacted] b6 b7C

LOCATE AND INTERVIEW [redacted] ABOUT THE DOCUMENTS AND WHAT HE KNOWS OF THEIR SOURCE(S) AND IMPORTANCE, ALSO ABOUT ANY RELEVANT INFORMATION HE MAY HAVE ACQUIRED DURING THE COURSE OF HIS

EMPLOYMENT. AFTER TAKING CUSTODY OF THE DOCUMENTS, IMMEDIATELY FORWARD THEM TO WMFO, AND SUTEL RESULTS OF INTERVIEW, FOLLOWED BY FD-302'S.

BT

#0025

NNNN

Memorandum

To : WF

Date 5-10-95

From : SD

Subject: 219B-WF-17994
(Title)

☐ RUC
☒ File Destruction Program

Hidden Interests
Major Case #38
FIF, FAG

Enclosed are 3 items.

These items are forwarded to your office since file meets criteria for destruction.

Enclosures are described as follows:

☒ Original Notes. - 1
☐ Original FD-302's.
☐ Laboratory and/or Technical Reports.
☒ Miscellaneous Documents.

2-inserts -

Enc. 3

NOTE: DO NOT BLOCK STAMP ORIGINAL ENCLOSURES.

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.) p. 60 TIME MAGAZINE

Date: 3/4/91
Edition:

Title: "A Capital Scandal"

Character: BF/E ; FAG
or
Classification:
Submitting Office: WMFO

Indexing:

See attached

29B-WF-171994 - 18

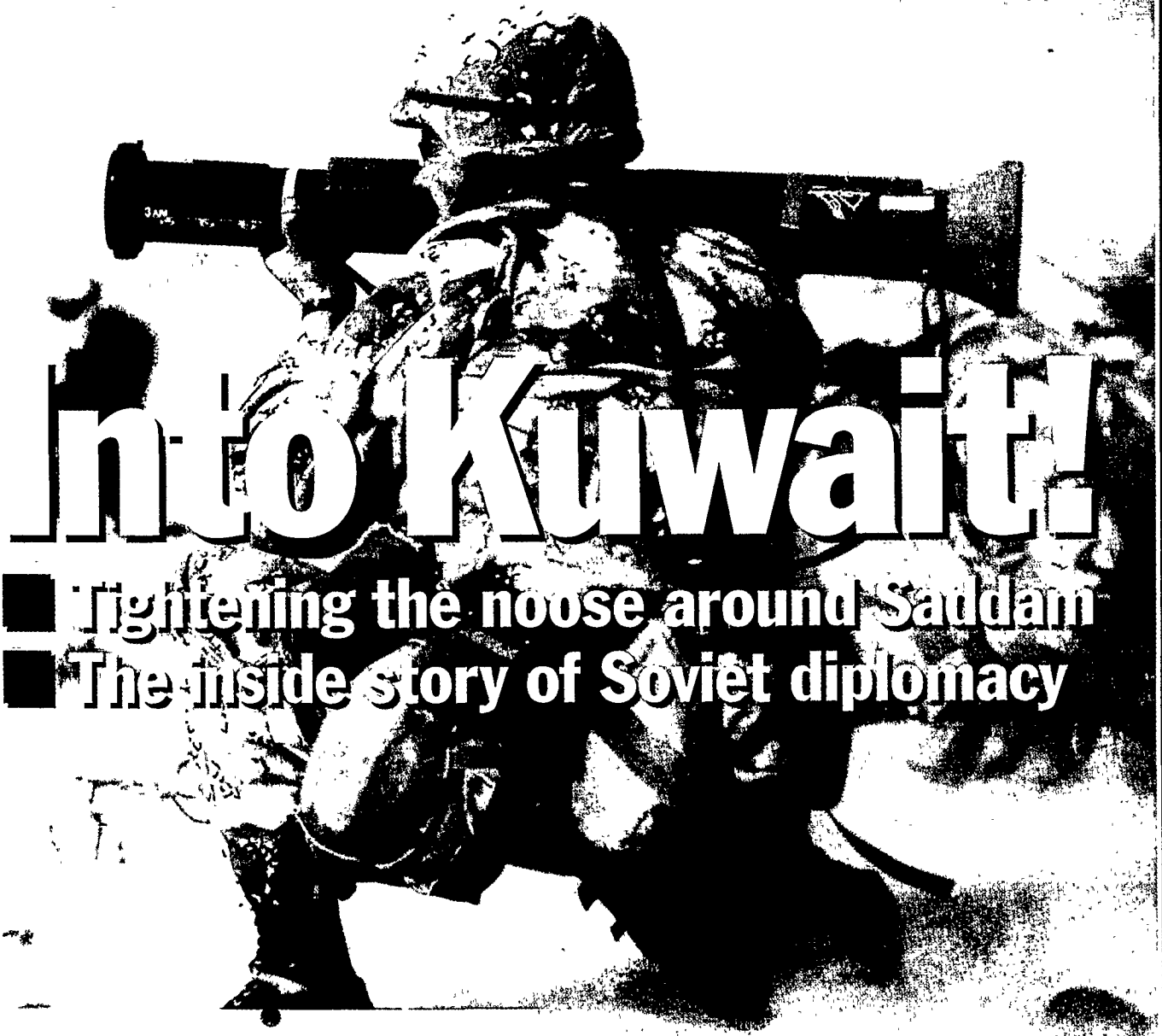
See See

1325015-000-4887

FBI/DOJ

WASHI[illegible] SCANDAL...

TIME



...to Kuwait!

- Tightening the noose around Saddam
- The inside story of Soviet diplomacy

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A Capital Scandal

The biggest bank in Washington and a legendary American political adviser are ensnared in a probe involving a shadowy money-laundering enterprise

By JONATHAN BEATY and S.C. GWYNNE
WASHINGTON

Could there be any doubt about this bank's nationality? From its name to its flag-waving ads to its slogan—"The Bank for All Americans"—First American Bank of Washington, seems practically like a branch of government. Its chairman and public face is one of America's most respected attorneys and political advisers, Clark Clifford. But what's behind that carefully cultivated image looks decidedly different.

Investigators have evidence that First American, the largest bank in the Washington area (1990 assets: $11 billion), has for years been secretly controlled by a criminally tainted, money-laundering, Luxembourg-based global bank. That evidence last week prompted the Federal Reserve to interdict all transfer of money and assets between the two banks. The regulators asked the Justice Department, which has appeared reluctant to pursue allegations, to begin a criminal and civil investigation. The Fed was responding to pressure generated by Manhattan district attorney Robert Morgenthau, who is presenting evidence of fraud, money laundering and disguised ownership to a New York City grand jury. Morgenthau has formally told the Fed his office has evidence that First American is under secret control.

First American's alleged parent is one that few people would be proud to claim: the Bank of Credit & Commerce International, convicted of violations in three countries and well known in global finance circles as a banker to Manuel Noriega and Colombian drug lords. The question that won't go away: How could an outfit like B.C.C.I. control a large U.S. bank without regulators knowing or doing anything about it?

Investigations in Washington, New York City and Florida are probing deeper into the bizarre affair and uncovering evidence of startling regulatory inaction, if not political chicanery. Clifford, 84, says he and his law partner Robert Altman, president of the bank, "have run First American for long years at the highest ethical level, and we are proud of our stewardship." But he acknowledged to TIME that he has retained a criminal-defense attorney to represent him in connection with the matter.

The scandal's most immediate repercussions affect First American, which had trouble enough already. Staggered by the avalanche of distressed real estate loans that has flattened banks across the country, First American lost $182.5 million in 1990, its first red ink ever. The deficit last week led to the resignation of C. Jackson Ritchie, the company's chief executive, and the layoff of nearly 100 of the bank's 6,000 employees. Regulators were worried that First American's secret parent, itself in financial trouble, would start siphoning off funds that would deepen the loss and conceivably fatten the bill to U.S. taxpayers should First American have to be bailed out. To guard against that, the Federal Reserve Board last week ordered First American not to transfer any funds, including management fees, to B.C.C.I., or to exchange any assets with it. Says an investigator involved in the bank probe: "They have been engaged in every-

A MYSTERIOUS COMPANY'S GROWING INTERESTS

Agha Hasan Abedi

1972
Declaring his intention to form the Third World's first multinational bank, Pakistani financier Agha Hasan Abedi organizes the Bank of Credit & Commerce International. Bank of America puts up $2.5 million, or 25%, of the bank's capital. Arab investors provide the rest of the money.

1975-76
U.S. regulators reject a B.C.C.I. bid for two New York banks when Abedi fails to disclose requested details about his company.

Ghaith R. Pharaon

Bert Lance

1977
Abedi helps Saudi billionaire Ghaith R. Pharaon begin his acquisition of the National Bank of Georgia from Bert Lance, Jimmy Carter's former budget director.

1978
B.C.C.I. orchestrates a hostile bid for Financial General Bankshares of Washington. When the SEC seeks to block the bid, B.C.C.I. hires Clark Clifford to help.

Clark Clifford

1980
Financial General agrees to sell to a group of Middle East investors, the same investors who own B.C.C.I. Regulators, uneasy with the arrangement, hesitate to approve the deal.

FROM LEFT TO RIGHT: AP; JEAN GAUMY—MAGNUM; JAMES KEYSER FOR TIME; WALTER CALAHAN—FOLIO

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thing they are now forbidden to do."

Suspicion that B.C.C.I. secretly controls First American goes back 10 years, when a group of Arab investors bought the Washington bank, then known as First General. Those same investors also happened to own controlling shares in B.C.C.I., a behemoth that has $20 billion in assets and some 350 branches in 70 countries. Bothered by the connection, regulators insisted on iron guarantees that B.C.C.I. would not run First American.

The link that investigators are now talking about is far stronger—and comprehensible enough to anyone who has ever had a mortgage. They say B.C.C.I. lent the investors the money they used to buy stock in First American, with the shares pledged as collateral, just as a mortgage holder pledges his home as collateral. Investigators say those loans are "nonperforming"—the bankers' term that means they aren't being repaid. Everyone knows what happens in that case: the bank gets the collateral, in this case the controlling shares in First American. And presto, an unregulated foreign organization takes over an American bank without U.S. regulators knowing about it.

It is hard to imagine more unlikely partners than the blue-blooded Clifford and Agha Hasan Abedi, the hard-driving, visionary founder of B.C.C.I. While Clifford was counseling President Truman in 1947, Abedi was shifting his young career in banking from India to Pakistan. In 1959 he founded his own successful bank there, and by the early 1970s he was aggressively courting Arab money. Abedi lavished special attention on Sheik Zayed bin Sultan al-Nahayan, who now heads Abu Dhabi's ruling family. Abedi ingratiated himself with the sheik, who was suspicious of bankers, by roughing it in tents and aboard camels to join him on falconing expeditions.

When Pakistan began to nationalize industries in 1972, Abedi persuaded Zayed to help start B.C.C.I., which was registered in the unregulated tax havens of Luxembourg and the Netherlands Antilles. The new bank had staggering ambitions. Abedi has grandly proclaimed it "a new center for Third World cohesion and a rallying point of thoughts and aspirations of the underprivileged." That grand vision helped attract California-based Bank of America, which put up $2.5 million, or 25% of B.C.C.I.'s original capital, before selling its stake and pulling out in 1980. Abedi continued to woo wealthy Arabs, who became B.C.C.I.'s principal shareholders and first big customers.

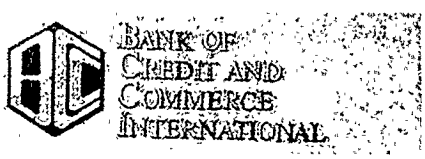
Rival bankers were long suspicious of the flamboyant B.C.C.I. "You had a $20 billion bank with no central-bank regulator or government lender of last resort," said a U.S. financier. "That gave most bankers a very nervous feeling about B.C.C.I. Who's watching these guys?" In fact, B.C.C.I. seemed far less interested in lending money than in earning fees by electronically whisking deposits through its growing network of global branches. B.C.C.I.'s willingness to transfer funds anywhere at any time was basic corporate policy, and the bank became a primary mover of flight capital from Third World nations. A high-ranking B.C.C.I. officer told investigators that moving money for 2,000 wealthy clients, from dictators to arms dealers, formed the core of the bank's business.

Abedi, who left B.C.C.I. last year after a stroke that followed a 1988 heart transplant, built his business on careful attention to the needs of top-drawer customers. In the bank's early days, B.C.C.I. officials in London could be roused in the middle of the night to make good on visiting sheiks' gambling losses. Abedi cultivated the friendship of former Pakistani President Mohammed Zia ul-Haq and other Third World leaders. "He was a collector of people," says a Pakistani journalist who has followed Abedi. "He used Zia as a calling card."

To attract deposits, B.C.C.I. opened magnificent offices even in poor surroundings. No matter how incongruous, the facilities were lavishly decorated with Persian rugs and sumptuous paintings. "Walk down the main street in Djibouti," says a Western banker, "and you'll see a building with a marble façade. That's B.C.C.I. On the two buildings on either side, the plaster will be breaking and falling."

What Abedi coveted most was the prestige of a bank in the U.S., the nerve center of Western capitalism. After regulators rejected two B.C.C.I. bids for American banks in the 1970s—Abedi wouldn't reveal all the information they wanted—he helped Saudi billionaire Ghaith R. Pharaon acquire the National Bank of Georgia in 1978 from Bert Lance, President Jimmy Carter's former budget director. Soon after that, Lance helped Abedi orchestrate a raid on Financial General Bankshares of Washington. The purchasers were four Middle Eastern shareholders of B.C.C.I. The hostile bid triggered a three-year court battle in which U.S. regulators accused the buyers of acting in effect as fronts for the unregulated B.C.C.I.

Enter Clark Clifford. The Washington éminence grise represented B.C.C.I. in the case and persuaded nervous Federal Re-

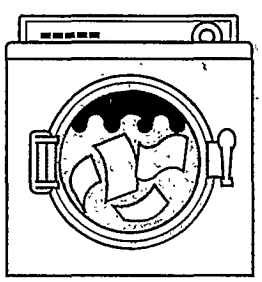


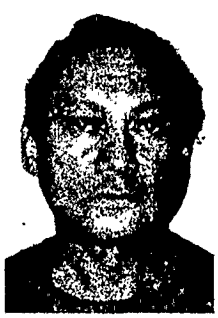
1981
Regulators grant approval after Clifford assures them that no link will exist between B.C.C.I. and the U.S. banking company.

1982
Clifford and law partner Robert Altman become chairman and president of the bank holding company, now renamed First American Bankshares, while remaining B.C.C.I.'s chief U.S. attorneys.

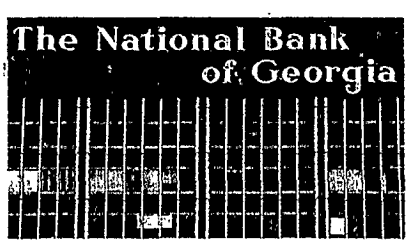
Robert Altman

1983
B.C.C.I. purchases a Colombian bank with branches in Medellin and Cali, centers of drug traffic and money laundering.




Manuel Noriega

1985-87
B.C.C.I. launders $32 million of drug money; $500,000 from Panamanian dictator Manuel Noriega passes through First American Bank in Washington.



1986
First American Bankshares buys the National Bank of Georgia from Pharaon.

John Kerry

1988
A Florida grand jury indicts B.C.C.I. for laundering drug money. During the investigation, a B.C.C.I. official says Abedi owns First American.

CLOCKWISE FROM UPPER RIGHT: KEZA—GAMMA LIAISON; ROB CRANDALL—PICTURE GROUP; RICH MAIMAN—SYGMA; MARK REINSTEIN—PHOTO REPORTERS; JIM STEM—GAMMA LIAISON

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serve officials that the buyers were acting as individuals on their own behalf. When questioned about B.C.C.I.'s financial role in the acquisition, Clifford flatly told the officials that there wasn't any. Clifford became chairman of the bank, renamed First American, and his law partner, Robert Altman, became president. Clifford regularly briefed Abedi on the U.S. firm's operations. When queried on the briefings, Clifford explained that B.C.C.I. as adviser to the Arab owners of First American needed to know about the banking company.

B.C.C.I. was meanwhile forging into uncharted waters, most notably laundering drug money. In 1983 B.C.C.I. acquired a Colombian bank with 30 branches that included several in Medellín and Cali, homes to the world's most powerful cocaine cartels. Among those laundering drug profits through B.C.C.I., say investigators, was former Panamanian strongman Manuel Noriega, who was collared by U.S. authorities in early 1990. Prosecutors who tracked his finances said Noriega had funneled $500,000 of cocaine funds through First American's flagship bank in Washington. First American officials denied any knowledge of the transaction.

B.C.C.I.'s fondness for drug money brought the bank to grief in Florida and eventually led to recent mammoth losses. Undercover customs agents first stumbled onto B.C.C.I. money laundering during a sting operation. As part of the scheme, agents sent several million dollars of Medellín cartel drug funds through a B.C.C.I. bank in Miami. What happened next was worthy of *Alice in Wonderland.* Bank officers noticed the agents' amateurish attempt at money laundering and offered to teach them more sophisticated methods. Example: the bank would wire funds to B.C.C.I. branches around the world before handing the cash back to drug traffickers in the form of phony loans. The narcotics kings happily paid large fees for the customized service.

Armed with virtually ironclad evidence, a Florida grand jury indicted B.C.C.I. for money laundering in 1988. Clifford hired a high-powered criminal lawyer to defend the bank. Despite overwhelming evidence, the government offered B.C.C.I. a plea bargain. The bank thus avoided a trial in which prosecutors planned to present evidence that laundering drug money was an approved policy of the global titan.

Other evidence would have proved equally explosive. An executive named Amjad Awan, who managed the bank's Panama office and was Noriega's personal banker, described the extent of B.C.C.I.'s empire in a recorded conversation with an undercover agent. "We own a bank in Washington," Awan told the agent. "It's called the First American Bank. There are six banks bought out by B.C.C.I. about eight years ago. B.C.C.I. was acting as adviser to them, but the truth of the matter is that the bank belongs to B.C.C.I. Those guys are just nominee shareholders."

Awan was one of five B.C.C.I. officers later convicted of conspiring to launder cocaine cash and sentenced to 12 years in prison, but he did not testify at his trial. Nor did the government play his taped conversation for the jury. For its part, B.C.C.I. forfeited the $15 million that agents had deposited but was not required to pay additional penalties.

Awan's statements are only part of the evidence of B.C.C.I.'s ties to First American that has remained buried for a remarkably long time despite being held by the government. None of the evidence has been forwarded to banking regulators, who might have done something about it.

A Senate subcommittee headed by Massachusetts Democrat John Kerry was probing money laundering and turned up more witnesses, who were later secretly taped by teams of customs and IRS agents while being interrogated by Kerry's chief counsel. One provided details of B.C.C.I.'s money-laundering operations in the U.S. and Latin America. The B.C.C.I. executive described a B.C.C.I. management conference in Vienna at which Abedi openly displayed charts of B.C.C.I. holdings that included First American. This senior-level manager said Clifford and Altman were at the meeting.

The most startling evidence came from yet another B.C.C.I. officer who in 1989 provided the smoking gun for anyone wondering who really owns First American. His secretly taped remarks described the way B.C.C.I. had provided nonrecourse loans to the Arab investors who bought controlling shares of First American, then took the shares back as collateral for the loans. Since the investors put up no money of their own, and B.C.C.I. held the stock, it was the real owner of First American. Some of the allegedly oil-rich Arabs who appeared to be major shareholders were no more than straw front men for Abedi.

Federal agents in an adjoining room listened to this key B.C.C.I. player for three days as he continued to explain B.C.C.I.'s

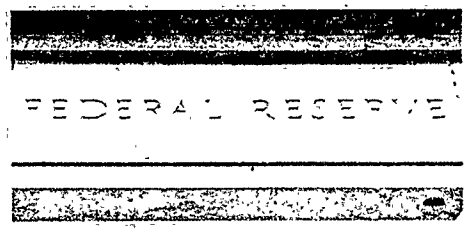
1989

Reeling from the impact of the Florida case and bad loans, B.C.C.I. loses $498 million. Despite evidence that B.C.C.I. controls First America, regulators permit First American to continue to expand by acquiring a bank in Florida.

1990

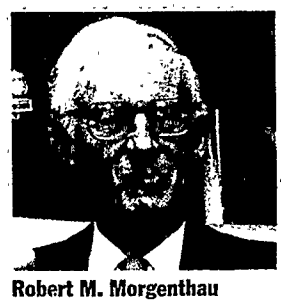
B.C.C.I. pleads guilty in Florida and pays $15 million. Sheik Zayed bin Sultan al Nahayan of Abu Dhabi, a longtime investor in B.C.C.I., acquires control of the troubled bank and orders an audit, which finds that an estimated $4 billion is missing. First American Bankshares loses $182.5 million for the year.

Sheik Zayed bin Sultan al Nahayan



1991

The Federal Reserve probes whether B.C.C.I. owns First American and orders the banking firms to halt all transactions with each other. The Fed asks the Justice Department to consider possible criminal charges. A grand jury in New York City examines evidence of money laundering and fraud.



Robert M. Morgenthau

COUNTERCLOCKWISE FROM LEFT ROBERT TRIPPETT—SIPA; NO CREDIT; AP; JAMES COLBURN — PHOTOREPORTERS

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machinations. He described plans to use political influence to derail the Kerry inquiry. Supervising customs agents said the tapes of this executive's remarks had been in their possession and that official reports had been completed, but they declined to say where the tapes and reports had been forwarded.

Despite the wealth of new findings, federal prosecutors seemed loath to bring charges against the banking companies. "I think they sold out a lot of charges in return for B.C.C.I. promises that they would deliver up Noriega," said William von Raab, a former U.S. customs commissioner who headed the agency during the investigations. Von Raab also hinted at a darker motive for the lack of action. "That bank [B.C.C.I.] has a penchant for collecting very important friends," he said. "I'm constantly amazed at the ability of the power-brokering establishment to affect government decisions."

After arranging the taped sessions for the feds, Kerry's chief counsel, Jack Blum, returned to Washington to find that his subcommittee job had been eliminated. Eventually frustrated by the feds' apparent lack of interest in the leads he provided, Blum delivered his evidence to Manhattan prosecutor Morgenthau, who has a legendary reputation for political independence and integrity. Within weeks the D.A. launched his probe into B.C.C.I. and First American.

With B.C.C.I.'s reputation almost completely in tatters after the money-laundering plea, the bank suffered severe financial setbacks. New business dried up just as the bank's freewheeling practices left it awash in bad loans. The struggling company has lost more than $550 million since its 1988 indictment, including a $498 million deficit in 1989.

To the rescue has come Sheik Zayed, ruler of Abu Dhabi and Abedi's old falconing partner, who put up $1 billion and thus took control of the bank. Zayed ordered an audit of his new property—and found that an estimated $4 billion had vanished from the company. If the government investigators are right, Zayed also has control of First American, since he currently owns the loans and collateral on B.C.C.I.'s books. For the moment at least, that appears to make First American a virtual arm of the Abu Dhabi state bank.

B.C.C.I. is retrenching around the world. The company has closed some 70 offices and laid off more than 2,300 employees, or nearly 17% of its work force, since 1989. Many of its U.S. offices stand empty. According to a statement from Abu Dhabi, the banking firm's modest new goal is "to produce a leaner, fitter and more profitable B.C.C.I."

The fate of First American may now rest in the hands of federal and state authorities. B.C.C.I., by design, is not entirely within their reach. ***—With reporting by Richard Behar/New York, Edward W. Desmond/New Delhi and Adam Zagorin/Brussels***

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CITE: //3920//

SUBJECT: CLARK M. CLIFFORD; ET AL; BF&I; FAG; OO:WMFO.

REWFTEL TO DIRECTOR, MARCH 12, 1991; WFTELCALL TO MM, MARCH 12, 1991.

MIAMI: PER REFTELCALL, DISCONTINUE ON LEADS SET IN REFTEL. SITUATION WITH REGARD TO [redacted] HAS CHANGED SUFFICIENTLY TO WARRANT REQUEST FOR APPROVAL FROM FBIHQ TO ALLOW TRAVEL OF WMFO CASE AGENT TO MIAMI DIVISION ON MARCH 14-15, 1991, FOR INITIAL CONTACT WITH [redacted]

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REQUEST OF THE BUREAU:

29B-WF-171994-19

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FBI - WASH. METRO FIELD OFFICE

1325015-000-4893

FBIHQ IS REQUESTED TO APPROVE TRAVEL OF WMFO SA [redacted] b6 b7C [redacted] TO MIAMI DIVISION ON MARCH 14, 1991, TO RETURN LATE MARCH 15, 1991 OR EARLY MARCH 16, 1991, FOR PURPOSES OF CONTACT WITH LIKELY WITNESS [redacted] AT U.S. ATTORNEY'S OFFICE, MIAMI, FLORIDA, AND CONFERENCE WITH MIAMI AGENTS ASSIGNED TO "SENTRUST" INVESTIGATION.

FOR INFORMATION FBIHQ AND MIAMI, AS SET FORTH IN RETEL, AUSA [redacted] SDF, MIAMI, NOTIFIED AUSA, WASHINGTON, b6 b7C D.C. (WDC), OR EXISTENCE OF [redacted] AND DOCUMENTS RELEVANT TO CAPTIONED MATTER. ALMOST IMMEDIATELY AFTER SENDING REFTEL, WMFO CASE AGENT WAS CONTACTED BY AUSA [redacted] AND INFORMED THAT [redacted] IS IN MIAMI AND DOES POSSESS THE DOCUMENTS, BUT THEY ARE STORED AT AN UNDISCLOSED LOCATION IN THE WDC SUBURBS, AND CONSIST OF FIFTEEN BOXES OF RECORDS. AUSA [redacted] FURTHER INDICATED THAT [redacted] WAS WILLING TO COME TO WDC TO RELINQUISH CUSTODY OF THE DOCUMENTS.

AFTER REPORTING THE FOREGOING TO THE AUSA, WDC, HE TELEPHONED AUSA [redacted] TO DISCUSS HOW BEST TO GET [redacted] TO b6 b7C WDC. FROM THAT DISCUSSION IT WAS LEARNED THAT [redacted] SEEMS TO BE GETTING INCREASINGLY NERVOUS ABOUT THE POSITION IN WHICH HE PLACED HIMSELF. IT WAS AGREED THAT IF SERVED WITH A

SUBPOENA, [redacted] MIGHT WELL WITHDRAW. ANOTHER CONSIDERATION WAS THAT MANY OF THE ALLEGED DOCUMENTS, WHICH [redacted] TOLD AUSA [redacted] WERE PHOTOCOPIED FROM THE FILES IN CLIFFORD'S LAW FIRM, ARE LIKELY TO BE PRIVILEGED COMMUNICATIONS, AND TO OBTAIN THEM BY SUBPOENA FROM [redacted] COULD BE CONSTRUED AT A LATER DATE AS THE GOVERNMENT HAVING "PIERCED THE VEIL" OF THE PRIVILEGE BY MEANS OF A SUBPOENA. THEREFORE, IT WAS AGREED THAT THE WMFO CASE AGENT AND A TRIAL ATTORNEY FROM THE DEPARTMENT OF JUSTICE SHOULD TRAVEL TO MIAMI TO MEET WITH [redacted] GAIN HIS CONFIDENCE AND ARRANGE FOR HIS TRAVEL TO WDC.

b6
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IN RETELCALL, MIAMI'S CORRELATIVE INTEREST IN CAPTIONED MATTER IN ITS "SENTRUST" CASE WAS DISCUSSED. PART OF PROPOSED TRAVEL WOULD INCLUDE DISCUSSION WITH MIAMI AGENTS OF PROMINENT FIGURE IN CAPTIONED MATTER, GHAITH R. PHARAON.

SACS WMFO AND MIAMI CONCUR WITH PROPOSED TRAVEL.

BT

#0009

NNNN

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File WF-171994 Date 6-25-91
Class. Case No. Last Serial

☐ Pending ☐ Closed

Serial No.	Description of Serial	Date Charged	
20	SUBP - [redacted]	6-25-91	b6 b7C
	Consol into 29B-WF-171994 SUB Q		
	[redacted]		b6 b7C

RECHARGE Date

To From

Initials of Clerk

Date

Date charged

Employee

Location

★ U.S. GPO:1989-241-706/08023

1325015-000-4896

20

FD-302 (REV. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/21/91

[redacted] voluntarily came to the office of the United States Attorney, Southern District of Florida, 155 South Miami Ave., Miami, Florida, where he was interviewed. Present during the interview was Assistant United States Attorney (AUSA) [redacted] USAO, Washington, D.C. (WDC). [redacted] provided the following information. b3 b6 b7C

[redacted] was born on [redacted], on St. Kitts, British West Indies, and has Social Security Account Number (SSAN) [redacted] At the time of this interview, he was residing at [redacted] Ave., Apt [redacted] Miami, Florida, 33137. He gave as points of contact [redacted] telephone [redacted] telephone (work) [redacted]. b3 b6 b7C

[redacted] admitted having a record of felony arrests and convictions including an 18 month sentence in South Carolina for [redacted] of which sentence he served eight months, and a two month sentence in Virginia for [redacted] The incidents which comprised this record occurred prior to 1987. b3 b6 b7C

For approximately [redacted] b3 b6 b7C

[redacted] b3 b6 b7C

Investigation on 3/15/91 at Miami, Florida File # 29B-WF-171994-21

by [redacted]:das Date dictated 3/20/91 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-4897

Continuation of FD-302 of [redacted], On 3/15/91, Page 2

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[redacted]

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[redacted]

b3
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[redacted]

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[redacted]

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[redacted]

[redacted] b3 b6 b7C

[redacted] b3 b6 b7C

Holding up the [redacted] b3 b6 b7C
interviewing agent and AUSA [redacted]

Despite the fact that he was told no such payment would be possible, [redacted] did agree to come to WDC on 3/18/91 and [redacted] to the FBI.

At the conclusion of this interview, [redacted] was served with a subpoena to appear before the United Stated Grand Jury, on [redacted] to [redacted] b3 b6 b7C

FD-302 (REV. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/21/91

[redacted] voluntarily came to the office of the United States Attorney, Southern District of Florida, 155 South Miami Ave., Miami, Florida, where he was interviewed. Present during the interview was Assistant United States Attorney (AUSA) [redacted] USAO, Washington, D.C. (WDC). [redacted] provided the following information.

[redacted] black male was born on [redacted], on St. Kitts, British West Indies, and has Social Security Account Number (SSAN) [redacted]. At the time of this interview, he was residing at [redacted] Ave., Apt. [redacted], Miami, Florida, 33137. He gave as points of contact [redacted] telephone [redacted] telephone (work) [redacted]

[redacted] admitted having a record of felony arrests and convictions including an 18 month sentence in South Carolina for [redacted] of which sentence he served eight months, and a two month sentence in Virginia for [redacted] The incidents which comprised this record occurred prior to 1987.

For approximately [redacted]

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Investigation on 3/15/91 at Miami, Florida File # 29B-WF-171994

by SA [redacted]das Date dictated 3/20/91

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI a[redacted] it and its contents are not to be distributed outside your agency.

SEARCHED INDEXED SERIALIZED FILED MAR 30 1991

[redacted] 5-008-4900

FD-302 (REV. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/21/91

[redacted], a black male, born [redacted] Social Security Account Number [redacted] provided the following information. b3 b6 b7C

During his employment [redacted]

[redacted] b3 b6 b7C

Prior to his [redacted] b3 b6 b7C

Investigation on 3/19/91 at Arlington, Virginia File # 29B-WF-171994 -22

by SAS [redacted] das b6 b7C

Date dictated 3/20/91

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-4903

b3
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[redacted]

b3

[redacted]

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[redacted]

With regard to the [redacted]

b3
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b7C

[redacted]

Concerning [redacted]

b3
b6
b7C

[redacted]

After disclosing that [redacted] informed the interviewing agents that he had considered attempting [redacted] then inquired of the interviewing agents whether the FBI would want him attempt to enter Security Storage to get the documents. He was immediately told by the interviewing agents not to consider such a course of action and that in no way was FBI going to make such a request of him. He was instructed only to honor the subpoena served on him in Miami, Florida, on 3/15/91, compelling him to appear before the Grand Jury in [redacted] on [redacted] to testify.

b3
b6
b7C

FD-302 (REV. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/21/91

[redacted], a black male, born [redacted] Social Security Account Number [redacted] provided the following information. b3 b6 b7C

During his employment [redacted] b3 b6 b7C

Prior to his [redacted] b3 b6 b7C

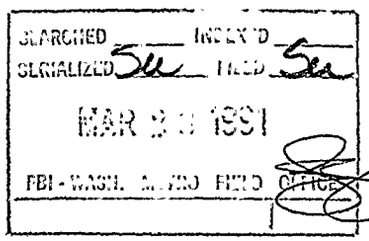
Investigation on 3/19/91 at Arlington, Virginia File # 29B-WF-171994

by SAs [redacted]:das Date dictated 3/20/91 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-4905

29B-WF-171994-22



1325015-000-4906

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.) p. A-1 The Wall Street Journal

Date: 3/22/91
Edition:

Title: "Capital Influence; How Clifford's Repute Protected Client BCCI from the Regulators"

Character: BF & E; FAG
or
Classification:

Submitting Office: WMFO

Indexing:

(X)

*** 75 CENTS

Capital Influence

How Clifford's Repute Protected Client BCCI From the Regulators

His Standing and Assurances Deterred Scrutiny of Firm Said to Control U.S. Bank

A Denial of Any Impropriety

By PETER TRUELL and JILL ABRAMSON
Staff Reporters of THE WALL STREET JOURNAL

WASHINGTON—With his signature silver hair, craggy features and resonant voice, Clark Clifford is the consummate Washington wise man. Presidents have come and gone, but for decades Mr. Clifford has sat atop the three branches of the capital's permanent government: law, money and politics.

He presides over one of the city's most influential law firms, Clifford & Warnke, just a few steps from the White House. As chairman of First American Bankshares Inc., he controls an $11 billion banking empire. As the dean of the Democratic Party, he has been sought out for counsel by practically every major Democratic figure since the Truman administration.

But at age 84, Mr. Clifford finds himself defending this golden resume against the blight of scandal, thanks to his late-in-life foray into banking with a group of Middle Eastern money men.

Clark Clifford

The pressure has been mounting for at least two years. The Customs Service cracked down on money laundering at a major Clifford client, the Bank of Credit & Commerce International. Senate investigators began tussling with him over documents. And finally, late last year, an aggressive prosecutor in New York put the spotlight on Mr. Clifford himself: The superlawyer's own Washington-based bank, investigators now believe, was unlawfully controlled by the money-laundering BCCI, partly through Arab investors who were Mr. Clifford's banking partners.

A chorus of media coverage—in this newspaper, the Washington Post and CBS's "60 Minutes," among other places—has called attention to Mr. Clifford's actions at a time when he had planned to bask in the sunset of an illustrious career.

Did Clark Clifford do anything wrong? Was he a major player in a subterfuge to hide the corrupt ownership of a major U.S. bank? Or, as Mr. Clifford says, was he duped into acting as a front man?

Whatever the case, a close look at the Clifford affair reveals that his reputation and influence were instrumental in keeping the artifice together. "I mean, Clark Clifford is sort of the godfather of the Democratic party," a BCCI official once explained—to a Customs agent with a hidden tape recorder. More recently, Mr. Clifford's influence helped short-circuit a Senate investigation of BCCI's affairs.

Also caught in the BCCI maelstrom is Robert Altman, Mr. Clifford's law partner and younger alter ego. Mr. Altman and his wife, the actress Lynda Carter (TV's Wonder Woman) are fixtures on Washington's A-list, playing host to fetes—such as the recent 45th birthday party for White House economist Michael Boskin—at their Gatsby-like home in Potomac, Md. While his mentor plays Mr. Democrat, Mr. Altman and his wife have embraced well-placed Republicans, such as Commerce Secretary Robert Mosbacher and Transportation Secretary Samuel Skinner and their wives.

Robert Altman

Mr. Altman says the media are making too many assumptions before all the facts are in. "People are jumping to conclusions about BCCI's control" of First American, he says. "We don't even know that as a matter of fact."

Official Washington, meanwhile, is shaking its head in wonder. "I just don't think anyone believes Clark Clifford could be involved with anything that isn't on the up and up," says Debbie Dingell, the powerhouse wife of Rep. John Dingell, the influential Michigan Democrat and a close friend of the Altmans.

During an interview this week, Mr. Clifford passionately defended himself against all allegations of impropriety. "The record that I have here has been built very carefully over many years," he said. It was only two months ago, he says, that he learned that his bank, First American, was at least in part secretly owned by BCCI.

How could all this have happened?

Reassuring the Regulators

Messrs. Clifford and Altman forged their relationship with BCCI in the late 1970s, when the foreign bank was acting as financial adviser to some Arab investors trying to buy into what was then Financial General Bankshares of Washington. Financial General was a plum property. At a time when few banks could conduct business across state lines, it had a branch network stretching from New York to Tennessee. Eventually, it would be renamed First American.

BCCI, for its part, was hell-bent on global growth. Founded in 1972 by Paki-

Please Turn to Page A4, Column 1

29B-WF-171994-23

Sec Sec

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FBI/DOJ

Capital Influence: Clifford's Reputation and Position Shielded BCCI, Alleged Secret Owner of a U.S. Bank

Continued From First Page

stani banker Hasan Abedi, BCCI swelled in the 1970s, setting up offices throughout the Middle East, Europe, Africa and Asia. But its unorthodox structure—with two holding companies in the lightly regulated tax havens of Luxembourg and the Cayman Islands—made some regulators wary. The Bank of England refused to give BCCI full banking status, while New York banking authorities rejected an effort, involving BCCI, to acquire the Bank of Chelsea.

But Mr. Clifford was impressed with his client, Mr. Abedi, calling him "a visionary." In 1977, the investor group being advised by BCCI—including the former intelligence chief of Saudi Arabia—began gobbling up Financial General stock.

Eventually the takeover required approval from a bevy of regulators, who gathered in Washington on April 23, 1981, at a hearing held by the Federal Reserve. Just who, the regulators wanted to know, was *really* proposing to buy the bank? Not BCCI, Mr. Clifford said.

"There is no function of any kind on the part of BCCI," asserted Mr. Clifford, flanked by four Arab investors. "I know of no present relationship. I know of no planned future relationship that exists."

Referring to the proposed holding companies for First American—called Credit & Commerce American Holdings and Credit & Commerce Investment N.B.—Mr. Altman told the hearing "there is no connection between those entities and BCCI, in terms of ownership or other relationship." The similarity of the holding company names with BCCI's, the Washington lawyers insisted, was pure coincidence.

Mr. Clifford says he was assured by Mr. Abedi and by shareholder Kamal Adham, the former Saudi intelligence chief, that the individual shareholders, not BCCI, were putting up the money to buy the bank. He says it will be proved that at least some of the shareholders did use their own money.

He was aware that all of the shareholders banked at BCCI. "The men we met appeared to be men of character," he adds. He says numerous government investigators checked the backgrounds of the investors and came up empty-handed.

But some of those regulators were relying on Mr. Clifford's own assurances that BCCI wasn't involved—and on Mr. Clifford's reputation for integrity.

Sidney Bailey, a Virginia bank regulator, recalls the 1981 hearing well. "It was our understanding that they [First American] would be distinct and separate from BCCI and that there would be no connection with BCCI whatsoever," he says. "These were absolute assurances."

The New York state banking authority was the last regulator to sign off on the takeover. Muriel Siebert, the former head of that agency, concedes that she too relied mainly on Mr. Clifford's word. "If we had known about [BCCI's role] we wouldn't have allowed it to go through," she says.

Later, after she had returned from state service to her brokerage firm, she says she received a fee of "$50,000 or $100,000" for her role in helping find a buyer for First American's Bank of Commerce unit in New York. She says the transaction had no connection to her former role as a regulator.

Mr. Clifford agreed to become First American's chairman after receiving assurances that he would have "full authority" and that the shareholders would play only a passive role, with Mr. Abedi serving as their investment adviser. Mr. Altman became First American's president.

With its new name and new leaders, First American expanded rapidly. Each time a new acquisition was made, Messrs. Clifford and Altman made the same assurances: BCCI was in no way involved in the running of their bank. The role of Mr. Clifford's law firm grew alongside the bank. The firm served as the bank's attorneys, receiving millions in legal fees annually, and continued as counsel to BCCI.

Throughout the 1980s, both men made trips to London to brief Mr. Abedi on First American's affairs. When First American needed money to make an acquisition, for example, Mr. Clifford says he distributed rights offerings to the shareholders through Mr. Abedi, who would see some of the First American shareholders on trips to the Persian Gulf.

He insists that neither Mr. Abedi nor anyone else at BCCI was ever involved in the management of First American. "Not for one hour during any day," he asserts. Although at least one prospective First American executive was flown to London to meet Mr. Abedi, Mr. Clifford now says Mr. Abedi played no role in hiring decisions. Mr. Clifford says it was natural to seek Mr. Abedi's opinion of the job applicant, since he was being considered for an international banking post.

Both Mr. Clifford and Mr. Altman went to some length to discourage inquiries into the ownership of First American. In a lawsuit filed by a disgruntled shareholder of First American's Virginia bank, the two lawyers fought unsuccessfully to keep out of court any evidence about the investors who controlled their bank.

So who really did buy First American?

Investigators for New York County District Attorney Robert Morgenthau have established this much: Early on, perhaps at the outset, several shareholders in the shell corporations that were buying First American had borrowed the money to pay for their shares from BCCI. In at least some cases they never repaid those loans or paid interest on them, lawyers say, adding that since the loans were effectively collateralized with the stock, BCCI soon had paper control of First American's parent. The bank was, in effect, a secret wholly owned subsidiary of BCCI.

Influence on the Hill

It was drug money that led regulators to the true ownership of First American.

In early 1988, Sen. John Kerry, a Massachusetts Democrat, launched a moneylaundering probe in his narcotics-trade subcommittee, part of the Senate Foreign Relations Committee. BCCI quickly became a focus. Former Panamanian consul general Jose Blandon told the subcommittee that the bank was part of Manuel Noriega's "criminal empire."

The investigation was explosive—but in

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the cozy world of Democratic politics, so was the fact that BCCI was represented by Clifford & Warnke. Mr. Clifford's status as Democratic insider carries great weight on the hill. For one thing, he was active in a political action committee headed by Pamela Harriman, wife of the late ambassador W. Averill Harriman, that helped bankroll Democratic Senate campaigns. Clifford & Warnke is a Democratic powerhouse in its own right; its partners have given almost $150,000 to various Democratic campaign committees since 1985.

The Kerry subcommittee obtained intriguing leads. Amjad Awan, a BCCI official, testified in detail about his handling of Mr. Noriega's finances. And in early 1989, investigators obtained checks totaling several thousand dollars that bore the inscription "Noriega" in the lower left corner. The checks had been passed through a BCCI account held at a First American branch in Washington. Mr. Clifford says he didn't know about the checks, noting the vast quantity of transactions handled by his bank.

But Sen. Kerry's investigation quickly ran into a big technical problem: too little time. The full Foreign Relations Committee, headed by Sen. Claiborne Pell, had set early 1989 as a deadline; funds for the probe would then run out. But by the end of 1988, Jack Blum, then the Kerry committee's top investigator, still didn't have the documents he needed to initiate a public hearing on the BCCI case.

Then, when he returned from an out-of-town trip in early 1989, he learned Mr. Clifford had called Sen. Pell seeking an extension to answer one of the subcommittee's subpoenas. The extension, which Sen. Pell granted, delayed the submission of material by Mr. Clifford beyond the date on which Mr. Blum was required to complete his investigation, effectively derailing the probe. Public hearings were never held.

"Pell and Clifford have known each other for years and years," explains Geryld Christianson, who, as the committee's staff director, handled the request from Mr. Clifford. "He asked for an extension, and I said I didn't see why not." But, he adds, "Clifford never invoked the friendship in his discussions with Pell, nor did Pell with me." Sen. Pell received a $1,000 contribution from Mr. Clifford in May of 1990.

After winding down his investigation, Sen. Kerry also received a total of $3,000 in contributions from Mr. Clifford and one of his law partners. Sen. Kerry says that, during the stillborn investigation, he wasn't aware that Mr. Clifford intended to contribute.

Mr. Clifford says he wasn't throwing around any political weight. "At no time have I used political influence," he says.

A Slap on the Wrist

Separately, other investigators also were also watching BCCI. Starting in 1986, the U.S. customs service had mounted its own probe of BCCI's money-laundering activities.

An undercover sting code-named Operation C-Chase was passing Colombian drug cartel money through BCCI. By October 1988 the bank and several of its senior officers were indicted in Tampa on charges of laundering more than $14 million. And BCCI's legal advisers quickly rode to the rescue.

Messrs. Clifford and Altman assembled a team of Washington and Florida lawyers to press the defense, which ultimately cost at least $10 million. That team over several months negotiated a settlement in which a BCCI unit pleaded guilty to money-laundering charges. In addition, five BCCI officers received prison terms.

But the $14.6 million in fines was seen as little more than a slap on the wrist of an institution that had virtually made itself a full-service bank for money-launderers. The plea agreement was so "lenient," contended a report prepared by Sen. Kerry's staff, that it could undermine "deterrence of other financial institutions from laundering money."

Once again, the superlawyers went into action. Mr. Altman approached another powerful friend, Sen. Orrin Hatch, a senior Republican on the Judiciary Committee, whose blessing would add considerable credibility to the Tampa settlement. "I'd known him and his wife for years," Mr. Hatch says of Mr. Altman. "I think he is a fine fellow. I believe he was straight and blunt with me."

The Utah Republican says he also talked to representatives from the Justice Department who "felt they had done a good job and that they were being slammed," Mr. Hatch explains.

Thus, on Feb. 22, 1990, Sen. Hatch made a ringing endorsement of the settlement in the Congressional Record. Even though BCCI had pleaded guilty to 31 felony counts, "there was no systematic money laundering uncovered in the BCCI case after intensive investigation," Mr. Hatch's statement asserted. He also commended BCCI for the "responsible way the company has responded to the charges in these proceedings."

Recently, at Sen. Hatch's request, Mr. Altman and his TV-star wife put in a celebrity appearance at a charity function that the senator helped sponsor for the National Foundation for Depressive Illness. Sen. Hatch says he stands by his actions and emphasizes that he subsequently worked with Sen. Kerry on proposed money-laundering legislation.

But the Justice Department had learned more about BCCI. It obtained strong evidence that BCCI was surreptitiously controlling Washington's First American Bank—evidence that the department never passed along to banking regulators.

Law-enforcement investigators learned of the relationship straight from Mr. Awan, the BCCI official. Acting "through private individuals," Mr. Awan said, "BCCI has bought and controls First American Bank," according to a summary of his statements compiled and sworn to by an agent of the Internal Revenue Service. He said individuals, rather than BCCI, were used to buy First American because U.S. law blocked BCCI from the transaction. "Clark Clifford," he went on to say, "is one of the persons who is working on behalf of BCCI."

Mr. Awan went so far as to say that Mr. Clifford was slowing down the Senate investigation of BCCI that was under way at that time.

Plainly, BCCI was grateful to have Messrs. Clifford and Altman as its men in the capital. "Our attorneys there, they're heavyweights," Mr. Awan said in a taped conversation with an undercover agent from U.S. Customs. "We own a bank based in Washington, it's called First American," he adds. The "truth of the matter is that the bank belongs to BCCI. Those guys are just nominee shareholders," he says of the Arab investors.

BCCI's lawyers go out of their way to undercut Mr. Awan's statements. "He doesn't know this firsthand. He picked it up as office or organizational rumor, and he's asserting it," says John Hume, who represented Mr. Awan in the money-laundering proceedings.

As soon as his Senate investigation was terminated Mr. Blum took his suspicions to Robert Morgenthau, the New York County district attorney who has made money laundering a top target of his office. Last fall, Mr. Morgenthau's office presented the evidence to bank regulators that BCCI effectively held a controlling stake in First American Bank's holding company.

As a result, the Federal Reserve recently demanded that BCCI and First American keep their businesses separate. It also demanded that BCCI submit plans to sell its controlling stake in First American Bank's parent. The Senate banking committee is saying it will look into the Fed's procedures for screening foreign banks that want to set up in the U.S.

1325015-000-4910

And Messrs. Clifford and Altman seem hurt and surprised at the revelations. If regulators were fooled about BCCI's secret ownership, so, they say, were they. Despite their frequent contact with BCCI's principals, they—and they alone—have been making decisions for the bank, Mr. Clifford says. In any case, their law firm's relationship with BCCI was severed in October.

Messrs. Clifford and Altman are now devoting themselves to damage control, working with a team of criminal defense lawyers and public relations specialists.

While Mr. Altman was recently seen power-lunching with the television host Larry King, some of his other friends are putting distance between themselves and the flashy lawyer. When asked about his relationship with the Altmans, for example, Mr. Boskin, the president's top economist, stressed through a spokesman that during two Christmas skiing holidays in Aspen, his family and the Altmans "skied on different mountains."

Mr. Clifford, meanwhile, tries to concentrate on happier developments. His memoirs, due to be published in June, are being serialized beginning this week in the New Yorker.

But official Washington is pondering a different mystery: Why would Clark Clifford, who was already a millionaire, cast his lot with these money men? The answer, he says, is that he wasn't looking forward to retirement and that his law practice no longer intrigued him. "When this came along I was challenged by it," he explains.

He is getting ready to tell his side of the story—in court if necessary: "When the time comes I will raise my hand and make an oath, that at no time have Mr. Abedi, Mr. Adham, or any of the investors made a decision for First American Bank," Mr. Clifford says.

1325015-000-4911

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File 29B-WF-171994 Date 6-25-91
Class. Case No. Last Serial

☐ Pending ☐ Closed

Serial No.	Description of Serial	Date Charged
24	SUBP - Perpetual Sav. BK	6-25-91
	Consol into 29B-WF-171994 SUB Q	

b6
b7C

RECHARGE Date _____

To _____ From _____

Initials of Clerk _____ Date _____

_____
Date charged

_____
Employee

_____
Location

★ U.S. GPO:1989-241-706/08023

1325015-0004912

24

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File 29B-WF-171994 _____ Date 6-25-91
Class. Case No. Last Serial

☐ Pending ☐ Closed

Serial No.	Description of Serial	Date Charged
25	SUBP - Board of Governors of the Fed Resv System	
	Consol into 29B-WF-171994 SUB Q	

_____
Employee

RECHARGE Date _____

To _____ From _____

Initials of Clerk _____ Date _____

_____
Date charged

_____
Employee

_____
Location

★ U.S. GPO:1989-241-706/08023

1325015-000-4913

25

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 4/9/91

TO : SAC, MIAMI

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5 NVMRA)

SUBJECT : CLARK M. CLIFFORD;
Et al;
BF&E; FAG
(OO: WMFO)

ReWFtels to MM, 3/12/91 and 3/13/91.

[redacted] (B/M, dob [redacted], SSAN [redacted]), mentioned in referenced teletypes, was interviewed at the USAO, Miami, on 3/15/91, at which time he claimed to have [redacted] of the law firm of CLIFFORD & WARNKE (C&W), prior to being fired in [redacted]. The [redacted] were said to be stored in the suburban Washington, D.C. (WDC) area. [redacted] agreed to come to WDC to relinquish custody of the documents, but was served with a subpoena, anyway, compelling his appearance before the USGJ, WDC, on March 22, 1991.

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b7C

Also during the Miami interview, [redacted] disclosed that the basis for his dismissal from C&W was [redacted] C&W [redacted]. It was his stated belief he had been [redacted] by C&W as [redacted] which he denied having done. WMFO is currently investigating [redacted] story, but is need of a photograph of [redacted] to show the bank teller who handled the [redacted]

b6
b7C

2-Miami
1-WMFO

JNR:jnr
(3)

29B-WF-171994 - 26

Searched
Indexed
Filed

Approved: _____ **Transmitted** _____ (Number) (Time) **Per** _____

1325015-000-4914

The examination of the bank transaction is further necessitated by the need to establish [redacted] veracity with regard to the alleged photocopied C&W records. When [redacted] came to WDC and was again interviewed on 3/19/91, he claimed that the documents had been discarded by [redacted] the [redacted] of his former girlfriend, [redacted], in a dispute over a debt. Supposedly, [redacted] now resides in the (East Point) Atlanta, Georgia area, and [redacted] only knew an equally-general locale for [redacted]. WMFO is still attempting to locate both [redacted]

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b7C

[redacted] gave as his points of contact in Miami:

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b7C

Residence: [redacted] Avenue, [redacted]

Acquaintances: [redacted]

b6
b7C

LEADS:

MIAMI DIVISION:

At Miami, Florida: will contact [redacted] [redacted]: (1) obtain a photograph of him as he would have appeared in April, 1990; interview him for any indentifying information on either [redacted] also to find out how or from whom he learned that the documents had been discarded.

b6
b7C

1325015-000-4915

File - Serial Charge Out
FD-5 (Rev. 6-17-70)

File 29B-WF-171994 Date 6-25-91
Class. Case No. Last Serial

☐ Pending ☐ Closed

Serial No.	Description of Serial	Date Charged
28	SUBP - Perpetual Saw Bank	
	Consol into 29B-WF-171994 Sub Q	

[redacted] b6 b7C
Employee

RECHARGE Date _____

To _____ From _____

Initials of Clerk _____ Date _____

_____
Date charged

_____
Employee

_____
Location

★ U.S. GPO:1989-241-706/08023

1325015-000-4917

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/3/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/3/91, SA [redacted] and the writer met b6 b7C with AUSA [redacted] and DOJ [redacted] Discussed was the proposed trip to Europe to interview [redacted] During the meeting, AUSA [redacted] placed an over seas telephone call to [redacted] Attorney, [redacted] has tentatively agreed to bring [redacted] to Washington, D.C., for the interview. The interview has been tentatively scheduled for the week of 5/13/91.

Also discussed was the trip to Tampa to review records and to interview [redacted]. Said trip will be from 5/7 - 5/10/91. The second trip to interview [redacted] and continue to review documents will be pushed back to a later date. b6 b7C

[redacted] On that same date, the writer contacted Customs Agent and discussed the above information. b6 b7C

[redacted] On that same date, the writer contacted SA [redacted] Tampa. The investigative trip to Tampa was discussed.

b6
b7C

29B-WF-171994 - 29

SL SL

GTZ

1325015-000-4918

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 5/7/91

TO : DIRECTOR, FBI
Attn: Laboratory Division

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5 NVMRA)

SUBJECT : CLARK M. CLIFFORD, aka;
Et al;
BF&E; FAG
(OO: WMFO)

REQUEST OF THE BUREAU: The Laboratory Division is requested to produce enhanced, still photographs from the enclosed videotape casette at the following points:

Camera	Time	Description of Person
6	2:37:39p.m.	Male; lower right
6	2:44:20p.m.	Female; lower right
6	2:44:42p.m.	Female; lower right
4	2:45:24p.m.	Male; center bottom
3	2:45:58p.m.	Female; white blouse, dark sweater, print skirt
3	2:46:40p.m.	Female; white blouse, dark sweater, print skirt
4	2:47: p.m.	Female; white hat, glasses, overcoat
3	2:50: p.m.	Male; at desk, dark pants, plaid shirt
4	2:52: p.m.	Male; center bottom, plaid shirt

ENCLOSURES:

One Panasonic "Super Hi-Fi" VHS videotape cassette, labled "12", dated "4/2/90 to 4/13/90";

3-FBIHQ (Enc. 2)
1-WMFO

JNR:jnr
(4)

29B-WF-171994-30

Lab # 105080 [redacted]

b6
b7C

7/30 (done in mid-June - mailing delay due to document prep problems - should be in hand 7/31)

Approved: _____ **Transmitted** _____ **Per** _____
(Number) (Time)

1325015-000-4919

One FD-340, containing Polaroid photographs from television screen, showing above-described subjects.

The enclosed videotape was produced by the security-surveillance cameras at PERPETUAL SAVINGS BANK, F.S.B. (PSB), 445 11th Street, NW, Washington, D.C., during the period between 4/2/90 and 4/13/90. On 4/10/90, at or about 2:48p.m., PSB teller [redacted] (the Black male at the last window on the right as one views the teller stations from the lobby) received a [redacted] The person into whose account the check was deposited denies making the deposit or any knowledge of it (and, in fact, does not appear on the videotape). He believes (and the possibility exists) he was [redacted] where he was employed at the time. It is hoped that he can identify one of the customers, depicted on the enclosed videotape, who approached teller [redacted] at or about the appropriate time. b6 b7C

1325015-000-4920

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/17/91, a meeting was held at the office of the U.S. Attorney, District of Columbia. In attendance were AUSA [redacted], DOJ [redacted], SA [redacted] and the writer. AUSA [redacted] advised that letters had been sent to [redacted] inviting them to testify before a FGJ. [redacted] have agreed to testify but have requested that their testimony be held in abeyance until they have given depositions to the Federal Reserve Board (FRB). b3 b6 b7C

AUSA [redacted] further advised that the U.S. Attorney's Office has agreed with the FRB to allow the FRB to complete their process of taking depositions before presenting evidence to a FGJ. b6 b7C

SA [redacted] contacts with [redacted] were discussed as was the situation concerning him. b3 b6 b7C

Attached hereto is a memorandum prepared by AUSA [redacted], dated 5/17/91. Said memorandum sets forth a list of leads. The list was reviewed in detail and the writer has placed notations on same reflecting who will address the leads. b6 b7C

29B-WF-171994-31

SW SW

[redacted]

1325015-000 b6 b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 4/18/91

From : SA [redacted] b6 b7C

Subject: CLARK M. CLIFFORD;
Et Al;
BF&E; FAG; CONSPIRACY
OO:WMFO

On 4/2/91, AUSA [redacted] b6 b7C
and I attended a meeting with [redacted], [redacted] and [redacted] at The Board of Governors of the Federal Reserve System (BGFRS), to discuss the scope and status of the BGFRS' parallel investigation concerning the captioned matter. I served a subpoena from the United States Grand Jury, WDC, requiring the BGFRS to provide all records in its possession relative to the matter.

[redacted] said that the BGFRS has four categories of information relating to this matter: The CCAH applications for approval by the BGFRS as a bank holding company; the yearly filings and periodic examination reports; the information received from the PATTON BOGGS and BLOW since December 1990, regarding BCCI (the BGFRS has been primarily dealing with PB&B attorney [redacted], who, prior to being asked by BCCI to act as counsel in this matter, had been managing ABU DHABI's real estate holdings in the United States); records received in response to BGFRS administrative subpoenas requiring production of all records of CCAH and the personal financial records of CLARK M. CLIFFORD and [redacted]. With regard to the records of CLIFFORD and [redacted], BGFRS will require a separate subpoena specifically requiring the production of those records. b6 b7C

[redacted] provided a "general overview" of the scope and results of the BGFRS investigation. Essentially, the information from PATTON, BOGGS and BLOW has revealed there were several large, non-performing loans made by BCCI to the shareholders of CCAH. The BCCI and CCAH documents supporting these loans have been taken to and stored in ABU DHABI, under the control of the current owners of BCCI. BCCI has also formed an "investigative committee," comprised of representatives from the b6 b7C

2 - WMFO
JNR:das
(2)

29B-WF-171994-32
SU SU

1325015-000-4926

auditing firms of Price Waterhouse and ERNST & WHINNEY, along with the attorneys from PATTON BOGGS and BLOW.

In May 1990, while auditing BCCI, Price Waterhouse found a "huge hole" in BCCI's capitalization, equal to approximately $1 billion. [redacted] sought an infusion of capital from SHEIK ZAYEK BIN SULTAN AL-NAHAYAN of ABU DHABI, who already owned 30 percent of BCCI. SHEIK AL-NAHAYAN contributed the necessary capital, raising his ownership interest in BCCI to 79 percent, then instructed Price Waterhouse to expand the scope of the audit. In or before October 1990, Price Waterhouse issued a "coded report" showing BCCI loans to CCAH shareholders and to GHAITH PHARAON; loans which far exceeded what a U.S. bank would be allowed to loan, given the capitalization and other assets available. The records of those loans were kept in the homes of AGHA ABEDI and [redacted], and appeared on the books and records of BCCI as "lines of credit," even though they were merely amounts of money disbursed through nominees for the purchase of CCAH. Reportedly due to these disclosures, SHEIK AL-NAHAYAN successfully sought the resignations of both ABEDI and [redacted]

b6
b7C

[redacted] wrote to Price Waterhouse requesting access to the report. After receiving and reviewing the report, [redacted] wrote to CCAH demanding the documents showing the loans. It was arranged that [redacted] representing the BGFRS, and an employee of The Federal Reserve Bank in New York would travel to ABU DHABI with PATTON BOGGS & BLOW Attorney [redacted] to examine the documents. During the trip, which occurred in early March 1991, [redacted] and the others examined numerous documents and made copies of those they deemed pertinent. Those copies were transported by [redacted] and the others to London, England, and placed in the custody of the law firm of ALLAN & OVERY (phonetic), counsel to BCCI. [redacted] did not make an inventory of the documents. [redacted] has written a letter to PATTON BOGGS & BLOW requesting that the documents be turned over to the BGFRS.

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b7C

[redacted] is working on a report of investigation concerning the trip to ABU DHABI and his examination of the documents. It was "clear" to him from his examination that the CCAH borrowers were nominees for BCCI.

The purchase of CCAH stock in 1986 by CLIFFORD and [redacted] was first disclosed in [redacted] reply to [redacted] request for the identity of every shareholder. [redacted], in a recent deposition given to the BGFRS, explained how it came to be that he and CLIFFORD bought the stock. It is also clear from the documents received from PATTON BOGGS & BLOW that loans were made by BCCI to CLIFFORD and [redacted] for the purpose of purchasing the CCAH shares. [redacted] bought approximately $5 million worth, and CLIFFORD $10 million worth. Their purchases together totalled less than one percent of the outstanding stock in CCAH. Loans

b6
b7C

1325015-000-4927

were made for the entire amount of the purchase, with a price of the shares of stock having a "book-value" of $2,200 each. In 1988, both CLIFFORD and [redacted] sold some of the shares for approximately three times the book-value, realizing a sufficient profit to pay off their loans in 1989. Both CLIFFORD and [redacted] still hold some CCAH shares. b6 b7C

Tangential issues discovered by the BGFRS in its inquiry include:

1. BCCI owns Independence Bank in California, purchased by nominee GHAITH PHARAON; a violation of the Bank Holding Act.

2. BCCI violated the Bank Holding Act in 1982 by its nominee purchase of the National Bank of Georgia, which again involved GHAITH PHARAON.

First American Bankshares will have to be sold by BCCI to someone other than SHEIK AL-NAHAYAN.

[redacted] will report the findings of his investigation to the Board of Governors, which, in turn, will direct the next steps, e.g., penalties against BCCI and actions against CLIFFORD and [redacted] has also been told that congressional hearings by Congressman GONZALES and Senator KERRY are upcoming. b6 b7C

1325015-000-4928

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK M. CLIFFORD;
ET AL;
BF&E; FAG;
(OO: WMFO)

On 4/17/91, the writer briefly met with AUSA [redacted] b6 b7C District of Columbia. The writer introduced himself and advised that he had been assigned to captioned investigation as a second Agent. Such was per the request of AUSA [redacted]. AUSA [redacted] provided the writer with a brief case overview. A meeting was set up for 4/18/91 in order to discuss this matter in detail.

On 4/18/91, the writer and SA [redacted] met b6 b7C with AUSA [redacted]. The writer received a thorough overview of this case. In addition, AUSA [redacted] stated that he had been in contact with Customs Agent [redacted] and AUSA [redacted], Middle District of Florida. Said District had handled the 1988 Money Laundering case involving BCCI. AUSA [redacted] was informed that [redacted] believed that captioned investigation would benefit from interviewing individuals who were involved in their case and reviewing the trial transcripts and evidence. Such should have a direct impact on captioned matter. AUSA [redacted] advised that he would like SA [redacted] and the writer to accompany DOJ, Fraud Section, [redacted] and himself to Tampa, Florida, in early May, 1991. Interviews and records reviews will be conducted at said time. AUSA [redacted] added that [redacted] was aware of an individual outside of the United States who may have significant information relevant to this matter.

Subsequently, on that same date, the writer attended a meeting at AUSA [redacted] office. In addition to the writer and AUSA [redacted] in attendance were Attorney's [redacted] and [redacted] are criminal Attorney's representing the current owners of BCCI and BCCI. This meeting was preliminary in nature. BCCI'S potential cooperation and culpability were discussed. b6 b7C

29B-WF-171994 -34

SU SU

[redacted] b6 b7C

1225015-000-4

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/15/91, the writer contacted Analyst [redacted] b6 b7C Visual Investigative Analysis Unit (VIA), CID, FBIHQ. The writer inquired as to the potential for VIA assistance with link analysis and flow charting in this matter.

On the above date, the writer contacted SSA [redacted] b6 b7C [redacted], FIFU, CID, FBIHQ. SSA [redacted] stated that he would support the above mentioned VIA request.

On the above date, the writer hand carried the above mentioned VIA request to FBIHQ.

On 5/16 and 17/91, respectively, the writer reviewed the file and other records pertaining to this matter.

On 5/16/91, the writer contacted SA [redacted] NYO. b6 b7C b7D The writer apprised SA [redacted] of the contact with [redacted]

On 5/17/91, the writer continued to review documents relevant to this investigation.

29B-WF-171994-35

SW SW

[redacted]

1325015-000-4933

[redacted] b6 b7C

M moranaeum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/23/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK M. CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

b6
b7C

On 4/16/91 the writer was assigned to this matter. SA [redacted] provided the writer with an overview of the case. The writer than began to review documents germane to this investigation.

On 4/17/91, the writer continued to review documents and the case file.

On that same date, the writer attempted to contact [redacted] Sterling, Virginia 22170. b6 b7C There did not appear to be anyone home at said address. The writer noted a considerable amount of junk mail around the entrance and observed SA [redacted] business card against the door. It appeared that no one had been home at the above address for a while. The writer then went to the town house unit next door, [redacted] confirmed that [redacted] resided at the above address. However, [redacted] stated that [redacted] has not been around for about 6 months and that [redacted] has not been occupied during that period.

On 4/19/91, the writer contacted Postal Inspector [redacted] b6 b7C [redacted] Merrifield, Virginia, telephone [redacted]. The writer requested an address check for [redacted], specifically if there was a record of a forwarding address from the above residence.

On 4/22/91, [redacted] contacted the writer. [redacted] advised that b6 b7C there was no record of a forwarding address for [redacted] checked with the Postal Carrier for that route and determined that [redacted] was still getting mail at [redacted]. In addition, mail was being received in the names [redacted] and [redacted] determined that occasionally someone was picking up the mail and occasionally the Carrier would return it when the box became overfilled. [redacted] stated that there was no particular pattern as to when mail was picked up or returned by the Letter Carrier.

29B-WF-171994-36

1325015-000-4934

M moranaeum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/23/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG;
(OO: WMFO)

On 4/23/91, the writer accompanied DOJ Attorney [redacted] to the Federal Reserve Bank (FRB). [redacted] showed the writer where relevant records were located at the FRB. The FRB records were divided into two areas. The first, located in the "old" FRB building, were regular submissions to the FRB. The second, located in the "new" FRB building, were FRB investigative files and submissions in support thereof. b6 b7C

[redacted] provided a detailed overview of the records and their importance to this investigation. [redacted] advised that FRB Attorneys [redacted] were very knowledgeable of the records and were working on the FRB investigation of this matter. b6 b7C

On the above date, [redacted] introduced the writer to [redacted] FRB. This matter was discussed briefly. b6 b7C

On that same date, the writer reviewed available information at the NVMRA.

29B-WF-171994-37

1325015-000-4935

M moranaeum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/23/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 4/23/91, the writer and SA [redacted] met b6 b7C
with AUSA [redacted] and DOJ [redacted]
The 60 Minutes tape of the interview of CLARK CLIFFORD was reviewed in detail. After said review, AUSA [redacted] discussed the following:

1. Subpoenas/Letters

He was in the process of preparing a subpoena for SA [redacted] to serve to Perpetual Savings Bank, concerning the [redacted] situation. b6 b7C

Letters were being prepared by his office to send to CLARK CLIFFORD and [redacted] requesting interviews.

2. Federal Grand Jury (FGJ)

AUSA [redacted] anticipated that information would be presented to a FGJ beginning on [redacted]. He requested that SA [redacted] be available on that date to assist him. b3 b6 b7C

3. Interviews conducted by Investigators for the Federal Reserve Bank (FRB)

AUSA [redacted] wanted SA [redacted] and the writer to review reports of interviews conducted by FRB Investigators and to establish an interview list from same. b6 b7C

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SW SW

1325015-000-4936

4. Trip to the Middle District of Florida

AUSA [redacted] believes that [redacted], SA [redacted] b6 b7C the writer and himself should travel to the Middle District of Florida twice to meet with AUSA [redacted] and Customs Agent [redacted]. They will provide an overview of the BCCI Money Laundering case and provide information from that matter which is inter-related to captioned investigation. In addition, [redacted] will arrange for the interviews of [redacted] and [redacted]. Both individuals possess information pertinent to captioned case. The first trip has been tentatively scheduled for 5/6/91 and the second for 5/13/91.

5. Trip to Europe to interview a potentially important witness

AUSA [redacted] has received preliminary information b6 b7C that [redacted] is aware of a former high ranking BCCI Official who is willing to meet with AUSA [redacted] in Europe to discuss important evidence. AUSA [redacted] requested that SA [redacted] accompany him to Europe should it be determined that such trip could be justified based upon evidentiary value.

1325015-000-4937

M moranaeum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/26/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 4/25/91, the writer reviewed records relevant to this matter.

On the above date, [redacted] Federal Reserve Bank (FRB), contacted the writer. [redacted] expressed a concern about the records taken from the FRB to be copied at the USAO. The writer referred [redacted] to AUSA [redacted] District of Columbia. b6 b7C

Subsequent to the above conversation, the writer contacted AUSA [redacted] and advised him of the contact with [redacted] AUSA [redacted] advised that he would contact [redacted] and discuss this issue. AUSA [redacted] requested that the writer obtain copies of recent articles in New Yorker magazine featuring excerpts from CLARK CLIFFORD'S forthcoming book. He also requested that the writer determine who the publishing company was. b6 b7C

On that same date, the writer went to the Public Library, Sterling, Virginia. The above requested articles were located and copied. It should be noted that no reference was made in the two articles as to who the publisher of the book was.

29B-WF-171994-39

SU SU

1325015-000-4938

M moranaum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/26/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO:WMFO)

On 4/26/91, the writer met with AUSA [redacted] b6 b7C and DOJ [redacted] The writer provided them with copies of New Yorker articles from the 3/25/91 and 4/1/91 issues. Said articles contained excerpts from CLARK CLIFFORD'S forthcoming autobiography. In addition, the writer provided a copy of a Regardie's article, from the current issue about CLIFFORD. AUSA [redacted] advised that his office was in the process of drafting letters for CLIFFORD and [redacted]. Said letters had not yet been finalized.

29B-WF-171994-40

SEARCHED SERIALIZED

1325015-000-4939

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535

April 22, 1991

CLARK M. CLIFFORD;
[redacted]
b6
b7C

dba CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V.;
NETHERLANDS, ANTILLES;
AGHA HASAN ABEDI;
[redacted]

dba BANK OF CREDIT AND COMMERCE, INTERNATIONAL;
BANK FRAUD AND EMBEZZLEMENT;
FRAUD AGAINST THE GOVERNMENT;
CONSPIRACY

The captioned matter was initiated in February 1991, in response to a criminal referral form received from the Board of Governors of the Federal Reserve System, Washington, D.C., alleging that false statements were made to it by the captioned subjects with regard to the ownership and control of Credit and Commerce American Holdings, N.V. (CCAH), Netherlands, Antilles. Among the holdings of CCAH is First American Bankshares (FABS), which owns, among others, First American Bank, WDC. The central allegation was that subjects [redacted] b6 b7C were merely nominees for the Bank of Credit and Commerce, International (BCCI) in 1982, when they purchased [redacted] FABS' predecessor, Financial General Bankshares (FGB), then traded the FGB shares for shares in CCAH. The purchasing of the shares and the resultant [redacted] CCAH was established using loans from BCCI; loans which attorneys for BCCI have now disclosed to the BGFRS were made to the nominees at the direction of AGHA HASAN ABEDI and [redacted] for the purpose of gaining control of CCAH, in direct contravention of an agreement between CCAH and the BGFRS that no BCCI financial or managerial participation would occur.

29B-WF-171994-41

In sworn filings and testimony before the BGFRS in 1978, regarding the efforts of CCAH to purchase FGB, CLARK M. CLIFFORD, and noted WDC attorney, who served as advisor to presidents TRUMAN, KENNEDY, JOHNSON, and CARTER, and as Secretary

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-4940

of Defense for one year in the JOHNSON administration, and [redacted], CLIFFORD's law partner, as attorneys for CCAH, said that the independent wealth of the four arab investors, and none of BCCI's, would be used to purchase the FGB shares. Subsequently, CLIFFORD, [redacted] and the other captioned subjects have served as controlling directors of CCAH and FABS, renewing on a yearly basis false claims to the BGFRS that BCCI had no ownership interest in, and exercised no control over, CCAH. b6 b7C

Knowledge of the false statements came to light after the April 1990, money-laundering conviction of BCCI in the Middle District of Florida. SHEIK ZAYED BIN SULTAN AL-NAHAYAN, the ruler of ABU DHABI and a long time investor in BCCI, acquired control of BCCI by means of a substantial infusion of capital, which approximated $1 billion. Subsequently, AL-NAHAYAN ordered an audit, apparently done by PRICE WATERHOUSE, which disclosed, inter alia, the BCCI loans to the nominees who purchased the FGB shares. The audit also disclosed that, in 1986, similar loans were made to CLIFFORD and [redacted] for the purpose of purchasing shares of CCAH, again in contravention of the edict of the BGFRS. The conditions under which the loans were made to both the Arab nominees and to CLIFFORD and [redacted] were essentially the same: although each was required to sign a promissory note and an assignment of collateral - the CCAH shares - each was given a "side letter" saying that there was no requirement to pay either the principal or interest on the loan; that each was only required to hold the stock. In the loans made to CLIFFORD and [redacted] the "side letters" further stipulated that, should either choose to sell his shares, a buyer would be provided, and that each was guaranteed a minimum return of what he had paid for the shares and was entitled to any profit. CLIFFORD and [redacted] held their shares until approximately March 1988, when each sold a portion of his shares to another nominee of BCCI. Approximately one year later, CLIFFORD and [redacted] repaid their loans to BCCI, but still hold a portion of their stock in CCAH. b6 b7C

Prosecution of this matter is being pursued by the office of the United States Attorney, Washington, D.C.

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 4/22/91

TO : DIRECTOR, FBI

171994

FROM : SAC, WMFO (29B-WF-~~171995~~) (P) (C-5)

SUBJECT : CHANGED;
CLARK M. CLIFFORD;
[redacted]
dba CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V.;
NETHERLANDS, ANTILLES;
AGHA HASAN ABEDI;
[redacted]
dba BANK OF CREDIT AND COMMERCE, INTERNATIONAL;
BF&E; FAG; CONSPIRACY
OO:WMFO

b6
b7C

Re WMFO teletypes to Director, dated 3/12/91 and 3/13/91.

title change

Title marked CHANGED to indicate addition of subjects ABEDI, [redacted] and the BANK OF CREDIT AND COMMERCE, INTERNATIONAL.

b6
b7C

Enclosed are five copies of an LHM concerning the captioned matter.

The investigation of this matter is continuing. Presently, documents in the possession of the Board of Governors of the Federal Reserve System, Washington, D.C., are being reviewed. The agent assigned to the captioned is SA [redacted] extension 6418.

b6
b7C

3 - FBIHQ (Encs. 5)
1 - WMFO
JNR:das (4)

29B-WF-171994-42

Searched
Serialized
Indexed
Filed

Approved: _____ Transmitted _____ (Number) (Time)

1325015-000-4942

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/2/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E;
FAG; CONSPIRACY;
(OO: WMFO)

On 4/29/91, the writer was contacted by [redacted] b6 b7C
[redacted] UNIT CHIEF, Financial Institution Fraud Unit, FBIHQ. [redacted] advised that he was the FBI representative to the Bank Working Group. He added that following the meeting on 4/26/91, [redacted] Federal Reserve Bank (FRB), discussed captioned matter with him. Specifically, [redacted] discussed the insistence of AUSA [redacted] to remove records from the FRB for purposes of copying. [redacted] was apprised of details concerning this matter and the necessity of having a working set of copies of the FRB records for evidentiary purposes.

On 4/30/91, the writer met with [redacted] concerning the status of the copying of FRB records. The writer anticipated that said records should be fully copied and returned to the FRB by 5/3/91. [redacted] stated that if he could be of assistance to so advise him. b6 b7C

On 4/30/91, the writer met with AUSA [redacted] The copying of the FRB records was discussed. Once such was completed the writer would begin to review same. b6 b7C

On 5/1/91, the writer met with DOJ [redacted] b6 b7C
[redacted]. The FRB Attorneys who travelled to London to obtain documents, in this matter, will be returning in the next few days. [redacted] mutually agreed that a conference be scheduled in the next few weeks. The purpose will be to bring the FRB Investigators and DOJ Investigators together in order to discuss the inter-related investigations. [redacted] requested that Unit Chief [redacted] be invited to the meeting. The writer advised [redacted] that if this were an investigative meeting it would be inappropriate for [redacted] to attend the meeting.

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Sa Sa

1325015-000-4945

On that same date, the writer was contacted by [redacted] b6 b7C [redacted] advised that the above conference had tentatively scheduled for either 5/20/91 or 5/22/91. [redacted] added that DOJ Fraud Section Chief [redacted] would probably attend the meeting.

On 5/2/91, the writer contacted Unit Chief [redacted] b6 b7C and apprised him of the above meeting. It was agreed that if this meeting was investigative in nature, than [redacted] should not be involved. However, in the event that [redacted] is involved in the meeting consideration should be given to [redacted] attending as the Bureau Liaison with DOJ. [redacted] left his participation in said meeting to the discretion of WMFO.

1325015-000-4946

MAY-02-'9[redacted]5:02 T-JAP GENEVE0227386081 #87[redacted]

5.2.91
Rec'd 10:00 am
KTW

Fax To: Mr. [redacted], FBI
Fax No: (202) 324-6426
RE: [redacted] information

b6
b7C

Name: [redacted]
Date of Birth: [redacted]
Place of Birth: ~~Bhopal~~, India
Sex: male
height: 1 meter 85
Weight: 85 kg
Hair Color: Black
Eyes: Brown
Country of Citizenship: Pakistan
PASSport: [redacted]
Issued in Abu Dhabi July 22, 1980
Race: Eurasian ?
Religion: Moslem
Address: [redacted]
PAKISTAN

ORIGINAL

b6
b7C

29B-WF-171994-45

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 02 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-4947

M moranaeum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/25/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 4/24/91, the writer and SA [redacted] met with AUSA [redacted] and DOJ [redacted] AUSA [redacted] advised that he had been in touch with Deputy U.S. Marshall [redacted], New York, concerning the former high ranking BCCI official who could have significant information relevant to this investigation. AUSA [redacted] provided the following background information for said individual: b6 b7C

His name was [redacted]. He was from Pakistan. [redacted] was represented by American Attorney [redacted] was located in the Middle East. [redacted] had been in prison in Abu Dhabi for over 10 years. The Statute of Limitations has expired for anything involving BCCI that [redacted] may have had culpability for. In return for his cooperation with captioned investigation, [redacted] wants immunity from prosecution, relocation to the United States and a reward. b6 b7C

[redacted] was the [redacted] has information concerning First American Bank and two other banks. He was aware of lengthy meetings where discussions were held as to the funnelling of money from Abu Dhabi to the U.S. [redacted] has information involving meetings which involved CLIFFORD and [redacted] b6 b7C

[redacted] Sheik. He in turn [redacted] Sheik [redacted] Sheik. b6 b7C

It is alleged that [redacted] has given his story to Regardie's and was paid for same. Regardie's is supposedly waiting for [redacted] to go public before the story is published. It is believed that the KERRY Commission knows about [redacted] and that they have spoken with [redacted]. The KERRY Commission is believed to be getting ready to bring [redacted] to the U.S. to testify in the late spring or early summer. b6 b7C

29B-WF-171994 -46
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1325015-000-4948

AUSA [redacted] is anxious to speak with [redacted]. He is attempting to set up a meeting with [redacted]. Said meeting if it takes place will likely occur in Europe. In the event that AUSA [redacted] travels to Europe for this meeting, he reiterated his request that SA [redacted] accompany him. b6 b7C

AUSA [redacted] discussed the following information: b6 b7C

1 [redacted] b6 b7C

AUSA [redacted] was aware that [redacted] has been in contact with Federal Reserve Bank (FRB) Attorney [redacted] about records he allegedly had. AUSA [redacted] would like to have [redacted] consensually record conversations with [redacted]

2. Xeroxing of FRB records

AUSA [redacted] has made arrangements with [redacted], FRB, for the transport of FRB records to the USAO. Said records will be copied and returned to the FRB. AUSA [redacted] requested that the writer coordinate this project. b6 b7C

3. Interviews

AUSA [redacted] would like to have the following individuals interviewed in the near future: b6 b7C

[redacted]

1325015-000-4949

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/6/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

The writer has been responsible for the transport of records from the Federal Reserve Board (FRB) to the U.S. Attorney's Office, District of Columbia and the return thereof. The purpose was to copy FRB records for investigative purposes. Said records were voluminous. The copies will be maintained at the U.S. Attorney's Office, in the custody of AUSA [redacted] b6 b7C [redacted]. Set forth below is a log detailing the taking/returning of records to the FRB.

Date	Activity
4/24/91	Took 4 boxes of records from the Legal Section, at the Old FRB Building. Such contained documents submitted to the FRB.
4/24/91	Took 1 box of records from the Office of Bank Supervision, at the New FRB Building. This box was sealed. It contained documents which may be privileged. It was not copied and will not be reviewed. It will remain sealed and in the custody of AUSA [redacted] b6 b7C
4/25/91	Returned 2 boxes of records to the Old FRB Building.
4/26/91	Returned 2 boxes of records to the Old FRB Building.
4/26/91	Took 4 boxes of records from the Office of Bank Supervision, at the New FRB Building. Such contained FRB investigative files.
4/29/91	Returned records to the New FRB Building that were taken on 4/26/91.

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[redacted] 1225015-000-4 b6 b7C

4/29/91 Took 5 boxes of records from the Office of Bank Supervision, at the New FRB Building. Such contained FRB investigative files.

5/01/91 Returned records to the New FRB Building that were taken on 4/29/91.

5/01/91 Took 1 box of records and a set of binders from the Office of Bank Supervision, at the New FRB Building. Such contained FRB investigative files.

5/06/91 Returned records to the New FRB Building that were taken on 5/01/91.

1325015-000-4951

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 5/8/91

[redacted] date of birth [redacted] b3 b6 b7C
social security number [redacted] address [redacted]

[redacted] b3 b6 b7C

[redacted] b3 b6 b7C

[redacted] b3 b6 b7C

[redacted] b3 b6 b7C

[redacted] b3 b6 b7C

[redacted] a

[redacted] b3 b6 b7C

[redacted] he was told this while he was in the [redacted] area to testify for the Federal Grand Jury.

Investigation on 5/7/91 at [redacted] # 29B-WF-171994 - 48

SA [redacted] b6 b7C b3

by [redacted] Date dictated 5/8/91

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

b3
b6
b7C

[redacted]

b3
b6
b7C

[redacted]

b3
b6
b7C

[redacted] provided the following description for [redacted]

b6
b7C

sex:	female
race:	black
height:	5 foot 3 inches/ 5 foot 4 inches
build:	medium
complexion:	light brown
hair:	black, short and curly
vehicle:	
employment:	[redacted]

b6
b7C

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 5/8/91

[redacted] date of birth [redacted]
social security number [redacted] address [redacted]

b6
b7C
b3

[redacted]

b6
b7C
b3

[redacted]

b6
b7C
b3

[redacted]

b6
b7C
b3

[redacted]

b6
b7C
b3

[redacted]

b6
b7C
b3

Investigation on 5/7/91 at [redacted] # 29B-WF-171994 -48

b6
b7C
b3

SA [redacted]

by [redacted] Date dictated 5/8/91

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-0004954

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

C-5

Date 5/8/91

TO : SAC, WMFO (C-5 NVMRA)

FROM : SAC, MIAMI (29B-WF-171994)(RUC)

SUBJECT : CLARK M. CLIFFORD;
et al;
BF&E;FAG
OO:WMFO

Reference WMFO airtel to Miami dated 4-9-91.

Enclosed for WMFO is one original and two copies of an FD-302 regarding the interview of [redacted] b6 b7C
Also enclosed is a 1A envelope containing a photograph of [redacted]

[redacted] was interviewed about [redacted] and [redacted] b6 b7C
but he refused to give and specific information regarding either. [redacted] claims he does not recall any specifics about the location where [redacted] resided even though he spent much time there over the year he was dating [redacted]

[redacted] did indicate that he has current information regarding [redacted] whereabouts in the Atlanta area, (at least a current phone number) however, he refused to disclose this information claiming she did not want to talk to anyone about this matter. He did state he would contact her and have her call the interviewing agent. b6 b7C

2-WMFO (enc.- 4)
1-MIAMI

KM:km
(3)

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SEARCHED See INDEXED
SERIALIZED See FILED See
MAY 13 1991
Per

Approved: WAC Transmitted (Number) ( ) OFFICE [redacted] b6 b7C

1325015-000-4956

[redacted] provided a photograph of himself willingly but was hesitant to advise any other information about himself, especially a current address. b6 b7C

Since there are no investigative leads pending, Miami considers this case RUC'd.

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 5/8/91

TO : SAC, WMFO (C-5 NVMRA)

FROM : SAC, MIAMI (29B-WF-171994)(RUC)

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et al;
BF&E;FAG
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(2)-WMFO (enc.- 4)
1-MIAMI

KM:km
(3)

29B-WF-171994-49
Su Su

Approved: _____ Transmitted _____ Per _____
(Num[redacted]) b6 b7C

132-WF-000-4958

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 5/15/91

TO : DIRECTOR, FBI
ATTN: VISUAL INVESTIGATIVE ANALYSIS UNIT, CID

FROM : SAC, WMFO (29B-WF-171994) (P) (C-5)

SUBJECT : CLARK M. CLIFFORD;
ET AL;
BF&E; FAG;
CONSPIRACY;
(OO: WMFO)

Request of the Bureau: The Visual Investigative Analysis Unit, Criminal Investigative Division, is requested to provided assistance in this matter. Specifically needed are flow charts and link analysis information. This case is a significant and complex documentary investigation. It involves a voluminous amount of records. Such include documents obtained from the Federal Reserve Board (FRB), information obtained from a joint [redacted] Customs Investigation, print media articles and records/interviews from captioned investigation. It should be noted that due to the stature of individuals and financial institutions involved in this matter, national media attention has been focused on this case. As the investigation progresses it is anticipated that media attention will intensify. b7E

Synopsis: This matter was predicated on the receipt of a criminal referral from the FRB. It was alleged that false statements were made to the FRB with regard to the ownership of Credit and Commerce American Holdings (CCAH). Among the holdings of CCAH is First American Bankshares (FABS), which owns among others, First American Bank (FAB). The central

3-FBIHQ
2-Visual Investigative Analysis Unit, CID
1-Financial Institutions Fraud Unit, CID
1-WMFO
(DML)

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29B-WF-171994

Hand Carried to FBI HQ 5-16-91

Approved: _____ Transmitted _____ (Number) (Time) Per _____

Searched _____
Serialized _____
Indexed _____
Filed _____

1325015-000-4961

allegation was that the principal share holders of CCAH were merely nominees for the Bank of Credit and Commerce, International (BCCI) in 1982, when they purchased controlling interest in FABS' predecessor, Financial General Bankshares (FGB). The FGB shares were then traded for shares in CCAH. The purchasing of the shares and the resultant control of CCAH was established using loans from BCCI. The loans were made by BCCI for the purpose of gaining control of CCAH. Such was in direct contravention of an agreement between CCAH and the FRB. According to said agreement, BCCI was to have no financial or managerial participation in CCAH. Subjects in this matter include CLARK M. CLIFFORD, a prominent Washington, DC, Attorney and his [redacted] CLIFFORD has served as an Advisor to Presidents TRUMAN, KENNEDY, JOHNSON and CARTER. CLIFFORD also served as Secretary of Defense in the JOHNSON Administration. Other prominent individuals involved in this matter include Sheik ZAYED BIN SULTAN AL-NAHAYAN, the Ruler of Abu Dhabi, GHAITH PHARAON and BERT LANCE, former Director of Management and Budget under President CARTER. Additional criminal referrals related to this matter are expected to be made by the FRB.

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Administrative: WMFO has assigned two SA'S to investigate this matter on a full time basis. In addition, two Prosecutors have likewise been assigned on a full time basis, one AUSA from the District of Columbia and one Trial Attorney from the Fraud Section, DOJ. U.S. Attorney JAY STEVENS considers this a high priority within his office and has been personally involved in the direction of this investigation.

1325015-000-4962

FD-437 (Rev. 4-1-91)

Memorandum

To : File

From SA [redacted] (29B-WF-171994) (P) b6 b7C

(serial # is mandatory when control file is used)

Subject : DR. GHAITH PHARAON

1. Source of Captioned Matter:

   - [x] A: Federal Supervisory Agency Written Referral
   - [ ] B: Financial Institution Written Referral
   - [ ] C: Other

2. Name of Victim Financial Institution: FEDERAL RESERVE BANK

3. Type of Victim Institution:

   - [ ] A: FDIC
   - [ ] B: OCC
   - [x] C: FRB
   - [ ] D: Savings Association
   - [ ] E: Credit Union
   - [ ] F: Farm Credit Institution

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4. State Victim Institution Located: (two letter identifier) DC

5. Type of Subject(s):

   - [ ] A: Insider
   - [x] B: Insider & Outsider
   - [ ] C: Outsider
   - [ ] D: Unknown

6. A: Amount of Reported Loss (before restitution, if any) -0-.
   B: Amount of Reported Restitution (if any) _____.

7. Action taken:

   - [ ] A: case opened/or reopened
   - [x] B: incorporated into pending investigation
   - [ ] C: no action due to state or local prosecution
   - [ ] D: amount of loss does not meet prosecutive guidelines
   - [ ] E: Federal violation is handled by another Federal agency or FBI squad
   - [ ] F: matter was presented to USA and prosecution was declined
   - [ ] G: initiation of investigation delayed due to current unavailability of resources
   - [ ] H: Financial Institution Fraud, within the FBI's jurisdiction, referred to U. S. Secret Service
   - [ ] I. No apparent Federal Violation

29B-WF-171994-53

Searched _____
Serialized Su
Indexed _____
Filed Su

Refer to MIOG, Section 29-6.1, for reporting and notification requirements upon receipt of criminal referrals in financial fraud matters.

FBI/DOJ

1325015-000-4969

FD-407 (Rev. 4-1-91)

Memorandum

To : File

From SA [redacted] (29B-WF-171994) (P) b6 b7C
(serial # is mandatory when control file is used)

Subject : ~~DRE CHATTER PLANTON~~
BCCI HOLDING (LUXEMBOURG) S.A.

1. Source of Captioned Matter:

- [x] A: Federal Supervisory Agency Written Referral
- [ ] B: Financial Institution Written Referral
- [ ] C: Other

2. Name of Victim Financial Institution: FEDERAL RESERVE BANK

3. Type of Victim Institution:

- [ ] A: FDIC
- [x] B: OCC
- [ ] C: FRB
- [ ] D: Savings Association
- [ ] E: Credit Union
- [ ] F: Farm Credit Institution

4. State Victim Institution Located: (two letter identifier) DC

5. Type of Subject(s):

- [ ] A: Insider
- [x] B: Insider & Outsider
- [ ] C: Outsider
- [ ] D: Unknown

6. A: Amount of Reported Loss (before restitution, if any) —0—.
B: Amount of Reported Restitution (if any) _____

7. Action taken:

- [ ] A: case opened/or reopened
- [x] B: incorporated into pending investigation
- [ ] C: no action due to state or local prosecution
- [ ] D: amount of loss does not meet prosecutive guidelines
- [ ] E: Federal violation is handled by another Federal agency or FBI squad
- [ ] F: matter was presented to USA and prosecution was declined
- [ ] G: initiation of investigation delayed due to current unavailability of resources
- [ ] H: Financial Institution Fraud, within the FBI's jurisdiction, referred to U. S. Secret Service
- [ ] I. No apparent Federal Violation

29B-WF-171994-55
Searched _____
Serialized 5u
Indexed 5u
Filed 5u

Refer to MIOG, Section 29-6.1, for reporting and notification requirements upon receipt of criminal referrals in financial fraud matters.

FBI/DOJ
1325015-000-4975

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E;
FAG; CONSPIRACY;
(OO: WMFO)

b6 b7C

On 5/14/91, the writer contacted the Office of Congressional Affairs, FBIHQ. The writer was referred to SSA [redacted] SSA [redacted] was not available at that time. b6 b7C

On 5/15/91, attempt to contact SSA [redacted] met with negative results.

b6 b7C

On 5/16/91, the writer discussed this matter with SSA [redacted]. The following was addressed:

1. The KERRY Sub-Committee hearings dating back to 1988, addressing the Tampa money laundering case. SSA [redacted] was requested to obtain transcripts from pertinent hearings, to include the testimony of [redacted]. The Committee chaired by KERRY was the Sub-Committee on Terrorism and Narcotics. b6 b7C

2. The writer alerted SSA [redacted] to potential hearings which will probably involve this matter. Such will include the KERRY Committee and the [redacted] Committee, The House Banking Committee. b6 b7C

3. The writer discussed the contact of [redacted], Committee Counsel, House Banking Committee, with SA [redacted], Treasury Department concerning (FNU) [redacted]. SSA [redacted] was requested to contact [redacted] about same.

(INDEX)

b6 b7C

29B-WF-171994-58

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[redacted] b6 b7C

1325015-000-4081

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/17/91, the writer reviewed records pertinent to this matter.

On 5/20/91, the writer contacted the Accounting Firm of Ernst and Whinney, New York. It was determined that the firm has merged with Arthur Young. The new firm name is Ernst and Young. The writer spoke with General Counsel, [redacted] at telephone [redacted] was familiar with the BCCI account due to the money laundering case in Tampa. [redacted] advised that basically BCCI was a United Kingdom client. He added that Deputy General Counsel [redacted] coordinated this matter with the USA in Tampa. [redacted] is located in Cleveland, Ohio, at telephone [redacted] b6 b7C

On that same date, attempts to contact [redacted] Kidder Peabody, New York, telephone [redacted], met with negative results. b6 b7C

On 5/21/91, the writer contacted [redacted] was provided with an overview of the information needed from [redacted]. He requested that whatever documentation can be provided, including invoices, account numbers and individuals involved, would be helpful. The writer disclosed to [redacted] that a FGJ subpoena would be forthcoming in this matter. b6 b7C

29B-WF-171994-59

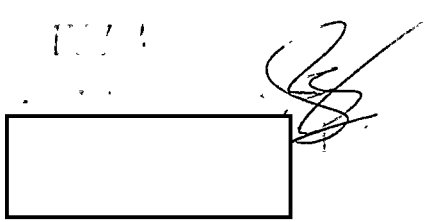
[redacted]

1325015-000 b6 b7C

29BWF-171994 – 60

SW

SW SW



b6
b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/20/91, a meeting was held at the office of the U.S. Attorney, District of Columbia. In attendance were AUSA [redacted], DOJ [redacted], SA [redacted] b6 b7C
[redacted] and the writer. AUSA [redacted] advised that tentative dates had been set for the appearance of CLARK CLIFFORD and [redacted] before the FGJ. Said dates were 6/12/91 for CLIFFORD and 6/14/91 for [redacted] b6 b7C

[redacted] provided a detailed overview of what was contained in the Federal Reserve Board (FRB) documents. It was mutually agreed that each of us should review the FRB records.

(NFE)

AUSA [redacted] would like to schedule a 2 day trip to New York to conduct interviews and contact the banks and other concerns at New York. The trip has tentatively been scheduled for 5/29 and 30/91. b6 b7C

On 5/21/91, the writer was contacted by Tampa Customs Agent [redacted] advised that he still had additional debriefings scheduled with [redacted]. He anticipated preparing his report of the overall debriefing in mid-June. [redacted] also advised that the [redacted] debriefing was not progressing very well. [redacted] voiced his concern about recent contacts between the Office of the U.S. Attorney, Tampa and the District Attorney in Manhattan. The new AUSA at Tampa was considering being cross-designated as an ADA and presenting information to the New York City FGJ to be used locally and federally. The writer and [redacted] disagree with same. b6 b7C

On that same date, the above information was discussed with AUSA [redacted] AUSA [redacted] stated that he had become aware of the above facts earlier this date and that discussions were held between the offices of U.S. Attorney for the District of Columbia and Tampa. AUSA [redacted] concurred with the writer's position and advised that his recommendation was that the two investigations (local and federal) should remain separate and distinct. b6 b7C

29B-WF-171994 -61

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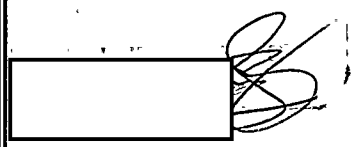

b6
b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/6/91 and 5/7/91, respectively, the writer reviewed media reports relavent to this matter. In addition the writer reviewed all Reports of Interview (ROI) as provided by Investigators for the Federal Reserve Board (FRB). b6 b7C b7E

On 5/7/91, the writer and SA [redacted] travelled to Tampa, Florida, to meet with representative of the [redacted] and Customs concerning their BCCI money laundering investigation. b6 b7C

On the above date, the writer and SA [redacted] met with AUSA [redacted] and DOJ [redacted] Said meeting took place in Tampa. Discussed was the investigative schedule in Tampa.

INDEX

On 5/8/91, the above individuals met with [redacted] CID, SA'S [redacted], at the [redacted] office, 2203 North Lois Ave, Suite 308, Tampa, Florida 33607, telephone (813)228-2047. AUSA [redacted] presented an overview of the focus of our investigation. Thereafter [redacted] provided a briefing of the joint [redacted] Customs money laundering case. [redacted] focused on specific individuals/interviews that appeared to be germane to our investigation. [redacted] provided [redacted] with a listing/inventory of subpoenaed records and evidence. [redacted] advised that in addition, Customs had evidence in their possession which would be beneficial to us. [redacted] provided copies of [redacted] memorandums of interviews of [redacted] (Said memos have been designated to Sub-File N). [redacted] described information provided to him by a Confidential Informant (CI) that he had in New York. Based on his description of the CI, the writer knew who the CI was. Said CI was [redacted] that the writer developed while assigned to New York. b6 b7C b7D b7E

On the above date, the writer contacted SA [redacted], NYO. SA [redacted] is the SA operating the above [redacted] stated that he would contact the source and make him available to the writer. Subsequently the writer contacted SA [redacted] who advised that the source was expecting the writer to contact him. b6 b7C b7D

1325015-000-4986

On that same date, AUSA [redacted] SA [redacted] and the writer met with the Customs Agents assigned to the case in Tampa. Specific details concerning that meeting were reported by SA [redacted]

On 5/9/91, the above individuals met with Customs Agent [redacted] took us to the Hernanco County Jail, where we met with [redacted] was interviewed concerning his knowledge of the relationship between BCCI and First American Bank. Specific attention was focused on his knowledge of BCCI'S dealings with CLARK CLIFFORD and [redacted] It should be noted that this interview was conducted in conjunction with ongoing debriefings of [redacted] with respect to the money laundering cases in Miami and Tampa. It was mutually agreed that the official report of interview would be prepared by [redacted]. This will be done after the debriefing process has been completed. [redacted] anticipated that he would ~~begin~~ complete this process in early June, 1991.

On the above date, AUSA [redacted] and SA [redacted] departed Tampa and returned to Washington, D.C. for the purpose of interviewing [redacted] on 5/10/91.

On 5/10/91, [redacted] and the writer reviewed records at the offices of the [redacted] and Customs. Copies of the Customs transcript index and synopsis of recordings were furnished to [redacted] Other Customs records/evidence will be forwarded to Washington, D.C., by Customs.

On that same date, the writer contacted [redacted] Results of same were reported per appropriate insert/FD-209.

On that same date, [redacted] and the writer returned to Washington, D.C.

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b7C

1325015-000-4987

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/13/91, the writer reviewed documents relevant to this matter.

On that same date, a meeting was held at the office of the U.S. Attorney, District of Columbia. In attendance were AUSA [redacted] DOJ [redacted], U.S. Deputy Marshall [redacted] SA [redacted] and the writer. b6 b7C The purpose of this meeting was to discuss the potential interview and value thereof for [redacted]. During the meeting AUSA [redacted] and SA [redacted] spoke via overseas telephone with [redacted] Attorney, [redacted] and subsequently with [redacted] Specific information from said conversations will be reported by SA [redacted] No firm date or location was established for the interview.

Subsequently, on that same date, AUSA [redacted] SA [redacted] and the writer met. The investigation, to date, was discussed in detail for lead purposes. The [redacted] and [redacted] interviews were reviewed at length. b6 b7C

On 5/14/91, the above individuals met to complete the investigative review for lead purposes. As a result, AUSA [redacted] stated that he would prepare a lead list and requested that we meet again to discuss same on 5/17/91. b6 b7C

29B-WF-171994 -62

[redacted] b6 b7C

1325015-000-4008

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/21/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG; CONSPIRACY;
(OO: WMFO)

On 5/8/91, while the writer was with [redacted] CID, SA [redacted], SA [redacted] contacted former BCCI official [redacted] had previously travelled to Tampa and was interviewed by SA [redacted] advised [redacted] of captioned investigation. [redacted] expressed an interest in discussing this matter with the writer. Arrangements were made for the writer to contact [redacted] at his business telephone in Belview, Washington [redacted]. b6 b7C b7E

On 5/13/91, the writer attempted to contact [redacted] Said attempt met with negative results. It was determined that [redacted] was away on a business trip. b6 b7C

On 5/20/91, [redacted] attempted to contact the writer. Said contact was negative. [redacted] left a message that he again had to travel on business and would not be back until 5/24/91. b6 b7C

INDEX

29B-WF-171994-63

[redacted] b6 b7C

1425015-000-4

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 5/22/91

b6
b7C

TO : ADIC, NEW YORK
ATTN: SA [redacted] (C-3)

FROM : SAC, Washington Field Office (137D-23067)

SUBJECT : [redacted] b7D

Re: Tel calls between WMFO SA [redacted] and b6 b7C
NY SA [redacted]

Enclosed for New York are an original FD-209, an original insert and copies thereof. Said enclosures reflect contact with captioned New York source. The enclosures are self explanatory.

For the information of New York, [redacted] is b6 b7C b7D knowledgeable of information relevant to a WMFO investigation entitled "CLARK CLIFFORD; ET AL", (29B-WF-171994). WMFO Case Agent anticipates additional source contacts. Such contacts will be coordinated with SA [redacted]

insert placed in Sub D

2-New York (encls. 4)
1-WMFO (29B-WF-171994)
DML

29B-WF-171994-64

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

[redacted] b6 b7C

5015-000-4

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: 11:39
Sender's Initials: KLH
Number of Pages: 15

To: FBIHQ, CID, WCCS, FIFU (Name of Office) Date: 5/23/91

Facsimile number: 324-6492

Attn: SSA [redacted] (Name / Room / Telephone No.)

b6
b7C

From: SAC, WMFO (29B-WF-171994) (Name of Office)

Subject: CLARK M. CLIFFORD, et al

Special Handling Instructions: Hand carry to SSA [redacted]

(per telcall)

b6
b7C

Originator's Name: SA [redacted] C-5 Telephone: 324-6418

b6
b7C

Originator's Facsimile Number: 324-6426 65

Approved: [redacted]

29B-WF-171994

SEARCHED INDEXED
SERIALIZED FBI/DOJ FILED
MAY 24 1991
METRO FIELD OFFICE

[redacted]

b6
b7C

132015-000-4991

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: 8:40
Sender's Initials: KLH
Number of Pages: 2

To: FBIHQ, CID, WCCS, FIFU (Name of Office) Date: 5/23/91

Facsimile number: 324-6492

Attn: SSA [redacted] (Name / Room / Telephone No.)

b6
b7C

From: SAC, WMFO (Name of Office)

Subject: Clark Clifford
FAA

b6
b7C

Special Handling Instructions: Hand carry to SSA [redacted] (AS PER PHONE CALL)

Originator's Name: SSA [redacted] C-5 Telephone: 324-6404

b6
b7C

Originator's Facsimile Number: 324-6426 — 66

Approved: D/CO

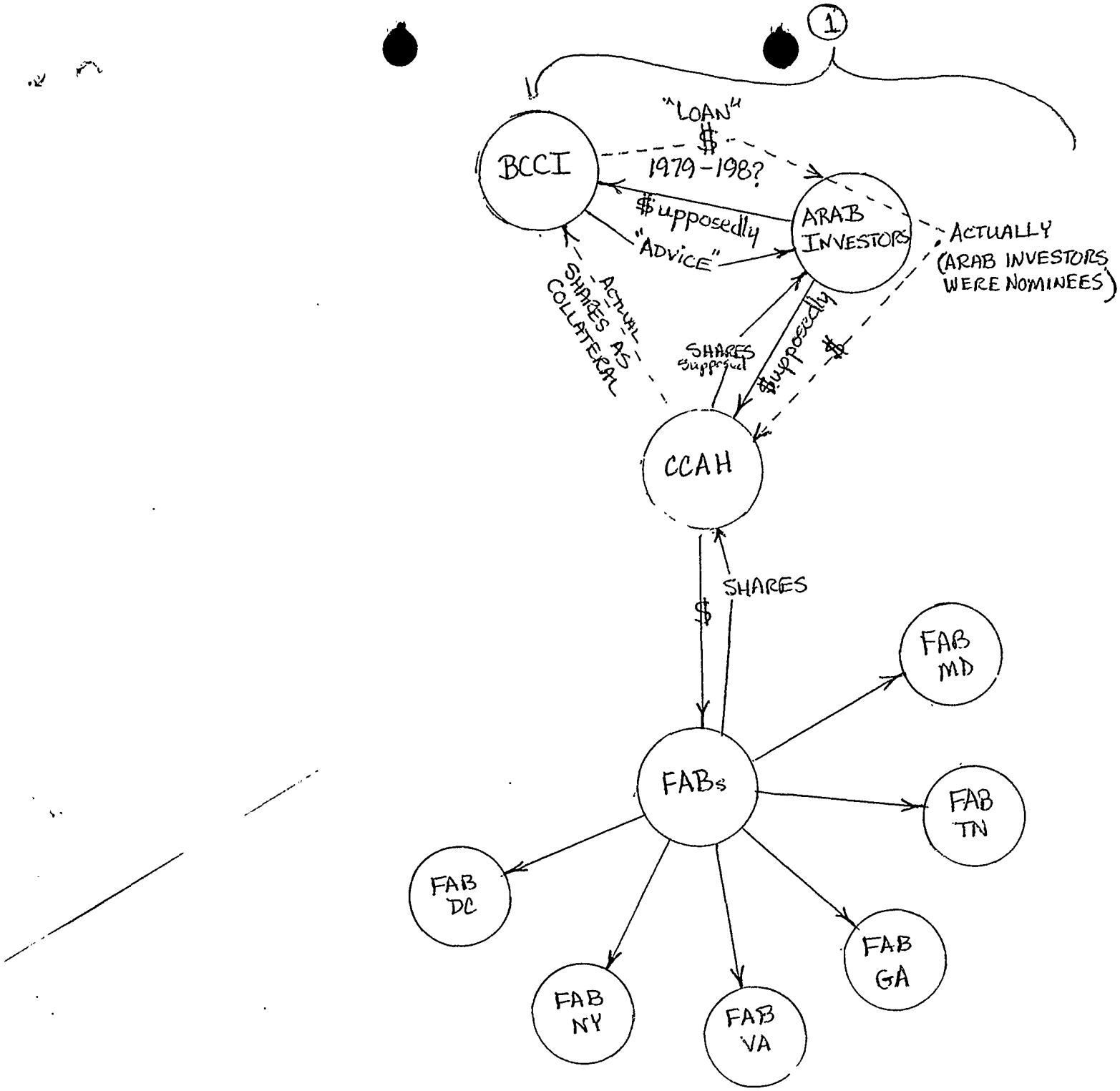
29B-WF-D1664

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED/DOJ [redacted]
MAY 24 1991
FBI [redacted]

[redacted]

b6
b7C

5015-000-

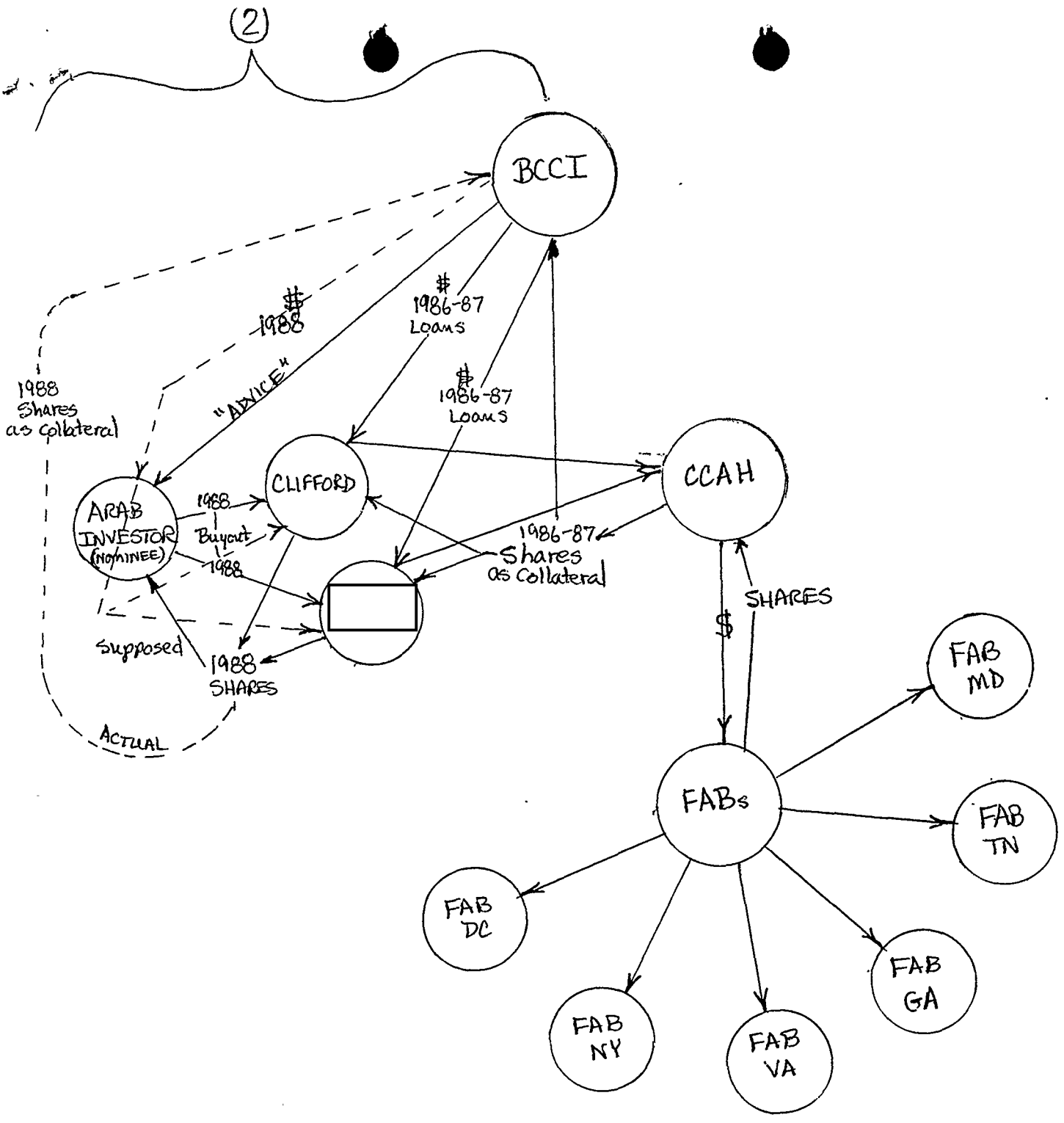


① By means of a series of nominee purchases, ARAB "investors" common to both BCCI and CCAH supposedly acquire controlling interest in FABs, when actually their money was derived from BCCI "loans". Using the same method, BCCI's money was used by the "investors" to infuse capital to allow FABs to expand.

② Clifford and [redacted] "loaned" money by BCCI to buy shares of CCAH in 1986-87. In 1988, BCCI, using nominee, bought back about half of C[redacted]A's shares at about 3 times what they originally "paid".

b6
b7C

1325015-000-4996



b6
b7C

① By means of a series of nominee purchases, ARAB "investors" common to both BCCI and CCAH supposedly acquire controlling interest in FABs, when actually their money was derived from BCCI "loans". Using the same method, BCCI's money was used by the "investors" to infuse capital to allow FABs to expand.

② Clifford and [redacted] "loaned" money by BCCI to buy shares of CCAH in 1986-87. In 1988, BCCI, using nominee, bought back about half of C's & A's shares at about 3 times what they originally "paid".

b6
b7C

1325015-000-4997

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE
- ☑ Immediate
- ☐ Priority
- ☐ Routine

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☑ Unclassified

Time Transmitted: 12:00
Sender's Initials: KTW
Number of Pages: 3

To: NEW YORK (SQUAD C-3) Date: 6-12-91
(Name of Office)

Facsimile number: 212-335-2745

Attn: SSA [redacted] (C-3) b6 b7C
(Name / Room / Telephone No.)

From: WMFO (C-5)
(Name of Office)

Subject: CLARK MCADAMS CLIFFORD; ETAL;
BFTE;
00:WMFO

Special Handling Instructions: SERVE FACSIMILE COPY OF SUBPOENA ASAP. ORIGINAL WILL BE FORWARDED VIA OVERNIGHT MAIL. SUMMARY TELETYPE TO FOLLOW.

Originator's Name: [redacted] Telephone: 202-324-6409 b6 b7C

Originator's Facsimile Number: 202-324-6426

Approved: D/COS

29B-WF-171994 — 68

SU SUV FBI/DOJ

[redacted] [redacted] b6 b7C

5-[illegible]-5003

AO 110 (Rev. 12/89) Subpoena to Testify Before Grand Jury

United States District Court

IN DISTRICT OF [ ] b3 b6 b7C

TO: [ ]

SUBPOENA TO TESTIFY BEFORE GRAND JURY

SUBPOENA FOR: [ ] b3

IN RE: POSSIBLE VIOLATIONS OF
18 U.S.C. § 1005

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE [ ]

COURTROOM [ ] b3

DATE AND TIME [ ]

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):*

[ ] b3

☐ *Please see additional information on reverse.*

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

U.S. MAGISTRATE OR CLERK OF COURT

Nancy M. Mayer-Whittington, Clerk

DATE

June 12, 1991

[ ] b3 b6 b7C

This subpoena is issued upon application of the United States of America

DOJ, Frauds & Economic Crime Section, Criminal Division
United States Attorney's Office, 5th Floor
Washington, D.C. [ ]

1325015-000-5004

*If not applicable, enter "none."

AO 110 (Rev. 12/89) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE (1)

RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE

SERVED ON (PRINT NAME)

SERVED BY (PRINT NAME)	TITLE

STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER (2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____ _____
Date *Signature of Server*

_____
Address of Server

ADDITIONAL INFORMATION

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.

(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal Rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 6/12/91

TO : ADIC, NEW YORK (C-3)

FROM : SAC, Washington Field Office (29B-WF-171994) (P)

SUBJECT : CLARK McADAMS CLIFFORD; AKA CLARK M. CLIFFORD;
CLARK CLIFFORD; ET AL;
BF&E; FAG;
(OO: WMFO)

b6
b7C

Re: Tel calls between WMFO SA [redacted] and NY SA [redacted] on 6/11 and 6/12/91, WMFO facsimile to NY, dated 6/12/91 and WMFO teletype to NY, dated 6/12/91.

b3
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b7C

Enclosed for New York is an original Federal Grand Jury (FGJ) Subpoena, commanding the appearance of [redacted] before a FGJ, in the [redacted] at [redacted]

Leads:

New York, at New York, New York:

Will serve the enclosed original FGJ Subpoena to [redacted] telephone [redacted]. The yellow copy of the subpoena should serve as the return copy.

b3
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b7C

2-New York (encls. 2)
1-WMFO

29B-WF-171994-69

Searched
Serialized
Indexed
Filed

Approved: _____ Transmitted _____ (Number) (Time)

1325015-000-5006

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/14/91

From : SA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
et al;
BF&E; FAG
OO:WMFO

On 5/28/91, SA [redacted] and I, along with AUSA [redacted], WDC, and DOJ [redacted] b6 b7C met with [redacted] and [redacted] of the Board of Governors of the Federal Reserve System (BGFRS), 20th and C Streets, N.W., WDC. The purpose for this meeting was to discuss the progress being made by the BGFRS in its BCCI-related investigation and the status of the BGFRS' attempt to acquire BCCI documents from the latter's headquarters in Abu Dhabi.

Special Counsel [redacted] reported that the documents were sent from Abu Dhabi to London, England, to the attorneys for BCCI. Subsequently, the Bank of England ordered BCCI to turn the documents over to the BGFRS. This was done in two submissions, one consisting of approximately 6,000 documents, and another of approximately 1,200. An additional 2,000 documents remain in London, England, pending a determination of whether their release will violate bank secrecy laws in various jurisdictions. Currently, [redacted] are reviewing the documents thus far received. According to [redacted] these documents are "not in perfect shape," i.e., they are out of order with regard to the matters to which they pertain, and [redacted] are making "an effort to clean them up," [redacted] said. b6 b7C

copy filed Sub Aug 3

The next investigative step to be taken by the BGFRS is to depose [redacted] on Monday, June 3, CLARK CLIFFORD on June 5, [redacted] on June 7, and on some future date, [redacted], who is represented by [redacted] These depositions are part of the BGFRS' preparation for seeking civil-money penalties and restitution orders against [redacted] CLIFFORD, and the law firm of CLIFFORD & WARNKE. b6 b7C

1 - SAC, WMFO
JNR:das
(1)

29B-WF-171994-70
Sa Sa

1325015-000-5007

Next, [redacted] summarized and characterized the BCCI documents. They include such things as nominee agreements, handwritten notes, and account statements, all tending to show that BCCI had control over the management of CCAH and its subsidiaries. Their continuing review of these documents has disclosed such things as BCCI "coordinating committee" minutes which document the presence of both National Bank of Georgia and First American Bank/New York personnel on the committee, and that the committee was reporting to both BCCI and First American Bankshares (FABS). Present from First American Bank/New York, were [redacted] and from First American Bank/Georgia were [redacted] (now in Hong Kong), [redacted] (phonetic), and [redacted]. The minutes show the meeting occurred in or about November 1985, predating the acquisition of NBG, and report discussions about the move of NBG from ownership by GHAITH PHARAON to FABS. A corroborative witness concerning the coordinating committee's activities, [redacted] said, would be [redacted] (phonetic), currently employed at the Meridian Bank of New York, but who was secretary to the coordinating committee in Miami, Florida, at the time of the meeting, and who told the BGFRS of the minutes and that [redacted] was present during the meetings. Another possibly-corroborative witness is [redacted] currently in custody in the Middle District of Florida.

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The move to change from ownership by PHARAON to that of FABS was based in large part on PHARAON's company, REDEC, defaulting on a large BCCI loan. With regard to the sale of NBG to FABS, [redacted] an attorney at CLIFFORD & WARNKE, prepared and maintained the stock-transfer records. Concerning the rights-offering to finance FABS' purchase of NBG, [redacted] and [redacted] found a facsimile transmission from [redacted] to [redacted] putting the latter on notice that the [redacted] family was going to pay $6,096.00 per share of the CCAH stock to be offered. The day before the exercising of that option, [redacted] and CLIFFORD purchased their CCAH stock at $2,016.00 per share.

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b7C

[redacted] have discovered some circumstantial evidence that CLIFFORD and [redacted] knew of the nominee status of the CCAH investors. An example would be a June, 1986 letter from CLIFFORD to AGHA ABEDI, covering a memorandum from the law firm, and advising ABEDI of the need to exercise care in that NBG purchase. Another group of documents are schedules prepared by [redacted] to show amounts required to cover [redacted] and CLIFFORD's taxes and other expenses incurred by virtue of the gain in the value of their stock. Other documents attest to the fact that BCCI had a set plan for using nominees everywhere in the world.

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[redacted] then summarized their findings with regard to BCCI's acquisition of CCAH. In or about April 1977, the "Middendorf Group" bought out the former owner of Financial

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1325015-000-5008

General Bankshares (FGB). General [redacted], and then, probably through [redacted]. In a 1/30/78 memorandum located by [redacted] reports to ABEDI that BCCI is buying stock in FGB and has two names, [redacted] but needs two others. The memo reportedly goes on to state, "Our friend (i.e., [redacted]" recommends that CLIFFORD be hired, inasmuch as CLIFFORD has "blessed" the acquisition. b6 b7C

Also found among the documents in Abu Dhabi were letters to [redacted] and CLARK CLIFFORD from applicants for the position of CEO at FGB. The responses to those letters, which also were found, said that [redacted] and CLIFFORD were "sending them on to the appropriate person (i.e., ABEDI)." b6 b7C

[redacted] reported that, when interviewed by him and [redacted] the former CEO at FAB/NY, said that BCCI was "close" to FAB/NY and NBG. He also told them that no money could have moved into or out of FAB without his knowing it. However, they subsequently discovered that $45 million had gone into an ICIC Certificate of Deposit (CD), and that [redacted] had not known either of ICIC or the money. FABS [redacted] subsequently told [redacted] that [redacted] had ordered the transfer. b6 b7C

CLIFFORD's and [redacted] 1986 stock purchase was made with a loan from BCCI, after [redacted] had tried to change the loan proposal. [redacted] (a law firm specializing in mergers and acquisitions) had negotiated with [redacted] with regard to a loan to [redacted] and CLIFFORD. At the "last minute" however, sometime just prior to July 25, 1986, i.e., the rights-offering date, [redacted] sent [redacted] a new loan proposal, saying that [redacted] and CLIFFORD wanted a loan to be of the "non-recourse" variety. [redacted] responded by sending a letter to [redacted], saying "That was not our deal"; that [redacted] did not want CCAH stock anyway, and much less so as the only security in the deal. b6 b7C

The BGFRS anticipates filing its "notice of charges" against BCCI by the end of July 1991. Subsequently, BCCI will have a right to a hearing.

[redacted] reported having received a letter from [redacted] claiming that the entire matter, i.e., that he allegedly was only a BCCI nominee, was "a fabrication." [redacted] protested that he had not been loaned any money; that the stock in CCAH was his and that he wanted it back. b6 b7C

I initiated a discussion of the need to be able to attribute to the various sources the records being brought from Abu Dhabi. The BGFRS' response was that, although these documents came from BCCI in Abu Dhabi, they had been gathered from various points, e.g., the basements in [redacted] and ABEDI's residences and other BCCI offices throughout the world. The b6 b7C

1325015-000-5009

discussion then continued on the topic of authentication of these records, which, it was ultimately decided, might be a problem. The meeting was concluded at this point.

Upcoming investigation by SA [redacted] and myself, along with AUSA [redacted] and [redacted] includes interviews of [redacted] in New York, New York, beginning on 5/29/91, and also includes a contact of SA [redacted] former source, who is still active in the New York Division as [redacted] (NY case agent, SA [redacted], concurs with contact), and with security personnel of KIDDER PEABODY. b6 b7C

On 5/29/91, SA [redacted] and I, accompanied by AUSA [redacted] and [redacted] traveled to New York and conducted the planned investigation between May 29-31, 1991. b6 b7C

1325015-000-5010

C-5

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RR RUCNFB FBIWMFO

DE FBINY #0044 1680403

ZNR UUUUU

R 142333Z JUN 91

FM FBI NEW YORK (29B-WF-171994) (RUC)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //3540//

SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; BFE; OO: WMFO.

RE WMFO (C-5) FAX TO NEW YORK (C-3) JUNE 12, 1991.

REFERENCED FAX REQUESTED PERSONAL SERVICE OF ATTACHED SUBPOENA TO [redacted] NEW YORK DIVISION CONTACTED [redacted] JUNE 13, 1991. TO REQUEST ARRANGEMENTS FOR PERSONAL SERVICE OF SUBPOENA. [redacted] REQUESTED THAT THE SUBPOENA NOT BE PERSONALLY SERVED AND THAT THE SUBPOENA BE FAXED TO HIS ATTORNEY, [redacted] MIAMI, FLORIDA [redacted] FAX [redacted] REQUESTED THAT HE RECEIVE NO VISITORS INASMUCH AS IT MAY AROUSE SUSPICION AT THIS CURRENT

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29B-WF-171994-71

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUN 17 1991
FBI - NEW YORK FIELD OFFICE
[redacted]

b6
b7C

1325015-000-5011

EMPLOYER. NEW YORK DIVISION SUBSEQUENTLY RECEIVED A TELEPHONE CALL FROM [redacted] WHO ADVISED THAT FAXED SERVICE TO HIS OFFICE WOULD BE SATISFACTORY AND GUARANTEED [redacted] APPEARANCE AT USDC, [redacted] NEW YORK DIVISION SUBSEQUENTLY CONTACTED SSA [redacted] WMFO (C-5) FOR CLARIFICATION IN THIS MATTER. AFTER CONTACTS WERE MADE BETWEEN SSA [redacted] USA OFFICE DOC AND NEW YORK DIVISION IT WAS DETERMINED THAT FAX SERVICE TO [redacted] ATTORNEY WOULD BE SATISFACTORY. THIS WAS CONFIRMED DURING A TELEPHONIC CONVERSATION BETWEEN SSA [redacted] AND SA [redacted] NEW YORK DIVISION (C-3). NEW YORK DIVISION FAXED ABOVE MENTIONED SUBPOENA TO [redacted]'S ATTORNEY [redacted] JUNE 13, 1991.

b3
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b7C

NEW YORK DIVISION CONSIDERS THIS MATTER RUC.

BT

#0044

NNNN

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/18/91

From : SA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et Al;
FIF; FAG;
OO:WMFO b6 b7C

The purpose of the memorandum is to update the file on the negotiations with [redacted], who is the central figure in our planned trip to London, England.

In a telephone conversation on 6/11/91 with [redacted] currently residing in Sanibel Island, Florida, telephone [redacted], I requested that [redacted] contact [redacted] and ascertain whether he would be willing to come directly to the United States, bypassing London, given assurances that his transportation and subsistence would be paid. On 6/12/91, [redacted] reported having spoken with [redacted] and being told that, without some prior meeting in a neutral site, e.g., London, [redacted] was not going to come to the United States at all. The purpose of such a meeting would be for [redacted] to determine if his immunity from prosecution was certain and whether his reward for being of material assistance in the government's case would be sufficient, given the risks to himself and his family that he believes exist. b6 b7C

According to [redacted] plans to come to London to join MRS. [redacted] sometime between June 24 and July 31, 1991, and already has the necessary visa to make the trip. [redacted] told [redacted] he would be willing to travel to London during that period of time to meet with the representatives of the U.S. Government on a specific date, as long as the government reimbursed him for his ticket. b6 b7C

[redacted] told [redacted] that his family has been getting "intense pressure," which is being passed along to [redacted]. Almost on a daily basis, someone in [redacted] family seeks his assurance that he is not going to divulge the information he knows. [redacted] told [redacted] that, very recently, he had received a facsimile from SHEIK ZAYED, offering [redacted] a "six-figure settlement," provided that [redacted] agrees to be silent and to show ZAYED all the documents which [redacted] supposedly possesses. (According to b6 b7C

(1) - WMFO
JNR:das
(1)

29B-WF-171994 - 72

[redacted] b6 b7C

1325015-000-5013

b6
b7C

, it is who has the documents, not) identified the "conduit" for the pressure as , an attorney who represents wife's family. b6 b7C

I explained to that, with regard to the captioned matter, the likelihood of receiving any substantial reward for his services was unlikely. b6 b7C

said he had talked to Customs' agent in Tampa, Florida, who is interested in using in an ongoing investigation of the operation of BCCI in the Cayman Islands. said he realized that such an effort, and any statutory reward to which might be entitled, was a long-term proposition.

then said that one of the stops he intends to make during his own visit in the U.S. is Senator KERRY's office in Washington, D.C. (WDC). Senator KERRY is also aware of and interested in talking to The information which and possess, believes, will encourage Senator KERRY to involve the Board of Governors of the Federal Reserve System (BGFRS), which might possibly lead to monetary sanctions against BCCI, et al, in which might share. believes that such a reward could be substantial and would "probably bring in tomorrow." b6 b7C

On 6/12/91, I contacted AUSA and informed him of my conversation with . We agreed that, given the lack of any assurance that was going to be in London during the week of June 16 through June 22, 1991, and the necessity for AUSA and to prepare for the upcoming Grand Jury appearances of CLARK CLIFFORD and currently scheduled for 6/26 and 6/28/91, respectively, it would be best to reschedule our trip to London during the second week of July 1991, and to give a "date-certain" of 7/9/91, to meet us there. We also agreed it would be advantageous to get to WDC during the first week of July 1991, and to have him testify before the Grand Jury on 7/3/91. b6 b7C

After researching the matter, AUSA informed me that Title 12, USC, Section 1831K provides that, with the concurrence of the Department of Justice, the maximum amount of reward available to someone like is $100,000, no matter what the size of the penalties imposed by the BGFRS. It was agreed that I would contact and inform him of the nature of the reward statute, and give him the date of 7/9/91 for trip to England. is to convey to that he will be reimbursed for his trip and that a letter detailing his immunity would be there. b6 b7C

Efforts to contact between 6/13-17/91 have been unsuccessful. b6 b7C

1325015-000-5014

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 6/19/91

From : SA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On 6/18/91, AUSA [redacted] notified me of the existence of another possible witness in the captioned matter. About two weeks ago, DOJ Criminal Division Deputy Asst. Attorney General FNU [redacted] called the USAO, WDC, to report having received some information from the Board of Governors of the Federal Reserve System (BGFRS). The information was that a "Mr. [redacted] (ph.) at the BGFRS had received a letter from a "Mrs. FNU [redacted] (ph.), stating that [redacted] A telephone number for Mrs. [redacted] was provided: [redacted] AUSA [redacted] requested that I call her. b6 b7C b7D

After determining that the number was an [redacted] exchange, I called it and spoke with [redacted], a U.S. citizen, dob [redacted] SSAN [redacted] currently residing, along with [redacted] During the ensuing conversation, [redacted] provided the following information. b6 b7C b7D

She identified [redacted] as [redacted], dob [redacted] (or [redacted] was not certain when I asked, but later in the conversation said [redacted]), and said he was [redacted] and had been [redacted] (exact date not given, but according to what she was saying, it must have been either in [redacted] It was [redacted] b6 b7C b7D

2-WMFO

29B-WF-171994-93

JNR:jnr
(2)

[redacted] b6 b7C

1325015-000-5015

say that, when [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

. I informed her of our planned trip to [redacted] and that we might contact him in person then.

When I called, she had just finished talking on the phone with [redacted] of the Manhattan DA's Office. I told her about the separate nature of our inquiries. I also told her that, if she perceives a threat to herself or her children that she should notify the local police. I assured her that someone from the FBI would personally contact her in the near future. She said she will be at her present address until [redacted] after which she has no idea where she will go. I suggested she seek local welfare help in that regard. b6 b7C b7D

I next reported this conversation to AUSA [redacted] who requested that either SA [redacted] or I travel to [redacted] as soon as possible to interview [redacted]. We also discussed the need to travel to the [redacted] anyway to complete our work there, and the possibility of combining the trips. It was agreed that he would ascertain the status of [redacted] preparation of an application for an ex parte order for [redacted] presently in the possession of [redacted] investigators in the MDF. b6 b7C b7D b7E

On 6/19/91, I telephonically contacted [redacted] at [redacted], and explained the nature of captioned matter. [redacted] b6 b7C b7D

1325015-000-5016

[redacted]

b6
b7C
b7D

[redacted], who said he is [redacted], verified that it was he who was [redacted] asking specifically for [redacted] says that, as soon as he discovered that BCCI was [redacted]

[redacted] is represented by [redacted] (assisted by [redacted] telephone [redacted]

b6
b7C
b7D

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 6/19/91

From : SA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On 6/18/91, AUSA [redacted] notified me of the existence of another possible witness in the captioned matter. About two weeks ago, DOJ Criminal Division Deputy Asst. Attorney General FNU [redacted] called the USAO, WDC, to report having received some information from the Board of Governors of the Federal Reserve System (BGFRS). The information was that a "Mr. [redacted] (ph.) at the BGFRS had received a letter from a "Mrs. FNU [redacted] (ph.), stating that [redacted] A telephone number for Mrs. [redacted] was provided: [redacted] AUSA [redacted] requested that I call her. b6 b7C b7D

After determining that the number was an [redacted] exchange, I called it and spoke with [redacted], a U.S. citizen, dob [redacted] SSAN [redacted], currently residing, along with [redacted] section. During the ensuing conversation, [redacted] a [redacted] provided the following information. b6 b7C b7D

She identified [redacted] as [redacted] dob [redacted] (or [redacted] she was not certain when I asked, but later in the conversation said [redacted]), and said he was [redacted]" and had been [redacted] (exact date not given, but according to what she was saying, it must have been either in [redacted]. It was [redacted] b6 b7C b7D

(2)-WMFO

29B-WF-171994-73
SU SU SU

JNR:jnr
(2)

1325015-000-5018

American Embassy
London

OFFICE OF THE LEGAL ATTACHE

UNCLASSIFIED FACSIMILE

071-499-7944

FROM: [redacted], ASSISTANT LEGAL ATTACHE

TO: SSA [redacted] NVMRA (WMFO)

b6
b7C

SUBJECT:

NO. OF PAGES. 2 (including cover page)

SENDER: BT DATE: JUNE 20, 1991

REC'D BY: DATE:

COMMENTS:

29B-WF-171994

SEARCHED INDEXED
SERIALIZED FILED
JUN 26 1991
FBI/DOJ METRO FIELD OFFICE

b6
b7C

[redacted]

[redacted]

1525015-000-5021

JUN 20 '91 12:45 FROM LEGAT LONDON PAGE.001

C-5

/READ 1521/172
0000 MRI 01521

PP FBIWMFO LON

DE RUCNFB #0091 1750917

ZNR UUUUU

P 211846Z JUN 91

FM DIRECTOR FBI

TO FBI WMFO (29B-WF-171994)/PRIORITY/

LEGAT LONDON/PRIORITY/

BT

UNCLAS

CITE: //0624//

PASS: SSA [redacted] C-5; ASST. LEGAT [redacted] b6 b7C

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO:

WMFO.

RE WMFO TELETYPES TO DIRECTOR 6/5/91 AND 6/14/91;

BUTELCALLS OF SSA [redacted] TO ASSISTANT LEGAT [redacted] b6 b7C

LONDON AND SSA [redacted] WMFO ON 6/17/91.

FBIHQ HAS APPROVED THE TRAVEL OF SAS [redacted] AND

[redacted] TO LUNDON, ENGLAND, DURING THE PERIOD OF

7/7/91 - 7/13/91, TO CONDUCT INTERVIEWS AND REVIEW DOCUMENTS IN b6 b7C

29B-WF-171994 -75

SCANNED SERIALIZED INDEXED FILED

JUN 24 1991

OFFICE [redacted] b6 b7C

1325015-000-5023

CONJUNCTION WITH CAPTIONED MATTER.

ON 6/11/91, THE OFFICE OF LIAISON AND INTERNATIONAL AFFAIRS, FBIHQ CONCURRED WITH THIS TRAVEL. ON 6/11/91, [redacted] b6 b7C [redacted] DEPARTMENT OF STATE, OFFICE OF OVERSEAS CITIZENS SERVICES. AND [redacted] ATTORNEY, DEPARTMENT OF JUSTICE. OFFICE OF INTERNATIONAL AFFAIRS CONCURRED WITH THIS TRAVEL.

LEGAT LONDON HAS ADVISED THAT COUNTRY AND HOST COUNTRY CLEARANCES HAVE BEEN APPROVED FOR SAS [redacted] b6 b7C TO TRAVEL TO LONDON, ENGLAND, DURING THE PERIOD OF 7/7/91 - 7/13/91, TO CONDUCT INTERVIEWS AND REVIEW DOCUMENTS IN CONJUNCTION WITH THE INVESTIGATION OF CAPTIONED MATTER.

BT

#0091

NNNN

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 6/25/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 6/25/91, the writer was contacted by [redacted], DOJ. [redacted] requested that the writer pick up additional records from the Federal Reserve Board (FRB). b6 b7C

On that same date, the writer met with [redacted] FRB, [redacted] provided the writer with a facsimile copy of a correspondence between [redacted] 6 Filings between 1982 and 1989 for CCAH and First American Bankshares. b6 b7C

On that same date, the above records were given to [redacted] at the USAO, District of Columbia. b6 b7C

On that same date, AUSA [redacted], District of Columbia, advised that in order to accommodate [redacted] the FGJ appearance dates for [redacted] had been switched with each other. [redacted] will appear before the FGJ on [redacted] and [redacted] on [redacted]. AUSA [redacted] anticipates that [redacted] will be available for interview and FGJ next week. In addition, AUSA [redacted] is providing [redacted] b3 b6 b7C

29B-WF-171994 - 76

[redacted] b6 b7C

1325015-000-5025

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/24/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
FIF;
FAG;
(OO: WMFO)

On 6/11/91, a meeting was held in the office of AUSA [redacted], District of Columbia. In addition to AUSA [redacted] in attendance were [redacted] DOJ, SA [redacted] and the writer. AUSA [redacted] advised that it appeared that AUSA's [redacted] would investigate the National Bank of Georgia/GAITH PHAERON aspect of this case. No final decision had yet been made as to the roles of the newly assigned AUSA's. Preparation for the [redacted] FGJ appearances were discussed. [redacted] was scheduled to appear on [redacted] AUSA [redacted] estimated that questioning would probably be broad based. b3 b6 b7C b6 b7C

On that same date, [redacted] travelled to Tampa, Florida, to continue the record review in Tampa.

On that same date, the writer caused New York to conduct indices searches and DMV searches for [redacted] Said checks met with negative results. INDEX b6 b7C

On 6/12 and 6/13/91, the writer had numerous contacts with SA [redacted], NYO. Said contacts were for the purpose of arranging the subpoena service to [redacted] The writer obtained the subpoena from AUSA [redacted] and forwarded same to the NYO for service. Subsequently, on 6/13/91, service was made to [redacted] Attorney, [redacted] b6 b7C

(1) - WMFO
DMC

29B-WF-171994-77
Su Su Su

[redacted] b6 b7C

1325015-000-5026

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/24/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 6/5/91, a meeting was held in the office of AUSA [redacted], District of Columbia. In addition to AUSA [redacted] the meeting was attended by [redacted] SA [redacted] and the writer. Investigative results/direction was closely discussed. AUSA [redacted] furnished SA [redacted] with a FGJ Subpoena for [redacted]. AUSA [redacted] advised that the roles of the two additional criminal AUSA'S and the one civil AUSA had not yet been defined. b3 b6 b7C

On 6/6/91, SA [redacted] and the writer travelled to New York, New York. The above mentioned subpoena was served to [redacted]

On that same date, SA [redacted] and the writer met with [redacted] in the vicinity of 23rd St., and First Ave., New York, New York. (Inserts reporting contacts are being ccld to New York.) b6 b7C b7D

On 6/7/91, the writer met with [redacted] DOJ. Discussed was work which remained to be completed at Tampa. It was agreed that [redacted] and the writer should return to Tampa to complete record reviews. b6 b7C

On 6/10/91, the writer met with TA [redacted], DOJ. The writer was furnished with a subpoena addressed to the [redacted] b3 b6 b7C

On that same date, the subpoena was served to [redacted] b3 b6 b7C

29B-WF-171994-78

1-WMFO

DMC

SL SL

[redacted]

1325015-000-1 b6 7C

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/24/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
FIF; FAG;
(OO: WMFO)

Between 5/28/91 and 5/31/91, the investigative activity listed below took place in New York, New York. AUSA [redacted], SA [redacted] and the writer travelled to New York to conduct said investigation. The following took place: b6 b7C

1. Interview of [redacted] (5/29/91)
2. Interview of [redacted] (5/29 & 5/31/91)
3. Meeting at [redacted]. Service of subpoena to [redacted] (5/30/91)
4. Interview of [redacted] (5/30/91)

b3 b6 b7C b7D

It should be noted that [redacted] were interviewed in the office of their Attorney, [redacted] Contact with [redacted] was coordinated through NY SA [redacted] b6 b7C b7D

On 5/29/91, while in New York, the writer contacted [redacted] at his place of employment, Meridien International Bank, Ltd., 126 East 56th St., New York, New York, 10022, 29th Floor, telephone [redacted] expressed an interest in cooperating in this matter but requested that an interview be arranged through his Attorney, [redacted], telephone [redacted] The writer attempted to immediately contact [redacted] Said contact met with negative results. For information, [redacted] is defending [redacted] in a local Florida matter and access to him was limited. On 5/30/91, AUSA [redacted] contacted [redacted] Arrangements will be made to interview [redacted] at a later date. b6 b7C

On 5/30/91, AUSA [redacted] advised that his office had assigned two criminal AUSA'S and one civil AUSA to this matter. Their roles had not yet been defined. The criminal AUSA'S were [redacted]

29B-WF-171994 Sec-79
Sec Sec

O-WMFO
DML

[redacted] b6 b7C

1325015-000-5028

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/24/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 5/22/91, the writer attempted to contact [redacted], b6 b7C at what was believed to be his home telephone number, [redacted]. There was no answer in repeated attempts.

On 5/23/91, the writer attempted to contact [redacted], b6 b7C at [redacted] A female answered by saying "Sovereign Group". The writer asked for [redacted] and was told that he was out of the country and was not expected back for at least a few weeks.

On 6/13/91, [redacted] contacted the writer and advised b6 b7C b7D that [redacted] was supposed to be in New York at that time.

On that same date, the writer attempted to contact [redacted] at his residence [redacted]. A female who identified b6 b7C herself as MRS. [redacted] answered and advised that [redacted] was out of town but was scheduled to return later in the month.

1-WMFO
DML

INDEX

29B-WF-171994 - 80

See See See

[redacted] b6 b7C

1325015-000-5029

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/24/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 5/22/91, the writer was contacted by AUSA [redacted] b6 b7C
[redacted] District of Columbia. AUSA [redacted] requested that the writer contact the Federal Reserve Board and determine the dates that [redacted] were scheduled to provide depositions. b6 b7C

On that same date, the writer contacted [redacted] Enforcement Branch, Federal Reserve Board. [redacted] advised that [redacted] was scheduled to appear on [redacted] b6 b7C

Subsequently, on that same date, the writer apprised AUSA [redacted] of the above appearance dates.

On 5/23/91, the writer advised AUSA [redacted] that [redacted] b3 b6 b7C
[redacted] was out of the country and that the writer would attempt to contact [redacted] at a later date. AUSA [redacted] requested that the writer obtain background information for [redacted] and the address at [redacted] for subpoena purposes.

On 5/24/91, the writer determined that all subpoenas to [redacted] were to be addressed to [redacted] b3 b6 b7C

1-WMFO
DML

INDEX #2

29B-WF-171994 - 81
SW SW SW

1325915-000-5030

[redacted] b6 b7C

On that same date, the writer developed the following background information:

Name [redacted] b6 b7C
AKA
Address [redacted] Scarsdale, New York 10583
DOB
SSAN [redacted]

On that same date, AUSA [redacted] was furnished with the above listed information. b6 b7C

On that same date, the writer was contacted by [redacted] b6 b7C [redacted], DOJ. [redacted] advised that he had obtained a copy of the transcript for the testimony of [redacted] before the KERRY Committee.

1325015-000-5031

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/24/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 6/18/91, the writer met briefly with AUSA [redacted], District of Columbia. AUSA [redacted] outlined his FGJ preparation for [redacted] b3 b6 b7C

On 6/19/91, the writer attempted to contact SSA [redacted], Office of Congressional Affairs, FBIHQ. Said attempt met with negative results. b6 b7C

On that same date, the writer met with SA [redacted], CI-7. SA [redacted] advised that he had opened an FCI investigation concerning the unauthorized possession of classified documents. The subject was [redacted] (ph). [redacted] was supposedly writing a book about the Bank of Credit and Commerce International (BCCI). He appeared to be the same individual who contacted the House Banking Committee about information concerning CLIFFORD and [redacted] b6 b7C

INDEX

On that same date, the writer contacted [redacted], DOJ. [redacted] stated that he had pretty much completed the review of records at Tampa. He would finish the ex-parte order for confidential [redacted] documents, at Tampa and arrange to obtain same. b6 b7C b7E

On 6/20/91, the writer met [redacted] at the [redacted]. The writer served a FGJ subpoena for [redacted] Said subpoena was served to [redacted]. The [redacted] b3 b6 b7C

(1)-WMFO
DML

29B-WF-171994 -82

SEARCHED SERIALIZED INDEXED FILED

[redacted] b6 b7C

1325015-000-5032

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 6/25/91

TO : ADIC, NEW YORK
ATTN: SA [redacted] b6 b7C

FROM : SAC, Washington Field Office [redacted] b7D

SUBJECT : [redacted]

Re: Tel calls between WMFO SA [redacted] and NY SA [redacted] b6 b7C

Enclosed for New York are an FD-209 and four inserts setting forth results of contacts by WMFO Case Agents and captioned source. Said enclosures are self explanatory.

For the information of New York, [redacted] continues to provide WMFO information germane to an investigation entitled "CLARK McADAMS CLIFFORD; ET AL;", (29B-WF171994). It is anticipated that WMFO will maintain regular contact with the source. Such contact will continue to be coordinated with NYO SA [redacted] b6 b7C b7D

2-New York (encls. 5)
1-WMFO
(DML)

Inserts placed in sub 1

main

29B-WF-171994-83

Searched
Serialized
Indexed
Filed

Approved: _____ **Transmitted** _____ (Number) (Time)

1325015-000-5033

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 06-12-91

also see att

TO : SAC, WMFO (29B-WF-171994)(RUC)

FROM : ADIC, NEW YORK (C-3) also see att

SUBJECT: CLARK McADAMS CLIFFORD, aka ET AL
BF&E
FAG
(OO: WMFO)

ReNYteletype to WMFO, dated 6/14/91.

Enclosed for WMFO is an original and one copy of Federal Grand Jury subpoena demanding the appearance of [redacted] [redacted] b3 b6 b7C

Reteletype sets forth details surrounding fax service of enclosed subpoena to [redacted] attorney in [redacted]. The purpose of this communication is to return to WMFO the original and one copy of Federal Grand Jury subpoena which was served via fax and, inasmuch, possession of the original and one copy of the above mentioned subpoena is no longer necessary by the New York Division. b3 b6 b7C

Investigation at New York complete.

2-WMFO (Encls. 2)
1-New York

TJP/cjo
(4)

29B-WF-171994 -84

UCFN ☐ Pos ☐ Neg
GENERAL INDICES:
☐ Automated Search
WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg
☐ Manual Search
WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

1* [redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-5035

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/3/91

From : SA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On 6/21/91, a group of tape recordings, relating to the captioned matter, was received from the U.S. Customs Service. On 6/26/91, I attempted to place the box containing those tapes in ELSUR storage at WMFO HQ, operating under the impression that it was the only such storage facility. At the time, all personnel assigned to handle Bulky Exhibits at WMFO HQ were in a meeting with the inspectors. Therefore, I reliquished custody of the box to SA [redacted] (A-5), who had agreed to place it in Bulky Exhibits when the meeting ended. b6 b7C

On 7/2/91, SA [redacted] notified me that WMFO HQ Bulky Exhibits had refused to accept the box, saying that it should be stored in the NVMRA's ELSUR-storage facility. On 7/3/91, I reacquired custody of the box from SA [redacted], and now request that it be accepted for storage within the NVMRA's Bulky Exhibit facility. b6 b7C

2-WMFO
~~(1-29B-WF-171994)~~
(1-Bulky Exhibits)

JNR:jnr
(2)

29B-WF-171994-85

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 3 1991
FBI - WASH. METRO FIELD OFFICE

1525015-000-5036

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: 1:17
Sender's Initials: KUH
Number of Pages: 3

To: US Attorney, WDC (Name of Office) Date: 7/1/91

Facsimile number: 514-8783

Attn: AUSA [redacted] (Name) [redacted] (Room) 514-6531 (Telephone No.)

b6
b7C

From: FBI, WMFO (Name of Office)

Subject: BCCI (29B-WF-171994)

Special Handling Instructions: Please handcarry to AUSA [redacted]

b6
b7C

Originator's Name: SA [redacted] Telephone: 324-6418

Originator's Facsimile Number: 324-6426

Approved: [redacted]

29B-WF-171994-86

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FBI - WASH. METRO FIELD OFFICE

FBI/DOJ

[redacted]

b6
b7C

1325015-000-[redacted]

WORKING IN U.S. EMBASSY. DUE TO SA [redacted] PARTICIPATION IN [redacted] (WHICH LED TO BCCI'S CONVICTION IN MDF), HE IS VERY KNOWLEDGEABLE OF IDENTITY AND WHEREABOUTS OF MOST IF NOT ALL POTENTIAL WITNESSES IN CAPTIONED MATTER WHO ARE LOCATED IN OR NEAR LONDON. BGFRS SPECIAL COUNSELS [redacted] AND [redacted] HAVE ALSO CONDUCTED INTERVIEWS AND DOCUMENT REVIEW IN LONDON AND ELSEWHERE AS PART OF THEIR INQUIRY. SOME OF THE SAME PERSONS THEY CONTACTED ARE POTENTIAL WITNESSES IN CAPTIONED MATTER.

LEGAT LONDON IS REQUESTED, INSOFAR AS POSSIBLE, TO ARRANGE FOR THE FOLLOWING INTERVIEWS TO TAKE PLACE AT ANY TIME BEGINNING 6/17/91 TO 6/22/91: [redacted] (CURRENT BCCI EMPLOYEE; POSSIBLE CONTACT [redacted], ATTORNEY WITH ALLEN & OVERY, REPRESENTING BCCI); [redacted], STANMORE, MIDDLESEX) [redacted] (PRICE WATERHOUSE, LONDON); [redacted] ROAD, FARNUM, SURRY); [redacted] (CURRENT BCCI EMPLOYEE; POSSIBLE CONTACT [redacted]; [redacted] (EMPLOYED AT NATIONAL COMMERCIAL BANK OF SAUDI ARABIA, LONDON; OWNS MEFG CORPORATION, LONDON; [redacted] IS HIS ATTORNEY); [redacted] (MEMBER OF BCCI'S BOARD OF DIRECTORS; POSSIBLE CONTACT IS HERBER); [redacted] (FORMERLY PAKISTANI, NOW UK CITIZEN, SHE WAS [redacted] BCCI EMPLOYEE WHO [redacted] SUBJECTS); [redacted] (FORMERLY [redacted] BCCI'S FORMER OWNER, AGHA ABEDI; WAS LONDON RESIDENT); [redacted] (BCCI EMPLOYEE; POSSIBLE CONTACT IS [redacted] (FORMER FAB/NY EMPLOYEE; PRESENCE OR LOCATION IN LONDON NOT KNOWN); [redacted] (FORMERLY PAKISTANI NOW UK CITIZEN; LONDON RESIDENT; ARRANGED AND RECORDED MEETINGS FOR BCCI); [redacted] TADWORTH, SURRY); [redacted], ST. GEORGE'S HILL, SURRY).

CONTEMPLATED PLANS ARE FOR WMFO SAS [redacted] AND [redacted] ACCOMPANIED BY AUSA [redacted] AND DOJ [redacted] (CURRENTLY ASSIGNED TO USAO, WDC), TO TRAVEL FROM DULLES AIRPORT, VIRGINIA, TO LONDON, ENGLAND, ON 6/16/91, RETURNING ON OR ABOUT 6/22/91. THE PURPOSES FOR THE TRIP WOULD BE:

1. TO INTERVIEW THE PERSONS SHOWN ABOVE;
2. TO REVIEW AVAILABLE RECORDS AT [redacted] AND THE [redacted] RE THE [redacted] MATTER.

ESTIMATED EXPENSES FOR EACH FBI SA WOULD BE $2,306.00, CALCULATED ON SEVEN DAYS PER DIEM AT $232.00/DAY, PLUS $628.00 ROUND-TRIP AIRFARE; TOTAL: $4,612.00.

BT

[redacted] — In addition to this list, London is arranging for [redacted] and [redacted]

b6 b7C b7E b6 b7C b6 b7C b7D b7E b6 b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/5/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

Between 6/26 - 7/5/91, the writer reviewed numerous documents. Such included copies of submissions to the Federal Reserve Board (FRB), and depositions taken by FRB Investigators.

On 7/2/91, the writer reviewed volume 2 of the FBIHQ file for an old New York investigation entitled [redacted], NY 87-79521, Bureau file 87-141685. [redacted] was an undercover operation which operated in the late 1970's and early 1980's. The writer believed that NY UCA's [redacted] UCO. The FBIHQ file contained 3 volumes. Volumes 1 and 3 could not be located. No information germane to captioned matter was contained in the volume reviewed. b7E

On [redacted], SA [redacted] and the writer transported [redacted] from the FGJ, [redacted], to the U.S. Attorney's office, for storage/review. Said [redacted] to the FGJ [redacted] b3 b6 b7C

On 7/3 and 7/5/91, respectively, attempts to contact [redacted] met with negative results. On the later date, the writer determined that [redacted] was out of the country and was not scheduled to return until August, 1991. b6 b7C

On 7/5/91, attempts to contact [redacted] met with negative results. b7D

29B WF-171994 - Main - 87

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FBI - WASH. METRO FIELD OFFICE

[redacted] b6 b7C

1325015-000-5

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/5/91

From : SA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On 7/3/91, [redacted] Special Agent [redacted] Tampa, reported that he had rechecked his records for employee identification numbers (EINs) for BCCI, CCAH, CCAI and FGB, and found that the EIN for BCCI is 59-2183794. No EINs were found for CCAH, CCAI or FGB; however, the EIN for FGB should have "rolled over" to its successor, First American Corporation. I immediately passed on this information by telephone to DOJ [redacted] b6 b7C b7E

Also on 7/3/91, Asst. Legat [redacted] London, reported that, inasmuch as U.S. Customs SA [redacted] is on leave, he will be proceeding alone with arranging the requested interviews, and that doing so may run over into our first day or two there. b6 b7C

Later on 7/3/91, AUSA [redacted] informed me that a letter to BCCI's London attorney, [redacted], detailing our desire to talk to a number of his clients and requesting authorization to do so, had been sent on 7/2, via fax.

1-WMFO

JNR:jnr
(1)

b6 b7C

-88

29B-WF-171994 Main

[redacted] b6 b7C

SEARCHED ____ INDEXED ____
SERIALIZED Su FILED Su
JUL : 1991
FBI - WASH. METRO FIELD OFFICE

62-125015-000-5041

0-9 (Rev. 8-16-79)

b6
b7C

C-5

TRANSMIT VIA: AIRTEL

CLASSIFICATION: _____ DATE: 7/9/91

FROM: Director, FBI

TO: SAC, WMFO (29B-WF-171994) (P) (C-5)

CLARK M. CLIFFORD;
ET AL;
BF&E; FAG;
CONSPIRACY;
OO: WMFO

Re WMFO airtel to the Bureau, dated 5/15/91.

Your request for a Visual Investigative Analysis (VIA) application to the captioned matter has been received by the VIA Unit, Criminal Investigative Division. The present workload of the VIA Unit precludes the assignment of an analyst to this matter at the present time. Therefore, your request has been placed on file with the VIA Unit, and will be considered with all pending requests for VIA assistance when a VIA Analyst becomes available for assignment. You will be notified when a VIA application has been authorized for this matter.

UCFN ☒ Pos ☒ Neg

...AL INDICES:

— Automated Search .....

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

☐ Manual Search .....

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

29B-WF-171994-89

SU SU

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1325015-000-5042

/ 17R1/191
0000 MRI 01781

RR FBIWMFO

DE FBITP #0004 1921226

ZNR UUUUU

R 101914Z JUL 91

FM FBI TAMPA (29B-WF-171994) (ORA) (RUC)

TO FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //1260:3880//

SUBJECT: CLARK MCADAMS CLIFFORD, AKA, ET AL; FIF; FAG; OO: WMFO.

RE WMFO TELETYPE TO DIRECTOR, JUNE 24, 1991.

FOR INFORMATION OF WMFO, AFTER NUMEROUS ATTEMPTS TO TELEPHONICALLY CONTACT [redacted] AT [redacted] MET WITH NEGATIVE RESULTS, AN ATTEMPT TO CONTACT HER AT HER RESIDENCE, [redacted] ORLANDO, FLORIDA, ON JULY 3, 1991, ALSO MET WITH NEGATIVE RESULTS. A NOTE WAS LEFT AT THE ABOVE RESIDENCE REQUESTING [redacted] TO CONTACT THE FEDERAL BUREAU OF INVESTIGATION (FBI), ORLANDO RESIDENT AGENCY (ORA). ON JULY

b6
b7C

29B-WF-171994-90

SEARCHED SU INDEXED
SERIALIZED SU FILED SU
JUL 11 1991
FBI/DOJ
OFFICE [redacted]

b6
b7C

1325015-000-5043

8, 1991, [redacted] TELEPHONICALLY CONTACTED SPECIAL AGENT (SA) [redacted], ORA, AND ADVISED SHE WAS PREPARING TO LEAVE THE ORLANDO AREA AND DID NOT WISH TO DISCUSS HER TRAVELLING PLANS. [redacted] STATED SHE HAD NO DOCUMENTS THAT SHE WANTED TO GIVE TO THE FBI; AND STATED SHE WOULD BE GIVING ALL OF HER PERTINENT DOCUMENTS AND RECORDS TO MR. [redacted] (PHONETIC), NEW YORK DISTRICT ATTORNEY'S OFFICE. [redacted] ADVISED [redacted] WORKS UNDER DISTRICT ATTORNEY MR. ROBERT MORGANTHAU; AND IF THE FBI NEEDED TO RECONTACT HER, THEY COULD DO SO THROUGH [redacted] HUSBAND WHO IS CURRENTLY IN LONDON.

b6
b7C

THIS MATTER IS BEING RUC'D BY THE TAMPA DIVISION.

BT

#0004

NNNN

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/3/91

From : SA [redacted] b6 b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et Al;
FIF; FAG
OO:WMFO

The purpose of this memorandum is to update the file on progress toward our trip to London, England, during the week of 7/7-13/91.

On 6/12/91, AUSA [redacted], Washington, D.C. (WDC), requested that I provided [redacted] of the U.S. State Department, telephone [redacted], with contact phone numbers for [redacted], who represents [redacted]. I telephoned [redacted] and gave her the numbers for [redacted] in Florida, [redacted] and for [redacted] in Pakistan, [redacted] b6 b7C

Later on 6/12/91, I contacted Assistant Legat [redacted] by telephone in London and, in a conference call, also spoke with U.S. Customs Agent [redacted], also assigned to the U.S. Embassy in London. I informed [redacted] that, due to the problems encountered in arranging for the appearance of [redacted] in London, we have been forced to postpone our trip until the week of 7/13-13/91. SA [redacted] said he had already arranged for some interviews, but would reschedule them. Those whom he had already contacted and who had agreed to be interviewed were [redacted] of Price Waterhouse, and a representative of the Bank of England. I informed [redacted] that, with regard to persons currently employed by BCCI, AUSA [redacted] would clear the interviews of them through the attorney representing BCCI, [redacted] b6 b7C

On 6/17/91, at AUSA [redacted] request, I contacted [redacted] to determine her progress in arranging the host-country clearance for us to interview [redacted] in London. [redacted] reported that she had not yet sent the cable with the information her counterparts in London required to contact [redacted] but would do so.

1 - WMFO
JNR:das
(1)

29B-WF-171994 - 91

[redacted] b6 b7C

1325015-000-5045

On 6/19/91, Assistant Legat [redacted] reported that he had arranged hotel accommodations for our investigative party at the Mostyn Hotel, located on Bryanston Street, London, telephone 011-44-71-935-2361. b6 b7C

Also on 6/19/91, at AUSA [redacted] request, I contacted [redacted] and gave her the name and identifying information on [redacted] whom we plan to interview in London on our trip. I contacted [redacted] and gave her the information on [redacted]. During that conversation, she told me she had sent the numbers for [redacted] to London. b6 b7C

On 6/20/91, in a telephone conversation with Assistant Legat [redacted] and U.S. Customs Agent [redacted] discussed the 6/13/91 letter from [redacted] of BCCI's Legal Department to [redacted] of the U.K. Customs and Excise Office (see Serial 74). I informed SA [redacted] that AUSA [redacted] had been and would be in contact with Attorney [redacted], who would be conferring with the London Attorney, [redacted], of Allen & Overy, about our proposed interviews of current BCCI employees. SA [redacted] said that, as soon as he is notified of that liaison, he will continue to arrange interviews as requested. b6 b7C

SA [redacted] informed me that he had been contacted by another Customs agent, reporting source information with regard to BCCI personnel. According to the source, AGHA ABEDI, since [redacted]" and [redacted] had taken over as [redacted]. The source contended that [redacted] is a key person and is willing to be interviewed. [redacted] will attempt to locate [redacted] and arrange for him to come to London. b6 b7C

SA [redacted] also said he is setting up a meeting with the Bank of England personnel and would like to sit in on that meeting. I told him I had no objection to his doing so. b6 b7C

On 6/25/91, [redacted] informed me that, by Friday, 6/28/91, we needed to get a list of all the people set for interviews in London. Subsequently, I telephoned Legat London and spoke with Assistant Legat [redacted] who said he would pass on the request to Assistant Legat [redacted] b6 b7C

On 6/26/91, AUSA [redacted] and I met with [redacted] at AUSA [redacted] office. The purpose for the meeting was to discuss what it would take to get [redacted] to agree to come to London to be interviewed, then to come to WDC to testify in the Grand Jury. [redacted] reported he had been in contact with the offices of U.S. Senator John Kerry, the Board of Governors of the Federal Reserve System (BGFRS), and the Manhattan District Attorney, Robert Morganthau. [redacted] is attempting to structure a situation in which [redacted] if he agrees to come to the U.S. to assist in the various inquiries about BCCI, will receive the most protection b6 b7C

1325015-000-5046

and most reward available. Essentially, [redacted] was told that, if [redacted] agrees to come to London, is forthcoming, and has information which will help, and understands he will have to testify before the Grand Jury in WDC in addition to whatever testimony he gives elsewhere, the U.S. Attorney's Office, i.e., DOJ, will cooperate in any attempt [redacted] makes to receive a statutory reward from the BGFRS. [redacted] was also told not to even consider playing one agency against another. At the close of the meeting, it was arranged that [redacted] would return the following day to be interviewed and to display the documents which he said he had brought as a "proffer" of [redacted] testimony. b6 b7C

On 6/27/91, [redacted] was interviewed at AUSA [redacted] office (see FD-302). b6 b7C

I subsequently contacted [redacted], telephone [redacted] who assists [redacted] at the Department of State. Ms. [redacted] informed me that the list being requested was one which AUSA [redacted] should have provided through his administrative office in answer to a questionnaire. Using the information from that questionnaire, the State Department prepares a cable to the consular section of the embassy in London containing the identifying information on the travelers and interviewees, which the consular section then transmits to the British Ministry of Foreign Affairs. Using that information, the ministry then gives host-country clearance to the travelers and verifies with the interviewees that their appearance is voluntary. b6 b7C

Travel arrangements, as they now stand, are for SA [redacted] and me to depart, via United Airlines from Dulles Airport at approximately 6:00 PM on 7/7/91, arriving in London at approximately 6:30 AM, 7/8/91. Our return would be during the day on 7/13/91, again via United Airlines. b6 b7C

1325015-000-5047

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/5/91

From : SA [redacted]:das

b6
b7C

Subject: CLARK MC ADAMS CLIFFORD, aka;
Et Al;
FIF; FAG
OO:WMFO

On 7/1/91, in a telephone conversation with AUSA [redacted], we discussed the upcoming interviews in London of various witnesses in captioned matter. AUSA [redacted] was attempting to determine who had already been contacted for interviews. I informed AUSA [redacted] that contacts of several of the people on the list sent to the Legat by teletype on 6/12/91, were being held in abeyance pending his determination from BCCI's counsel, [redacted], that interviews of certain current employees were approved. I further mentioned that AUSA [redacted] had agreed to contact [redacted] in deference to the letter which BCCI's London counsel, [redacted] sent to British Customs Representative [redacted], dated 6/13/91, about which I had told him earlier. AUSA [redacted] said he was unaware of that letter and asked about its contents. After reading the letter to him, I sent him a copy, via facsimile, along with the list of people I had requested the Legat to contact to arrange interviews. The latter document was sent to AUSA [redacted] in response to his further comment that he was not aware there were so many BCCI people involved. After reminding AUSA [redacted] that it was from him and [redacted] that I had obtained the list of potential interviewees, he said he would set about making sure that the list was properly conveyed.

b6
b7C

Later on 7/1/91, [redacted] called and requested that I attempt to obtain employee identification numbers (EINs) for Financial General Bankshares, BCCI and CCAH for purposes of inclusion in the ex parte order he is preparing for submission to the court in order to secure tax records for those and other entities. I telephoned [redacted] Agent [redacted] in Tampa, Florida, and requested that he search for those EINs. SA [redacted] said he thought he had already submitted that information to [redacted] but would check his records again.

b6
b7C

1 - WMFO
JNR:das
(1)

29B-WF-171994 -92

[redacted]

b6
b7C

1325015-000-5048

I also notified Assistant Legat [redacted], London, of the need to determine a list of available interviewees. Assistant Legat [redacted] said he would contact Customs Agent [redacted] on the morning of 7/2/91, and would ascertain the progress on interview arrangements.

b6
b7C

1325015-000-5049

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/15/91

From : SA [redacted] b6 b7C

Subject: CLARK MCADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On 7/11/91 accompanied by U.S. DOJ [redacted] b6 b7C
[redacted] U.S. Customs Special Agent [redacted]
(assigned to the U.S. Embassy, London) and Her Majesty's Customs & Excise Agent [redacted] I attended a meeting with the provisional liquidators of BCCI in the United Kingdom (U.K.), Touche Ross (TR), at BCCI headquarters, 100 Leadenhall Street, London. Representing TR were [redacted] who is the [redacted] and [redacted]

Agent [redacted] and SA [redacted] explained the nature of b6 b7C
their ongoing interests in BCCI from the standpoint of money laundering, and both offered TR the opportunity to request their assistance in identifying the various kinds of transactions involved.

[redacted] and I explained the nature of the captioned matter, i.e., that it is a criminal investigation predicated on a referral from the Board of Governors of the Federal Reserve System (BGFRS) and that in furtherance of that inquiry, we would be seeking documents and other information from TR, now that it was in control of BCCI. We also explained that the BGFRS is b6 b7C conducting its own inquiry, with which we are cooperating, although they are for different purposes. Also, we disclosed our awareness of the investigation being conducted by the New York County District Attorney's Office (NYDAO), explaining that we were not parties to it and did not know its nature or scope.

[redacted] informed us that TR's primary focus at this b6 b7C very early stage is to ascertain what records and assets it has, and to microfilm all the records prior to any determination being made as to the dissolution of BCCI. He has been given six months

1-WMFO

JNR:jnr
(1)

[redacted] b6 b7C

29B-WF-171994 -93

See See

1325015-000-5050

29B-WF-171994)

to accomplish this task and to come up with a recommendation to the overall [redacted] (ph.), in Luxembourg, about the liquidation of the U.K. portion. One of [redacted] first goals is to produce an organizational chart detailing all aspects of BCCI.

b6
b7C

1325015-000-5051

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/15/91

From : SA [redacted] b6 b7C

Subject: CLARK MCADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On 7/10/91, SA [redacted] and I, accompanied by U.S. DOJ Trial Attorney [redacted] and Her Majesty's [redacted], met with attorneys [redacted] at their law firm, Barlow Lyde & Gilbert (BLG), Beaufort House, 15 St. Botolph Street, London EC3A 7NJ, telephone 071-247-2277. BLG represents the auditing firm of PRICE WATERHOUSE (PW) with regard to civil and criminal inquiries evolving from PW's audits of the various incarnations of Bank of Credit and Commerce International Holdings, collectively called BCCI. b6 b7C

At the outset of the meeting, Agent [redacted] introduced us, giving a brief overview of how the captioned matter is associated with the prior, combined U.K.-U.S. Government (Middle District of Florida) inquiry [redacted] followed with a further explanation of how the captioned matter is concerned with issues of the clandestine ownership and control of an American bank by BCCI. b6 b7C b7E

[redacted] asked how our inquiry fits in with those of the Board of Governors of the Federal Reserve System (BGFRS) and the New York County District Attorney, ROBERT MORGANTHAU. [redacted] explained that ours is a federal inquiry, predicated on a criminal referral from the BGFRS, while the grand jury investigation being conducted by DA MORGANTHAU is separate and distinct; that we are not sharing the results of our inquiry with the NY DA, or vice versa. [redacted] seemed incredulous, asking what we wanted from PW that we could not derive from cooperating with the NY DA and the BGFRS. In the ensuing exchange, [redacted] asked if the nature of our inquiries of PW could and would be kept confidential. b6 b7C

-94

29B-WF-191994 Main

1-WMFO

JNR:jnr
(1)

[redacted] b6 b7C

1325015-000-5052

[redacted] responded by saying he found such a request "bizarre", and asked what [redacted] was implying. [redacted] told [redacted] that the very existence of a federal grand jury (FGJ) inquiry is a confidential matter, and that any disclosure of its existence or purpose, or of the information it receives, is prohibited, even to another law enforcement entity, such as the NY DA, without leave of the court. [redacted] then said again that it seemed "bizarre" to him that we would be asking him not to cooperate further with the NY DA, and spoke of his observation that grand-jury confidentiality had already been breached on several occasions, given reports appearing in the New York Times about information supposedly provided to that body. Specifically mentioned was information attributed to a PW audit report, which [redacted] then denied had been given to the NY DA or grand jury by BLG. b6 b7C

[redacted] assured [redacted] that we were in no way asking or requiring him to not cooperate fully with the NY DA, only that the nature of our inquiry not be disclosed; that we were aware of the disclosures of NY grand jury information to the press, but that we could not and would not make any comment about it; that we take the confidentiality of the FGJ process very seriously, and could assure him that information provided to the FGJ by PW in this matter would not appear in the New York Times. b6 b7C

[redacted] invoked "auditor/client confidentiality" also, saying that it precluded PW from disclosing what the nature and contents of its audits were. This followed his renewed request to know what information we were seeking from PW, and our response, which was to ask what records existed, other than the already-disclosed coded and plain-text audit reports. [redacted] did say that numerous records had been made available to the Bank of England by PW under "Section 82" of the U.K.'s bank security act. b6 b7C

According to [redacted], PW took over the coordination of auditing all of BCCI (in 69 countries) from the auditing firm of ERNST & WINNEY in 1987. With regard to the disclosure of any PW records of those audits, [redacted] said he would confer with PW's counsel in the U.S., whose identity he declined to disclose. b6 b7C

1325015-000-5053

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: 12:15 PM
Sender's Initials: DY
Number of Pages: _____

To: U.S. Dept. of Justice (Name of Office) Date: 7/16/91

b6
b7C

Facsimile number: 514-6118

Att: [redacted]

(X)

From: FBI - WMFO C-5 (Name of Office)

Subject: CLARK CLIFFORD, Et al

Special Handling Instructions: Please handcarry to Trial Attorney [redacted]

b6
b7C

Originator's Name: SA [redacted] Telephone: 324-6418

b6
b7C

Originator's Facsimile Number: 324-6426

Approved: [redacted]

29B-WF-171994 -95

FBI/DOJ

[redacted]

1325015-000-[redacted]

b6
b7C

FD 1781/191
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DE FBITP #0004 1921226

ZNR UUUUU

R 101914Z JUL 91

FM FBI TAMPA (29B-WF-171994) (ORA) (RUC)

TO FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //1260:3880//

SUBJECT: CLARK MCADAMS CLIFFORD, AKA, ET AL; FIF; FAG; OO:
WMFO.

RE WMFO TELETYPE TO DIRECTOR, JUNE 24, 1991.

FOR INFORMATION OF WMFO, AFTER NUMEROUS ATTEMPTS TO TELEPHONICALLY CONTACT [redacted] AT [redacted] MET WITH NEGATIVE RESULTS, AN ATTEMPT TO CONTACT HER AT HER RESIDENCE, [redacted] ORLANDO, FLORIDA, ON JULY 3, 1991, ALSO MET WITH NEGATIVE RESULTS. A NOTE WAS LEFT AT THE ABOVE RESIDENCE REQUESTING [redacted] TO CONTACT THE FEDERAL BUREAU OF INVESTIGATION (FBI), ORLANDO RESIDENT AGENCY (ORA). ON JULY

b6
b7C

8, 1991, [redacted] TELEPHONICALLY CONTACTED SPECIAL AGENT (SA) [redacted] ORA, AND ADVISED SHE WAS PREPARING TO LEAVE THE ORLANDO AREA AND DID NOT WISH TO DISCUSS HER TRAVELLING PLANS. [redacted] STATED SHE HAD NO DOCUMENTS THAT SHE WANTED TO GIVE TO THE FBI; AND STATED SHE WOULD BE GIVING ALL OF HER PERTINENT DOCUMENTS AND RECORDS TO MR. [redacted] (PHONETIC), NEW YORK DISTRICT ATTORNEY'S OFFICE. [redacted] ADVISED [redacted] WORKS UNDER DISTRICT ATTORNEY MR. ROBERT MORGANTHAU; AND IF THE FBI NEEDED TO RECONTACT HER, THEY COULD DO SO THROUGH [redacted] HUSBAND WHO IS CURRENTLY IN LONDON.

b6
b7C

THIS MATTER IS BEING RUC'D BY THE TAMPA DIVISION.

BT

#0004

NNNN

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- ☐ Immediate
- ☑ Priority
- ☐ Routine

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☐ Unclassified

Time Transmitted: 9:16
Sender's Initials: KTN
Number of Pages: 2

To: USAO, WASHINGTON, D.C. Date: 7-17-91
(Name of Office)

Facsimile number: 202 514-8783

Attn: AUSA [redacted] b6 b7C
(Name) (Room) (Telephone No.)

From: WMFO
(Name of Office)

Subject: CLARK MCADAMS CLIFFORD;
ET AL

Special Handling Instructions: PLEASE HAND CARRY TO AUSA [redacted] b6 b7C

Originator's Name [redacted] Telephone: 324-6409

Originator's Facsimile Number: 324-6426

Approved: [redacted]

29B WF-171994-96
SA FBI/DOJ [redacted] b6 b7C

1325015-000-5057

DML:dml

CLARK McADAMS CLIFFORD;
ET AL;
29B-WF-171994

On the below listed dates, [redacted] furnished the following information to WMFO SA [redacted] b6 b7C b7D

On 7/5/91, attempts to contact the source met with negative results. A message was left for the source to contact the writer.

On 7/7/91, the source contacted the writer. The source advised that he/she was in [redacted] for business purposes. The writer stated that he would be [redacted] on that same date. The writer told the source that [redacted] had not yet returned to [redacted]. The source was [redacted] The source stated [redacted] b6 b7C b7D

On 7/8/91, the source contacted the writer. The source had determined that [redacted] was [redacted] The source believed that [redacted]. The source was told [redacted] b6 b7C b7D

On that same date, the source advised that [redacted] The source was told that [redacted] The source stated that [redacted] b6 b7C b7D

On that same date, the source determined that [redacted] b6 b7C b7D

Based on the above information, the writer contacted [redacted] b6 b7C b7D

On 7/14/91, the source contacted [redacted] b6 b7C b7D

told the source that [redacted]

On 7/15/91, the source advised that [redacted] b6 b7C b7D

who worked as one of [redacted]

It should be noted that as of 7/17/91, [redacted] was still [redacted] b6 b7C b7D

It is not known if or when [redacted]

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 7/18/91

TO : ADIC, NEW YORK
ATTN: SA LIONEL CRAFT (C-3)

FROM : SAC, WMFO (29B-WF-171994) (P) (C-5)

SUBJECT : [redacted]

b7D
b6
b7C

Re: Tel call between WMFO SA [redacted] and NY SA [redacted]

Enclosed for New York are two FD-209'S and two inserts setting forth results of contacts by WMFO SA [redacted] and captioned source in London, England. Said enclosures are self explanatory.

b6
b7C

For the information of New York, [redacted] continues to provide WMFO information germane to an investigation entitled "CLARK McADAMS CLIFFORD; ET AL;", (29B-WF171994). It is anticipated that WMFO will maintain regular contact with the source. Such contact will continue to be coordinated with NYO SA [redacted]

b6
b7C
b7D

2-New York (encls. 4)
1-WMFO
(DML)

Enclosures placed in Sub D

29B-WF-171994-97

Searched
Serialized
Indexed
Filed

Approved: _____ **Transmitted** _____ (Number) (Time) **Per** _____

1325015-000-5060

Memorandum

To : Director, FBI
Attn: Voucher/Payroll Unit

Date 7/18/91

From : SAC, WMFO (29B-WF-171994)(P)

Subject: CLARK MCADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

PURPOSE

The purpose of this communication is to justify a claim for reimbursement of expenses incurred by SA [redacted] of this office during a recent trip to London, England, in conjunction with the captioned matter. b6 b7C

DETAILS

During the week of 7/7-13/91, SA [redacted] one of the co-case agents assigned to the captioned matter, traveled, as approved, to London, England, to conduct investigation consisting of meetings, interviews and reviews of documents. One of the interviews was of a potentially-key witness, [redacted] a Pakistani national, who was concerned about his own culpability and, therefore, only agreed to this initial interview because it would occur in a neutral site, i.e., London. Even though he had agreed to be interviewed, [redacted] balked at coming to the U.S. Embassy, despite assurances he would not be arrested. Because it was therefore deemed necessary to arrange for other facilities, a conference room was rented at the Mostyn Hotel, where SA [redacted] was staying, for the two days on which the interview occurred. Refreshments were also purchased. b6 b7C

The charges for the room came to 107.00 Pounds Sterling, while the refreshments, including tips, came to 20.00 Pounds Sterling. The total in U.S. dollars, using the appropriate conversion factor of $1.655/Pound Sterling, was $210.19.

It is believed that the expense was justified by the extremely valuable information derived from the interview, and the unavailability of other suitable facilities. It was not acceptable to use SA [redacted] room at the hotel due to its small size and the fact that the number of participants in the b6 b7C

2-FBIHQ
1-WMFO

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sessions, including the interviewee, was five.

RECOMMENDATION

Based on the foregoing information, it is recommended that SA [redacted] claim for reimbursement of $210.19 be allowed. b6 b7C

1325015-000-5062

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/19/91

From SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
FIF; FAG;
(OO: WMFO)

On 7/10/91 a meeting was held in the office of [redacted] b6 b7C b7D

[redacted]

[redacted] b6 b7C

-99

29B-WF-171994 Main

SW SW

1325015-000-5063

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 7/9/91, a meeting was held at the U.S. Embassy, London, England. Participants in the meeting included [redacted] b6 b7C b7D

[redacted]

While the above meeting was ongoing, the above named participants were joined by [redacted] b6 b7C b7D

[redacted]

Subsequently, on that same date, SA [redacted] and the writer met with SSA'S [redacted]. Discussed was the b6 b7C b7D

[redacted]

-100

29B-WF-171994 Main

[redacted] b6 b7C

See See

1325015-000-5064

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 7/8/91, after having arrived in London, England, SA [redacted] and the writer met with DOJ [redacted]. Setting up the interview/investigative agenda for the week was discussed. b6 b7C

On that same date, SA [redacted] and the writer met with SSA [redacted], FBI Assistant Legat, at the American Embassy. SSA [redacted] assisted in setting up witness interviews and meetings. b6 b7C

On that same date, SA [redacted] and the writer met with SSA [redacted] who was [redacted] b6 b7C b7D

On that same date, SA [redacted] and the writer met with AUSA [redacted], District of Columbia and [redacted]. A meeting schedule was set up for the week. b6 b7C

On that same date, the writer coordinated SFO's contact with [redacted]. Said contact was based on information provided by [redacted]. According thereto, [redacted]. SFO questioned [redacted] as a potential material witness. b6 b7C b7D

29B-WF-171994 Miami
- 101
Su Su

[redacted] b6 b7C

1325015-000-5065

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/22/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 7/15/91, the writer had contacts with AUSA [redacted] and DOJ [redacted] A meeting was set up for 7/16/91, to review this matter. [redacted] advised that Manhattan District Attorney ROBERT MORGANTHAU had complained to DOJ about captioned investigation. Specifically the investigation that was conducted in London. b6 b7C

On 7/15 and 16/91, respectively, the writer attempted to contact Mrs. [redacted]. Said attempt met with negative results. b6 b7C

On 7/16/91, a meeting was held in the office of AUSA [redacted], District of Columbia. In addition to AUSA [redacted] in attendance were DOJ [redacted] SA [redacted] and the writer. The London trip was reviewed. Also discussed were the investigative steps to be taken in the near future. [redacted] outlined three complaints that Manhattan District Attorney ROBERT MORGANTHAU made with DOJ. They were: b6 b7C

1. Gestapo like methods in having [redacted] taken off a plane. b6 b7C
2. Intimidation in interviewing [redacted] (6 interviewers).
3. Telling [redacted] not to testify before the Manhattan District Attorney.

X

It should be noted that each of the above complaints lack substance.

AUSA [redacted] advised that a decision had been made by his superiors that AUSAS [redacted] would begin the investigation of the Independence Bank. A request for additional resources would be forthcoming through the U.S. Attorney. The strategy would be to build a case against GAITH PHARAON and then to gain his cooperation in going against [redacted] and other subjects in captioned investigation. b6 b7C

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[redacted] b6 b7C

1325014/000-5066

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/22/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 7/17/91, the writer met briefly with AUSA [redacted] b6 b7C
[redacted] District of Columbia. AUSA [redacted] advised that he and AUSA [redacted] were about to start the Independence Bank aspect of the investigation. AUSA [redacted] stated that he would contact the writer to coordinate the investigative needs for this matter.

On that same date, the writer was contacted by SSA [redacted] b6 b7C b7D

On 7/18/91, the writer was contacted by DOJ [redacted] b6 b7C
[redacted] advised that [redacted] had contacted the USAO and requested immunity. An agreement should be worked out and it is anticipated that [redacted] will come to Washington, D.C., from London.

[redacted] b6 b7C

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29B-WF-171994

1325015-000-5067

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/23/91

From : SA [redacted] b6 b7C

Subject: CLARK MCADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On this date, I contacted [redacted] b6 b7C concerning the status of the efforts to get [redacted] to the U.S. to testify. [redacted] said that the effort is currently on hold, pending action by the Board of Governors of the Federal Reserve System (BGFRS). According to [redacted] "had to" return to Pakistan, due to the fact that all of [redacted] wife's money is "frozen" in BCCI, and [redacted] has no money of his own.

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(1)

[redacted] b6 b7C

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JUL 23 1991
FBI - WASH. METRO FIELD OFFICE
JR

1325015-000-5068

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/23/91

From : SA [redacted] b6 b7C

Subject: CLARK MCADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

On 7/18/91, I telephonically contacted [redacted] to ascertain the possibility of finding a U.K. record of the 1978 entries of subjects CLIFFORD and [redacted] (to meet with [redacted] for purposes of coaching his testimony in a then-upcoming, U.S. court appearance). [redacted] said that [redacted] are the custodians of disembarkation records, but such records are kept only a short time. He said he would check on the possibility of any records existing, however. b6 b7C b7D

[redacted] reported having recently spoken with [redacted] (one of our potential witnesses), who told him that [redacted] (another potential witness) is refusing to speak to anyone in authority for fear of being arrested. [redacted] is going to recontact [redacted] in an attempt to change his mind. b6 b7C b7D

Also on 7/18/91, I was called by SA [redacted] Miami Division, the case agent on the CenTrust matter. SA [redacted] said that, in talking to FBIHQ (SSA [redacted]), he had learned of [redacted] b6 b7C b7D

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I telephoned [redacted] b6 b7C b7D

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[redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
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b6 b7C

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[redacted] b6 b7C b7D

I also asked [redacted] b6 b7C b7D

Later on 7/18/91, I discussed with AUSA [redacted] b6 b7C the efficacy of considering an attempt to seize and forfeit CLIFFORD's and [redacted] CCAH shares. AUSA [redacted] said he believed we would have to be closer to an indictment before initiating such a move, but that he would be willing to consult with SA [redacted] of our FAST Team.

1325015-000-5070

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/23/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 7/22/91, the writer [redacted] b6 b7C b7D

[redacted]

[redacted] b6 b7C

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1325015-000-5071

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [✓] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [ ] Unclassified

Time Transmitted: 2:30
Sender's Initials: KTW
Number of Pages: 25

To: FBIHQ - DIV 6 - FIFU (Name of Office) Date: 7-29-91

Facsimile number: 324-6492

Attn: SSA [redacted] (Name / Telephone No.) b6 b7C

From: FBI, WMFO (Name of Office)

This comma also filed in:
FUG 1
FUG 2
FUG 3

Subject: CLARK MCADAMS CLIFFORD; ETAL
FIF; FAG;
OO: WMFO
29B-WF-171994

Special Handling Instructions:
HAND CARRY TO SSA [redacted] b6 b7C

Originator's Name: SA [redacted] Telephone: 324-6409

Originator's Facsimile Number: 324-6409

29B-WF-171994 -107
SW SW

Approved: [signature]

FBI/DOJ

1325015-000-5072

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [x] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [ ] Unclassified

Time Transmitted: 2:20
Sender's Initials: KTW
Number of Pages: 25

To: CRIMINAL DIVISION, DOJ
(Name of Office)

Date: 7-29-91

Facsimile number: 514-9412

Attn: [redacted]
(Name) Room Telephone No.)

b6
b7C

From: FBI, WMFO
(Name of Office)

Subject: CLARK MCADAMS CLIFFORD; ET AL;
(NYDA PRESS RELEASE / INDICTMENT)

Special Handling Instructions:

Originator's Name: SA [redacted]

b6
b7C

Telephone: 324-6409

Originator's Facsimile Number: 324-6409

Approved: [signature]

FBI/DOJ

1325015-000-5073

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [ ] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [ ] Unclassified

Time Transmitted: 2:50
Sender's Initials: KTW
Number of Pages: 25

To: USAO DISTRICT OF COLUMBIA Date: 7-29-91
(Name of Office)

Facsimile number: 514-8783

Attn: [redacted] b6 b7C
(Name Room Telephone No.)

From: FBI, WMFO
(Name of Office)

Subject: CLARK MCADAMS CLIFFORD, ET AL;
(NY DA PRESS RELEASE/INDICTMENT)

Special Handling Instructions:

Originator's Name: SA [redacted] b6 b7C Telephone: 324-6409

Originator's Facsimile Number: 324-6409

Approved:

FBI/DOJ

1325015-000-5074

DISTRICT ATTORNEY - COUNTY OF NEW YORK

News Release

Contact: Gerald McKelvey

July 29, 1991

(212) 335-9400

A New York County grand jury has returned an indictment that charges that the Bank of Credit and Commerce International (BCCI), its related entities and two of its founders engaged in a multi-billion dollar scheme to defraud its depositors, falsified bank records to hide illegal money laundering, and committed larcenies totaling more than $30 million, District Attorney Robert M. Morgenthau announced today. The indictment stems from an ongoing investigation of BCCI that began in the spring of 1989.

Charged in the indictment are AGHA HASAN ABEDI, who founded the bank in 1972, and SWALEH NAQVI, who was the bank's chief operating officer until October of 1990. The corporate defendants are BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., the leading bank established by ABEDI in 1972, and four subsequently created entities, BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; BCCI HOLDINGS (LUXEMBOURG) S.A.; INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY HOLDINGS.

"This indictment spells out the largest bank fraud in world financial history," Mr. Morgenthau said. "BCCI was operated as a corrupt criminal organization throughout its entire 19 year history. It systematically falsified its records. It knowingly

1325015-000-5075

allowed itself to be used to launder the illegal income of drug sellers and other criminals. And it paid bribes and kickbacks to public officials."

All of the defendants are charged with the crime of Scheme to Defraud in the First Degree and three counts of Grand Larceny in the First Degree.

"By means of this scheme, the defendants obtained more than $20 billion from its depositors, including citizens and foreign nationals in New York City, banks headquartered in Manhattan, central banks of other nations, and thousands of depositors throughout the world," Mr. Morgenthau said. "The best estimates indicate at this time that upwards of $5 billion has been lost through this fraud."

The Scheme to Defraud count includes allegations that the defendants paid a bribe of $3 million to the two senior officers of the Central Reserve Bank of Peru, in exchange for receiving deposits from the bank.

The Grand Larceny counts relate to the loss of more than $30 million from the American Express Bank Limited on July 5, 1991, when the Bank of England and regulatory agencies in other nations, including the United States, ordered the closing of BCCI. Because BCCI obtained the deposits from American Express Bank through fraudulent means, by falsely representing BCCI's financial condition, the losses are thefts, Mr. Morgenthau said.

In addition, BCCI S.A. is charged with eight counts of Falsifying Business Records in the First Degree, relating to a

1325015-000-5076

series of instances on which the bank failed to file currency transaction reports on currency deposits of $10,000 or more in one of the bank's customer accounts, as is required by federal law.

"These transactions appear to be instances of money-laundering," Mr. Morgenthau said.

The top count in the indictment, Grand Larceny in the First Degree, exposes NAQVI and ABEDI to prison terms of up to 25 years on conviction. NAQVI, 57, is living in Abu Dhabi, one of the states in the United Arab Emirates, and ABEDI, 68, is living in Pakistan. The extradition of both men is being sought, Mr. Morgenthau said.

The corporate defendants are exposed to forfeiture actions and fines of millions of dollars on conviction of the charges.

"The corporate structure of BCCI was set up to evade international and national banking laws so that its corrupt practices would be unsupervised and remain undiscovered," Mr. Morgenthau said. "The defendants systematically falsified the capital structure of BCCI to make it appear as though it was a solvent, profitable bank secured by the backing of wealthy businessmen from the Middle East.

"In fact, much of the bank's capitalization and assets were fictitious and its backing illusory," the District Attorney continued. "The defendants created the appearance of respectability by persuading world leaders to appear with them

and defrauded their thousands of depositors, both small and large, who relied on that appearance of respectability."

"This largest of Ponzi schemes is over," he said. "But we have much yet to discover about this bank, and much to do in reforming international banking practices. The key to the scheme was that BCCI was structured in such a way so that no single central bank was able to monitor its activities. No foreign bank should be permitted to operate in the United States unless it is supervised by a single, strong central bank and is not bound by bank secrecy laws of another jurisdiction. Without these reforms, the potential for massive worldwide bank fraud remains."

The investigation is continuing, Mr. Morgenthau said.

The District Attorney thanked the Federal Reserve Bank of New York and the Board of Governors of the Federal Reserve System, and the New York State Department of Banking, for their close cooperation from the earliest stages of the investigation. "Our combined efforts and resources have enabled us to understand one of the most complex and secretive criminal organizations that we have ever encountered," Mr. Morgenthau said. "Without the generous assistance and intricate knowledge of bank regulators, this investigation could not have been done."

He particularly thanked Federal Reserve Board Chairman Alan Greenspan, and William Taylor, Virgil Mattingly Jr. and Richard Small of the Federal Reserve System; and Gerald Corrigan, President of the Federal Reserve Bank of New York, and Ernest

Petrikas and Thomas C. Baxter Jr. of the Federal Reserve Bank of New York.

Mr. Morgenthau also thanked New York State Department of Banking Superintendent Derrick Cephas, Deputy Superintendent Vincent Conlon, former Superintendent Jill Considine, former counsel Barbara Barrantes, and Timothy Mahoney, Jerry Schwartz and Leon Ellen of the Department's Special Investigation Division.

The District Attorney also thanked the Bank of England for its invaluable assistance. "Under British law, the Bank could not assist us without some lawful basis to do so," Mr. Morgenthau said. "Since the time that stage was reached, however, we and the Bank have shared important information in a cooperative and helpful manner."

In the District Attorney's Office, the investigation was conducted under the supervision of Senior Investigator Andrew Finan, assisted by Investigators Mark Baldassare, Robert O'Donoghue and Fred Ghussin and Supervising Investigators Gerald McQueen, Mervin Woike and Thomas Jackson, under the supervision of Chief Investigator Andrew Rosenzweig.

The case was presented to the grand jury by Assistant District Attorney John W. Moscow, Deputy Chief of the Investigation Division, who, with Assistant District Attorneys Richard T. Preiss and Marc Frazier Scholl, is in charge of the prosecution. They were assisted by Investigation Division Chief Michael G. Cherkasky.

1325015-000-5079

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: CRIMINAL TERM

THE PEOPLE OF THE STATE OF NEW YORK :

-against- :

BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; :
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; :
BCCI HOLDINGS (LUXEMBOURG) S.A.; :
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED; :
INTERNATIONAL CREDIT AND INVESTMENT COMPANY HOLDINGS; :
AGHA HASAN ABEDI; and :
SWALEH NAQVI. :

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuse defendants Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A. [These defendants along with other related entities described below are hereinafter included in the appellation "BCC Group."], defendants International Credit and Investment Company (Overseas) Limited and International Credit and Investment Company Holdings [These defendants along with other related entities described below are hereinafter included in the appellation "ICIC Group."], and defendants Agha Hasan Abedi and Swaleh Naqvi of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law Section 190.65 (1)(a), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from November 1, 1972 through July 5, 1991, with intent to defraud ten and more persons and to obtain property from ten and more persons by false and fraudulent pretenses,

representations, and promises, engaged in a scheme constituting a systematic ongoing course of conduct and so obtained property from one and more such persons, as follows:

The defendants, in the County of New York and elsewhere, made false and fraudulent pretenses, representations and promises as to (1) the identity of the owners of the BCC Group, and the degree of their financial involvement in the BCC Group, (2) the amount of shareholder capital at risk in the BCC Group, (3) the financial condition, net worth, and capital of the member entities of BCC Group, and (4) the ability of the BCC Group to repay creditors, including but not limited to depositors and banking institutions.

By means of the scheme described herein the defendants obtained property, the value of which has exceeded $20,000,000,000.00 (twenty billion dollars), from diverse persons, including United States citizens and foreign citizens residing in New York County, banks based in New York County, central banks of other nations, and thousands of depositors throughout the world.

The scheme was premised on the fact that banks rely on credit. The essence of the scheme was to convince depositors and other banking and financial institutions, by means of false pretenses, representations, and promises that the BCC Group was a safe financial repository and institution for funds, and thereby defendants acted to persuade depositors and banking and other financial institutions to provide the BCC Group banks with deposits and credit.

1325015-000-5081

Foremost among the originators of the scheme was defendant Abedi, a Pakistani banker who had worked as chief executive of a number of Pakistani banks, until the nationalization of the banks in Pakistan in 1972. Abedi recruited co-schemers with the notion of establishing a third world bank which would be substantially owned by its employees and would be so structured that it could not be nationalized.

Defendants Abedi and Naqvi, acting with and assisted by others, established a series of banks and bank holding companies, as well as related corporate and investment entities, in more than seventy countries around the world. The leading bank, established first, was defendant Bank of Credit and Commerce International, S.A. [hereinafter BCCI, SA] established in 1972 in Luxembourg, Abu Dhabi, and England. Defendants Abedi and Naqvi, along with others, thereafter caused the incorporation and establishment of defendant Bank of Credit and Commerce International Holdings, S.A. [hereinafter BCCI Holdings] in Luxembourg in 1974, and defendant Bank of Credit and Commerce International (Overseas) Limited [hereinafter BCCI Overseas] in Grand Cayman in 1975. Those three entities, as well as the related corporate and investment entities established as subsidiaries to BCCI Holdings and as affiliates of defendants were collectively known as "the BCC Group."

As part of the scheme, defendant International Credit and Investment Company (Overseas) Limited [hereinafter ICIC Overseas] was established in Grand Cayman as a bank. ICIC Overseas was used to conceal BCC Group liabilities and to create false assets for the

1325015-000-5082

BCC Group. Defendant International Credit and Investment Company Holdings [hereinafter ICIC Holdings] was established and was used to conceal stolen monies. ICIC Overseas and ICIC Holdings, together with a series of related corporate and non-corporate entities were collectively known as the "ICIC Group."

Defendant Abedi was in charge of the BCC Group and the ICIC Group. Defendant Naqvi rose to become the second in command. In the late 1980s, after defendant Abedi became incapacitated, defendant Naqvi took charge of the scheme and of the BCC Group and ICIC Group. Defendants Abedi and Naqvi, acting with a small executive staff, created the false pretenses, representations and promises to advance the scheme to defraud.

In the course of the scheme and in furtherance thereof certain acts were committed. Among those are the following:

First, to create the false impression that the BCC Group was a repository and a financial institution with which depositors and other creditors could safely do business, the schemers employed the ruling families of a number of Middle Eastern states and other purportedly wealthy businessmen as nominal shareholders of the entities comprising the BCC Group, in particular, of BCCI Holdings. The schemers falsely pretended, represented, and promised that the nominees owned and financially would stand behind the BCC Group. However, by the terms of the secret contractual agreements the nominees were insulated from any economic loss suffered by the BCC Group.

1325015-000-5083

Among the nominees were Ghaith R. Pharaon, Sheik Kamal Adham, Sayed Jawhary, also known as El Sayed El Sayed El Gohari, and Faisal Saud al-Fulaij, all of whom assisted the defendants by knowingly permitting the BCC Group management to trade on their reputations for wealth by fraudulently using their names as shareholders in BCCI Holdings, and thus, as owners of the BCC Group. Defendants further advanced their scheme to defraud by causing documents to be filed with the Superintendent of Banks of New York State, in New York County, that gave false information concerning the identities of the true owners of the BCC Group, including BCCI Holdings.

In addition, Pharaon, Adham, Jawhary, and al-Fulaij permitted defendants Abedi and Naqvi, the BCC Group, including but not limited to defendants BCCI S.A., BCCI Overseas, and BCCI Holdings, and the ICIC Group, to create the false appearance that the BCC Group and the ICIC Group loaned them money. This resulted in the creation of false assets for the BCC Group in the form of loans receivable which were not genuine. The false and fraudulent impressions were further enhanced by false confirmations of indebtedness to the BCC Group which Pharaon, Adham, Jawhary, and al-Fulaij caused and permitted to be sent to auditors of the BCC Group.

The creation of false assets and the false assertions of ownership of the stock of defendant BCCI Holdings created the false and fraudulent impressions that Pharaon, Adham, Jawhary, and al-Fulaij were economically involved in defendant BCCI Holdings as

1325015-000-5084

Among the nominees were Ghaith R. Pharaon, Sheik Kamal Adham, Sayed Jawhary, also known as El Sayed El Sayed El Gohari, and Faisal Saud al-Fulaij, all of whom assisted the defendants by knowingly permitting the BCC Group management to trade on their reputations for wealth by fraudulently using their names as shareholders in BCCI Holdings, and thus, as owners of the BCC Group. Defendants further advanced their scheme to defraud by causing documents to be filed with the Superintendent of Banks of New York State, in New York County, that gave false information concerning the identities of the true owners of the BCC Group, including BCCI Holdings.

In addition, Pharaon, Adham, Jawhary, and al-Fulaij permitted defendants Abedi and Naqvi, the BCC Group, including but not limited to defendants BCCI S.A., BCCI Overseas, and BCCI Holdings, and the ICIC Group, to create the false appearance that the BCC Group and the ICIC Group loaned them money. This resulted in the creation of false assets for the BCC Group in the form of loans receivable which were not genuine. The false and fraudulent impressions were further enhanced by false confirmations of indebtedness to the BCC Group which Pharaon, Adham, Jawhary, and al-Fulaij caused and permitted to be sent to auditors of the BCC Group.

The creation of false assets and the false assertions of ownership of the stock of defendant BCCI Holdings created the false and fraudulent impressions that Pharaon, Adham, Jawhary, and al-Fulaij were economically involved in defendant BCCI Holdings as

1325015-000-5085

shareholders, that their money was at risk in the bank, and that they would financially stand behind the BCC Group if necessary.

Second, defendants established separate subsidiaries of defendant BCCI Holdings in a number of countries, including Luxembourg and the Cayman Islands, which have strict laws against release of banking information. By so doing, defendants guaranteed that there would be no comprehensive regulation on a consolidated basis by any single regulator of the BCC Group. This permitted the inter-bank transfer of assets and liabilities to be conducted in a manner that could and did conceal the true economic position of the BCC Group.

Third, defendants authorized and caused to be authorized the payments of bribes and kickbacks to agents of other banking and financial institutions. By virtue of that practice, defendants attempted to avoid and did avoid scrutiny by other banking and financial institutions of the capital structure and financial viability of the BCC Group. In 1986 and 1987, to obtain deposits from and a banking relationship with the Central Reserve Bank of Peru, defendants Abedi and Naqvi authorized and directed employees of the BCC Group to open a bank account in a Swiss bank in Panama to transmit bribes and kickbacks in the amount of a percentage of the deposits maintained by The Central Reserve Bank of Peru to the two senior officers of that bank. The total of such payments was approximately $3,000,000.00.

Fourth, the defendants systematically engaged in a program known as the External Marketing Program in New York County during

1325015-000-5086

the period of from 1987 to 1990. Pursuant to that program defendants and agents of defendants actively solicited bank deposits from numerous persons in New York County and elsewhere for the BCC group. Accounts and deposits were solicited and obtained through false representations that the BCC Group was a safe and viable banking institution. As part of this program, the defendants and their agents also represented that said persons could open, at the agency of defendant BCCI S.A. located in New York County, banking accounts that would be booked at the overseas branches of the BCC Group, including but not limited to branches of defendant BCCI Overseas in Lahore, Pakistan and Dhaka, Bangladesh. By means of these solicitations and with the knowledge that the representations made concerning the financial condition and the capital and net worth of the banking institutions were materially false, defendants obtained property in the form of deposits at the BCCI SA agency in New York County on behalf of the BCC Group from American citizens and residents of New York County.

Fifth, the defendants systematically filed and caused to be filed with the Superintendent of Banks of the State of New York, in New York County, provided and represented as true to correspondent banks, and otherwise published financial statements which defendants knew to contain false and fraudulent representations materially overstating and falsifying the capital, net worth of the BCC Group, and, in particular, of defendants BCCI Holdings, BCCI S.A., and BCCI Overseas, as well as the ability of these institutions to repay their creditors.

1325015-000-5087

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, on or about July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money, having an aggregate value of in excess of $1,000,000, to wit, greater than $12,900,000 in connection with foreign exchange trading between American Express Bank Ltd. and the BCC Group.

1325015-000-5088

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, on or about July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money, having an aggregate value of in excess of $1,000,000, to wit, $10,000,000 in connection with a non-collateralized placement by American Express Bank Ltd. with the BCC Group.

1325015-000-5089

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, during the period of from on or about January 1, 1983 to July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money having an aggregate value of in excess of $1,000,000, to wit, in excess of $6,900,000 in connection with letters of credit and acceptances between American Express Bank Ltd. and the BCC Group.

1325015-000-5090

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 24, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

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SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 29, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-5092

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 30, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

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EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 8, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

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NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 13, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

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TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 14, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

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ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about October 12, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 01008270 and omitted to make a record of said transactions as required by law.

1325015-000-5097

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about October 12, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 07004836 and omitted to make a record of said transactions as required by law.

ROBERT M. MORGENTHAU
District Attorney
New York County

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7/29/91
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DISTRICT ATTORNEY - COUNTY OF NEW YORK

News Release

Contact: Gerald McKelvey

July 29, 1991

(212) 335-9400

A New York County grand jury has returned an indictment that charges that the Bank of Credit and Commerce International (BCCI), its related entities and two of its founders engaged in a multi-billion dollar scheme to defraud its depositors, falsified bank records to hide illegal money laundering, and committed larcenies totaling more than $30 million, District Attorney Robert M. Morgenthau announced today. The indictment stems from an ongoing investigation of BCCI that began in the spring of 1989.

Charged in the indictment are AGHA HASAN ABEDI, who founded the bank in 1972, and SWALEH NAQVI, who was the bank's chief operating officer until October of 1990. The corporate defendants are BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., the leading bank established by ABEDI in 1972, and four subsequently created entities, BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; BCCI HOLDINGS (LUXEMBOURG) S.A.; INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY HOLDINGS.

"This indictment spells out the largest bank fraud in world financial history," Mr. Morgenthau said. "BCCI was operated as a corrupt criminal organization throughout its entire 19 year history. It systematically falsified its records. It knowingly

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allowed itself to be used to launder the illegal income of drug sellers and other criminals. And it paid bribes and kickbacks to public officials."

All of the defendants are charged with the crime of Scheme to Defraud in the First Degree and three counts of Grand Larceny in the First Degree.

"By means of this scheme, the defendants obtained more than $20 billion from its depositors, including citizens and foreign nationals in New York City, banks headquartered in Manhattan, central banks of other nations, and thousands of depositors throughout the world," Mr. Morgenthau said. "The best estimates indicate at this time that upwards of $5 billion has been lost through this fraud."

The Scheme to Defraud count includes allegations that the defendants paid a bribe of $3 million to the two senior officers of the Central Reserve Bank of Peru, in exchange for receiving deposits from the bank.

The Grand Larceny counts relate to the loss of more than $30 million from the American Express Bank Limited on July 5, 1991, when the Bank of England and regulatory agencies in other nations, including the United States, ordered the closing of BCCI. Because BCCI obtained the deposits from American Express Bank through fraudulent means, by falsely representing BCCI's financial condition, the losses are thefts, Mr. Morgenthau said.

In addition, BCCI S.A. is charged with eight counts of Falsifying Business Records in the First Degree, relating to a

series of instances on which the bank failed to file currency transaction reports on currency deposits of $10,000 or more in one of the bank's customer accounts, as is required by federal law.

"These transactions appear to be instances of money-laundering," Mr. Morgenthau said.

The top count in the indictment, Grand Larceny in the First Degree, exposes NAQVI and ABEDI to prison terms of up to 25 years on conviction. NAQVI, 57, is living in Abu Dhabi, one of the states in the United Arab Emirates, and ABEDI, 68, is living in Pakistan. The extradition of both men is being sought, Mr. Morgenthau said.

The corporate defendants are exposed to forfeiture actions and fines of millions of dollars on conviction of the charges.

"The corporate structure of BCCI was set up to evade international and national banking laws so that its corrupt practices would be unsupervised and remain undiscovered," Mr. Morgenthau said. "The defendants systematically falsified the capital structure of BCCI to make it appear as though it was a solvent, profitable bank secured by the backing of wealthy businessmen from the Middle East.

"In fact, much of the bank's capitalization and assets were fictitious and its backing illusory," the District Attorney continued. "The defendants created the appearance of respectability by persuading world leaders to appear with them

and defrauded their thousands of depositors, both small and large, who relied on that appearance of respectability."

"This largest of Ponzi schemes is over," he said. "But we have much yet to discover about this bank, and much to do in reforming international banking practices. The key to the scheme was that BCCI was structured in such a way so that no single central bank was able to monitor its activities. No foreign bank should be permitted to operate in the United States unless it is supervised by a single, strong central bank and is not bound by bank secrecy laws of another jurisdiction. Without these reforms, the potential for massive worldwide bank fraud remains."

The investigation is continuing, Mr. Morgenthau said.

The District Attorney thanked the Federal Reserve Bank of New York and the Board of Governors of the Federal Reserve System, and the New York State Department of Banking, for their close cooperation from the earliest stages of the investigation. "Our combined efforts and resources have enabled us to understand one of the most complex and secretive criminal organizations that we have ever encountered," Mr. Morgenthau said. "Without the generous assistance and intricate knowledge of bank regulators, this investigation could not have been done."

He particularly thanked Federal Reserve Board Chairman Alan Greenspan, and William Taylor, Virgil Mattingly Jr. and Richard Small of the Federal Reserve System; and Gerald Corrigan, President of the Federal Reserve Bank of New York, and Ernest

Petrikas and Thomas C. Baxter Jr. of the Federal Reserve Bank of New York.

Mr. Morgenthau also thanked New York State Department of Banking Superintendent Derrick Cephas, Deputy Superintendent Vincent Conlon, former Superintendent Jill Considine, former counsel Barbara Barrantes, and Timothy Mahoney, Jerry Schwartz and Leon Ellen of the Department's Special Investigation Division.

The District Attorney also thanked the Bank of England for its invaluable assistance. "Under British law, the Bank could not assist us without some lawful basis to do so," Mr. Morgenthau said. "Since the time that stage was reached, however, we and the Bank have shared important information in a cooperative and helpful manner."

In the District Attorney's Office, the investigation was conducted under the supervision of Senior Investigator Andrew Finan, assisted by Investigators Mark Baldassare, Robert O'Donoghue and Fred Ghussin and Supervising Investigators Gerald McQueen, Mervin Woike and Thomas Jackson, under the supervision of Chief Investigator Andrew Rosenzweig.

The case was presented to the grand jury by Assistant District Attorney John W. Moscow, Deputy Chief of the Investigation Division, who, with Assistant District Attorneys Richard T. Preiss and Marc Frazier Scholl, is in charge of the prosecution. They were assisted by Investigation Division Chief Michael G. Cherkasky.

1325015-000-5104

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: CRIMINAL TERM

THE PEOPLE OF THE STATE OF NEW YORK :

-against- :

BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; :
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; :
BCCI HOLDINGS (LUXEMBOURG) S.A.; :
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED; :
INTERNATIONAL CREDIT AND INVESTMENT COMPANY HOLDINGS; :
AGHA HASAN ABEDI; and :
SWALEH NAQVI. :

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuse defendants Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A. [These defendants along with other related entities described below are hereinafter included in the appellation "BCC Group."], defendants International Credit and Investment Company (Overseas) Limited and International Credit and Investment Company Holdings [These defendants along with other related entities described below are hereinafter included in the appellation "ICIC Group."], and defendants Agha Hasan Abedi and Swaleh Naqvi of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law Section 190.65 (1)(a), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from November 1, 1972 through July 5, 1991, with intent to defraud ten and more persons and to obtain property from ten and more persons by false and fraudulent pretenses,

representations, and promises, engaged in a scheme constituting a systematic ongoing course of conduct and so obtained property from one and more such persons, as follows:

The defendants, in the County of New York and elsewhere, made false and fraudulent pretenses, representations and promises as to (1) the identity of the owners of the BCC Group, and the degree of their financial involvement in the BCC Group, (2) the amount of shareholder capital at risk in the BCC Group, (3) the financial condition, net worth, and capital of the member entities of BCC Group, and (4) the ability of the BCC Group to repay creditors, including but not limited to depositors and banking institutions.

By means of the scheme described herein the defendants obtained property, the value of which has exceeded $20,000,000,000.00 (twenty billion dollars), from diverse persons, including United States citizens and foreign citizens residing in New York County, banks based in New York County, central banks of other nations, and thousands of depositors throughout the world.

The scheme was premised on the fact that banks rely on credit. The essence of the scheme was to convince depositors and other banking and financial institutions, by means of false pretenses, representations, and promises that the BCC Group was a safe financial repository and institution for funds, and thereby defendants acted to persuade depositors and banking and other financial institutions to provide the BCC Group banks with deposits and credit.

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Foremost among the originators of the scheme was defendant Abedi, a Pakistani banker who had worked as chief executive of a number of Pakistani banks, until the nationalization of the banks in Pakistan in 1972. Abedi recruited co-schemers with the notion of establishing a third world bank which would be substantially owned by its employees and would be so structured that it could not be nationalized.

Defendants Abedi and Naqvi, acting with and assisted by others, established a series of banks and bank holding companies, as well as related corporate and investment entities, in more than seventy countries around the world. The leading bank, established first, was defendant Bank of Credit and Commerce International, S.A. [hereinafter BCCI, SA] established in 1972 in Luxembourg, Abu Dhabi, and England. Defendants Abedi and Naqvi, along with others, thereafter caused the incorporation and establishment of defendant Bank of Credit and Commerce International Holdings, S.A. [hereinafter BCCI Holdings] in Luxembourg in 1974, and defendant Bank of Credit and Commerce International (Overseas) Limited [hereinafter BCCI Overseas] in Grand Cayman in 1975. Those three entities, as well as the related corporate and investment entities established as subsidiaries to BCCI Holdings and as affiliates of defendants were collectively known as "the BCC Group."

As part of the scheme, defendant International Credit and Investment Company (Overseas) Limited [hereinafter ICIC Overseas] was established in Grand Cayman as a bank. ICIC Overseas was used to conceal BCC Group liabilities and to create false assets for the

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BCC Group. Defendant International Credit and Investment Company Holdings [hereinafter ICIC Holdings] was established and was used to conceal stolen monies. ICIC Overseas and ICIC Holdings, together with a series of related corporate and non-corporate entities were collectively known as the "ICIC Group."

Defendant Abedi was in charge of the BCC Group and the ICIC Group. Defendant Naqvi rose to become the second in command. In the late 1980s, after defendant Abedi became incapacitated, defendant Naqvi took charge of the scheme and of the BCC Group and ICIC Group. Defendants Abedi and Naqvi, acting with a small executive staff, created the false pretenses, representations and promises to advance the scheme to defraud.

In the course of the scheme and in furtherance thereof certain acts were committed. Among those are the following:

First, to create the false impression that the BCC Group was a repository and a financial institution with which depositors and other creditors could safely do business, the schemers employed the ruling families of a number of Middle Eastern states and other purportedly wealthy businessmen as nominal shareholders of the entities comprising the BCC Group, in particular, of BCCI Holdings. The schemers falsely pretended, represented, and promised that the nominees owned and financially would stand behind the BCC Group. However, by the terms of the secret contractual agreements the nominees were insulated from any economic loss suffered by the BCC Group.

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Among the nominees were Ghaith R. Pharaon, Sheik Kamal Adham, Sayed Jawhary, also known as El Sayed El Sayed El Gohari, and Faisal Saud al-Fulaij, all of whom assisted the defendants by knowingly permitting the BCC Group management to trade on their reputations for wealth by fraudulently using their names as shareholders in BCCI Holdings, and thus, as owners of the BCC Group. Defendants further advanced their scheme to defraud by causing documents to be filed with the Superintendent of Banks of New York State, in New York County, that gave false information concerning the identities of the true owners of the BCC Group, including BCCI Holdings.

In addition, Pharaon, Adham, Jawhary, and al-Fulaij permitted defendants Abedi and Naqvi, the BCC Group, including but not limited to defendants BCCI S.A., BCCI Overseas, and BCCI Holdings, and the ICIC Group, to create the false appearance that the BCC Group and the ICIC Group loaned them money. This resulted in the creation of false assets for the BCC Group in the form of loans receivable which were not genuine. The false and fraudulent impressions were further enhanced by false confirmations of indebtedness to the BCC Group which Pharaon, Adham, Jawhary, and al-Fulaij caused and permitted to be sent to auditors of the BCC Group.

The creation of false assets and the false assertions of ownership of the stock of defendant BCCI Holdings created the false and fraudulent impressions that Pharaon, Adham, Jawhary, and al-Fulaij were economically involved in defendant BCCI Holdings as

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shareholders, that their money was at risk in the bank, and that they would financially stand behind the BCC Group if necessary.

Second, defendants established separate subsidiaries of defendant BCCI Holdings in a number of countries, including Luxembourg and the Cayman Islands, which have strict laws against release of banking information. By so doing, defendants guaranteed that there would be no comprehensive regulation on a consolidated basis by any single regulator of the BCC Group. This permitted the inter-bank transfer of assets and liabilities to be conducted in a manner that could and did conceal the true economic position of the BCC Group.

Third, defendants authorized and caused to be authorized the payments of bribes and kickbacks to agents of other banking and financial institutions. By virtue of that practice, defendants attempted to avoid and did avoid scrutiny by other banking and financial institutions of the capital structure and financial viability of the BCC Group. In 1986 and 1987, to obtain deposits from and a banking relationship with the Central Reserve Bank of Peru, defendants Abedi and Naqvi authorized and directed employees of the BCC Group to open a bank account in a Swiss bank in Panama to transmit bribes and kickbacks in the amount of a percentage of the deposits maintained by The Central Reserve Bank of Peru to the two senior officers of that bank. The total of such payments was approximately $3,000,000.00.

Fourth, the defendants systematically engaged in a program known as the External Marketing Program in New York County during

1325015-000-5110

the period of from 1987 to 1990. Pursuant to that program defendants and agents of defendants actively solicited bank deposits from numerous persons in New York County and elsewhere for the BCC group. Accounts and deposits were solicited and obtained through false representations that the BCC Group was a safe and viable banking institution. As part of this program, the defendants and their agents also represented that said persons could open, at the agency of defendant BCCI S.A. located in New York County, banking accounts that would be booked at the overseas branches of the BCC Group, including but not limited to branches of defendant BCCI Overseas in Lahore, Pakistan and Dhaka, Bangladesh. By means of these solicitations and with the knowledge that the representations made concerning the financial condition and the capital and net worth of the banking institutions were materially false, defendants obtained property in the form of deposits at the BCCI SA agency in New York County on behalf of the BCC Group from American citizens and residents of New York County.

Fifth, the defendants systematically filed and caused to be filed with the Superintendent of Banks of the State of New York, in New York County, provided and represented as true to correspondent banks, and otherwise published financial statements which defendants knew to contain false and fraudulent representations materially overstating and falsifying the capital, net worth of the BCC Group, and, in particular, of defendants BCCI Holdings, BCCI S.A., and BCCI Overseas, as well as the ability of these institutions to repay their creditors.

1325015-000-5111

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, on or about July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money, having an aggregate value of in excess of $1,000,000, to wit, greater than $12,900,000 in connection with foreign exchange trading between American Express Bank Ltd. and the BCC Group.

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THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, on or about July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money, having an aggregate value of in excess of $1,000,000, to wit, $10,000,000 in connection with a non-collateralized placement by American Express Bank Ltd. with the BCC Group.

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FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, during the period of from on or about January 1, 1983 to July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money having an aggregate value of in excess of $1,000,000, to wit, in excess of $6,900,000 in connection with letters of credit and acceptances between American Express Bank Ltd. and the BCC Group.

1325015-000-5114

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 24, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-5115

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 29, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-5116

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 30, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-5117

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 8, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-5118

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 13, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

PAGE.021

FROM NY DISTRICT ATTORNEY 12:29 1325015-000-5119

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 14, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

PAGE.022 FROM NY DISTRICT ATTORNEY 29 '91 12:29 1325015-000-5120

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about October 12, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 01008270 and omitted to make a record of said transactions as required by law.

1325015-000-5121

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about October 12, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 07004836 and omitted to make a record of said transactions as required by law.

ROBERT M. MORGENTHAU
District Attorney
New York County

1325015-000-5122

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C-5

/FIND

Enter message id (MRI): 413

Retrieval completed at 1744
FIND /MRI 413
Results are: 0001 found

/READ
0024 MRI 00413

OO P12 FBIWMFO

DE FBIHN #0001 2111744

ZNR UUUUU

O 300555Z JUL 91

FM FBI HONOLULU (29B-WF-171994) (RUL)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

-109

29B-WF-171994

RECEIVED MOORE
JUL 30 1991

[redacted] b6 b7C

UNCLAS

CITE: //3280//

PASS: FBIHQ FOR FINANCIAL INSTITUTION FRAUD UNIT, WHITE

COLLAR CRIME SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK

CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN

HOLDINGS, N.V. NETHERLAND ANTILLES; AGHA HASAN ABEDI; [redacted]

[redacted]; SHAYKH ZAYID BIN SULTAN AL-NUHAYAN, AKA SHEIK ZAYID BIN

SULTAN AL-NAHAYAN, [redacted] BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO. b6 b7C

RE FBIHQ TT DATED 7/26/91.

THE RESULTS OF A HONOLULU INDICES SEARCH FOR COMPANIES AND INDIVIDUALS IDENTIFIED IN REFERENCED TELETYPE ARE AS FOLLOWS:

(1) "GUAM BOND"; HOBBS ACT - CPO; MAIL FRAUD; FBW; OO: HONOLULU HNFILE 194A-88, REVEALED THAT ON 1/30/86, MAIN SUBJECT DR. [redacted] (FORMERLY OF MATTHEWS AND WRIGHT INC., NEW YORK, WHO WERE THE BOND UNDERWRITERS FOR THE GUAM HOUSING AUTHORITY $300,000,000 HOUSING PROJECT BOND), GAVE A $50,000 CASHIER'S CHECK MADE PAYABLE TO GOVERNOR BORDALLO-REYES REELECTION CAMPAIGN COMMITTEE. THE CHECK WAS DRAWN ON THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) IN HONG KONG TO [redacted] SPECIAL ASSISTANT TO THE GUAM GOVERNOR FOR BUSINESS AND ECONOMIC AFFAIRS. [redacted] [redacted] WAS THE GOVERNOR OF GUAM AT THAT TIME. NO FURTHER INFORMATION HAS BEEN DETERMINED REGARDING THAT TRANSACTION WITH THE BCCI. RECORDS OF THE BCCI NEW YORK BRANCH, WERE SUBPOENAED REGARDING A CHECK FROM MATTHEWS AND WRIGHT INC. TO b6 b7C

[redacted] ON 4/10/85, IN THE AMOUNT OF $250,000. b6 b7C

SIMILARLY, ON OR ABOUT 4/23/85, FUNDS WERE TRANSFERRED AT THE DIRECTION OF THE BCCI HONG KONG LIMITED TO PAY $250,000 TO THE IRVING TRUST COMPANY BANK, 1 WALL STREET, NEW YORK, NEW YORK.

(2) "NEUMAR"; NEUTRALITY MATTER - PHILIPPINES; OO: HONOLULU. HNFILE 2-35 (PENDING). REVEALED THAT IN THE TESTIMONY OF [redacted], BEFORE THE U.S. HOUSE OF REPRESENTATIVES SUBCOMMITTEE ON ASIAN AND PACIFIC AFFAIRS, ON APPROXIMATELY 7/10/87, [redacted] PROVIDED A LIST OF BANK ACCOUNTS INCLUDING NUMBERS BELIEVED TO BE UTILIZED BY [redacted] THROUGH THE BCCI, FOR THE PURPOSE OF DISBURSING FUNDS FOR ARMS PURCHASES. FURTHERMORE, HONOLULU DIVISION ALONG WITH U.S. CUSTOMS, AND [redacted] HAVE BEEN DEBRIEFING A FORMER AIDE OF [redacted] (PROTECT IDENTITY). [redacted] HAS NOTED THAT ON SEVERAL OCCASIONS [redacted] BUT COULD NOT PROVIDE ANY MORE SPECIFIC INFORMATION. ALSO THIS INVESTIGATION HAS REVEALED THAT [redacted] A MIAMI BASED ATTORNEY AND CUBAN EXILE, WAS APPROACHED BY AN INDIVIDUAL IDENTIFYING HIMSELF AS [redacted] A YUGOSLAVIAN NATIONAL. b6 b7C b7D b7E

[redacted] TOLD [redacted] ABOUT TWO BANK ACCOUNTS THAT BELONGED TO [redacted] AT THE BCCI LOCATED IN HONG KONG. AND PROVIDED THE ACCOUNT NUMBERS. [redacted] BELIEVED THAT THESE ACCOUNTS WERE USED TO LAUNDER COLOMBIAN DRUG MONEY.

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AS ALL INVESTIGATION IN THE HONOLULU DIVISION IS COMPLETE, THIS MATTER IS BEING CONSIDERED RUC.

BT

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C-5

976

Retrieval completed at 1743
FIND /MRI 976
Results are: 0001 found

/READ
0023 MRI 00976

00 P12 FBIWMFO

DE FBIMW #0001 2111743

ZNY EEEEE

O 301333Z JUL 91

FM FBI MILWAUKEE (29B-WF-R-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS E F T O

CITE: //3470//

PASS: ATTENTION FBIHQ, FINANCIAL INSTITUTION FRAUD UNIT,

WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO:

WMFO.

RE BUREAU TELETYPE TO ALL FIELD OFFICES, 7/26/91.

MILWAUKEE OFFICE FOIMS AND GENERAL INDICES NEGATIVE

REGARDING ALL COMPANY AND INDIVIDUAL NAMES SET FORTH ON

REFERENCED COMMUNICATION.

BT

#0001

29B-WF-171994-110

SEARCHED SERIALIZED INDEXED

JUL 30 1991

FBI - MILWAUKEE

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b7C

1325015-000-5127

C-5

1176

Retrieval completed at 1745
FIND /MRI 117A
Results are: 0001 found

/READ
0025 MRI 01176

OO P12 FBIWMFO

DE FBISI #0001 2111745

ZNR UUUUU

O 301506Z JUL 91

FM FBI SPRINGFIELD (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3860//

PASS: FBIHQ, FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR

CRIME SECTION.

29B-WF171994-111

SEARCHED ____ INDEXED ____
SERIALIZED Sw FILED Sw
JUL 30 1991
FBI - SPRINGFIELD

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA CLARK M. CLIFFORD,

CLARK CLIFFORD; [redacted] b6 b7C

[redacted]

[redacted]

[redacted] CREDIT AND COMMERCE

AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN

ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA

PAGE TWO DE FBISI 0001 [illegible]

SHEIK ZAYED BIN SULTAN AL-NAHAYAN, [redacted] BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAB; OO: WMFO.

b6
b7C

RE BUREAU TEL TO AFO, 7/26/91.

ON 7/29/91, SPRINGFIELD INDICES NEGATIVE FOR ALL COMPANIES AND INDIVIDUALS SET OUT IN RE TELETYPE.

BT

#0001

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FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 7/25/91

TO : ADIC, NEW YORK
ATTN: SA [redacted] (C-3) b6 b7C

FROM : SAC, WMFO (29B-WF-171994) (P) (C-5)

SUBJECT : [redacted] b7D

Re: Tel call between WMFO SA [redacted] and NY SA [redacted] b6 b7C

Enclosed for New York is an FD-209 and an insert setting forth results of contacts by WMFO SA [redacted] and captioned source. Said enclosures are self explanatory. b6 b7C

For the information of New York, [redacted] continues to provide WMFO information germane to an investigation entitled "CLARK McADAMS CLIFFORD; ET AL;", (29B-WF171994). It is anticipated that WMFO will maintain regular contact with the source. Such contact will continue to be coordinated with NYO SA [redacted] b6 b7C b7D

2-New York (encls. 5)
1-WMFO
(DML)

Main
29B-WF-171994 -1/2

enclosure placed in 29B-WF-171994 SUB A

Searched
Serialized Su
Indexed
Filed Su

Approved: _____ **Transmitted** _____ (Number) (Time) **Per** _____

1325015-000-5130

C-5

Retrieval completed at 1950
FIND /MRI 1688
Results are: 0001 found

/READ
0034 MRI 01688

00 P12 FBIWMFO

DE FBISA #0004 2111950

ZNR UUUUU

O 301900Z JUL 91

FM FBI SAN ANTONIO (29B-WF-171994) (SQ. 3) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3770//

PASS: FIFU, WCCS, FBIHQ.

b6
b7C

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, [redacted] BANK OF CREDIT AND

29B-WF-171994

113

JUL 30 1991

1325015-000-5131

COMMERCE INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE TELETYPE FROM FBIHQ TO ALL FIELD OFFICES, DATED JULY 26, 1991.

SAN ANTONIO CASE [redacted] REFLECTS AN [redacted] REFERENCED IN HOUSTON TELETYPE, DATED JULY 28, 1988 (HOUSTON CASE [redacted]

b3
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INDICES ON ALL OTHER NAMES AND COMPANIES ARE NEGATIVE.

NO FURTHER INVESTIGATION REMAINS FOR SAN ANTONIO. THEREFORE, THIS MATTER IS CONSIDERED RUC.

BT

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/FIND

Enter message id (MRI): 1719

Retrieval completed at 1951
FIND /MRI 1719
Results are: 0001 found

/READ
0035 MRI 01719

OO P12 FBIWMFO

OE FBIKX #0005 2111951

ZNR UUUUU

O 3019197 JUL 91

FM FBI KNOXVILLE (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3370: SQ 3//

PASS: FIF UNIT, WCCS.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG;

OO:WMFO.

A SEARCH OF KNOXVILLE AUTOMATED/MANUAL INDICES WAS NEGATIVE FOR ALL NAMED INDIVIDUALS AND COMPANIES IN REFERENCED TELETYPE, EXCEPT FOR GHAITH PHARAON, AND POSSIBLY AGHA HASAN ABEDI.

KNOXVILLE CASE CODE NAMED MAYBAN (MAJOR CASE NUMBER 45) 29A-KX-1397 CONCERNED INVESTIGATION AND PROSECUTION OF [redacted]

copy filed Sub Sug 3

29B-WF-171994-

JUL 30 1991

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1325015-000-5133

[redacted], AND OTHERS IN CONNECTION WITH THE FAILURE OF A TWENTY-SIX BANK GROUP, INCLUDING UNITED AMERICAN BANK, WHICH WAS THE LARGEST BANK IN TENNESSEE. IN CONNECTION WITH THAT MATTER, AN INDIVIDUAL NAMED [redacted] WAS INTERVIEWED ON 9/6/85. [redacted] IS A DISBARRED ATTORNEY FROM ATLANTA, GA., WHO WAS PREVIOUSLY CONVICTED OF [redacted] [redacted] ALLEGEDLY WAS INVOLVED IN THE [redacted] [redacted], WHICH IT IS BELIEVED [redacted]

b6
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b6
b7C
b7E

IN THE NOTED INTERVIEW, [redacted] WAS DISCUSSING A MIDDLE EAST FINANCIAL CONNECTION TO HANDLE A BOND INVESTMENT THAT [redacted] WANTED TO MAKE. [redacted] WAS DEALING WITH ATTORNEY G. W. RIDENOUR, JR., [redacted] AND IS NOW DECEASED.

b6
b7C

TO THE MATTER AT HAND, THE FOLLOWING QUOTE FROM [redacted] FD-302 REFLECTS HIS COMMENTS RE PHARAON: [redacted] DISCUSSED (SIC) THE MIDDLE EAST CONNECTION AND HE HYPOTHESIZED THAT IT COULD HAVE ORIGINATED IN TWO WAYS. IN 1978 OR 1979, [redacted] [redacted] STARTED SELLING HIS FIRST NATIONAL BANK OF GEORGIA TO GAITH PHARON (SIC), A SAUDI ARABIAN BUSINESSMAN. THIS WAS ONE POSSIBLE ENTREE TO THE MIDDLE EAST. PHARON'S (SIC) ATTORNEY

b6
b7C

IS FROM TEXAS AND HE SITS ON THE BOARD OF [redacted] BANK. THE SECOND POSSIBLE CONNECTION WAS THROUGH (FNU) ABEDI, BANK OF COMMERCE AND CREDIT INTERNATIONAL, WITH OFFICES IN LONDON AND THE MIDDLE EAST. b6 b7C

NO OTHER INFORMATION IS AVAILABLE. KNOXVILLE IS NOT AWARE OF ANY INVESTIGATIONS BY OTHER AGENCIES RE THE SUBJECTS.

BT

#0005

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[illegible]/211

0000 MRI 02119

PP RUCNFB FBIWMFO

DE FBIAL #0004 2120934

ZNR UUUUU

P 302135Z JUL 91

FM FBI ALBANY (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-171994)/PRIORITY/

BT

UNCLAS

CITE: //3010//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION-FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] ET AL; FIF; FAG; OO: WMFO.

b6
b7C

REFERENCE TELETYPE FROM DIRECTOR TO ALL FIELD OFFICES DATED JULY 26, 1991.

A SEARCH OF GENERAL AND FOIMS INDICES IN THE ALBANY DIVISION WAS NEGATIVE REGARDING CAPTIONED COMPANIES AND

29B-WF-171994 — 115

INDEXED
FILED
JUL 31 1991
ASAC METRO FIELD

1325015-000-5136

INDIVIDUALS.

ALBANY WILL CONSIDER THIS MATTER RUC'D.

BT

#0004

NNNN

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 03-12-2018 BY: [redacted]

b6
b7C

SECRET

MRI 2170/211
0000 MRI 02170

OO P12 FBIWMFO

DE FBIDE #0012 2120733

ZNY SSSSS

O 302145Z JUL 91

FM FBI DETROIT (29B-WF-171994) (RUC) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

SECRET

~~SITE:~~ //3220//

PASS: FOR FBIHQ - CRIMINAL INVESTIGATIVE DIVISION, WHITE COLLAR CRIME SECTION, FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA

b6
b7C

b6
b7C

b6
b7C

29B-WF-171994 - [redacted]

SEARCHED [redacted] INDEXED [redacted] 116
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - U.S.Pos. METRO FIELD OFFICE

SECRET

1325015-000-5138

PAGE TWO DE FBIDE 0012 S E C R E T

SHEIK ZAYED BIN SULTAN AL-NAHAYAN, [redacted] BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR GHAITH PHARAON; FIF; FAG; OO: WMFO. b6 b7C

THIS COMMUNICATION IS CLASSIFIED "SECRET" IN ITS ENTIRETY.

RE JULY 26, 1991, TELETYPE FROM THE DIRECTOR TO ALL FIELD OFFICES.

INDICES SEARCHES FOR ALL COMPANIES AND INDIVIDUALS IDENTIFIED IN REFERENCED TELETYPE WERE CONDUCTED AT DETROIT WITH NO REFERENCES BEING IDENTICAL EXCEPT THE FOLLOWING:

[redacted] IS REFERENCED IN A HOUSTON TELETYPE TO DIRECTOR AND ALL OFFICES, DATED JULY 29, 1988, ON HOUSTON FILE NUMBER [redacted] TITLED "PALESTINE LIBERATION FRONT; IT-PLF; OO: HOUSTON." THIS COMMUNICATION STATES THAT [redacted] IS AN ALIAS FOR [redacted] WHO IS THE [redacted] PLF [redacted] AND IS STATIONED AT NICOSIA, CYPRUS. [redacted] HAD SENT $70,000.00 BY WIRE TRANSFER TO THE HOUSTON BANK ACCOUNT OF [redacted] FROM THE HELLENIC BANK LIMITED, NICOSIA, CYPRUS. b3 b6 b7C b7E

BANK OF CREDIT AND COMMERCE IS REFERENCED IN A WMFO AIRTEL TO THE DIRECTOR, DATED JULY 8, 1988, TITLED [redacted] b6 b7C

[redacted] AKA; IT-LIBYA; OO: WMFO" AND CONTAINED IN DETROIT FILE [redacted] THIS COMMUNICATION STATES THAT SOURCE INFORMATION HAS REVEALED THAT [redacted]

b3
b6
b7C
b7D
b7E

GHAITH PHARAON IS REFERENCED IN DETROIT FILE NUMBER [redacted], TITLED "ARAB FINANCIAL ACQUISITIONS - DETROIT, MICHIGAN; IS-ME; OO: DETROIT." THIS REFERENCE IS A NEWSPAPER ARTICLE FROM "THE DETROIT NEWS," DATED FEBRUARY 4, 1975, WHICH DESCRIBES PHARON'S PURCHASE OF STOCK IN DETROIT'S BANK OF THE COMMONWEALTH.

b3
b7E

THE AFOREMENTIONED REFERENCED INVESTIGATIONS ARE CURRENTLY CLOSED AND DETROIT CURRENTLY HAS NO INVESTIGATION PENDING INVOLVING COMPANIES AND INDIVIDUAL IDENTIFIED IN CAPTIONED TELETYPE.

AT THIS TIME, DETROIT IS UNAWARE OF ANY INVESTIGATIONS INVOLVING BANK OF CREDIT AND COMMERCE INTERNATIONAL, AND OR OTHERS NAMED IN REFERENCED TELETYPE, WHICH IS PRESENTLY BEING CONDUCTED BY OTHER FEDERAL, STATE OR LOCAL LAW ENFORCEMENT AGENCIES.

PAGE FOUR DE FBIDE 0012 S E C R E T

IN THE ABSENCE OF ANY FURTHER REQUEST FOR INVESTIGATION, DETROIT IS CONSIDERING THIS MATTER RUC.

C BY G-3; DRD OADR.

BT

#0012

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1325015-000-5141

/READ/MRI 1965/211
0000 MRI 01965

OO P12 FBIWMFO

DE OTT #0008 2120932

ZNR UUUUU

O 302107Z JUL 91

FM LEGAT OTTAWA (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //5150//

PASS: HQ: FIFU/WCC/CID.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; ETC; FIF; FAG;

OO: WMFO.

REBUTEL JULY 26, 1991, AND JULY 30. 1991, OTTELCALL TO SA [redacted] WMFO.

b6
b7C

MANUAL AND AUTOMATED INDICES SEARCHES AT LEGAT, OTTAWA, PROVIDED NEGATIVE RESULTS REGARDING INDIVIDUALS AND COMPANIES IDENTIFIED IN RETEL.

ADDITIONALLY, [redacted]

b6
b7C
b7D

29B-WF-171994

INDEXED
FILED

JUL 31 1991

FBI - METRO FIELD OFFICE

117

1325015-000-5142

[redacted] b6 b7C b7D

LEAD:

LEGAT, OTTAWA

PROVIDE A COPY OF RETEL TO [redacted] FOR INDICES SEARCHES ON b7D

ALL COMPANIES AND INDIVIDUALS LISTED; SUTEL RESULTS TO FBIHHQ

AND WMFO.

BT

#0008

NNNN

0000 MRJ 01891

PP RUCNFB FBIWMFO

DE BOG #0003 2212093Z

ZNR UUUUU

P 302049Z JUL 91

FM LEGAT BOGOTA (29-0)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //5700:BOG300.211//

PASS: CID, WCCS, FIF.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; ET AL; FIF; FAG; OO: WMFO.

REFERENCE FBIHQ TELETYPE DATED JULY 26, 1991.

FOR INFORMATION OF RECEIVING OFFICES, LEGAT, BOGOTA INDICES FOR NAMES TO BE SEARCHED ON REFERENCED TELETYPE WERE NEGATIVE.

BT

#0003

NNNN

29B-WF-171994 - 118

INDEXED

JUL 31 1991

1325015-000-5144

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 03-12-2018 BY: [redacted]

b6
b7C

/READ/MRI 1850/211
0000 MRI 01850

OO P12 FBIWMFO

DE FBIAQ #0003 2120931

ZNY SSSSS

O 302027Z JUL 91

FM FBI ALBUQUERQUE (29B-WF-R-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

S E C R E T

CITE: //3020//

PASS: HQ FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

b6
b7C

29B-WF-171994 —

Searched ___ INDEXED ___
Serialized SW FILED SW

JUL 31 1991

ALBUQUERQUE METRO FIELD OFFICE

119

1325015-000-5145

PAGE TWO DE FBIAQ 0003 ~~SECRET~~

BIN SULTAN AL-NAHAYAN, [redacted] [redacted] BANK OF CREDIT AND b6 b7C

COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH

PHARAON, FIF; FAG; OO: WMFO.

THIS COMMUNICATION IS CLASSIFIED SECRET IN ITS ENTIRETY.

RE BUTEL TO ALL FIELD OFFICES, DATED JULY 26, 1991.

ON JULY 29, 1991, THE ALBUQUERQUE GENERAL, CONFIDENTIAL, ELSUR INDICES WERE SEARCHED IN REGARDS TO ALL INDIVIDUALS AND COMPANIES LISTED IN REFERENCED BUTEL. THE ONLY POSITIVE REFERENCE THAT COULD BE LOCATED IN ANY ALBUQUERQUE FILE WAS FOR THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). THIS REFERENCE WAS LOCATED IN FILE [redacted] b3 b7E

[redacted]

REFERENCED CASE IS A MULTI-VOLUME FCI INVESTIGATION INVOLVING THE ABUL NIDAS ORGANIZATION (ANO), WHICH HAS BEEN RUC SINCE AUGUST 17, 1989. THE REFERENCE FOR BCCI WAS LISTED ON BUTEL TO ALL FIELD OFFICES DATED JULY 25, 1987. THE TELETYPE GAVE A BRIEF SUMMARY OF ANO ACTIVITIES AND LISTED THE BANK OF CREDIT AND COMMERCE INTERNATIONAL LOCATED IN LONDON, ENGLAND, AS THE PRINCIPAL BANK USED BY THE ANO ECONOMIC NETWORK. TELETYPE INDICATES THAT THE BCCI MAY HAVE EMPLOYEES OR MANAGERS WHO ARE ANO MEMBERS OR SUPPORTERS WHO WORK TO FACILITATE THE ANO'S

PAGE THREE DE FBIAQ 0003 ~~SECRET~~

FINANCIAL TRANSACTIONS. NO OTHER INFORMATION WAS GIVEN ABOUT BCCI AND NO OTHER REFERENCES WERE LOCATED IN ANY ALBUQUERQUE FILE.

NO FURTHER INVESTIGATION BEING CONDUCTED BY ALBUQUERQUE DIVISION.

C BY G-3; DECL ON OADR.

BT

#0003

NNNN

1325015-000-5147

/READ/MRI 1669/211
0000 MRI 01669

RR RUCNFB FBIWMFO

DE FBINF #0005 2120931

ZNY SSSSS

R 301352Z JUL 91

FM FBI NORFOLK (29B-WF-171994) (RUC)

TO DIRECTOR FBI /ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

ET

S E ~~C~~ R E T

CITE: //3560:SQUAD 5//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA ET AL; FIF; FAG;

OO: WMFO.

ALL INFORMATION CONTAINED HEREIN IS CLASSIFIED SE~~C~~RET IN ITS ENTIRETY.

RE FBIHQ TELETYPE TO ALL FIELD OFFICES DATED JULY 26, 1991.

NORFOLK INDICES CONTAIN ONE REFERENCE TO ONE [redacted] b6 b7C

[redacted] UNDER HOUSTON FILE NUMBER

29B-WF-171994 - 120

INDEXED SL FILED SL

JUL 31 1991

FBI/DOJ HOUSTON FIELD OFFICE

1325015-000-5148

[redacted] CAPTIONED "PALESTINE LIBERATION FRONT (PLF); IT-PLF; OO: HOUSTON." b3 b7E

IN A HOUSTON TELETYPE DATED JULY 28, 1988, TO FBIHQ AND ALL FIELD OFFICES, HOUSTON IDENTIFIED [redacted] b6 b7C [redacted] AS AN INDIVIDUAL RESPONSIBLE FOR TRANSFERRING $70,000.00 OVER AN 18-MONTH PERIOD, BEGINNING NOVEMBER, 1986, THROUGH APRIL, 1988, TO AN ACCOUNT CONTROLLED BY [redacted] HOUSTON BELIEVED [redacted] TO BE IDENTICAL WITH [redacted] PLF, [redacted] STATIONED AT NICOSIA, CYPRUS. HOUSTON IDENTIFIED [redacted] AS A [redacted] PLF IN THE HOUSTON AREA.

WMFO AND FBIHQ ARE DIRECTED TO HOUSTON CASE FILE [redacted] b3 b6 b7C b7E FOR FURTHER DETAILS REGARDING [redacted] THIS MATTER CONSIDERED RUC.

C BY 9708, DECL ON OADR.

BT

#0005

NNNN

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 7
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Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;

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X For this Page X
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0130	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI	$46,285,845.00	☐ Yes ☒ No

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Security Pacific National Accounts - 607750471, 607750491

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP
				1325015-000-12422

FBI/DOJ

SEIZURE NUMBER: 3920-92-F-0130
PROPERTY: Bank Accts & HG 285,845
FBI CASE NUMBER: 29A-WF-171994
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/21/93
29B-WF-171994-2
3920-92-F-0130-
SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI
WDC
7/21/93

b6
b7C

1325015-000-12424

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signatu	117. Sharing ☐ Yes ☐ No
		118. Award Recommended

b6
b7C

1325015-000-12423

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 7
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Page 7 ~ Duplicate;
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0129	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$487,448.84	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Hufstedler, Kaus & Ettinger

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12411

FBI/DOJ

SEIZURE NUMBER: 3920-93-F-0129
PROPERTY: Bank Accts #487448.84
FBI CASE NUMBER: 290-WF-171944
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/93 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A_____

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED ____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED ____ LFU DECISION (SERIAL #) ____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) ____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD ____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

~~EPG~~:epg
(30)

DB 7/21/93
29B-WF-171994-2
3920-92-F-0129-

CY 7/21/93 WDC

SEARCHED DB INDEXED DB
SERIALIZED DB FILED DB
JUL 21 1993
[redacted]

b6 b7C

1325015-000-12413

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	FLA 3/31/92	b6 b7C
		118. Award Recommended
		1325015-000-12412

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 7
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0128	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$15,299,703.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	First Forida Account #440-757-7116

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP
				1325015-000-12400

FBI/DOJ

SEIZURE NUMBER: 3920-92-F-0128
PROPERTY: Bank Accts $15,229,703
FBI CASE NUMBER: 29A-WF-171991
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO
(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
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29B-WF-171994-2
3920-92-F-0120-

SEARCHED INDEXED
SERIALIZED FILED
1993
[redacted]
b6
b7C

1325015-000-12402

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

	116. PLA Sig[illegible] Date	117. Sharing ☐ Yes ☐ No	b6 b7C
	PLA 5/5/12	118. Award Recommended	

1325015-000-12401

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0127	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$3,727,520.97	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	First National Bank of Louisville Acct #70328615

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12389

FBI/DOJ

SEIZURE NUMBER: 3920-92-F-0127
PROPERTY: Bank Acct #3,727,520.97
FBI CASE NUMBER: [redacted]
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZURE [illegible] DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE ___

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

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29B-WF-171994 — 2
3920-92-F-0127

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7/21/93
WDC

SEARCHED INDEXED
SERIALIZED FILED
1993
FBI - WMFO

b6 b7C

1325015-000-12391

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA[illegible]	117. Sharing ☐ Yes ☐ No	b6 b7C
	PLA[illegible] 3/31/92	118. Award Recommended 1325015-000-12390	

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0126	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$2,66,808.53	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Mabon Securities Inc. Account #04-4050

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12651

FBI/DOJ

SEIZURE NUMBER: 3920-92-F-0126
PROPERTY: Bank Acct $266,908.53
FBI CASE NUMBER: 290-WF-171944
CASE AGENT/SQUAD: [redacted] b6 b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/2/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
(1-3920-92-F-0120)
(1-3920-92-F-0121)
(1-3920-92-F-0122)
(1-3920-92-F-0123)
(1-3920-92-F-0124)
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(1-29B-WF-171994 SUB FS)

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29B-WF-171994 -2
3920-92-F-0126-

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SERIALIZED FILED
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1325015-000-12653

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature

116. PLA Sig

PLA

5/31/95

117. Sharing ☐ Yes ☐ No

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118. Award Recommended

1325015-000-12652

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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FACSMILE TRANSMISSION RECORD

ADDRESSEE:

[redacted] b6 Per FBI b7C

FAX NO. 324-9335

ORIGINATOR:

[redacted]
Trial Attorney
Commercial Litigation
Civil Division
550 11th Street, N.W.
Washington, D.C. 20530

Telephone: (202) 307-0492
FTS 367-0492
FAX: (202) 307-0494
FTS 367-0494

DATE SENT: 6/5/92 NO. OF PAGES: 6 (INCLUDING COVER SHEET)

SPECIAL INSTRUCTIONS: Please notify if you have problems receiving the stated number of fax pages.

RECEIPT ACKNOWLEDGED BY:

[redacted] --

PLEASE CALL.

THANKS. --[redacted]

29B-WF-171994-Sub FS -36

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
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29 B- WF-171994 Sub FS-36

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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Page 297 ~ Referral/Consult;
Page 298 ~ Referral/Consult;
Page 301 ~ Referral/Consult;
Page 302 ~ Referral/Consult;
Page 303 ~ Referral/Consult;
Page 304 ~ Referral/Consult;
Page 322 ~ Duplicate;
Page 324 ~ Duplicate;
Page 325 ~ Duplicate;
Page 327 ~ Duplicate;
Page 329 ~ Duplicate;

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Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/6/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
OO:WMFO

On February 6, 1992, SA [redacted] (C-5 - BCCI), PLA [redacted] and SA [redacted] (FAST) met with Department of Justice (DOJ) Attorneys [redacted] (Trial Attorney) and [redacted] both of whom are in the Asset Forfeiture Office at DOJ. The meeting was held to discuss the asset forfeitures of BCCI and to determine the direction of the investigation as it relates to the assets of BCCI. b6 b7C

BCCI has agreed to a forfeiture of $550 million in assets, cash and other, however this amount can be exceeded if it is determined that BCCI possesses more than that amount in the United States. There is a 50/50 split, of the assets, between the US and a fund that was set up in England (for foreign loses). [redacted] broke the assets down into the four following categories: b6 b7C

1. Known Cash Assets: There is currently $340 million, known cash assets, held in US banks. Currently the US Marshals are collecting these funds. There is no further work needed on these assets.

2. Assets in Liquidation: There is currently $170 million of known assets which are currently in liquidation proceedings. These assets are held in the BCCI agencies of New York and California. There is no further work needed on these assets.

3. Assets belonging to BCCI that BCCI owns or doesn't own: These assets are either held in BCCI affiliates of BCCI subsidiaries. The total amount of these assets are unknown at this time. Of immediate concern are assets in the International Credit and Investment Company (Overseas), LTD (ICIC), ICIC Investment, LTD, ICIC Holdings, LTD, and ICIC Investment. On 1/31/92, $47 million in cash assets, which are currently held in the US by; 1. Oppenheimer & Co., New York, New

2-WMFO
RHM:rhm

29B-WF-171994 Sub FS-1

"FORFEITURES / SEIZURES"

INDEXED
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FEB 1 19
FBI - WASH. METRO FIELD OFFICE
91325015-000-10627

York (NY); 2. Bear Stearns & Co., NY, NY; 3. Bank of New York, NY, NY; were frozen by the US government to allow the investigation to determine the ties with BCCI. If it is determined that ICIC was owned by BCCI their assets are then forfeited, however this matter must be expedited as the freeze on the assets expires 3/2/92 (an extension can be requested).

4. Unknown Assets. These assets no one knows about and just appear one way or another. One example is that of a computer soft-ware company in California, BCCI apparently held a note against the company, the company went bankrupt and then BCCI took the assets of the company. These assets were turned over to the US government. Another example is a piece of property in Alexandria which BCCI currently holds a note to, the property is an old Church which burned down recently. What needs to be determined is who owns the property, the estimated value is $4 - $5 million.

It was decided that WMFO's FAST team would not be needed at this time, however they may be needed at a later date. SA [redacted] advised [redacted] that he can not be dedicated entirely to the forfeiture task as he also is handling other parts of the investigation, SA [redacted] further advised that other SAs may be brought into the forfeiture task as it relates to their respective investigations. b6 b7C

It is requested that a Sub file be opened up in order to track the forfeiture end of the investigation.

1325015-000-10628

Serialization Application begins with Serial # 1

FD-340a (Rev. 10-3-77)

(Title) HIDDEN INTERESTS; MAJOR CASE 38

(File No.) 29B-WF-171994 Sub FS *

Item	Date Filed	To be returned Yes	To be returned No		Disposition
1	9/28/92		X	Documents	JJB

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
SEP 28 1992
FBI — WASH. FIELD OFFICE
JJB

29B-WF-171994 Sub FS-1A

1325015-000-10630

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 8/21/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: ASSET FORFEITURE

On July 29, 1992 the Honorable JOYCE HENS GREEN, United States District Judge of the District of Columbia entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment Company (Investments) [ICIC(Inv)]. The total value of this Order was $104,488,322.73.

The writer contacted [redacted] U. S. Department of Justice, Attorney, Asset Forfeiture Office and he advised that the U.S. Marshall Service, out of the Southern District of New York, is currently obtaining the forfeited assets. The U. S. Marshall in charge of receiving the funds is [redacted] For further information on the forfeited assets contact should be made through the writer or [redacted]. b6 b7C

Attached is a copy of the Notice of Forfeiture which appeared in the August 21, 1992 issue of the USA Today newspaper.

1 - 29B-WF-171994 SUB FS
1 - FAST (SA [redacted]) b6 b7C

(1)

From Serial # 46

29B-WF-171994 Sub FS

Legal Notice

UNITED STATES COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BCCI HOLDINGS (LUXEMBORG), S.A.
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED

Defendants

CRIMINAL NUMBER 91-0655 (JHG)

NOTICE OF FORFEITURE

Notice is hereby given that on July 29, 1992, in the above-captioned case, the Honorable Joyce Hens Green, United States District Judge for the District of Columbia, entered an Order condemning and forfeiting the following properties to the United States of America:

Second Supplemental List of Forfeited Property

Account No.	Account Name	Approx. Balance
** Bank of California Corp.		
91-212373-1121	BCCI (Overseas) Chittigong	398,724.15
91-209411-1121	BCCI (Overseas) Dhaka	3,155,691.38
91-212399-1121	BCCI (Overseas) Sri Lanka	84,930.45
91-212407-1121	BCCI (Overseas) Sri Lanka	420,947.93
** Subtotal **		4,060,293.91
** Bank of New York		
Suspense	BCCI (Overseas) Kenya	30,238.40
180676	ICIC (Overseas) Ginny Mae Book Entry	118,708.66
180676	ICIC (Overseas) Ginnie Mae interest distributions	9,489.09
180676	ICIC (Overseas)	527,592.32
180650	ICIC Investments Ltd.	14,534,639.16
** Subtotal **		15,220,667.63
** Bear Stearns & Co., Inc.		
055-69205	ICIC Investments Ltd.	34,376,678.00
089-69205	ICIC Investments Ltd.	514,845.00
** Subtotal **		34,891,523.00
** Capital Bank		
0902205099	BCCI (Overseas) Jamaica	351,769.41
0902204203	BCCI S.A. Paraguay	639,404.78
** Subtotal **		991,174.19
** Esanu Katsky Korins & Siger	General Coffee Corp. claim in bankruptcy	4,925,000.00
** First American Bank, N.A.		
3-446-611	BCCI Legal Fund	68,919.87
** First American Title Ins. Co.		
Escrow Account	Amjad Awan (Proceeds of sale of condo)	140,478.46
** Goldman, Sachs & Co.		
001-37937-9-911	ICIC Investments Ltd.	0.00
032-34066-3	ICIC Investments Ltd.	360,602.60
** Subtotal **		360,602.60
** Mabon Securities		
04-4051	ICIC Investments Ltd.	20,240,717.09
46-0305	ICIC Investments Ltd.	452.50
46-2633	ICIC Investments Ltd.	0.00
48-2633	ICIC Investments Ltd.	0.00
** Subtotal **		20,241,169.59
** Morgan Stanley & Co.		
0424245	ICIC Investments Ltd.	128,392.89
737-0120128947	ICIC Investments Ltd.	128,726.20
** Subtotal **		257,119.09
** Oppenheimer & Co., Inc.		
05391180	ICIC Investments Ltd.	6,907,935.00
05391180	ICIC Investments Ltd. T-notes	16,421,620.00
** Subtotal **		23,329,555.00
** Prudential Securities **		
TNT880170-85	ICIC Investments Ltd.	151.39
** Security Pacific Int'l Bank		
04012039	BCCI (Overseas) Manila	443.00
03005016	BCCI (Overseas) Paris	1,225.00
** Subtotal **		1,668.00
*** Total ***		$104,488,322.73

The Order of Forfeiture having been entered, the United States hereby gives notice of its intention to dispose of each of the forfeited properties in such manner as the Attorney General of the United States may direct, consistent with the plea agreement entered into by the defendants and the United States on December 19, 1991. Any persons or entities having or claiming a legal right, title or interest in any of the aforementioned properties must , within thirty (30) days of the final publication of this notice or actual receipt thereof, whichever is earlier, petition the United States District Court for the District of Columbia for a hearing to adjudicate the validity of his/her alleged interest in the property pursuant to Title 18, United States Code, Section 1963(1). If a hearing s requested, it shall be held before the Court alone, without a jury. Claimants will bear the burden of proof in all such cases.Petitions that fail to allege an interest sufficient to maintain a claim under Section 1963(1) shall be subject to dismissal without a hearing.

The petition shall be signed by the petitioner under penalty of perjury and shall identify the particular property or properties in which the petitioner claims a legal right, title or interest; the nature and extent of the such right, title or interest; the nature and extent of the such right, title or interest in each property; the time and circumstances of the petitioner's acquisition of the right, title and interest in each property; and any additional facts and documents supporting the petitioner's claim and the relief sought.

A hearing on the petition shall, to the extent practicable and consistent with the interests of justice, be held within thirty (30) days of the filing of the petition. The Court may consolidate the hearing on the petition with a hearing on any other petition filed by a person other than any of the defendants named above. The petitioner may testify and present evidence and witnesses who appear at the hearing.

Your petition must be filed with the United States District Court for the District of Columbia in Criminal No. 91-0655 (JHG) at the following address:

3rd and Constitution Ave, N.W.
Washington, D.C. 20001

Furthermore, you must serve the United States Department of Justice with your petition at the following address:

Forfeiture Office
P.O. Box 27322, Central Station
Washington, D.C. 20038
Attn: Stefan D. Cassella, Esq.

And you should mail a copy of the petition to counsel for the court-appointed fiduciaries as follows:

Michael Nussbaum, Esq.
Nussbaum & Wald
Suite 200
One Thomas Circle
Washington, D.C. 20005

IF YOU FAIL TO FILE A PETITION TO ASSERT YOUR RIGHT, TITLE OR INTEREST IN THE ABOVE-DESCRIBED PROPERTY, WITHIN THIRTY (30) DAYS OF THIS NOTICE, YOUR RIGHT, TITLE AND INTEREST IN THIS PROPERTY SHALL BE LOST AND FORFEITED TO THE UNITED STATES. THE UNITED STATES THEN SHALL HAVE CLEAR TITLE TO THE PROPERTY HEREIN DESCRIBED AND MAY WARRANT GOOD TITLE TO ANY SUBSEQUENT PURCHASER OR TRANSFEREE.

8/21/92 USA TODAY

1325015-000-10632

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 2/12/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC # 8;
FIF; FAG;
OO: WMFO

WMFO/FAST requests that FBIHQ/FSPU advise WMFO/FAST as to the proper procedure for reporting the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) court ordered forfeiture of $550,000,000.

1) On or about 11/15/91 a United States federal grand jury in the District of Columbia returned a multi-count Indictment against four BCCI related entities and three individuals. (**A copy of this Indictment is enclosed.**) The Indictment contains a Forfeiture Count at page 51.

2) A superseding Information was subsequently filed on or about 12/15/91. (**A copy is enclosed.**)

3) These four entities, collectively called "BCCI", had their guilty pleas accepted by U.S. District Court, District of Columbia, Judge Joyce Hens Green, on or about 1/24/92. (**A copy of the plea is enclosed.**)

b6
b7C

2-FBIHQ
(2-FSPU, Attn: [redacted] (enc.)
2-WMFO
(1-BCCI Squad, Attn: SA [redacted]
(1-FAST, 29B-WF-171994 Sub FS)

EPG:epg
(4)

b7E

29B-WF-171994 Sub FS-2
FEB 12 1992
FBI/DOJ OFFICE

O+A - FS
Assign SA [redacted]
PLA 2/14/92

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-10633

4) After accepting the guilty pleas, Judge Green imposed the sentence included in the plea agreement - the forfeiture of all BCCI cash and other assets in the U.S., amounting to approximately $550,000,000. **(A copy of the Notice of Filing of Memorandum of Intent and Plea Agreement is enclosed.)**

On 2/6/92 SSA/PLA [redacted] (Supervisor, Legal Squad/FAST) and SA [redacted] (Legal Advisor, FAST) met with DOJ Asset Forfeiture Office Trial Attorneys (TA) [redacted] concerning the status of the payment/receipt of the $550 mil. We learned the following: b6 b7C

1) The $550,000,000 is an estimate of money and property to be forfeited. There may be more, there may be less. This estimate consists of the following categories of property:

A) $340,000,000: This amount consists of known cash deposits, which are presently being collected by the United States Marshals Service.

B) $170,000,000: This is the value of property presently subject to liquidation proceedings, in progress in California and New York. According to TA [redacted] the actual amount recognized as a result of these proceedings may be more in the neighborhood of $100,000,000 or so after settlement of creditor claims. b6 b7C

C) $47,000,000: ICIC (International Credit and Investment Company) - Grand Cayman Islands, assets in the United States. This money is located in three or more accounts, primarily in New York brokerage companies. JUDGE GREEN ordered that these assets be frozen for a period of thirty (30) days, at the request of DOJ, beginning 1/30/92. DOJ is now in the process of identifying these assets and attempting to secure their custody.

D) Miscellaneous: TA [redacted] advised that there may be other assets in the United States that are yet unidentified. JUDGE GREEN's Order specified that all assets identified as belonging to "BCCI" are to be forfeited. WMFO/BCCI squad has assigned personnel to work with [redacted] and [redacted] to identify these additional assets, if any. In addition, Court appointed fiduciaries who receive a percentage of assets found are also searching for additional assets. b6 b7C

2. TA [redacted] advised that **all property forfeited is to be split 50/50 with overseas BCCI creditors.** In addition, $10,000,000 is to go to the State of New York Attorney General's Office to cover its investigative expenses. Irrespective of the disposition of assets forfeited, credit b6 b7C

1325015-000-10634

will be given to DOJ and FBI/WMFO for the total value of property seized.

3. TA [redacted] is the point of contact to determine what has been seized/paid. He can be reached at the DOJ Asset Forfeiture Office, 1400 New York Avenue, WDC, telephone (202) [redacted]. b6 b7C

REQUEST OF FSPU: Advise WMFO/FAST how to report the BCCI court ordered forfeiture for statistical purposes. SSA [redacted] ext. 7272, or SA [redacted] ext. 7118/7223, may be contacted to respond to any questions concerning this matter. b6 b7C

1325015-000-10635

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 2/12/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC # 8;
FIF; FAG;
OO: WMFO

WMFO/FAST requests that FBIHQ/FSPU advise WMFO/FAST as to the proper procedure for reporting the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) court ordered forfeiture of $550,000,000.

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2) A superseding Information was subsequently filed on or about 12/15/91. (**A copy is enclosed.**)

3) These four entities, collectively called "BCCI", had their guilty pleas accepted by U.S. District Court, District of Columbia, Judge Joyce Hens Green, on or about 1/24/92. (**A copy of the plea is enclosed.**)

2-FBIHQ
(2-FSPU, Attn: [redacted] (enc.)
2-WMFO
(1-BCCI Squad, Attn: SA [redacted]
(1-FAST, 29B-WF-171994 Sub FS)

EPG:epg
(4)

29B-WF-171994 Sub FS -- 2

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Searched
Serialized
Indexed
Filed

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-10636

4) After accepting the guilty pleas, Judge Green imposed the sentence included in the plea agreement - the forfeiture of all BCCI cash and other assets in the U.S., amounting to approximately $550,000,000. **(A copy of the Notice of Filing of Memorandum of Intent and Plea Agreement is enclosed.)**

On 2/6/92 SSA/PLA [redacted] (Supervisor, Legal Squad/FAST) and SA [redacted] (Legal Advisor, FAST) met with DOJ Asset Forfeiture Office Trial Attorneys (TA) [redacted] concerning the status of the payment/receipt of the $550 mil. We learned the following: b6 b7C

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B) $170,000,000: This is the value of property presently subject to liquidation proceedings in progress in California and New York. According to TA [redacted] the actual amount recognized as a result of these proceedings may be more in the neighborhood of $100,000,000 or so after settlement of creditor claims. b6 b7C

C) $47,000,000: ICIC (International Credit and Investment Company) - Grand Cayman Islands, assets in the United States. This money is located in three or more accounts, primarily in New York brokerage companies. JUDGE GREEN ordered that these assets be frozen for a period of thirty (30) days, at the request of DOJ, beginning 1/30/92. DOJ is now in the process of identifying these assets and attempting to secure their custody.

D) Miscellaneous: TA [redacted] advised that there may be other assets in the United States that are yet unidentified. JUDGE GREEN's Order specified that all assets identified as belonging to "BCCI" are to be forfeited. WMFO/BCCI squad has assigned personnel to work with [redacted] and [redacted] to identify these additional assets, if any. In addition, Court appointed fiduciaries who receive a percentage of assets found are also searching for additional assets. b6 b7C

2. TA [redacted] advised that **all property forfeited is to be split 50/50 with overseas BCCI creditors.** In addition, $10,000,000 is to go to the State of New York Attorney General's Office to cover its investigative expenses. Irrespective of the disposition of assets forfeited, credit b6 b7C

will be given to DOJ and FBI/WMFO for the total value of property seized.

3. TA [redacted] is the point of contact to determine what has been seized/paid. He can be reached at the DOJ Asset Forfeiture Office, 1400 New York Avenue, WDC, telephone (202) 514-1213. b6 b7C

REQUEST OF FSPU: Advise WMFO/FAST how to report the BCCI court ordered forfeiture for statistical purposes. SSA [redacted], ext. 7272, or SA [redacted] ext. 7118/7223, may be contacted to respond to any questions concerning this matter. b6 b7C

1325015-000-10638

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 2/4/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

[redacted] Re 1/28/92 and 2/4/92 telcalls to WMFO FAST SA [redacted] b6 b7C

Attached hereto are the following (one copy each):

1) A three-count, Washington, D.C.(WDC) Grand Jury indictment, returned 11/15/91;
2) A superseding information, filed 12/19/91;
3) A joint plea agreement, between the U.S. Government, the State of New York and the defendant, "BCCI"; and
4) A "Notice of Filing of Memorandum of Intent and Plea Agreement."

As discussed in re 1/28/92 telcall, the four entities, collectively called "BCCI", had their guilty pleas accepted by the court on 1/24/92. After accepting the pleas, U.S. District Court Judge Joyce Hens Green imposed the sentence included in the plea agreement, i.e., the forfeiture of all BCCI cash and other assets in the U.S., amounting to approximately $550,000,000.00.

The DOJ's Asset Forfeiture Office (AFO), in the person of Trial Attorney [redacted] is coordinating/-tracking the fulfillment of the sentence, and has asked that an agent be assigned to assist in identifying and loacating additional assets. C-5 SA [redacted] currently assigned to the captioned matter, has been further assigned to assist T/A [redacted] They are to meet to discuss the matter on 2/5/92. b6 b7C

The FAST is requested to file the FD-635 relating to the forfeiture, and to assist SA [redacted] and DOJ in the implementation of the court's sentence. b6 b7C

(2)-WMFO (Enc. 4)
~~(1-FAST)~~
(1-29B-WF-171994)
JNR:jnr
(2)

29B-WF-171994 Sub FS-2X1

Searched
Serialized
Indexed
Filed

1325015-000-10639

EXHIBIT A-1

29B-WF-171994 Sub FS-202

SEARCHED INDEXED
SERIALIZED FILED
FEB 12 1992
FBI — WASH FIELD OFFICE

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EXHIBIT A-2

29B-WF-171994 Sub FS-2K3

SEARCHED INDEXED
SERIALIZED FILED
FEB 12 1992
FBI - WFO FIELD OFFICE

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1325015-000-10694

EXHIBIT B

29B-WF-171994 Sub FS - 2x4

SEARCHED INDEXED
SERIALIZED FILED
FEB 12 1992
FBI — WFO FIELD OFFICE

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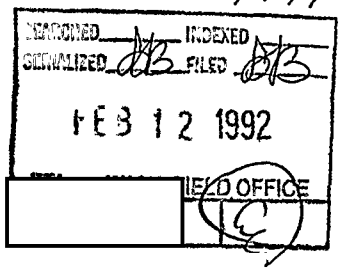
29B-WF-171994 SubFS-2X5



b6
b7C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Grand Jury Sworn in on January 16, 1991

Holding a Criminal Term

UNITED STATES OF AMERICA	:	
	:	
- v -	:	Crim No. 91-
	:	
BCCI HOLDINGS (LUXEMBOURG), S.A.	:	Violations:
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.	:	18 USC §371 (Conspiracy);
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED	:	18 USC §1343 (Wire Fraud);
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED	:	18 USC §1962(d) (Racketeering Conspiracy);
AGHA HASAN ABEDI,	:	
SWALEH NAQVI, and	:	18 USC §2 (Aiding
GHAITH PHARAON	:	and Abetting).
	:	
Defendants.	:	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Introduction

AT ALL TIMES MATERIAL TO THIS INDICTMENT:

1. The Federal Reserve System ("FRS") was an agency of the United States. The Board of Governors of the FRS ("the Board") had primary responsibility for supervising and regulating activities of bank holding companies and had residual responsibility for United States Offices of foreign banks.

2. The Federal Deposit Insurance Corporation ("FDIC") was an agency of the United States. The FDIC supervised FDIC-insured, state-chartered savings banks which were not members of the FRS. The FDIC examined and supervised those banks under its

purview, approved or denied applications for structural or corporate changes, and ruled on applications for insurance. The FDIC insured deposits in amounts up to $100,000 per account in banks which it insured.

3. The Federal Home Loan Bank Board ("FHLBB") was an agency of the United States established to regulate and supervise savings and loan associations and savings banks insured by the Federal Savings and Loan Insurance Corporation ("FSLIC"). As part of its duties, the FHLBB governed the FSLIC. The FHLBB examined insured institutions to ensure they were operated in a safe and sound manner and in conformity with applicable laws and regulations.

4. The FSLIC was an agency of the United States established to protect depositors by insuring deposits in savings and loan associations and in certain savings banks in amounts up to $100,000 per account.

5. As of August 9, 1989, the Office of Thrift Supervision ("OTS") succeeded to the interests of the FHLBB and the FSLIC with respect to the regulation and supervision of savings and loan associations and certain savings banks, and the FDIC succeeded the FSLIC as the insurer.

6. Independence Bank ("Independence"), Encino, California, was chartered, regulated and supervised by the State of California and had deposits insured by the FDIC.

7. CenTrust Savings Bank, a State Savings Bank ("CenTrust"), was located in Miami, Florida, and was chartered by

the State of Florida. CenTrust was regulated and supervised by the FHLBB and had deposits insured by the FSLIC until August 9, 1989. CenTrust was also subject to regulation and supervision by the Florida Department of Banking and Finance.

8. As of August 9, 1989, the insurance of the deposits of CenTrust was transferred to the FDIC and the OTS began its role as regulator and supervisor of CenTrust.

9. CenTrust Trust, formerly the Westport Company, was a wholly-owned subsidiary of CenTrust.

10. Defendant BCCI Holdings (Luxembourg), S.A. ("BCCI Holdings") was a foreign bank holding company established under the laws of Luxembourg.

11. Defendant BCCI Holdings owned and controlled Defendant Bank of Credit and Commerce International S.A. ("BCCI S.A."), a foreign bank established under the laws of Luxembourg. BCCI S.A. operated agencies in Los Angeles, California and New York, New York.

12. Defendant BCCI Holdings also owned and controlled Defendant Bank of Credit and Commerce International (Overseas) Limited ("BCCI Overseas"), a foreign bank established under the laws of the Cayman Islands. BCCI Overseas operated agencies in Miami, Tampa and Boca Raton, Florida.

13. The term "BCCI Group," as used in this indictment, means the combination of BCCI Holdings, BCCI S.A. and BCCI Overseas.

14. The term "BCCI Defendants," as used at times in this

Indictment, means the Defendants BCCI Holdings, BCCI S.A., and BCCI Overseas.

15. Defendant International Credit and Investment Company (Overseas) Limited ("ICIC Overseas") was a foreign bank established under the laws of the Cayman Islands.

16. Defendant AGHA HASAN ABEDI was a principal of BCCI Holdings, BCCI (Overseas), BCCI S.A. and ICIC Overseas.

17. Defendant SWALEH NAQVI was a principal of BCCI Holdings, BCCI (Overseas), BCCI S.A. and ICIC Overseas.

18. Defendant GHAITH PHARAON was a Saudi Arabian businessman and a shareholder in the BCCI Group.

The Conspiracy

19. Beginning in or about January 1984, the exact date being unknown to the Grand Jury, and continuing until in or about December 1989, in the District of Columbia and elsewhere, the Defendants

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL
(OVERSEAS) LIMITED,
INTERNATIONAL CREDIT AND INVESTMENT COMPANY
(OVERSEAS) LIMITED,
AGHA HASAN ABEDI,
SWALEH NAQVI, and
GHAITH PHARAON

knowingly and willfully combined, conspired, confederated, and

agreed together and with each other, and with others, both known and unknown to the Grand Jury,

(a) to defraud the United States, in particular the Board, FDIC, FHLBB, and FSLIC, of and concerning their right to have their business and affairs conducted free from deceit, dishonesty, impairment and obstruction, by impeding, hindering, obstructing and defeating by deceitful and dishonest means the lawful functions and operations of said agencies of the United States in regulating and supervising activities of the BCCI Group and their United States branches or agencies, ICIC Overseas, Independence and CenTrust, and

(b) to commit offenses against the United States, that is:

(1) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, of deposits of Independence, by means of fraudulent and false pretenses, representations and promises, and to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343;

(2) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the

FDIC, backed by funds and security of the United States, of deposits of Independence, by means of fraudulent and false pretenses, representations and promises, and for the purpose of executing and attempting to execute the scheme and artifice, knowingly to cause to be delivered by the United States Postal Service various mail matter, in violation of Title 18, United States Code, Section 1341;

(3) to knowingly execute and attempt to execute a scheme and artifice to defraud a federally insured financial institution, and by means of fraudulent and false pretenses, representations and promises to obtain moneys, funds and other property owned by or under the control of such a financial institution, in violation of Title 18, United States Code, Section 1344;

(4) to knowingly and willfully make false, fictitious and fraudulent statements to the FHLBB, and to knowingly and willfully make and cause to be made false entries in the books, reports and statements of CenTrust, in violation of Title 18, United States Code, Sections 1001 and 1006;

(5) to knowingly and willfully cause to be made false entries, including material omissions, in the books and records of Independence with the intent to deceive the Board and FDIC, in violation of Title 18, United States Code, Sections 1001 and 1005;

(6) to devise and intend to devise a scheme and artifice to defraud persons and entities throughout the United

States of money and property, namely, funds from purchasers of subordinated debentures issued by CenTrust, by means of false and fraudulent pretenses, representations and promises, and for purposes of executing said scheme, to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343;

(7) to devise and intend to devise a scheme and artifice to defraud persons and entities throughout the United States of money and property, namely, funds from purchasers of subordinated debentures issued by CenTrust, by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing said scheme, to cause to be placed in an authorized depository for mail matter things and matters to be delivered by the United States Postal Service, in violation of Title 18, United States Code, Section 1341.

The Manners and Means of the Conspiracy

It was a part of the conspiracy that:

20. The Defendants would enrich Defendants AGHA HASAN ABEDI, SWALEH NAQVI, the BCCI Defendants, ICIC Overseas and GHAITH PHARAON and their associates, by taking advantage of opportunities to deceive and exploit United States financial institutions, deceive United States Federal regulatory agencies, and deceive persons and entities throughout the United States.

It was further a part of the conspiracy that:

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21. The BCCI Defendants, ICIC Overseas, AGHA HASAN ABEDI and SWALEH NAQVI would acquire and maintain control and influence over Independence with the aid of Defendant GHAITH PHARAON, through deceptive stock purchases by way of hidden stock pledges, nominee agreements, nonrecourse loans, loan releases, beneficial interest agreements and outright falsehoods, fabrications and omissions in applications and reports filed with state and federal regulatory agencies;

22. The Defendants would use Defendant ICIC Overseas to facilitate deception of the Board, FDIC, FSLIC, and FHLBB concerning the involvement of the BCCI Defendants, AGHA HASAN ABEDI, and SWALEH NAQVI with Defendant GHAITH PHARAON;

23. Defendant GHAITH PHARAON, the owner of approximately 25 percent of the stock of CenTrust, would use his relationship with the BCCI Defendants and SWALEH NAQVI to arrange for a branch of the BCCI Group to purchase approximately $25,000,000 of the total $150,000,000 CenTrust subordinated debentures in order to mislead and deceive regulators and investors as to the true market for the CenTrust subordinated debentures;

24. The BCCI Defendants, Defendant GHAITH PHARAON and another would cause material misrepresentations and omissions to be made to investors;

25. The Defendant GHAITH PHARAON and another would promise the BCCI Defendants and SWALEH NAQVI that CenTrust would repurchase any CenTrust subordinated debentures purchased by the BCCI Group;

26. The BCCI Defendants and Defendant SWALEH NAQVI would direct BCCI (Overseas) Paris to purchase approximately $25,000,000 of CenTrust subordinated debentures;

27. Defendant GHAITH PHARAON and another would cause CenTrust Trust to repurchase said subordinated debentures from BCCI (Overseas) Paris, after approximately six weeks, thus making the BCCI Defendants whole and completing the deception of other investors as to the true market for the CenTrust subordinated debentures.

Overt Acts in Furtherance of the Conspiracy

28. In furtherance of the conspiracy, and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed, in the District of Columbia and elsewhere, the following overt acts, among others:

Overt Acts Relating to Independence Bank

1) On or about January 27, 1984, in Los Angeles, California, Defendant AGHA HASAN ABEDI had a conversation with an employee of the BCCI Group working in California, concerning the purchase by the BCCI Group of a bank on the west coast of the United States.

2) On or about August 28, 1984, in California, the employee referred to in Overt Act No. 1 had a conversation with the then-Chairman of Independence, Encino, California concerning the fact that Independence was for sale.

3) On or about November 13, 1984, the employee referred to

in Overt Act No. 1 wrote letters to Defendants AGHA HASAN ABEDI and SWALEH NAQVI, in each of which he discussed the acquisition by BCCI of Independence.

4) In or about November 1984, Defendant AGHA HASAN ABEDI had a telephone conversation with the employee referred to in Overt Act No. 1 in California, in which it was discussed that Defendant GHAITH PHARAON was interested in purchasing Independence himself.

5) On or about November 30, 1984, the employee of the BCCI Group referred to in Overt Act No. 1 signed a "letter of intent," confirming the willingness of a then-unnamed principal to purchase all of the capital stock of Independence.

6) Between in or about December 1984 and January 1985, Defendant GHAITH PHARAON in his personal capacity and Defendant SWALEH NAQVI on behalf of the BCCI Group signed an Investment Advisory Agreement.

7) Between in or about November of 1984 and April of 1985, representatives, agents and/or employees of the BCCI Group had conversations with the then owners of Independence concerning the purchase of Independence.

8) In or about April 1985, an employee of the BCCI Group had conversations with employees of the First National Bank of Boston ("Bank of Boston") concerning obtaining financing for Defendant GHAITH PHARAON to be used for a portion of the purchase price for Independence Bank.

9) On or about April 30, 1985, Defendant GHAITH PHARAON

signed a stock purchase agreement with the then owners of Independence, pursuant to which Defendant GHAITH PHARAON agreed to purchase all of the capital stock of Independence Bank for $23,000,000.00.

10) On or about May 17, 1985, Defendant GHAITH PHARAON signed a memorandum agreement with Defendant ICIC Overseas, which agreement provided, among other things, that:

i. Pharaon and ICIC have agreed to acquire 100% of Independence from the present shareholders;

ii. all shares would be held in the name of Pharaon but only 15% were to be held by Pharaon as the beneficial owner; and

iii. Pharaon was to hold the remaining 85% of the shares in a fiduciary capacity for ICIC.

11) On or about May 17, 1985, Defendant SWALEH NAQVI signed the memorandum agreement referred to in Overt Act No. 10 on behalf of Defendant ICIC Overseas.

12) On or about June 10, 1985, Defendant GHAITH PHARAON signed a document entitled "Notice of Acquisition of Control" which was filed with the FDIC and the California State Department of Banking, which called for the following information in question number 3:

"Indicate the full name of each acquiring party or transferee, the total number of shares presently held by each, the total number of shares to be purchased or transferred to each and the total number of shares to be held by each following completion of the proposed transaction. Indicate names of beneficial owners if

shares are to be registered in another name."
the response to which disclosed the only purchaser to be Defendant GHAITH PHARAON.

13) On or about June 11, 1985, in Los Angeles, California, Defendant GHAITH PHARAON met with members of the California State Banking Department, in the course of which meeting Defendant GHAITH PHARAON failed to disclose the existence of the agreement between Defendant ICIC Overseas and Defendant GHAITH PHARAON which was executed on or about May 17, 1985 and which is referred to in Overt Act No. 10.

14) On or about August 30, 1985, an employee of the BCCI Group had a conversation with another employee of the BCCI Group in which the first of these employees requested a loan be made by the BCCI Group to Defendant GHAITH PHARAON for purposes of acquiring Independence.

15) On or about August 30, 1985, an employee of the BCCI Group sent a telex which confirmed that the deposit of $8.5 million of Defendant GHAITH PHARAON will be held in an account at Banque Arabe et Internationale D'Investissement (BAII), Paris, France.

16) On or about August 29, 1985, an employee of the BCCI Group sent a telex to BAII which instructed BAII to confirm to the FDIC and the California State Banking Department, care of Defendant GHAITH PHARAON's attorney, that Defendant GHAITH PHARAON had in excess of $8.4 million on deposit with BAII, which funds were to be used by Defendant GHAITH PHARAON towards the

purchase of Independence.

17) On or about September 4, 1985, BAII confirmed by telex to the California State Banking Department, care of Defendant GHAITH PHARAON's attorney, that it held in excess of $8.4 million on deposit for Defendant GHAITH PHARAON, which funds were to be used by Defendant GHAITH PHARAON towards the purchase of Independence.

18) On or about September 5, 1985, Defendant GHAITH PHARAON caused to be delivered to the California State Banking Department a letter. This letter stated that enclosed was a: "Telex dated September 4, 1985 also from BAII confirming that Pharaon has available in excess of $8.4 million on deposit for the portion of the purchase price not being financed."

19) In or about August 1985, employees of the BCCI Group had conversations with representatives of BAII concerning the issuance by BAII of a letter of credit to the Bank of Boston in the amount of $5 million.

20) On or about August 29, 1985, an employee of the BCCI Group sent a telex to BAII instructing BAII to confirm by telex to the FDIC and the California State Banking Department, care of Defendant GHAITH PHARAON's attorney, that BAII had agreed to issue a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston as security for the Bank of Boston's loan to Defendant GHAITH PHARAON to purchase Independence.

21) On or about August 30, 1985, BAII sent a telex to the California State Banking Department and the FDIC, in care of

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Defendant GHAITH PHARAON's attorney, concerning the issuance by BAII of a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston as security for the Bank of Boston loan to Defendant GHAITH PHARAON to purchase Independence.

22) On or about September 5, 1985, Defendant GHAITH PHARAON caused his attorney to deliver a letter to the California State Banking Department confirming the availability of the $5 million letter of credit to be issued by BAII.

23) On or about September 30, 1985, Defendant GHAITH PHARAON signed an "Acquisition Promissory Note" for $12.6 million with the Bank of Boston.

24) On or about October 1, 1985, BAII issued a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston, which letter of credit secured the Bank of Boston loan to Defendant GHAITH PHARAON.

25) On or about October 1, 1985, the BCCI Group issued a $5 million counter-guarantee to BAII.

26) On or about October 1, 1985, agents of the BCCI Group, and Defendant GHAITH PHARAON caused the Bank of Boston to take acts affecting the distribution of funds completing the sale of all the capital stock of Independence Bank to Defendant GHAITH PHARAON.

27) In or about October 1, 1985, Defendant GHAITH PHARAON appointed the first of the employees of the BCCI Group referred to in Overt Act No. 14 as a Director of Independence.

28) From in or about March 1986 to in or about January

1989, Defendants AGHA HASAN ABEDI and SWALEH NAQVI met with and corresponded with the Chief Executive Officer of Independence on numerous occasions regarding personnel and operational matters involving Independence.

29) On or about June 25, 1986, in Paris, France, Defendant GHAITH PHARAON wrote a letter to Defendant SWALEH NAQVI which stated in pertinent part:

"According to [the Chief Executive Officer of Independence], and even if I established a holding co. for the purpose of sheltering some of the bank's income it is unlikely that under the present capital structure the bank would greatly grow without any additional capital. In the present circumstances, and until I have worked out some kind of re-scheduling with the Redec banks, I may face some difficulties in arranging independent facilities for Independence Bk for additional capital.

"Therefore I would suggest that for the time being the 15/85 arrangement be maintained until we can determine the course we want Independence to take, and the degree of capital that needs to be made available, if we want the bank to grow, as well as the return on this capital, when compared to other investment opportunities.

"If after meeting with [the Chief Executive Officer of Independence] you are convinced that

additional capital is required and the returns on such capital are attractive, I would be prepared to meet with you and modify the 15/85 arrangement in accordance with my earlier discussion with you and Mr. Abedi. Should this be the course to be followed it may also be necessary to have more support from BCCI in terms of management support, and international contacts."

30) On or about July 3, 1986, Defendant SWALEH NAQVI directed agents of the BCCI Group to cause BCCI Overseas (Panama) to make a loan in the amount of $12,631,000 to Defendant GHAITH PHARAON, which proceeds were used to repay the Bank of Boston loan to Defendant GHAITH PHARAON referred to in Overt Act No. 23.

31) In or about July of 1987, in London, England, Defendants AGHA HASAN ABEDI and SWALEH NAQVI met with an individual concerning prospective employment with Independence.

32) On or about December 29, 1987, Defendant SWALEH NAQVI directed an employee of the BCCI Group to cause BCCI Overseas (Grand Cayman) to advance $3,500,000 to Independence.

33) On or about May 17, 1988, an employee of the BCCI Group caused a branch of the BCCI Group in Bahrain to advance $4,000,000 to Defendant GHAITH PHARAON, which proceeds were added to the capital account of Independence.

34) On or about August 7, 1989, an employee of the BCCI Group caused a branch of the BCCI Group in Bahrain to advance $10,000,000 to Defendant GHAITH PHARAON, which proceeds were used to repay a BAII loan dated on or about July 5, 1989, in the

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amount of $10,000,000 to Defendant GHAITH PHARAON.

Overt Acts Relating to CenTrust Savings Bank

Application to FHLBB for Sale of Subordinated Debentures

35) On or about April 12, 1988, Defendant GHAITH PHARAON and another person caused to be filed a document titled "Amendment No. 1 To FORM OC" with the FHLBB.

36) Between on or about April 1, 1988, and on or about May 19, 1988, throughout the United States, Defendant GHAITH PHARAON and another person and various other employees and agents of CenTrust, together with underwriters, Merrill Lynch Capital Markets and Drexel Burnham Lambert, distributed a preliminary prospectus and conducted marketing seminars relating to the sale of CenTrust's subordinated debentures.

37) On or about May 16, 1988, Defendant GHAITH PHARAON and another person caused to be filed a document bearing the title "Amendment 3 to FORM OC" with the FHLBB.

38) On or about May 19, 1988, Defendant GHAITH PHARAON and another person caused to be filed with the FHLBB a document bearing the title "Amendment 4 to FORM OC."

39) On or about May 19, 1988, in Washington D.C., Defendant GHAITH PHARAON and another person caused to be filed with the FHLBB a document bearing the title "OFFERING CIRCULAR" relating to subordinated debentures to be issued by CenTrust.

Contacts with United States Regulators

40) On or about May 3, 1988, Defendant GHAITH PHARAON caused a letter to be delivered to the FHLBB in Washington D.C., which stated in pertinent part that the "subordinated debt issue would add $200 million of additional regulatory capital and thus, additional protection for the FSLIC insurance fund."

41) On or about May 3, 1988, Defendant GHAITH PHARAON communicated by telephone from in or near Savannah, Georgia with a FHLBB employee in Washington, D.C., concerning the CenTrust subordinated debt issue.

42) In or about May of 1988, in Washington D.C., Defendant GHAITH PHARAON and another person met with employees of the FHLBB concerning the issuance by CenTrust of subordinated debentures.

Sale of Subordinated Debentures to Institutional Investors

43) On or about May 24, 1988, Defendant GHAITH PHARAON and others caused to be transmitted by wire approximately $2,500,000 from Safeco Insurance Co., Seattle, Washington, to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

44) On or about May 25, 1988, Defendant GHAITH PHARAON and others caused to be transmitted by wire approximately $3,000,000 from Washington Mutual Savings and Loan Association, Seattle, Washington to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

Sale to BCCI and Repurchase of CenTrust Subordinated Debentures

45) On or about May 23, 1988, in Savannah, Georgia Defendant GHAITH PHARAON caused a telex to be sent from Interedec, a company controlled by Defendant GHAITH PHARAON, to London, England, related to the purchase of the CenTrust subordinated debentures in which it was indicated that the beneficiary of the $25 million of the CenTrust subordinated debentures "will be BCC in Paris."

46) On or about May 24, 1988, in New York, New York and Paris, France, Defendants SWALEH NAQVI and GHAITH PHARAON and the BCCI Defendants caused BCCI Overseas (Paris), a branch of the BCCI Group, to purchase approximately $25,000,000 of CenTrust subordinated debentures.

47) On or about June 24, 1988, Defendants GHAITH PHARAON and SWALEH NAQVI caused to be mailed from New York, New York, to London, England, three CenTrust subordinated debenture registered certificates, labelled RU 10, RU 11 and RU 12, in the name of BCCI Paris, totalling $25,000,000.

48) On or about July 15, 1988, Defendant GHAITH PHARAON caused to be mailed a letter from an employee of Interedec, located in Georgia, to an employee of CenTrust in Florida, concerning the purchase by CenTrust of the subordinated debentures previously purchased by BCCI Overseas (Paris), a branch of the BCCI Group, in which it was stated:

"[The Chairman of the Board of CenTrust] had asked me to provide relevant details to you in order for

Centrust to repurchase the USD 25 million Debentures from BCCI Paris on 27th July 1988 together with interest accrued up to 27th July 1988."

49) On or about July 25, 1988, defendant GHAITH PHARAON caused to be delivered a letter from London, England, to Richmond Hill, Georgia, which transferred the CenTrust debentures referred to in Overt Act No. 47.

50) On or about July 27, 1988, the Defendant GHAITH PHARAON and another caused CenTrust to transmit by wire approximately $25,000,000 to Security Pacific International Bank in New York, New York, related to the purchase by CenTrust of the subordinated debentures previously purchased by BCCI Paris.

51) Between on or about July 1, 1988, and March 1, 1989, on several occasions, in Atlanta, Georgia, Defendant GHAITH PHARAON and another caused false and fraudulent statements to be made to federal banking regulators concerning the actual level of regulatory capital of CenTrust.

(Title 18, United States Code, Section 371)

COUNT TWO

1. The allegations contained in paragraphs 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 16, 17 and 18 of COUNT ONE of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. From in or about January 1988 to in or about July 1988, Defendants

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED,
AGHA HASAN ABEDI,
SWALEH NAQVI, and
GHAITH PHARAON

devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises;

3. It was part of said scheme that:

a) Defendant GHAITH PHARAON and another would seek to sell CenTrust subordinated debentures to investors;

b) Defendant GHAITH PHARAON, who owned approximately 25 percent of the stock of CenTrust, would use his relationship with the BCCI Defendants and Defendant SWALEH NAQVI to arrange for a branch of the BCCI Group to purchase $25,000,000 of the CenTrust subordinated debentures in order to deceive other investors as to the true market for the CenTrust subordinated debentures;

c) Defendant GHAITH PHARAON and another would agree with the BCCI Defendants and Defendant SWALEH NAQVI that CenTrust would repurchase any CenTrust subordinated debentures purchased by the BCCI Group;

d) Defendant SWALEH NAQVI would direct and approve the purchase by BCCI (Overseas) Paris, of approximately $25,000,000 of CenTrust subordinated debentures;

e) Defendant GHAITH PHARAON and another would cause CenTrust Trust to repurchase said subordinated debentures from BCCI (Overseas) Paris, after approximately eight weeks, thus making the BCCI Defendants whole and completing the deception of other investors as to the true market for the CenTrust subordinated debentures;

f) Defendant GHAITH PHARAON and another would cause material misrepresentations and omissions to be made to investors.

4. On or about May 3, 1988, in the District of the Columbia and elsewhere, the BCCI Defendants, and Defendants GHAITH PHARAON, SWALEH NAQVI, and AGHA HASAN ABEDI, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice and attempting to do so, knowingly and willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds to wit: a communication by telephone between the Defendant GHAITH PHARAON in Savannah, Georgia and an employee of the FHLBB in Washington, D.C.

(Title 18, United States Code, Sections 1343 and 2)

COUNT THREE

Introduction

1. The allegations in Paragraphs 1 through 14 and 16 through 18 of Count One of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein.

The Enterprise

2. At all times material to this Indictment, the BCCI Group, International Credit and Investment Company (Overseas), Limited ("ICIC Overseas"), AGHA HASAN ABEDI, SWALEH NAQVI, GHAITH PHARAON, and others known and unknown to the Grand Jury, constituted an "enterprise" as defined in Title 18, United States Code, Section 1961(4), that is, a group of organizations and individuals associated in fact.

3. At all times material to this Indictment, this enterprise was engaged in, and its activities affected, interstate and foreign commerce.

The Racketeering Conspiracy

4. From in or about January of 1984, to in or about July of 1991, in the District of Columbia and elsewhere, Defendants

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED,
AGHA HASAN ABEDI,
SWALEH NAQVI, and
GHAITH PHARAON

along with others known and unknown to the Grand Jury, being persons employed by and associated with the enterprise described in paragraph two of this Count, which enterprise was engaged in and the activities of which affected interstate and foreign commerce, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other, and with persons known and unknown to the Grand Jury, to commit an offense against the United States, to wit: to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity.

5. It was part of the conspiracy that the Defendants and their co-conspirators would and did commit acts of racketeering activity as set forth below in paragraph 8 of this Count.

6. It was a further part of the conspiracy that each defendant agreed that two or more of the acts of racketeering set forth below in this Count would be committed in the conduct of the affairs of the enterprise.

Manners and Means of the Conspiracy

7. The allegations of Paragraphs 20 through 27 of Count One of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

The Pattern of Racketeering Activity

8. It was a part of the conspiracy that the Defendants and their co-conspirators would commit acts of racketeering activity

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consisting of the racketeering acts set forth below, and additional racketeering acts involving the unlawful control, operation, and manipulation of United States financial institutions and fraud against United States Federal bank regulatory agencies, and fraud against the investing public, constituting violations of Title 18, United States Code, Sections 1341, 1343 and 1344.

Racketeering Act One

Wire Fraud Related to Independence Bank

1) Between on or about January 1, 1984, and December of 1989, Defendants AGHA HASAN ABEDI, SWALEH NAQVI, and GHAITH PHARAON, the BCCI Defendants, and ICIC Overseas (not charged in this Count as a Defendant), devised and intended to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, for deposits of Independence, by means of fraudulent and false pretenses, representations and promises;

2) It was part of said scheme and artifice that on or about May 17, 1985, Defendant GHAITH PHARAON and Defendant SWALEH NAQVI, acting in the name of Defendant ICIC Overseas, did enter into a secret agreement whereby 85% of the shares of the stock of Independence, with the attendant voting rights, purportedly to be purchased in their entirety by Defendant GHAITH PHARAON, were instead pledged to ICIC Overseas; it was further part of said scheme that Defendant GHAITH PHARAON did conceal and cause to be

concealed this material fact from the FDIC and other regulators through fraudulent conduct and deceit; it was further part of the scheme that the BCCI Group exercised influence and control over the affairs of Independence Bank;

3) On or about the dates set forth below, the above Defendants transmitted and caused to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343:

Act	Date	From	To	Nature of Wire
a)	8/30/85	Banque Arabe et Internationale d'Investissement ("BAII") Paris, France	Morrison and Foerster Los Angeles, CA	Telex
b)	9/4/85	Banque Arabe et Internationale d'Investissement ("BAII") Paris, France	Morrison and Foerster Los Angeles, CA	Telex
c1)	10/1/85	First National Bank of Boston (hereinafter "Bank of Boston") Boston, MA	Citibank New York, NY	Wire Transfer $3,066,228.33
c2)	10/1/85	Bank of Boston Boston, MA	Citibank New York, NY	Wire Transfer $1,113,771.67
c3)	10/1/85	Bank of Boston Boston, MA	First Wisconsin International Bank New York, NY	Wire Transfer $3,840,000.00
c4)	10/1/85	Bank of Boston Boston, MA	Crocker Bank International New York, NY	Wire Transfer $3,840,000

c5)	10/1/85	Bank of Boston Boston, MA	Irving Trust New York, NY	Wire Transfer $535,040.00
c6)	10/1/85	Bank of Boston Boston, MA	Barclays Bank New York, NY	Wire Transfer $4,584,960.00
c7)	10/1/85	Bank of Boston Boston, MA	First American Bank New York, NY	Wire Transfer $478,000.00
c8)	10/1/85	Bank of Boston Boston, MA	First American Bank New York, NY	Wire Transfer $3,022,000.00
d)	10/1/85	BCCI London, England	Amer Lodhi c/o Morrison and Foerster Los Angeles, CA	Telex
e)	10/2/85	Morgan Guaranty New York, NY	Bank of Boston Boston, MA	Wire Transfer $7,900,000
f)	4/2/88	Independence Bank Encino, CA	Ghaith Pharaon Georgia	Telex
g)	5/17/88	BankAmerica International New York, NY	Independence Bank Encino, CA	Wire Transfer $4,000,000

(Title 18, United States Code, Sections 1343 and 2)

RACKETEERING ACTS TWO THROUGH FOUR

Mail Fraud and Wire Fraud in Connection with CenTrust

Racketeering Act Two

1. The allegations contained in paragraphs 1, 2 and 3 of COUNT TWO of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about May 25, 1988, the BCCI Defendants, and Defendants GHAITH PHARAON, AGHA HASAN ABEDI, and SWALEH NAQVI, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, knowingly and

willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds, namely, a wire transfer of approximately $3,000,000 of funds from Washington Mutual Savings and Loan Association, Seattle, Washington, to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

(Title 18, United States Code, Sections 1343 and 2)

Racketeering Act Three

1. The allegations contained in paragraphs 1, 2 and 3 of COUNT TWO of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about the dates set forth below, the above Defendants transmitted and caused to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343:

Act	Date	From	To	Nature of Wire
a)	5/3/88	GHAITH PHARAON Georgia	FHLBB Regulator Washington, D.C.	Telephone Call
b)	5/23/88	BCCI Group London, England	Interedec Savannah, GA	Telex
c)	5/24/88	Citibank New York, NY	BCCI Overseas (Paris) Paris, France	Wire Transfer approximately $25,000,000
d)	7/27/88	CenTrust Miami, FL	Security Pacific International Bank New York, NY	Wire Transfer approximately $25,000,000

(Title 18, United States Code, Sections 1343 and 2)

Racketeering Act Four

1. The allegations contained in paragraphs 1, 2 and 3 of COUNT TWO of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about May 25, 1988, in the District of the District of Columbia and elsewhere, the BCCI Defendants and Defendants GHAITH PHARAON, AGHA HASAN ABEDI, and SWALEH NAQVI, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, knowingly and willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds, to wit: wire transfer of approximately $2,500,000 of funds from Safeco Insurance Co., Seattle, Washington, and a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

(Title 18, United States Code, Sections 1343 and 2)

All in violation of Title 18, United States Code, Sections 1962(d) and 1963, and Title 18, United States Code, Section 2.

FORFEITURE

The Grand Jury further charges:

1. The allegations contained in COUNT THREE of this Indictment are hereby realleged and incorporated by reference herein, for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 1963.

2. The Defendants AGHA HASAN ABEDI,

SWALEH NAQVI, and GHAITH PHARAON have property constituting, and derived from, proceeds which they obtained directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, thereby making such property, or an amount of cash equivalent thereto, forfeitable to the United States of America pursuant to Title 18, United States Code, Section 1963(a)(3). Said properties consist of any and all proceeds the Defendants received as a result of the racketeering activity alleged in Racketeering Acts Two through Four of Count Three.

(Title 18, United States Code, Section 1963.)

A TRUE BILL:

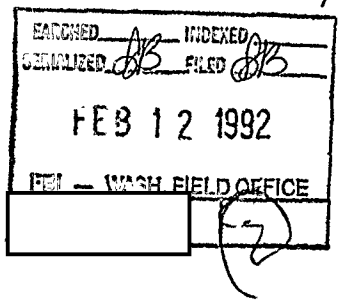
FOREPERSON

JAY B. STEPHENS
United States Attorney for
the District of Columbia

ROBERT S. MUELLER, III
Assistant Attorney General
Criminal Division
United States Department
of Justice

1325015-000-10746

29B-WF-171994 Sub FS - 2x6



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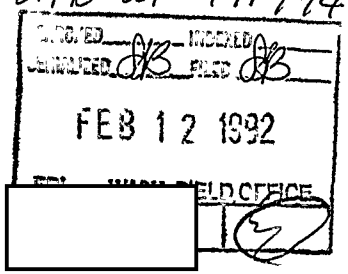

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1325015-000-10801

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

12/13/91F

UNITED STATES OF AMERICA	
- v -	Crim No. 91-
BCCI HOLDINGS (LUXEMBOURG), S.A. BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A. BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED Defendants.	

SUPREME COURT OF THE STATE OF
NEW YORK, COUNTY OF NEW YORK,
CRIMINAL TERM

PEOPLE OF THE STATE OF NEW YORK	
- v -	Ind 8090/91
BCCI HOLDINGS (LUXEMBOURG), S.A. BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A. BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED et. al., Defendants.	

PLEA AGREEMENT

Parties and Purpose

WHEREAS, the United States of America, by its attorneys for the United States Department of Justice (the "DOJ"), the People of the State of New York, by the District Attorney for New York

all the rights set forth in the prior paragraph. The Court Appointed Fiduciaries' attorneys have explained those rights to the Court Appointed Fiduciaries, and the consequences of the waiver of those rights as contemplated herein. The Court Appointed Fiduciaries understand that they are waiving all appellate issues that might have been available if they had exercised its right to trial.

34. Upon imposition of the sentence contemplated herein, the DOJ will move to dismiss the remaining charges against BCCI currently pending in any U.S. District Court.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of December _____, 1991.

1325015-000-10832

Agreed by United States,
and the People of the
State of New York:

By:

Department of Justice

Through:

William P. Barr
Attorney General

By_____
George J. Terwilliger
Acting Deputy Attorney General

By_____
Robert S. Mueller III
Assistant Attorney General
Criminal Division

By_____
Shirley D. Peterson
Assistant Attorney General
Tax Division

By_____
Stuart M. Gerson
Assistant Attorney General
Civil Division

And the following
United States Attorneys:

_____
Jay B. Stephens
District of Columbia

_____
Robert W. Genzman
M.D. Florida

_____
Otto G. Obermaier
S.D. New York

People of the State of New York
By:

_____
Robert M. Morgenthau
District Attorney
New York County

_____
Joe D. Whitley
N.D. Georgia

_____
Lourdes G. Baird
C.D. California

_____
Dexter W. Lehtinen
S.D. Florida

1325015-000-10833

Agreed by Court Appointed Fiduciaries
By:

COMMISSAIRES OF BCCI HOLDINGS (LUXEMBOURG) S.A., not in their individual capacities

_____

Brian Smouha

_____

Jacques Delvaux

_____

Constant Franssens

COMMISSAIRE OF BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., not in his individual capacity

_____

Brian Smouha

JOINT PROVISIONAL LIQUIDATORS OF BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LTD., and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LTD., not in their individual capacities

_____

Ian Wight

_____

Robert Axford

1325015-000-10834

Agreed by U.S. Regulators:

BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

By:_____
WILLIAM W. WILES
SECRETARY

FEDERAL DEPOSIT INSURANCE CORPORATION

By:_____
WILLIAM TAYLOR
CHAIRMAN

RESOLUTION TRUST CORPORATION

By:_____
WILLIAM TAYLOR
CHAIRMAN

OFFICE OF THE COMPTROLLER OF THE CURRENCY

By:_____
ROBERT L. CLARKE
COMPTROLLER OF THE CURRENCY

OFFICE OF THRIFT SUPERVISION

By:_____
TIMOTHY RYAN
DIRECTOR

SECURITIES AND EXCHANGE COMMISSION

By:_____
RICHARD C.BREEDEN
CHAIRMAN

1325015-000-10835

Agreed by New York and
California State Regulators:

SUPERINTENDENT OF BANKS OF
THE STATE OF NEW YORK, in his
capacity as Liquidator of
the New York Agency of the
New York Agency of Bank of
Credit & Commerce International,
S.A.

By:_____
Name:
Title:

By:_____
JAMES E. GILLERAN
SUPERINTENDENT OF BANKS OF STATE OF CALIFORNIA, As Such and As Liquidator of California Property and Business of Bank of Credit and Commerce International, S.A.

1325015-000-10836

Exhibit B

BANK/BROKER	AMOUNT	DESCRIPTION (ACCOUNT/NUMBERS)
American Express Bank Ltd. New York, New York	$60,255,910* $31,793,704*	Overnight Deposit TPMD - # 703876 (Plus Offsets)
	$30,009,792*	TPMD - # 703876 (From WSTPAC)
	$12,027,031	# 53066; # 53173; # 53165; # 698316; # 714758; # 53116; # 52977; # 705517; # 711036
	$12,444,311	Brokerage Acc't (Plus Offsets)
BankAmerica International New York, New York	$60,229,053* $ 4,529,622	TPMD - # 86052 # 86047; # 86041; # 86078
Citibank, N.A. New York, New York	$11,064,150 $ 4,402	# 36054705 # 36060398
	$ 1,181,398 $ 537,000	Custody Brokerage Acc't
Security Pacific International Bank New York, New York	$ 8,402,473** $ 3,803,250** $16,925,048**	----- ----- Non-Cayman-Branches of BCCI (Overseas)
Bank of New York New York, New York	$ 1,805,141 $ 300,055 $ 310,911 $ 33,058 $ 152,373 $15,000,000** (approx) $18,148,673	# 895.01 856 # 890.0054.301 # 890.0054.328 # 890.0054.794 # 890.0054.921 Non-Cayman-Branches of BCCI (Overseas) ICIC Investments Ltd., # 180650
Bank of California New York, New York	$ 1,283,093**	-----
Capital Bank Miami Miami, Florida	$ 24,215** $ 946,485**	----- Non-Cayman Branches of BCCI (Overseas)
	$ 3,053,641**	Capital Equiv. Deposit

DEC-16-1991 19:05 FROM U. S. ATTY 100 CHURCH TO 8368933 P.02

BANK/BROKER	AMOUNT	DESCRIPTION (ACCOUNT/NUMBERS)
First Florida Bank N.A. Tampa, Florida	$15,000,000	Capital Equiv. Deposit
First National Bank of Louisville Louisville, Kentucky	$ 2,650,936**	-----
Manufacturers Hanover Trust Company New York, New York	$ 500,000 (approx.)**	-----
Blunt Ellis & Loewi Inc./ Kemper Securities Group. Inc. Chicago, Illinois	$ 550,000	Brokerage Acc't
Mabon Securities Inc. New York, New York	$ 2,601,793	Brokerage Acc't
Oppenheimer & Co., Inc. New York, New York	$ 2,919,400	Brokerage Acc't
Franklin Trust Company San Mateo, California	$25,393,034***	Brokerage Acc't
-Bear Stearns	$ 5,957,568 510,470 739	ICIC Investments Ltd. # 05569205 # 08969205 # 05398340

DEC-16-1991 19:05 FROM U. S. ATTY 100 CHURCH TO 93689368 P.03

* It is the view of the parties to this agreement that these accounts properly belong to BCCI Overseas. In the event, however, that a determination is made that these assets belong to BCCI, S.A., by a Court of appropriate jurisdiction, at the instigation of someone not a party to this agreement, it is understood and agreed that such assets will be made available to the New York Superintendent if and to the extent necessary to satisfy all of the obligation of the New York liquidation.

** It is the understanding of the parties to this agreement that these accounts are now all being held in the name of non-Cayman branch accounts of BCCI Overseas. In the event that upon further inquiry it is determined by the New York Superintendent of Banks that any of these accounts are, in fact, being held in the name of BCCI S.A. (or any of its branches), this exhibit will be deemed to be automatically reformed to delete reference to such accounts upon the filing of a statement to such effect with the court presiding over the implementation of this proceeding.

*** It is the understanding of the parties to this agreement that this account belongs to BCCI Overseas. In the event that upon further inquiry it is determined by the California Superintendent of Banks that the account is, in fact, being held in the name of BCCI, S.A. (or any of its branches), this exhibit will be deemed to be automatically reformed to delete reference to such account upon the filing of a statement to such effect with the court presiding over the implementation of this proceeding.

1325015-000-10839

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
-v-	:	Crim. No. 91-0655 (JHG)
BCCI HOLDINGS (LUXEMBOURG), S.A. BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A. BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED	:	RECEIVED DEC 19 1991 NANCY M. MAYER-WHITTINGTON CLERK
Defendants	:	

NOTICE OF FILING OF MEMORANDUM OF INTENT AND PLEA AGREEMENT

The United States of America, through its attorneys, the Assistant Attorney General, Criminal Division, Department of Justice, and the United States Attorney for the District of Columbia, respectfully files herewith a Memorandum of Intent and Plea Agreement in the above-titled case.

ASSISTANT ATTORNEY GENERAL
CRIMINAL DIVISION
UNITED STATES DEPARTMENT OF JUSTICE

UNITED STATES ATTORNEY
FOR THE DISTRICT OF COLUMBIA

29B-WF-171994 Sub FS -2x8

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
FEB 12 1992
FBI — WASH. FIELD OFFICE

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1325015-000-10840

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the attached Notice of Filing of Memorandum of Intent and Plea Agreement, and the Memorandum of Intent and Plea Agreement, to be hand-delivered to counsel for the defendants, Eric Lewis, Nussbaum & Wald, One Thomas Circle, Suite 200, Washington, D.C., 20005.

JB. Stephens 12/19/91

JAY B. STEPHENS
UNITED STATES ATTORNEY
FOR THE DISTRICT OF COLUMBIA

1325015-000-10841

Memorandum of Intent

This memorandum confirms the intent of the undersigned to enter into the Plea Agreement attached as Exhibit 1 hereto ("Agreement"), and to apply for and obtain all regulatory, judicial, and administrative consents, and to make whatever other filings, notices, applications are required to seek orders or approvals to be obtained in order for all parties to the Agreement to enter into and fully satisfy the obligations set forth in the Agreement.

In the event that either the U.S. District Court or the New York Supreme Court refuses to accept the Agreement, any payments by the Court Appointed Fiduciaries under the Interim Capitalization Plan set out in paragraph 8(a) shall be reimbursed to the Court Appointed Fiduciaries from funds forfeited from BCCI by the Department of Justice, and in the event that no such forfeiture takes place, from any fines collected by the Federal Reserve.

Agreed by the United States and the People of the State of New York

Department of Justice
Through:

William P. Barr
Attorney General

By: _____
George J. Terwilliger
Acting Deputy Attorney General

People of the State of New York

By: _____
Robert M. Morgenthau
District Attorney
New York County

Agreed by Brian Smouha as one of the Commissaires of BCCI Holdings (Luxembourg) S.A., and Commissaire of Bank of Credit and Commerce International, S.A., not in his individual capacity.

By: _____
Brian Smouha

1325015-000-10842

EXHIBIT 1

/READ/MRI 1216/041
0000 MRI 01216

PP RUCNFB FBIBA

DE FBIWMFO #0028 0412141

ZNR UUUUU

P 102137Z FEB 92

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/PRIORITY/

FBI BALTIMORE/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. CID. WCCS, FIFD, SSA [redacted] b6 b7C

SUBJECT: HIDDEN INTEREST; MC #38; FIF; FAG; OO:WMFO.

FOR THE INFORMATION OF BALTIMORE, CAPTIONED TITLE "HIDDEN INTERESTS" IS A WIDE RANGING INVESTIGATION INTO THE INVOLVEMENT OF THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) WITH THE UNITED STATES BANKING INDUSTRY.

RECENTLY BCCI HAS AGREED TO A FORFEITURE OF $550 MILLION IN ASSETS, CASH AND OTHER, HOWEVER, THIS AMOUNT CAN BE EXCEEDED IF IT IS DETERMINED THAT BCCI POSSESSES MORE THAN

- 3
29B-WF-171994 Sub FS

Searched
Serialized SW
Indexed
Filed SW

1325015-000-10882

THAT AMOUNT IN THE UNITED STATES. CURRENTLY THERE EXISTS A PIECE OF PROPERTY, VALUED AT APPROXIMATELY $4 - $5 MILLION, IN ALEXANDRIA, VIRGINIA WHICH BCCI HOLDS A NOTE TO, THE LISTED OWNER ON THE DEED IS INVESTRADE DEVELOPMENTS OF VIRGINIA, INC, A DELAWARE CORPORATION HAVING AN ADDRESS AT 22 NORFOLK CRESCENT, LONDON W2 2DN ENGLAND.

WMFO IS ATTEMPTING TO DETERMINE THE OWNERSHIP OF INVESTRADE DEVELOPMENTS, INC., IN ORDER TO DETERMINE IF THE PROPERTY IN ALEXANDRIA IS FORFEITABLE UNDER THE PREVIOUSLY MENTIONED FORFEITURE AGREEMENT.

LEADS. BALTIMORE; AT DOVER, DELAWARE.

OBTAIN AND PROVIDE WMFO WITH CERTIFIED COPIES OF ARTICLES OF INCORPORATION FOR INVESTRADE DEVELOPMENTS OF VIRGINIA, INC.

BT

#0028

NNNN

FD-36 (Rev. 8-29-85)

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b7C [redacted]

C-5

FBI

TRANSMIT VIA:
- [X] Teletype
- [ ] Facsimile
- [ ] AIRTEL

PRECEDENCE:
- [ ] Immediate
- [X] Priority
- [ ] Routine

CLASSIFICATION:
- [ ] TOP SECRET
- [ ] SECRET
- [ ] CONFIDENTIAL
- [ ] UNCLAS E F T O
- [X] UNCLAS

Date 2/10/92

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/PRIORITY/

FBI BALTIMORE/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. CID, WCCS, FIFU, SSA [redacted]

b6
b7C

P.2

SUBJECT: HIDDEN INTEREST; MC #38; FIF; FAG; OO:WMFO.

FOR THE INFORMATION OF BALTIMORE, CAPTIONED TITLE "HIDDEN INTERESTS" IS A WIDE RANGING INVESTIGATION INTO THE INVOLVEMENT OF THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) WITH THE UNITED STATES BANKING INDUSTRY.

RECENTLY BCCI HAS AGREED TO A FORFEITURE OF $550 MILLION IN ASSETS, CASH AND OTHER, HOWEVER, THIS AMOUNT CAN BE EXCEEDED IF IT IS DETERMINED THAT BCCI POSSESSES MORE THAN THAT AMOUNT IN THE UNITED STATES. CURRENTLY THERE EXISTS A [redacted]

Searched ____
Serialized SW
Indexed SW
Filed SW

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29B-WF-171994 Sub FS - 3A

Approved: ____ **Original filename:** SEF00346.041

Time Received: ____ **Telprep filename:** SEF00350.041

MRI/JULIAN DATE: 1216/041 **ISN:** 028

FOX DATE & TIME OF ACCEPTANCE: 2/10/92 4:38

1325015-000-10884

PIECE OF PROPERTY, VALUED AT APPROXIMATELY $4 - $5 MILLION, IN ALEXANDRIA, VIRGINIA WHICH BCCI HOLDS A NOTE TO, THE LISTED OWNER ON THE DEED IS INVESTRADE DEVELOPMENTS OF VIRGINIA, INC, A DELAWARE CORPORATION HAVING AN ADDRESS AT 22 NORFOLK CRESCENT, LONDON W2 2DN ENGLAND.

WMFO IS ATTEMPTING TO DETERMINE THE OWNERSHIP OF INVESTRADE DEVELOPMENTS, INC., IN ORDER TO DETERMINE IF THE PROPERTY IN ALEXANDRIA IS FORFEITABLE UNDER THE PREVIOUSLY MENTIONED FORFEITURE AGREEMENT.

LEADS. BALTIMORE; AT DOVER, DELAWARE.

~~BALTIMORE WILL~~ OBTAIN AND PROVIDE WMFO WITH CERTIFIED COPIES OF ARTICLES OF INCORPORATION FOR INVESTRADE DEVELOPMENTS OF VIRGINIA, INC.

BT

/READ 895/041
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OO P12 FBIMM

DE FBIWMFO #0022 0411905

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FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

FBI MIAMI/IMMEDIATE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. OLIA. FLU; CID, WCCS, FIFU, SSA [redacted] b6 b7C

ASD, VPS, ITU, ASSISTANT UNIT CHIEF [redacted] MIAMI. SSA

[redacted].

SUBJECT: HIDDEN INTERESTS: MC #38; FIF; FAG; OO:WMFO.

REQUEST OF FBIHQ: TO APPROVE THE OFFICIAL TRAVEL OF WMFO

SA [redacted] TO GEORGETOWN, GRAND CAYMAN, ON b6 b7C

2/16/92, TO RETURN 2/19/92, FOR THE PURPOSE OF REVIEWING THE

SELECTING RECORDS FROM BCCI (OVERSEAS) [(O)], ICIC INVESTMENT.

ICIC HOLDINGS, LTD, ARE ALL RELATED COMPANIES AND WMFO HAS TO

29B-WF-171994 Sub FS - 4

Searched
Serialized Sec
Indexed
Filed Sec

1325015-000-10886

DETERMINE THEIR TIES WITH BCCI IN ORDER FOR THEIR ASSETS TO BE FORFEITED. RECORDS FOR THESE COMPANIES ARE CURRENTLY HELD IN THE GRAND CAYMANS. ALSO THE UNITED STATES GOVERNMENT CURRENTLY HAS FROZEN $47 MILLION WORTH OF ASSETS, WHICH ARE HELD IN THE UNITED STATES, HOWEVER, THE FREEZE ON THE ASSETS EXPIRES 3/2/92.

ACCORDING TO DOJ, SA [redacted] WILL HAVE ACCESS TO THE RECORDS, BUT WILL BE LIMITED TO VISUALLY REVIEWING THEM AND MARKING FOR COPYING THOSE WHICH ARE DEEMED TO HAVE EVIDENTIARY VALUE. NO COPYING OF RECORDS WILL BE ALLOWED UNTIL A LATER DATE, WHICH HAS YET TO BE DETERMINED. b6 b7C

DOJ INFORMED WMFO THAT ON 2/16/92, TWO FRAUD SECTION ATTORNEYS, [redacted] WILL TRAVEL TO GEORGETOWN, GRAND CAYMAN, FOR FOUR DAYS TO SELECT THE DOCUMENTS. WMFO INTENDS TO SEND SA [redacted] TO REVIEW AND SELECT ICCI DOCUMENTS NEEDED FOR THE FORFEITURE. PROPOSED ITINERARY OF SA [redacted] IS PENDING. FBIHQ AND MIAMI WILL BE ADVISED. b6 b7C

ESTIMATED EXPENSES OF THE TRIP ARE $1,765.20, CALCULATED ON FOUR DAYS PER DIEM AT $266.20 PER DAY ($208.20 FOR HOTEL APPROVED BY ASSISTANT UNIT CHIEF [redacted] VIA TELEPHONE b6 b7C

CONVERSATION AND $58 FOR MEALS). PLUS $698.00 ROUND TRIP AIRFARE.

LEADS. MIAMI; AT GRAND CAYMAN.

WILL SECURE HOST COUNTRY CLEARANCE FOR SA [redacted] b6 b7C

[redacted]

BT

#0022

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FD-36 (Rev. 8-29-85)

[redacted] b6 b7C

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FBI

TRANSMIT VIA:
- [X] Teletype
- [ ] Facsimile
- [ ] AIRTEL

PRECEDENCE:
- [X] Immediate
- [ ] Priority
- [ ] Routine

CLASSIFICATION:
- [ ] TOP SECRET
- [ ] SECRET
- [ ] CONFIDENTIAL
- [ ] UNCLAS E F T O
- [X] UNCLAS

Date 2/10/92

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR/IMMEDIATE/

FBI MIAMI/IMMEDIATE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. OLIA, FLU; CID, WCCS, FIFU, SSA [redacted] b6 b7C

ASD, VPS, ITU, ASSISTANT UNIT CHIEF [redacted] MIAMI. SSA

[redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO:WMFO.

REQUEST OF FBIHQ: TO APPROVE THE OFFICIAL TRAVEL OF WMFO SA [redacted] TO GEORGETOWN, GRAND CAYMAN, ON b6 b7C 2/16/92, TO RETURN 2/19/92, FOR THE PURPOSE OF REVIEWING THE SELECTING RECORDS FROM BCCI (OVERSEAS) [(O)], ICIC INVESTMENT, ICIC HOLDINGS, LTD, ARE ALL RELATED COMPANIES AND WMFO HAS TO DETERMINE THEIR TIES WITH BCCI IN ORDER FOR THEIR ASSETS TO BE [redacted]

Searched
Serialized Sec
Indexed b6
Filed Sec b7C

29B-WF-171994 Sub FS -4A

Approved: _____ **Original filename:** SEF001W.041

Time Received: 1400 **Telprep filename:** SEF00150.041

MRI/JULIAN DATE: 895/041 **ISN:** 022 1325015-000-10889

FOX DATE & TIME OF ACCEPTANCE: 2/10/92 14:03 PST

FORFEITED. RECORDS FOR THESE COMPANIES ARE CURRENTLY HELD IN THE GRAND CAYMANS. ALSO THE UNITED STATES GOVERNMENT CURRENTLY HAS FROZEN $47 MILLION WORTH OF ASSETS, WHICH ARE HELD IN THE UNITED STATES, HOWEVER, THE FREEZE ON THE ASSETS EXPIRES 3/2/92.

ACCORDING TO DOJ, SA [redacted] WILL HAVE ACCESS TO THE RECORDS, BUT WILL BE LIMITED TO VISUALLY REVIEWING THEM AND MARKING FOR COPYING THOSE WHICH ARE DEEMED TO HAVE EVIDENTIARY VALUE. NO COPYING OF RECORDS WILL BE ALLOWED UNTIL A LATER DATE, WHICH HAS YET TO BE DETERMINED. b6 b7C

DOJ INFORMED WMFO THAT ON 2/16/92, TWO FRAUD SECTION ATTORNEYS, [redacted] WILL TRAVEL TO GEORGETOWN, GRAND CAYMAN, FOR FOUR DAYS TO SELECT THE DOCUMENTS. WMFO INTENDS TO SEND SA [redacted] TO REVIEW AND SELECT ICCI DOCUMENTS NEEDED FOR THE FORFEITURE. PROPOSED ITINERARY OF SA [redacted] IS PENDING. FBIHQ AND MIAMI WILL BE ADVISED. b6 b7C

ESTIMATED EXPENSES OF THE TRIP ARE $1,765.20, CALCULATED ON FOUR DAYS PER DIEM AT $266.20 PER DAY ($208.20 FOR HOTEL

APPROVED BY ~~SSA~~ ASSISTANT UNIT CHIEF [redacted] VIA Telephone Conversation AND $58 FOR MEALS), PLUS $698.00 b6 b7C

ROUND TRIP AIRFARE.

LEADS. MIAMI; AT GRAND CAYMAN.

WILL SECURE ~~HOT~~ HOST COUNTRY CLEARANCE FOR SA [redacted] b6 b7C

[redacted]

BT

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	)	CRIMINAL NUMBER 91-0655 (JHG)

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Return

GOVERNMENT'S MOTION FOR RESTRAINING ORDER

The United States of America, by its counsel, hereby moves for a restraining order pursuant to Title 18, United States Code, Section 1963(d)(1)(A), to preserve the availability of property for forfeiture. In support of this motion, the government says the following.

1. ICIC (Overseas), Ltd. is a defendant in this criminal case. Pursuant to paragraph 1(e) of this Court's Order of Forfeiture of January 24, 1992 ("Order of Forfeiture"), all assets of ICIC (Overseas), Ltd. are subject to forfeiture to the United States.

2. ICIC Investment, Ltd. is described in documents available to the government as a "sister company" to ICIC (Overseas) Ltd. These documents describe ICIC Investment and ICIC (Overseas) as having a common parent, ICIC Holdings, Ltd., and they describe ICIC (Overseas) as deriving "indirect economic benefit" from ICIC Investment through said parent company. (See Exhibit A.)

5

29B-WF-171994-Sub FS

1325015-000-10892

3. Other documents reveal that ICIC (Overseas) has guaranteed the obligations of ICIC Investments in corporate resolutions and correspondence with third parties. (See Exhibits A and B.)

4. These documents also reveal that at least one of the directors of ICIC Investment, Mr. W.M. Jafree, also is, or has been, a director of ICIC (Overseas). (Compare Exhibit B with Exhibits C and D.)

5. ICIC Investment, Ltd. has assets at at least three financial institutions in the United States including Oppenheimer & Co., Inc., Bear Stearns & Co., Inc., and the Bank of New York.

6. The government infers from this information that there has been a transfer of funds between ICIC Investment and ICIC (Overseas), that there may be no real distinction between these two entities, that assets held in the name ICIC Investment are the assets of ICIC (Overseas), and that the assets held in the name of ICIC Investment, Ltd. are therefore subject to forfeiture under Title 18, United States Code, Section 1963(a) and paragraph 1(e) of the Order of Forfeiture.

WHEREFORE, the United States prays that this Court enter an order, pursuant to Title 18, United States Code, Section 1963(d)(1)(A) restraining the movement or other disposition of any assets held in the name of ICIC Investment, Ltd. at the following financial institutions for 30 days or until further Order of the Court, whichever is sooner:

Oppenheimer & Co., New York, New York

1325015-000-10893

Bear Stearns & Co., New York, New York

Bank of New York, New York, New York

Respectfully Submitted,

GEORGE W. PROCTOR
Director
Asset Forfeiture Office
Criminal Division
U.S. Department of Justice

by: _____

STEFAN D. CASSELLA
Trial Attorney
1400 New York Ave., N.W.
10th Floor
Washington, D.C. 20005
(202) 514-1263

1325015-000-10894

Lowenthal
copy
26

0 1 1 9 0 1 0 7 4 4

Institutional Credit Department
Dean Witter, Reynolds & Co. Inc.
[illegible] Third Avenue
New York, NY 10017

A/C # 055-69205-10-879

Dear Mr. McDonald:

This is to confirm that the powers of attorney granted to Mr. W.H. Jafree on June 10, 1987 and to Mr. A.H. Dossani on November 16, 1988 by International Credit and Investment Company (Overseas) Ltd. ("ICIC") have not been revoked and are still in full force and effect as of the date hereof.

Moreover, you are hereby advised that paragraph 3 of each of said powers of attorney contemplates the guarantee by ICIC of the obligations of its sister company, ICIC Investments Ltd. Such a guarantee evidences the indirect economic benefit ICIC derives from ICIC Investments Ltd. through our common parent, ICIC Holdings Limited.

We acknowledge that you will be relying upon our guarantee of the obligations of ICIC Investments Ltd. in entering into transactions with ICIC Investments Ltd. and in extending credit thereto.

Very truly yours,

International Credit and Investment Company (Overseas) Ltd.

By: J.H. HUMANI
Title: ASSISTANT MANAGER
Date: 8th DEC 1988

4

Exhibit A

91-0655(JHG)

(75) SC-69205
SC-20611

Certified Copy of Resolutions Adopted by the Board of Directors Whereby a Guarantee Has Been Authorized

1989 MAY 21 P 4:34

RESOLVED, That ICIC (OVERSEAS) LTD. (Name of Corporation) (the "Corporation"), is hereby authorized to guarantee the prompt payment when due of all liabilities, debits, obligations and commitments of ICIC INVESTMENTS LTD. (Name of Customer) to Bear Stearns in the manner set forth in the attached Guarantee and the Chairman of the Board, the President, the Executive Vice President, any Senior Vice President or any Vice President be, and each of them hereby is, authorized to execute, in the name of and on behalf of the Corporation, the Guarantee in said form as the officer executing the Guarantee shall approve, his execution thereof to be conclusive evidence of his approval.

RESOLVED, That the foregoing resolution and the certificates actually furnished to Bear Stearns by the Secretary of the Corporation pursuant thereto, be and they hereby are made irrevocable until written notice of their revocation thereof shall have been received by Bear Stearns; and further

CERTIFICATE

The undersigned President, (or Vice President) and Secretary of the Corporation do hereby SEVERALLY CERTIFY:

(a) That attached hereto are a true copy of the resolutions adopted at a duly constituted meeting of its Board of Directors, held on the 15th day of NOVEMBER, 1989.

(b) That the persons listed below hold the positions set forth opposite their names and are empowered by those resolutions;

Name	Title
1) MR. W.M. JAFFEE W.M. Jaffee	GENERAL MANAGER/DIRECTOR
2) MR. A.M. DOSSANI A. Dossani	MANAGER
3) MR. J.J. HEMANI J.J. Hemani	ASSISTANT MANAGER

(c) That the specimen signatures of each and every person empowered by those resolutions are as follows:

1) W.M.
2) Dossani
3) Hemani

2000-07-48-1917

5

Exhibit B

91-0655 (JHG)

1325015-000-10896

(055) 089-69205-1-9-P79-

REPORT OF NEW ACCOUNT — BEAR, STEARNS & CO.

I.C.I.C. Investment Ltd
Sec T-Bill Plc.
I.C.I.C. House W. Church St.
Attn: Mr. W.H. Talbot
Grand Cayman Is.
British W. Indies

A. INDIVIDUAL
B. JOINT
C. PARTNERSHIP
D. CORPORATION
E. SOLE OWNERSHIP
F. BANK OR TRUST CO
G. INSURANCE CO.
H. STATE AGENCY
BROKER-DEALER
INVESTMENT CLUB
TRUST
MUTUAL FUND
HEDGE FUND

02
76

Exhibit C 6

91-0655 (JHG)

1325015-000-10897

2 3 1 4 3 0 1 2

Diamantopoulos

BEAR STEARNS

INSTITUTIONAL CREDIT DEPT.

FEB MAY 21 P 4:35

55-20611
55-69205
60

Gentlemen:

In connection with your opening of an options account at Bear, Stearns & Co., Inc., you agree to abide by the positions and exercise limits established by the options exchange or other marketplace wherein option transactions for your account may be executed, and further agree that this account shall be handled in accordance with the rules of said exchange or marketplace and the Options Clearing Corp.

Very truly yours,

BEAR, STEARNS & CO., INC.

Agreed and accepted:

By _____
Signature -
V.S. JAFFEE

Title: DIRECTOR

Company name: ICIC INVESTMENTS LIMITED

Account number: _____

Date: FEBRUARY 7, 1990

mvm/0078R/12

7

Exhibit D

91-0655(JHG)

BEAR STEARNS

VERIFICATION OF ADDRESS CHANGE

We have recently received a request for a change in your mailing address. For your protection we ask that you confirm your new mailing address by signing and returning this form. To insure that future mailings, account statements, checks, securities, etc. are forwarded to the correct address you *must* return this form immediately. The change requested is as follows:

OLD ADDRESS

NEW ADDRESS

IMPORTANT: If the new address is *not* correct, please contact us immediately at 1-800-534-1428.

Exhibit E

91-0655 (JHG)

1325015-000-10899

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was sent by facsimile to Michael Nussbaum, Nussbaum & Wald, (202) 775-8992, Suite 200, One Thomas Circle, N.W., Washington, D.C. 20005, Attorney for Court-Appointed Fiduciaries.

January 30, 1992
(Date)

Stefan D. Cassella

x 9

1325015-000-10900

/READ/MRI 1855/044
0000 MRI 01855

OO P12 FBIWMFO

DE FBIMM #0020 0450449

ZNR UUUUU

O 132115Z FEB 92

FM FBI MIAMI (29B-WF-171994) (MLO) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3460//

PASS: 1) HQ PERSONAL ATTENTION FLU/OLIA, SSA [redacted] b6 b7C

FIFU, ~~PCCS~~, CID; 2) WMFO - SSA [redacted]

SUBJECT: HIDDEN INTERRESTS; MC #38; FIF; FAG; OO WMFO.

FOR INFORMATION OF FBIHQ AND WMFO ON 2/13/92, [redacted] b6 b7C [redacted] BRITISH EMBASSY, WASHINGTON D.C. ADVISED THAT THE BRITISH GOVERNMENT AND THE GOVERNOR OF THE CAYMAN ISLANDS HAD AGREED TO THE TRAVEL OF SA [redacted] FROM WMFO TO GEORGETOWN, GRAND CAYMAN ON 2/16/92 RETURNING ON 2/19/92. FOR FURTHER INFORMATION THE GOVERNOR OF THE CAYMAN ISLANDS HAD NO

29B-WF-171994

FS

FEB 13 1992

[redacted] b6 b7C

1325015-000-10901

KNOWLEDGE OF THE ANTICIPATED TRAVEL TO THE CAYMAN ISLANDS BY DEPARTMENT OF JUSTICE (DOJ) ATTORNEYS WHO HAVE INDICATED AN INTENT TO TRAVEL. CLEARANCES WERE GRANTED FOR DEPARTMENTAL ATTORNEYS, [redacted] BASED UPON TELEPHONE CALLS OF SSA [redacted] MIAMI LIAISON OFFICE. b6 b7C

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] SA [redacted] AND THE DEPARTMENTAL ATTORNEYS ARE IN THE CAYMANS IF REQUESTED BY SA [redacted] MIAMI LIAISON OFFICE IS AVAILABLE TO ASSIST WMFO AGENT IF NEEDED DURING THIS TRIP. TELEPHONE NUMBERS FOR SSA [redacted] HAVE BEEN PROVIDED TO SA [redacted]

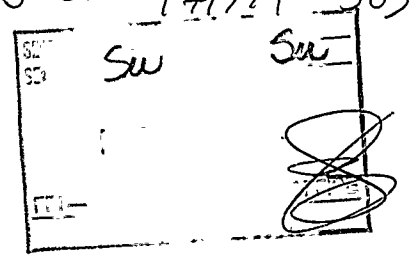
29B-WF-171994

SAB R

SA SA - 6

[redacted] b6 b7C

29B-WF-171994 SUB F/S



Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Subject

Date 2/24/92
Requested by: SA [redacted] b6 b7C
Ext. 4-9123 | Squad: C-5 | File No. 288-WF-171994
Social Security Account #

Aliases

Address [redacted] | Birth Date | Birth Place | Race | Sex ☒ Male ☐ Female b6 b7C

☒ Exact Spelling ☐ All References ☐ Main Security Case Files Only ☐ Security References Only
☐ Main Criminal Case Files Only ☐ Criminal References Only ☐ Main Security *(If no Main, list all Security References)* ☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☒ [redacted] Searched by	3-11-92 Date	☐ ISIS: ☐ NEG ☐ POS Searched by	Date
☒ [redacted] Searched by	2/25/92 Date	☐ OCIS: ☐ NEG ☐ POS Searched by	Date
☒ ELSUR Indices: ☐ NEG ☐ POS Searched by	2/14 Date	☐ IIS: ☐ NEG ☐ POS Searched by	Date
☒ [redacted] Searched by	3-11-92 Date	☐ MICRO: ☐ NEG ☐ POS Searched by	Date
☐ GLOBAL: ☐ NEG ☐ POS Searched by	Date	☐ REGIONAL: ☐ NEG ☐ POS Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
☐ Albany ☐ Bern Switzerland ☐ Bonn Germany ☐ Boston ☐ London England ☐ Mexico City Mexico ☐ New York City ☐ Newark ☐ Paris France ☐ Philadelphia ☐ Rome Italy ☐ All above

Mid-Atlantic
☐ Atlanta ☐ Baltimore ☐ Birmingham ☐ Charlotte ☐ Jackson ☐ Jacksonville ☐ Knoxville ☐ Memphis ☐ Miami ☐ Mobile ☐ New Orleans ☐ Norfolk ☐ Quantico ☐ Richmond ☐ San Juan ☐ Savannah ☐ Tampa ☐ Washington Field ☐ All above

Central
☐ Buffalo ☐ Chicago ☐ Cincinnati ☐ Cleveland ☐ Dallas ☐ Denver ☐ Detroit ☐ El Paso ☐ Houston ☐ Indianapolis ☐ Kansas City ☐ Little Rock ☐ Louisville ☐ Milwaukee ☐ Minneapolis ☐ Oklahoma City ☐ Omaha ☐ Pittsburgh ☐ San Antonio ☐ Springfield ☐ St. Louis ☐ All above

Western
☐ Albuquerque ☐ Anchorage ☐ Butte ☐ Honolulu ☐ Las Vegas ☐ Los Angeles ☐ Phoenix ☐ Portland ☐ Sacramento ☐ Salt Lake City ☐ San Diego ☐ San Francisco ☐ Seattle ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

UCFN ☒ Pos ☐ Neg

GENERAL INDICES:
☐ Automated Search
WF: ☐ Pos ☒ Neg AX: ☐ Pos ☐ Neg
☒ Manual Search

Consolidated by WF: ☐ Pos ☐ Neg AX: ☐ Pos ☒ N Date

Reviewed by Date

CFR CONFIDENTIAL INDICES SEARCH
SEARCHED BY: [redacted]
DATE 2/25/92
☒ NEGATIVE RESULTS
☐ POSITIVE RESULTS (REVIEW INFO. AT CFR)

288-WF-171994 sub F/S

RECORDED ____ INDEXED ____
SERIALIZED [redacted] FILED [redacted]
MAR 24 1992
1325015-000-10923
FBI - WASH. METRO FIELD OFFICE
[redacted]

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date: 3/26/92

To: Office Services Manager

Requested by: [redacted] b6 b7C

Ext. 9123 | Squad: C-5 | File No. 28B-WF-171994

Subject

Social Security Account #

Aliases [redacted] b6 b7C

	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ISIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **OCIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **IIS:** ☐ NEG ☐ POS	Searched by	Date	
☒ **FOIMS:** ☒ NEG ☐ POS	RPH	3/26 Date	
☐ **MICRO:** ☐ NEG ☐ POS	Searched by	Date	
☐ **GLOBAL:** ☐ NEG ☐ POS	Searched by	Date	
☒ **REGIONAL:** ☒ NEG ☐ POS	RPH	3/26 Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☒ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☒ Cincinnati
- ☒ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-10

Consolidated by Date

Reviewed by Date

28B-WF-171994 SEC 5

1325015-000-10924

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

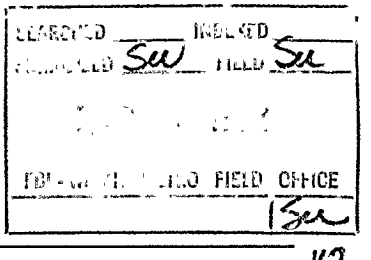
FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/6/92

On March 3, 1992 SA [redacted] received form [redacted] U.S. Department of Justice, Asset Forfeiture Office, documents concerning investment accounts held at Bear Stearns, 55 Water St., New York, New York in the name of International Credit and Investment Company (Overseas) LTD. [ICIC (O)], and ICIC Investment, LTD. b6 b7C

The documents consists of the following: New Account papers; A Guarantee; Amendment to Master Repurchase Agreement; Corporate Account papers; Certificate of foreign status; Miscellaneous correspondences; and account statements from the following accounts, 053-98411, 055-20611, 055-69205, 089-69205, 053-98340 and 207-40235.



Investigation on 3/3/92 at Washington, D.C. File # 29B-WF-171994 SUBFS

by SA [redacted] Date dictated 3/5/92 b6 b7C

1325015-000-10929

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

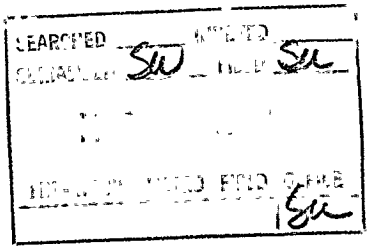
Date of transcription 3/27/92

[redacted] On March 20, 1992 SA [redacted] received from [redacted] U.S. Department of Justice, Asset Forfeiture Office, documents concerning investment accounts held at the following companies: Oppenheimer & Co., Inc., Oppenheimer Tower, World Financial Center, New York, New York (NY); PaineWebber Incorporated, 1200 Harbor Boulevard, Weehawken, New Jersey (NJ); Merrill Lynch, Two Broadway, NY, NY; Shearson Lehman Brothers Inc., 388 Greenwich Street, NY, NY; Morgan Stanley & Co. Inc., 1251 Avenue of the Americas, NY, NY; Prudential Securities Inc., 127 John Street, NY, NY; Mabon Securities Corp., 165 Broadway, NY, NY; Goldman Sachs & Co., 85 Broad Street, NY, NY; and Thomson McKinnon Securities Inc., One State Street Plaza, NY, NY.

b6
b7C

The investment accounts are held in the name of Bank of Credit and Commerce International, S.A.; BCCI Holdings (Luxembourg), S.A.; Bank of Credit and Commerce International (Overseas) Limited; International Credit and Investment Company (Overseas) Limited; and ICIC Investment Limited.

The documents consists of new account papers, corporate account papers, miscellaneous correspondences/account papers and account statements from various accounts held at the above listed investment companies.



Investigation on 3/20/92 at Washington, D.C. File # 29B-WF-171994 SOB FS

by SA [redacted] Date dictated 3/24/92

b6
b7C

1325015-000-10930

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 3/26/92

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

On 3/4/92, SA [redacted] received from [redacted] b6 b7C U.S. Department of Justice Attorney, Asset Forfeiture Office, the attached list of 'Confirmed Received Forfeited Assets'. This is a list from the U.S. Marshals, Southern District New York, and indicates the amount of cash received, as of 2/28/92, in compliance with the court ordered forfeiture agreement between the UNITED STATES OF AMERICA and BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED.

-14

1-WMFO (29B-WF-171994 SUB FS)

SBF/S

RHM:rhm
(1)

29B-WE-171994

MAR 1992

FBI—WMFO

1325015-000-10931

Account No.	Account Name	Approx. Balance	Amount Received	Date Received	Comments
Bank of New York		**S.D. New York**			
018872-500	BCCI (Overseas) Barbados	202,708.55	203,600.46	11-Feb-92	Confirmation received 2/14/92
8109803821	BCCI (Overseas) Barbados	101,108.90	101,108.90	11-Feb-92	Confirmation received 2/14/92
019054-500	BCCI (Overseas) Bombay	3,245,017.16	3,268,126.32	11-Feb-92	Confirmation received 2/14/92
8109803155	BCCI (Overseas) Bombay	851,642.06	882,766.95	11-Feb-92	Confirmation received 2/14/92
8900054840	BCCI (Overseas) Bombay	159,383.66	159,383.66	11-Feb-92	Confirmation received 2/14/92
018856-500	BCCI (Overseas) Cayman	1,834,405.29	1,847,468.88	11-Feb-92	Confirmation received 2/14/92
8109292983	BCCI (Overseas) Cayman	50,919.08	50,919.08	11-Feb-92	Confirmation received 2/14/92
8900051531	BCCI (Overseas) Cayman	745.86	916.57	11-Feb-92	Confirmation received 2/14/92
8900053658	BCCI (Overseas) Cayman	0.00	0.00	11-Feb-92	Confirmation received 2/14/92
8900054301	BCCI (Overseas) Cayman	300,027.55	300,027.55	11-Feb-92	Confirmation received 2/14/92
8900054328	BCCI (Overseas) Cayman	310,849.60	310,849.60	11-Feb-92	Confirmation received 2/14/92
8900054794	BCCI (Overseas) Cayman	33,057.60	33,057.60	11-Feb-92	Confirmation received 2/14/92
8900054921	BCCI (Overseas) Cayman	152,093.70	152,093.70	11-Feb-92	Confirmation received 2/14/92
019089-500	BCCI (Overseas) Panama	8,016,979.39	8,078,042.51	11-Feb-92	Confirmation received 2/14/92
8109298752	BCCI (Overseas) Panama	144,240.44	787,041.90	11-Feb-92	Confirmation received 2/14/92
8900053399	BCCI (Overseas) Panama	386,467.59	386,467.59	11-Feb-92	Confirmation received 2/14/92
Suspense acct.	BCCI (Overseas) Kenya	n/a	30,238.40	11-Feb-92	Confirmation received 2/14/92
Custody Acct. 180676	ICIC (Overseas)	n/a	527,592.32	11-Feb-92	Confirmation received 2/14/92
Custody Acct. 180676	ICIC (Overseas)	n/a	0.00		Book entry Ginnie Mae (face value $165,000)
** Subtotal **		15,789,646.43	17,119,701.99		
Citibank		**S.D. New York**			
36054705	BCCI (Overseas) Grand Cayman	11,064,150.00	11,367,952.14	19-Feb-92	Confirmation received 2/20/92
36080398	BCCI (Overseas) Grand Cayman	4,402.00	30,817.42	19-Feb-92	Confirmation received 2/20/92
Custody Acct.	BCCI (Overseas)	1,181,398.00	1,181,397.68	20-Feb-92	Confirmation received 2/21/92
Custody Acct. 089543	BCCI (Overseas)	537,000.00	0.00		Book entry securities
** Subtotal **		12,786,950.00	12,580,167.24		

As of 02/28/92 (p.m.)

Account No.	Account Name	Approx. Balance	Amount Received	Date Received	Comments
Court Registry Investment System		**S.D. Texas**			
86078	BCCI (Overseas) Macau	109,112.75	0.00		
86047	BCCI (Overseas) Muscat	4,339,738.83	0.00		
86052	BCCI S.A. - Abu Dhabi	60,563,405.50	0.00		
86041	BCCI (Overseas) Seoul	80,770.71	0.00		
** Subtotal **		65,093,027.79	0.00		Subtotal in order = $81,709,103.07
Doha Bank Ltd.		**S.D. New York**			
55804511	BCCI (Overseas)	500,308.00	500,307.58	14-Feb-92	Confirmed 2/19/92
First Florida		**M.D. Florida**			
440-757-7116	Capital Equiv. Dep.	15,299,703.58	15,338,629.19	28-Jan-92	
First National Bank of Louisville		**W.D. Kentucky**			
70328615	BCCI (Overseas)	3,727,520.97	3,727,520.97	30-Jan-92	
Hufstedler, Kaus & Ettinger		**C.D. California**			
Intermagnetics Trust Acct.		487,448.84	487,448.84	30-Jan-92	Received check dated 1/28/92
Kemper Securities		**N.D. Illinois**			
1278-4388	BCCI (Overseas)	583,305.00	591,361.11	11-Feb-92	Confirmation received 2/14/92
Mabon Securities		**S.D. New York**			
04-4050	BCCI (Overseas)	2,661,808.53	2,669,830.92	29-Jan-92	
unk.	ICIC Investments Ltd.	unk.	0.00		Restraining order served on 21-Feb-92.

As of 02/28/92 (p.m.)

MAR 2 '92 7:31 FROM US MARSHALS SDNY PAGE 003

Account No.	Account Name	Approx. Balance	Amount Received	Date Received	Comments
Manufacturers Hanover Trust Co.		S.D. New York			
(none)	BCCI (Overseas)	40,240.00	40,240.00	05-Feb-92	Non-interest bearing account
Paine Webber		S.D. New York			
DN-R5056-01	BCCI (Overseas)	73,000.00	1,008.35	14-Feb-92	Confirmed 2/19/92
Security Pacific Intl.		S.D. New York			
05007001	BCCI (Overseas) Abidjan	3,305,447.05	3,305,447.05	13-Feb-92	Confirmation received 2/14/92
07012001	BCCI (Overseas) Cayman	4,124,193.31	4,124,193.31	13-Feb-92	Confirmation received 2/14/92
04020101	BCCI (Overseas) Istanbul	1,723,590.57	1,723,590.57	13-Feb-92	Confirmation received 2/14/92
04020023	BCCI (Overseas) Izmir, Turkey	308,079.19	308,079.19	13-Feb-92	Confirmation received 2/14/92
04011002	BCCI (Overseas) Karachi	3,056,794.59	3,056,794.59	13-Feb-92	Confirmation received 2/14/92
05011001	BCCI (Overseas) Khartoum	701,251.94	701,251.94	13-Feb-92	Confirmation received 2/14/92
04012039	BCCI (Overseas) Manila	783,178.47	783,178.47	13-Feb-92	Confirmation received 2/14/92
04020030	BCCI (Overseas) Mersin, Turkey	116,667.53	116,667.53	13-Feb-92	Confirmation received 2/14/92
05008001	BCCI (Overseas) Monrovia	103,500.48	103,500.48	13-Feb-92	Confirmation received 2/14/92
03005016	BCCI (Overseas) Paris, France	857,082.72	857,082.72	13-Feb-92	Confirmation received 2/14/92
04018017	BCCI (Overseas) Seoul, Korea	5,714,329.75	5,714,329.75	13-Feb-92	Confirmation received 2/14/92
04031016	BCCI (Overseas) Shenzhen, China	589,044.22	589,044.22	13-Feb-92	Confirmation received 2/14/92
05009001	BCCI (Overseas) Sierra Leone	2,056,883.83	2,056,883.83	13-Feb-92	Confirmation received 2/14/92
04027001	BCCI (Overseas) Sri Lanka	1,818,758.32	1,818,973.32	13-Feb-92	Confirmation received 2/14/92
05012001	BCCI (Overseas) Togo	104,511.45	104,511.45	13-Feb-92	Confirmation received 2/14/92
** Subtotal **		25,363,313.42	25,363,528.42		
Security Pacific National		S.D. New York			
607750471	BCCI (Overseas) Abu Dhabi	1,785,845.00	0.00		
607750491	BCCI (Overseas) Grand Cayman	44,500,000.00	0.00		Face value, U.S. Treasury STRIPS
** Subtotal **		46,285,845.00	0.00		

As of 02/28/92 (p.m.)

MAR 2 '92 7:31 FROM US MARSHALS SDNY PAGE 004

Account No.	Account Name	Approx. Balance	Amount Received	Date Received	Comments
American Express Bank Ltd.		**S.D. New York**			
1509800	Union National Bank	30,832,640.32	0.00		
1605800	BCCI Grand Cayman	61,629,475.21	61,737,266.36	14-Feb-92	Confirmed 2/18/92
703876	BCCI S.A. - Abu Dhabi	8,818,703.73	8,818,703.73	14-Feb-92	Confirmed 2/18/92
703876 (AEB setoff)	BCCI S.A. - Abu Dhabi	23,037,303.36	23,537,303.36	14-Feb-92	Confirmed 2/18/92 (+ $500,000 setoff)
Brokerage Deposit	BCCI (Overseas) Grand Cayman	12,681,119.10	12,201,072.80	14-Feb-92	Confirmed 2/18/92
3/53066	BCCI (Overseas) Chittigong	610,940.61	611,440.61	14-Feb-92	Confirmed 2/18/92
3/53165	BCCI (Overseas) Dhaka	4,305,427.70	4,309,622.51	14-Feb-92	Confirmed 2/18/92
3/53173	BCCI (Overseas) Dakar	734,692.31	735,282.59	14-Feb-92	Confirmed 2/18/92
698316	BCCI (Overseas) Karachi	353,870.68	334,948.68	14-Feb-92	Confirmed 2/18/92
3/705517	BCCI (Overseas) Lahore	4,222,444.79	4,314,682.57	14-Feb-92	Confirmed 2/18/92
714758	BCCI (Overseas) Macau	247,751.59	247,751.59	14-Feb-92	Confirmed 2/18/92
Suspense Deposit	BCCI (Overseas) Macau	1,336,863.84	1,339,202.71	14-Feb-92	Confirmed 2/18/92
3/52977	BCCI (Overseas) Nairobi	606,571.81	607,221.11	14-Feb-92	Confirmed 2/18/92
53116	BCCI (Overseas) Seoul	335,246.63	335,246.63	14-Feb-92	Confirmed 2/18/92
3/711036	BCCI (Overseas) Seychelles	358,297.24	358,297.24	14-Feb-92	Confirmed 2/18/92
AEB setoff		n/a	0.00		See 703876 (AEB setoff) & Brokerage deposit entry
** Subtotal **		150,111,348.92	119,488,042.49		
Bank of California Corp.		**S.D. New York**			
91212381	BCCI Mali	1,283,092.84	1,283,092.84	14-Feb-92	Confirmed 2/18/92
Capital Bank		**S.D. Florida**			
850053580		3,053,641.00	1,853,641.08	21-Feb-92	Partial proceeds from certificate of deposit
			1,200,000.00	27-Feb-92	Remainder of certificate of deposit 850053580
902204122	BCCI Paraguay	1.00	0.00		
902205102		24,215.00	24,215.69	21-Feb-92	Confirmed 2/24/92
902205110		946,485.00	950,853.73	21-Feb-92	Confirmed 2/24/92
** Subtotal **		4,024,342.00	4,028,710.50		

MAR 2 '92 7:32 FROM US MARSHALS SDNY PAGE 005

Account No.	Account Name	Approx. Balance	Amount Received	Date Received	Comments
Oppenheimer & Co., Inc.		**S.D. New York**			
05391180	ICIC Investments Ltd.		0.00		Two accounts (order dated 2/10/92)
05391184	BCCI (Overseas)	2,991,107.70	2,991,107.70	14-Feb-92	Confirmed 2/19/92
Bear Stearns & Co.		**S.D. New York**			
unk.	ICIC Investments Ltd.	unk.	0.00		
Merrill Lynch, Pierce, Fenner & Smith		**S.D. New York**			
unk.	ICIC Investments Ltd.	unk.	0.00		
Dean Witter Reynolds, Inc.		**S.D. New York**			
unk.	ICIC Investments Ltd.	unk.	0.00		
** GRAND TOTAL **		347,102,009.02	206,210,698.14		

As of 02/28/92 (p.m.)

MAR 2 '92 17:32 FROM US MARSHALS SDNY PAGE.006

BCCI FORFEITURE
PENDING TRANSFERS/LIQUIDATIONS AS OF: 20-Feb-92

	Bank of New York		**S.D. New York**	
1.	Custody Acct. 180676	ICIC Investments Ltd.	165,000.00	Face value, Ginnie Mae due 8/15/16. See note. Restraining order served on 4-Feb-92
	Citibank		**S.D. New York**	
2.	Custody Acct. 089543	BCCI (Overseas)	537,000.00	Book entry securities. See note.
	Court Registry Investment System		**S.D. Texas**	
3.	86078	BCCI (Overseas) Macau	109,112.75 }	Pending order from Judge Sand (S.D.NY) allowing
4.	86047	BCCI (Overseas) Muscat	4,339,738.83 }	S.D.TX to release funds.
5.	86052	BCCI S.A. - Abu Dhabi	60,563,405.50 }	
6.	86041	BCCI (Overseas) Seoul	80,770.71 }	
	Paine Webber		**S.D. New York**	
7.	DN-R5056-01	BCCI (Overseas)	73,000.00	Received $1,008.35 (2/14/92). Balance is stock shares. (1,500 shares of Hilton Hotels; 493 shares of General Cinema)
	Security Pacific National		**S.D. New York**	
8.	607750471	BCCI (Overseas) Abu Dhabi	1,785,845.00	
9.	607750491	BCCI (Overseas) Grand Cayman	44,500,000.00	Face value, U.S. Treasury STRIPS. See note.
	American Express Bank Ltd.		**S.D. New York**	
10.	1509800	Union National Bank	30,832,640.32	

As of 28-Feb-92

MAR 2 '92 7:32 FROM US MARSHALS SDNY PAGE.007

	Capital Bank		S.D. Florida	
11.	902204122	BCCI Paraguay	1.00	Bank served on 2/19/92.
	Oppenheimer & Co., Inc.		S.D. New York	
12.	05391180	ICIC Investments Ltd.	unk.	Restraining order served on 4-Feb-92
	[Two accounts (order dated 2/10/92)]			
	Bear Stearns & Co.		S.D. New York	
13.	Unk.	ICIC Investments Ltd.	unk.	Restraining order served on 4-Feb-92
	Merrill Lynch, Pierce Fenner & Smith		S.D. New York	
14.	Unk.	ICIC Investments Ltd.	unk.	Restraining order served on 21-Feb-92
	Dean Witter Reynolds, Inc.		S.D. New York	
15.	Unk.	ICIC Investments Ltd.	unk.	Restraining order served on 21-Feb-92
	Mabon Securities Corp.		S.D. New York	
16.	Unk.	ICIC Investments Ltd.	unk.	Restraining order served on 21-Feb-92
	TOTAL PENDING TRANSFERS/LIQUIDATIONS		$142,986,514.11	See note.

Note: face values of securities are higher than liquidated values. DOJ appears to have at least two reasonable options: directing the financial institutions to transfer the book entries to its own account (which would have to be set up), or directing the financial institutions to sell the accounts and transfer the proceeds to DOJ via wire transfer.

As of 28-Feb-92

MAR 2 '92 7:33 FROM US MARSHALS SDNY PAGE.008
** TOTAL PAGE.008 **

INFORMATION COMMUNICATION Date: 04/03/92

FROM: NORFOLK (RUC)
SQUAD 5

POINT OF CONTACT: IA [redacted] b6 b7C

TO: WMFO (29B-WF-171994) (2)

TITLE: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

References: WMFO airtel to Albany dated 03/17/92.

PURPOSE(S): To note and index a list for defendants and subsidiaries and associated entities. Also to advise of any investigation regarding same.

DETAILS: Norfolk indices are negative regarding the following four defendants:

1. BCCI HOLDINGS (LUXEMBOURG), S.A.
2. BCCI, S.A.
3. BCCI (OVERSEAS) [(O)] LIMITED
4. INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED [(ICIC) (O)].

Norfolk indices are negative regarding how accounts could appear:

1. BCCI (OVERSEAS) TOGO
2. BCCI S.A. - ABU DHABI
3. BCC (ZAMBIA) LTD

Norfolk indices are negative regarding subsidiaries and affiliates with names dissimilar from BCCI as listed:

1. BANCA D'AMERICAZ E D'ITALIA
2. BANCO DE CREDITO E COMERCIO DE INVESTIMENTO S.A.
3. BANCO DE CREDITO Y COMERCIO DE COLUMBIA
4. BANCO DE DECUSNTO
5. BANCO FINAMERICA
6. BANCO MERCANTIL
7. BANK OF COMMERCE AND PLACEMENTS
8. BANK OF CREDIT AND COMMERCE (MISR) SAE

29B-WF-171994 — 15

SUBFS

SU SU

FILE #: 29B-WF-171994

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0 - Work Copy
CC:mp (3)

1325015-000-10939

9. BANQUE DE COMMERCE ET DE PLACEMENTS SA
10. BCC CREDIT AND FINANCE (URUGUAY) SA
11. BCC FINANCE AND SECURITIES LIMITED
12. BCC INVESTMENT HOLDING COMPANY
13. BCCI FINANCE CORPORATION LIMITED
14. BCCI FINANCE NV
15. BCCI LEASING (MALAYSIA) SDN BHD
16. BCP SWITZERLAND
17. CREDIT AND COMMERCE INSURANCE COMPANY (CCIC)
18. CREDIT AND FINANCE CORPORATION, LTD (CFC, LTD)
19. FINANCE AND INVESTMENT INTERNATIONAL LTD (FIIL)
20. ITALFINANCE INTERNATIONAL SPA
21. KUWAIT INTERNATIONAL FINANCE COMPANY SAK (KIFCO)
22. NATIONAL BANK OF OMAN LIMITED (SAO)
23. PT BCC PRATAMA LEASING INDONESIA
24. STOCK INVESTMENT HOLDING COMPANY

Norfolk indices are negative regarding ICIC, which contains the following entities:

1. ICIC APEX LTD (THE ULTIMATE HOLDING COMPANY OF THE ICIC GROUP)
2. ICIC HOLDINGS LTD
3. ICIC INVESTMENTS LTD
4. ICIC (OVERSEAS)
5. ICIC FOUNDATION
6. ICIC STAFF BENEFIT FUND
7. ICIC STAFF BENEFIT TRUST
8. ICIC PORTFOLIOS LTD
9. ICIC PRINCE INTERNATIONAL HOLDINGS LTD
10. CREDIT AND COMMERCE INSURANCE (CCI)
11. CCL FINANCIAL GROUP
    A. CCL ASSURANCE LTD
    B. CCL UNIT TRUSTS LTD
    C. CCL MORTGAGES AND FINANCE LTD
    D. CCL TRUSTEES LTD
12. ICAC (Not known what the initials stand for)
13. ITC (Not known what the initials stand for)

■

1325015-000-10940

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 3/30/92

TO : SAC, WMFO (29B-WF-171994)

FROM : SAC, DETROIT (29B-WF-171994) (RUC) (C-5)

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF;
FAG
(00: WMFO)

Re WMFO airtel to Albany, dated 3/17/92.

For information of WMFO, as requested in referenced airtel, the Detroit Division has indexed the four defendants, the listed subsidiaries and the listed associated entities. In addition, prior to the aforementioned indexing, Detroit Division indices was reviewed for the above, with negative results, in an attempt to identify assets.

In the absence of any further request for investigation, the Detroit Division is considering this matter RUC.

29B-WF-171994 Sub FS

Sub [illegible] - 16

(2) - WMFO
1 - Detroit
MPO/wmb
(3)

*1

[redacted]

b6
b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-10941

FD-36 (Rev. 11-17-88)

C-5

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 4/1/92

TO : SAC, WMFO (29B-WF-171994) (C-5)

FROM : SAC, BALTIMORE (29B-WF-171994) (P)

SUBJECT : HIDDEN INTEREST;
MC #38;
FIF; FAG;
OO: WMFO

RE: WMFO teletype to the Bureau and Baltimore dated 2/10/92.

Enclosed for WMFO is a 1A envelope containing certified copies of corporate records of Investrade Developments of Virginia, Inc.

For the information of WMFO on 2/20/92, SA [redacted] made inquiry at the Office of the Secretary of State, State of Delaware, Division of Corporations regarding Investrade Developments of Virginia, Inc. At that time [redacted] of the Delaware Division of Corporations stated that on 8/24/88, her office received the Certificate of Incorporation of Investrade Developments of Virginia, Inc. [redacted] advised that other corporate records on file with the Delaware Division of Corporations regarding Investrade Developments of Virginia, Inc. include the 1990 Annual Franchise Tax Report; the 1989 Annual Franchise Tax Report; and the 1988 Annual Franchise Tax Report. [redacted] was requested to provide certified copies of each of those documents.

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b7C

2 - WMFO (Encl. 1)
2 - Baltimore (2-29B-WF-171994)
PGC:tam
(4)

29B-WF-171994-Sub FS

Su Su

APR 3 1992

[redacted]

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b7C

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-10942

On 3/26/92, certified copies of the above described documents were provided by the Delaware Division of Corporations and are being forwarded to WMFO in the enclosed 1A envelop.

For the information of WMFO any future request for certified copies of corporate records on file with the State of Delaware would be expedited through the issuance of a Subpoena for those records.

1325015-000-10943

INFORMATION COMMUNICATION Date: 04/03/92

FROM: NORFOLK (RUC)
SQUAD 5

POINT OF CONTACT: IA [redacted] b6 b7C

TO: WMFO (29B-WF-171994) (2)

TITLE: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

References: WMFO airtel to Albany dated 03/17/92.

PURPOSE(S): To note and index a list for defendants and subsidiaries and associated entities. Also to advise of any investigation regarding same.

DETAILS: Norfolk indices are negative regarding the following four defendants:

1. BCCI HOLDINGS (LUXEMBOURG), S.A.
2. BCCI, S.A.
3. BCCI (OVERSEAS) [(O)] LIMITED
4. INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED [(ICIC) (O)].

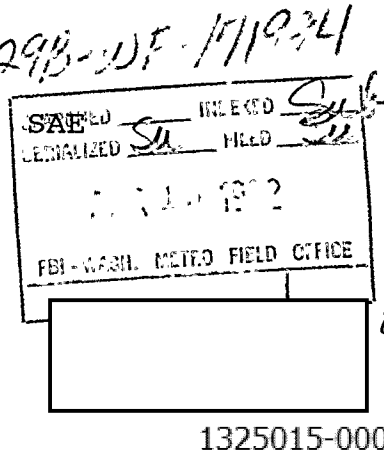
Norfolk indices are negative regarding how accounts could appear:

1. BCCI (OVERSEAS) TOGO
2. BCCI S.A. - ABU DHABI
3. BCC (ZAMBIA) LTD

Norfolk indices are negative regarding subsidiaries and affiliates with names dissimilar from BCCI as listed:

1. BANCA D'AMERICAZ E D'ITALIA
2. BANCO DE CREDITO E COMERCIO DE INVESTIMENTO S.A.
3. BANCO DE CREDITO Y COMERCIO DE COLUMBIA
4. BANCO DE DECUSNTO
5. BANCO FINAMERICA
6. BANCO MERCANTIL
7. BANK OF COMMERCE AND PLACEMENTS
8. BANK OF CREDIT AND COMMERCE (MISR) SAE

29B-WF-171994 - 18



b6 b7C [redacted]

FILE #: 29B-WF-171994

1 - File Copy
0 - Work Copy
CC:mp (3)

1325015-000-10944

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17
19-WMFO
(1-BCCI Squad, Attn: SA [redacted], NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

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b7C

EPG:epg
(20)

29B-WF-171994 Sub FS
-19

Serial _____
Searched Su
Indexed _____
Filed Su

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-10946

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 4/14/92
Attn: SSA [redacted] C-5/NVMRA

From : SSA/PLA [redacted] Legal Squad
Attn: SA [redacted] Legal Advisor, FAST

Subject: FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG
OO: WMFO

This matter is commonly referred to as the BCCI Investigation.

Attached is a copy of an Airtel we recently sent to FBIHQ/Forfeiture and Seized Property Unit concerning seventeen bank account seizures conducted in this case so far by DOJ Money Laundering Section-Attn: Trial Attorney, [redacted] tele [redacted] These seizures are being processed through the United States Attorneys Office, WDC, Attn: Forfeiture AUSA [redacted] as criminal forfeitures pursuant to a Plea Agreement.

The extent of WMFO/FAST's involvement in this matter is limited to keeping FBIHQ/FSPU advised of seizures as we are made aware of them by WDC/USA's office.

The value of seizures conducted to date is:

$ 347,034,008.40

It is our understanding that this makes the case agent, [redacted], the world leader in forfeitures. Congratulations!

2-WMFO
(1-29B-WF-171994)(C-5/NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)

EPG:epg
(2)

29B-WF-171994 - FS

SA [redacted]

[redacted]

1325015-000-10949

4/14/92
TO: SSA [redacted] b6 b7C
SQUAD C-5
NVMRA

FROM: SSA/PLA [redacted]

SUBJECT: BCCI FORFEITURE MATTER

Attached is a memo prepared by SA [redacted] regarding the captioned matter. During his recent file review, we determined that the forfeiture subfile on this matter is assigned to SA [redacted] of your squad. I would ask, if you and [redacted] do not object, that you reassign the subfile to us, where I will assign it to SA [redacted] We have sought to enter all FS subfiles into FOIMS and to further organize the administration of the WMFO forfeiture program. Towards that goal, we have asked that forfeiture subfiles be on our placed on our squad. b6 b7C

Because of the sheer size of the settlement in this matter, I would hasten to add that the success in this matter is that of the white collar SAs who worked the case; our involvement is only to administratively forward the list of properties identified as falling within the court decreed settlement to FBI Headquarters.

If you have any questions or problems, [redacted] could probably resolve them. b6 b7C

thanks

1 - SA [redacted] (A-6) b6 b7C
1 - SA [redacted] (C-5)
1 - LEO

Sue 4-17-92
Reassign Sub FS to [redacted]
4/17/92

29B-WF-171994 Sub FS
Sue Sue -21 b6 b7C
[redacted] Sa/EA

CC: [redacted]
et al:

1325015-000-10951

FD-36 (Rev. 8-29-85)

FBI

C-5
Pending

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 4/13/92

b6
b7C

TO : SAC, WASHINGTON METRO FIELD OFFICE

FROM : SAC, MIAMI (SQUAD WCC-3) (29B-WF-171994) (P)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
oo:WMFO

Reference conversation between Special Agents (SA) [redacted] Miami Division and [redacted] Washington Metro Field Office, on April 10, 1992.

b6
b7C

Enclosed for WMFO is one (1) 1A envelope containing the property receipt and inventory of property received from the United States Marshal Service.

On April 13, 1992, Miami Division received from United States Marshal Service, Marshal [redacted], twelve (12) boxes of computer equipment held in storage at WITHERS TRANSFER AND STORAGE, 10890 NW 29th Street, Miami, Florida, for the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).

b6
b7C

These boxes, along with four small storage boxes containing miscellaneous property, have been sent directly to the Tyson's Corner Resident Agency, attention Special Agent [redacted] under separate cover.

b6
b7C

cc: (3) - WMFO (encl. 1) didn't open yet
2 - Miami
(5)
KM:km

29B-WF-171994 FS-22 Sub

SEARCHED JB INDEXED
SERIALIZED Su FILED Su
APR 13 1992
FBI - WASH. METRO FIELD OFFICE

UCFN ☒ Pos ☐ Neg JB
GENERAL INDICES:
☐ Automated Search
WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg
☐ Manual Search
☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

Approved: [redacted] Transmitted (Number) (Time) Per

b6
b7C

1325015-000-10953

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 3/20/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

In order to better administrate the captioned matter, the following subfiles have been opened:

Sub A.....Outgoing Teletypes/Facsimiles
Sub C.....1As
Sub D.....FD-302s and Inserts
Sub F.....Financial Matters
Sub G.....Atlanta (National Bank of Georgia/BCCI)
Sub H.....Bulky Exhibit Forms (FD-192)
Sub I.....Ghaith R. Pharaon - InterRedec, et al
Sub J.....Collection and Review of Records - BCCI
Sub L.....Los Angeles (Independence Bank - BCCI)
Sub M.....Miami (CenTrust/BCCI activity)
Sub N.....Results of Customs/IRS Joint, Money-laundering Investigation in Middle District of Florida
Sub O.....Results of Investigation by Board of Governors of the Federal Reserve System
Sub P.....Press Coverage
Sub Q.....Subpoenas
Sub R.....Incoming Teletypes/Facsimiles
Sub S.....Airtels (In/Out)
Sub T.....All other banks (Main Bank/Houston; Bank of the Commonwealth/Detroit)
Sub U.....Dr. P. S. Prasad, et al
Sub V.....[redacted]; et al b6 b7C
Sub FS.....Forfeiture/Seizure
~~Sub TS.....TOP SECRET~~ MATERIAL

21-WMFO
(1-29B-WF-171994)
(1-Each Subfile)

JNR:jnr
(21)

Sub File already exist just file C-5

29B-WF-171994 -23 b6 b7C

Searched
Serialized
Indexed
Filed

1325015-000-10954

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
Page 4 ~ Duplicate;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
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Page 14 ~ Duplicate;
Page 15 ~ Duplicate;

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X Deleted Page(s) X
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ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

Sub FS
Sub-19 b6 b7C

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

12/2/93 29B-WF-171994
Searched
Indexed
Filed
UPC 12/2/93

1325015-000-9519

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

C-4
3920-93-F-0207
5/5/94

29B-WF-171994 Sub FS Sub-19-2
3920-93-F-0207

SEARCHED [redacted] FILED [redacted]
SERIALIZED [redacted]
MAY 0 [illegible] 1994
FBI — WASH. METRO FIELD OFFICE

1325015-000-9532

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

		117. Sharing ☐ Yes ☐ No
	11/29/93	118. Award Recommended

b6
b7C

1325015-000-9522

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-92F-207	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS ; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	100 ,000.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	FOLEY & LARDNER, TAMPA FL $ 100 ,000.00

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9521

FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 11
Page 4 ~ Duplicate;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;
Page 16 ~ Duplicate;

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X For this Page X
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62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature

116. PLA Signature/Date

117. Sharing ☐ Yes ☐ No

b6
1325015-000-b7C

118. Award Recommended

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-F-206	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS ; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 35,169.75	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	INT'L NEW YORK FIRST INTERSTATE BANK $ 35,169.75

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9678

FBI/DOJ

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
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0200
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0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted] b6 b7C
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

Subfs
Sub-18-1

12/2/93
29B-WF-171994

Searched
Serialized
Indexed
DEC 2 1993
WMFO

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[redacted] (forms)

12/14/9 [redacted]

1325015-000-9676

Rec'd 12/2/93 SB

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 75
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Page 63 ~ b1; b3; b6; b7C; b7D;
Page 64 ~ Referral/Consult;
Page 65 ~ Referral/Consult;
Page 77 ~ b6; b7C; b7E;
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Page 99 ~ b6; b7C; b7D;
Page 100 ~ b6; b7C; b7D;

To: Washington Field From: Criminal Investigative
Re: 29A-WF-171994, 04/26/2012

LEAD(s):

Set Lead 1: (Info)

WASHINGTON FIELD

AT WASHINGTON, DC

Read and Clear.

Set Lead 2: (Info)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

Read and Clear.

♦♦

1325015-000-8948

CR-11

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/02/2007

To: Washington Field **Attn:** Mark [redacted] b6 b7C

Counterterrorism **Attn:** NTCS/PACU
SSA [redacted]

International Operations **Attn:** SSA [redacted]
FOS

From: Abu Dhabi
Contact: [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 290-WF-171994 (Pending) -927

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: Coverage of lead 924.1.

Reference: 290-WF-171994 serial 924. b6 b7C

Details: Referenced EC reported a possible sighting of a yacht owned by Ghaith Pharaon named Le Pharaon which was moored at the Jumeria Beach Hotel in Dubai, UAE on 01/25/2007. The report came from an email address belonging to [redacted]

Legat Abu Dhabi was unable to confirm the reported sighting through local authorities. The case agent may want to reach out for [redacted] because he/she reportedly has some photographs of the vessel while it was in Dubai. b6 b7C

No additional investigation will be conducted by Legat Abu Dhabi.

[redacted] b6 b7C

1325015-000-8823

290-WF-171994

To: Washington Field From: Abu Dhabi
Re: 290-WF-171994, 10/02/2007

LEAD(s):

Set Lead 1: (Info)

WASHINGTON FIELD

AT WASHINGTON, DC

Read and clear.

Set Lead 2: (Info)

COUNTERTERRORISM

AT WASHINGTON, DC

NTCS/PACU: Read and clear.

Set Lead 3: (Info)

INTERNATIONAL OPERATIONS

AT MIDDLE EAST UNIT, DC

Read and clear.

♦♦

1325015-000-8824

DECLASSIFIED BY: NSICG
ON 05-03-2018

(Rev. 01-31-2003)

b6
b7C

~~SECRET~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/11/2008

To: Records Management **Attn:** NNCP/NCU#3/ICRC/J-07

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted]

Approved By: [redacted]

b6
b7C

Drafted By: [redacted] :mrs

Case ID #: (U) 62F-HQ-C1039976 (Pending) - 86111

Title: (U) NAME CHECK SUMMARY FILE

Synopsis: (U) Review of case file for information regarding [redacted] [redacted]

b6
b7C

~~(U) (S)~~ ~~Derived From : G-3~~
~~Declassify On: 1/9/2033~~

Reference: (U) 62F-HQ-C1039976 Serial 82715

Details: (U) Per referenced EC, Washington Field reviewed 29B-WF-171994-R, serial 83, for information related to [redacted]

b6
b7C

~~(U) (S)~~ A review of 29B-WF-171994-R, serial 83, provided the following information: The serial is a facsimile from FBIHQ, Financial Institution Fraud Unit, dated September 13, 1991, of six articles from various newspapers referencing the Bank of Credit and Commerce International (BCCI) investigation. In an article from The Independant, dated September 9, 1991, titled "China lost $400m in BCCI, says former official," [redacted] was identified as the former [redacted] BCCI's Far Eastern region and the [redacted] of Bank of Credit and Commerce Hong Kong, a subsidiary of BCCI Holdings. No further information on [redacted] was available.

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(U) As no further information on [redacted] was available from the review of this case serial, Washington Field was unable to obtain sufficient information to prepare an LHM suitable for dissemination to the USCIS.

b6
b7C

~~SECRET~~

Lead Covered February 11, 2008 (mc)

-978

S:\CR-11\[redacted]8042MRS2.wpd

290-WF-171994

1325015-000-6675

b6
b7C

To: Records Management From: Washington Field
Re: (U) 62F-HQ-C1039976, 02/11/2008

(U) Washington Field considers the lead covered.

1325015-000-8826

To: Records Management From: Washington Field
Re: (U) 62F-HQ-C1039976, 02/11/2008

LEAD(s):

Set Lead 1: (Info)

RECORDS MANAGEMENT

AT WASHINGTON, DC

(U) Read and clear.

♦♦

1325015-000-8827

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-03-2018 BY [redacted]

(Rev. 01-31-2003)

b6
b7C

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/16/2008

To: Athens
International Operations **Attn:** Eurasia Unit
Washington Field **Attn:** Squad CR-11

From: Counterterrorism
NTCS/Public Access Center Unit/Room 4981
Contact: SSA [redacted]

b6
b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 290-WF-171994-929 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: **Internet Activity Report number 1902802.** The information contained herein was received on the FBI's Internet web site as possibly being related to terrorist or other criminal activity. The submitted text has been incorporated into this communication.

Details: [redacted] Harriman, TN 37748, [redacted] reports that while she was on a recent cruise vacation she took photographs of a yacht docked in Limassol, Cyprus, on Sunday May 11, 2008. [redacted] advises the yacht may be the same yacht owned by Gaith Rashad Pharaon. [redacted] has offered to provide the photographs to the FBI.

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ACS research conducted by the FBIHQ Public Access Center Unit (PACU) regarding Gaith Rashad Pharaon yielded Case ID: 290-WF-171994, Case Agent SA [redacted]

b6
b7C

AutoTrackXP research conducted by the FBIHQ PACU regarding [redacted] confirmed [redacted] Harriman, TN 37748.

b6
b7C

Submitted Text:

"The yacht mentioned in the two articles below was seen in Limassol, Cyprus on Sunday May 11, 2008. I could not find any where on your web site that the fugative owning this yacht was apprehended. I also have pictures of the yacht docked at Limassol, Cyprus. If you

Set + Cover lead to SA [redacted] Lead was assigned + covered 5/19/2008

b6
b7C

1325019-000-8828

need the pictures and supply an email address, I can send them.

We were on a cruise ship and saw the yacht docked and I took a picture. Someone on had mentioned that they thought that this was the yacht that Princess Dianna was on with her boy friend (wrong yacht). I took the picture and did an internet search after I returned home and I found the articles below.

FBI ups ante in hunt for BCCI millionaire

By Paul Lashmar
Sunday, 13 August 2006

The FBI has issued an international alert for a Saudi millionaire thought to be living incognito in the Mediterranean, who is accused of being a key figure in the Bank of Credit and Commerce International fraud.

Gaith Rashad Pharaon, 65, was once a familiar figure in London business circles. But he is now wanted in Washington for a series of federal and international crimes ranging from fraud to financing terrorism.

An FBI despatch to police forces around the world describes Mr Pharaon as being involved in one of the biggest commercial frauds in history. The collapse of BCCI took almost $13bn (£6.9bn) in depositors' money and left 250,000 international creditors unpaid.

Mr Pharaon has evaded the US authorities for almost 15 years. A large reward is offered for information leading to his arrest.

The FBI says Mr Pharaon owns the yacht Le Pharone with a picture of the Sphinx painted on the stern. The yacht was spotted at the beginning of the summer docked off the tiny Italian island of Pantelleria near Sicily. The 90-ton, 60-metre vessel, which sails under the Panamanian flag, was intercepted by FBI agents deployed from Rome in a bid to arrest its owner.

But Mr Pharaon was not located, and the yacht was released. Italian police said the yacht's British captain reported he was heading to Algeria.

The FBI describes Mr Pharaon as extremely wealthy with "numerous contacts within governments around the world". The alert says he is "of stocky build with thinning black hair, graying at the temples". He speaks Arabic, French, English and Greek, and smokes cigars. "He normally wears a small pointed beard, but has been seen with a moustache," the FBI adds.

Mr Pharaon is alleged to have acted as a frontman for BCCI to acquire illegal stakes in American banks. The National Bank of Georgia was allegedly Mr Pharaon's first American target in 1978. According to BCCI's own records, the Luxembourg-based BCCI wound up with a controlling stake.

Fugitive Alert on the Riviera

August 10, 2006 8:02 AM

Brian Ross Reports:

The FBI has put out an all points bulletin for a wealthy fugitive, who has managed to elude U.S. authorities for almost 15 years, traveling on his yacht along the Riviera and around the Mediterranean Sea.

Gaith Rashad Pharaon, a Saudi citizen who once lived in a mansion in Georgia and traveled in elite social and political circles in the U.S., is being sought for his role in one of the largest commercial frauds and bank failures in U.S. history.

Pharaon faces charges of fraud, conspiracy and racketeering in connection with the fall of the Bank of Credit and Commerce International, BCCI, in the early 1990s.

The FBI says Pharaon owns the yacht "Le Pharaon" with a picture of the Egyptian Sphinx painted on the stern.

The yacht was spotted at the beginning of the summer docked at the tiny Italian island of Pantelleria off Sicily. Police raided the vessel at the request of the FBI, but Pharaon was not located, and the yacht was released. Italian police said the yacht's captain reported he was heading to Algeria.

The FBI describes Pharaon as extremely wealthy with "numerous contacts within governments around the world."

1325015-000-8830

His son competes in international speedboat races, according to the FBI, and there is a possibility "that he occasionally watches those races."

Pharaon, 66 years old, is "of stocky build with thinning black hair, graying at the temples." The FBI says he speaks Arabic, French, English and some Greek and smokes cigars."

Submitted ID:

Date: 5/16/2008 1:24:59 AM EDT [5/16/2008 5:24:59 AM GMT]
First Name: [redacted] b6 b7C
Middle Name: [redacted]
Last Name: [redacted]
Phone: [redacted]
Email: [redacted]
Street 1: [redacted]
Street 2:
Suite:
City: Harriman
State: TN
Zip: 37748
Country: USA

Remote IP Address: [redacted]

Remote Host: 72.246.124.6
User Browser Info: Mozilla/4.0 (compatible; MSIE 7.0; Windows NT 6.0; FunWebProducts; SLCC1; .NET CLR 2.0.50727; Media Center PC 5.0; .NET CLR 3.0.04506)

LEAD(s):

Set Lead 1: (Info)

ATHENS

AT ATHENS, GREECE

For information.

Set Lead 2: (Info)

INTERNATIONAL OPERATIONS

AT EAU

Attn: Eurasia Unit. For information.

Set Lead 3: (Discretionary)

WASHINGTON FIELD

AT WASHINGTON, DC

Attn: Squad CR-11-SA [redacted] For information and investigation deemed appropriate.

b6
b7C

♦♦

1325015-000-8832

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/18/2008

To: Counterterrorism **Attn:** NTCS/Public Access Center Unit
SSA [redacted] b6
SA [redacted] b7C

International Operations **Attn:** A/UC [redacted]
FOS

Washington Field **Attn:** SA [redacted]
Squad CR-11

From: Athens
ALAT [redacted] b6
Contact: [redacted] b7C

Approved By: [redacted]

Drafted By: [redacted]:tjl

Case ID #: 290-WF-171994 (Pending) -933

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: To provide response from [redacted] b7D

Reference: 290-WF-171994 Serial 929

Enclosure(s): Information from [redacted] provided b7D
to Legat Athens on 07/17/2008.

Details: [redacted] b6 b7C b7D

UNCLASSIFIED

SEARCHED INDEXED
SERIALIZED FILED
JUL 18 2008
LEGAL ATTACHE - ATHENS

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290-WF-171994-FUG3

1325015-000-8842

To: Counterterrorism From: Athens
Re: 290-WF-171994, 07/18/2008

LEAD(s):

Set Lead 1: (Info)

COUNTERTERRORISM

AT WASHINGTON, DC

For information.

Set Lead 2: (Info)

INTERNATIONAL OPERATIONS

AT WASHINGTON, DC

For information.

Set Lead 3: (Info)

WASHINGTON FIELD

AT WASHINGTON, DC

For information.

♦♦

1325015-000-8843

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/18/2009

To: Washington Field

From: Washington Field
Squad CR-11, NVRA
Contact: SA [redacted]

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :mrs

Case ID #: 290-WF-171994 (Pending) -934
290-WF-171994-SECRET

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: Request subfile be created to maintain documents classified SECRET.

Details: It is requested that subfile SECRET be created to maintain documents gathered during captioned investigation that are classified SECRET.

♦♦

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-03-2018 BY [redacted]

b6
b7C

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 12/17/2009

To: Criminal Investigative **Attn:** Financial Crimes Section,
National Mortgage Fraud Team

Finance Budget Section

Miami SSA [redacted] Sq. C2

b6
b7C

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted]

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :mrs

Case ID #: 290-WF-171994 (Pending) -935

Title: HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

Synopsis: Request CID-DAD concurrence to establish a $100,000 reward for information leading to the arrest and extradition of Ghaith Pharaon.

Details: As background, captioned matter was an investigation of the secret ownership interests in U.S. financial institutions by the Bank of Credit and Commerce International (BCCI). The collapse of world-wide BCCI was at the time the largest bank failure in history. The only remaining investigation related to captioned matter is a fugitive investigation for Ghaith Pharaon, who is thought to reside in Saudi Arabia.

Pharaon participated in a conspiracy with BCCI and its principal officers to defraud the U.S. Government and individual investors. With the assistance of Pharaon, and by employing fraudulent methods such as deceptive stock purchases, hidden stock pledges, nominee agreements, non-recourse loans, and false applications filed with various state and federal regulatory agencies in the U.S., BCCI acquired and controlled the National Bank of Georgia in Atlanta, Georgia, Independence Bank in Encino, California, and Centrust Savings Bank in Miami, Florida. Both Independence Bank and Centrust Savings Bank eventually failed,

9345MRSS.wpd

causing the U.S. Government and its citizens to incur millions of dollars in losses.

BCCI used Pharaon to secretly acquire the National Bank of Georgia and Independence Bank. Although Pharaon was the purported purchaser, BCCI and Pharaon had an agreement whereby the stocks of both banks, with its voting rights, were pledged to BCCI. As a result, BCCI exercised significant control over the personnel and operational decisions of the banks. At no time were U.S. banking regulators informed of the secret agreements between Pharaon and BCCI or of BCCI's true interest in acquiring the banks.

BCCI officials assisted Pharaon in facilitating a fraud by manipulating the financial market for an offering of subordinate debentures issued by Centrust Savings Bank (CSB) in Miami, Florida. In January 1988, Pharaon acquired approximately 25 percent of the stock in CSB. During the same year, CSB received regulatory approval to raise capital by selling 150 million dollars worth of subordinated debentures. Within a few days prior to the issuance date, CSB had not found subscribers for all the debentures. Pharaon and CSB made an agreement wherein BCCI would purchase 25 million dollars worth of debentures, thus ensuring the debenture offering would appear to be fully subscribed. The purchase by BCCI was not a bona fide purchase as BCCI's funds were never at risk. Approximately eight weeks after the issue date, CSB repurchased the debentures from BCCI, at full value plus interest, per the stated agreement. Pharaon and CSB used BCCI to artificially inflate the demand for the debentures and thereby deceived investors as to the true value of the notes. The Miami Division investigation of CSB was maintained as 290-MM-49881, titled "MAJOR CASE # 33; CENTRUST BANK; et al." Pharaon is also a fugitive in the Miami investigation.

In an indictment filed on November 15, 1991, in the U.S. District Court for the District of Columbia, Pharaon was charged with Conspiracy to Commit Wire Fraud, Wire Fraud, Conspiracy to Commit Racketeering, and Aiding and Abetting. A warrant for Pharaon's arrest was issued on the same date. On January 15, 1993, the aforementioned indictment was superseded by one which incorporated the initial indictment and broadened the alleged conspiracy.

Since Pharaon's indictment, the FBI has expended a great deal of effort attempting to locate and arrest Pharaon. One part of that effort throughout the years has been the tracking of the "Le Pharaon," a yacht owned by Pharaon. Law enforcement authorities in several countries have boarded and

1325015-000-8848

searched the yacht for Pharaon, with negative results. Pharaon is aware of the FBI's efforts to locate and arrest him and is believed to restrict his travel to countries where authorities would not assist the U.S. in his arrest and extradition. Pharaon's arrest warrant and his Interpol Red Notice, Number A355/8-1992, are active and valid.

In September 2009, SSA [redacted] FBIHQ Detailee to an Other Government Agency (OGA), notified WFO that the OGA was possibly in a position to provide information about Pharaon. In October 2009, SSA [redacted] and the WFO case agent met with OGA officials and learned that an individual with access to Pharaon, who was an OGA source reporting on other matters, had come forward offering possible information about Pharaon's whereabouts and travel plans. The OGA indicated the individual would provide the information in return for a reward, which the OGA suggested be a minimum of $100,000.00. WFO believes the information which may be provided by the OGA source represents a great opportunity to locate and arrest Pharaon. b6 b7C

The establishment of a significant reward may be the impetus needed for an individual close to Pharaon to provide information on his current whereabouts and travel plans. WFO requests CID-DAD concurrence to establish a $100,000 reward for information leading to the arrest and extradition of Ghaith Pharaon. As the payment of a $100,000 reward would severely impact WFO's annual criminal budget, the National Mortgage Fraud Team is requested to ensure program funds will be available to cover the payment of the reward.

1325015-000-8849

LEAD(s):

Set Lead 1: (Action)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

The Economic Crimes Section is requested to obtain DAD concurrence to establish a $100,000 reward for information leading to the arrest and extradition of Ghaith Pharaon.

The National Mortgage Fraud Team is requested to ensure program funds will be available to cover the payment of the reward.

Set Lead 2: (Info)

FINANCE

AT WASHINGTON, DC

Read and clear.

Set Lead 3: (Info)

MIAMI

AT MIAMI, FL

Read and clear.

♦♦

1325015-000-8850

DECLASSIFIED BY: NSICG
ON 05-03-2018

b6
b7C

~~SECRET~~

Date: 20 December 2009

From: Office of the Legal Attache

Our File Number: F-221-12-09

Subject: Ghaith Fir'awn

Reference: F-152-10-09

UCF#: WF-171994-936

Details:

(U)

b7D

(U)

b7D

~~SECRET~~

CLASSIFIED BY: NSICG [redacted]
REASON: 1.4 (B,D)
DECLASSIFY ON: 12-31-2034
DATE: 05-03-2018

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

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b7C

~~SECRET~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/21/2009

To: Washington Field **Attn:** Squad CR-11
SA [redacted]

b6
b7C

International Operations **Attn:** Middle East Unit
UC [redacted]
SSA [redacted]
FOS [redacted]

From: Amman
Contact: IA [redacted]

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :re

(U) **Case ID #:** ~~(S)~~ 290-WF-171994 (Pending) -937

(U) **Title:** ~~(S)~~ HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

(U) **Synopsis:** ~~(S)~~ Provide information regarding the location of fugitive Ghaith Pharaon.

~~**Derived From :** Multiple Sources~~
~~**Declassify On:** 20341221~~

(U) **Administrative:** ~~(S)~~ [redacted]

b1
b3
b7D

(U) **Details:** ~~(S)~~ [redacted]

b1
b3
b7D

~~SECRET~~

fugitive · WPE

UNCLASSIFIED 1825015-000-8852

To: Washington Field From: Amman
(U) Re: (S) 290-WF-171994 (Pending), 12/21/2009

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

(U) For information only.

♦♦

1325015-000-8853

ALL FBI INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-03-2018 BY [redacted] NSICG

(Rev. 01-01-2008)

b6
b7C

~~SECRET~~//~~NOFORN~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 01/25/2010

To: International Operations **Attn:** Africa Unit
UC [redacted]
SSA [redacted]
FOS

Washington Field **Attn:** CR-11
SSA [redacted]
SA [redacted]

Miami **Attn:** C2
SSA [redacted]

Criminal Investigative **Attn:** Financial Crimes Section
National Mortgage Fraud Team

Counterterrorism **Attn:** ITOS II/ETIU II
SSA [redacted]
IA [redacted]

b6
b7C

From: [redacted]
Contact: Legat [redacted]

b7D
b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :bjm

Case ID #: (U) 290-WF-171994 (Pending) — 138

Title: (U) HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

(U) **Synopsis:** ~~(S//NF)~~ [redacted]

b7D

~~**Derived From :** FBI NSISCG-20080301~~
~~**Declassify On:** 20350125~~

(U)

Details: ~~(S//NF)~~ [redacted]

b7D

~~SECRET~~//~~NOFORN~~

1325015-000-8854

To: International Operations From: [redacted] b7D
Re: (U) 290-WF-171994, 01/25/2010

[redacted] b7D

(U) ~~(S//NF)~~ On 01/24/2010 and 01/25/2010, Legat in coordination with [redacted] b7D

[redacted]

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

DECLASSIFIED BY: NSICG
ON 05-03-2018

b6
b7C

Our File Number: F-36-02-10

Date: 16 February 2010

From: Office of the Legal Attache

Subject: Ghaith Fir'awn

UCF#: WF-171994-940

Ref: F-221-12-09

b7D

(U)

b7D

(U)

b7D

mes

FBI INFO.
CLASSIFIED BY: NSICG [redacted]
REASON: 1.4 (B,D)
DECLASSIFY ON: 12-31-2035
DATE: 05-07-2018

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b7C

~~SECRET~~//~~NOFORN~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 02/25/2010

To: International Operations **Attn:** Africa Unit
UC [redacted]
SSA [redacted]
FOS [redacted]
Interpol
SSA [redacted]
IA [redacted]

b6
b7C

Washington Field **Attn:** CR-11
SSA [redacted]
SA [redacted]

Miami **Attn:** C2
SSA [redacted]

Criminal Investigative **Attn:** Financial Crimes Section
National Mortgage Fraud Team

Counterterrorism **Attn:** TFOS
ITOS II/ETIU II
SSA [redacted]
IA [redacted]

From: [redacted]
Contact: Legat [redacted]

b7D
b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :bjm

Case ID #: (U) 290-WF-171994 (Pending) — 942

Title: (U) HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

(U)
Synopsis: ~~(S//NF)~~ [redacted]

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~~**Derived From :** FBI NSISCG-20080301~~
~~**Declassify On:** 20350125~~

Reference: (U) 290-WF-171994 Serial 938

~~SECRET~~//~~NOFORN~~

1325015-000-8858

To: International Operations From: [redacted] b7D
Re: (U) 290-WF-171994, 02/25/2010

(U) (U) 290-WF-171994 Serial 939

Details: (S//NF) [redacted] b1 b3 b7D

[redacted]

(U) (S//NF) [redacted] b1 b3 b7D

[redacted]

To: International Operations From: [redacted] b7D
Re: (U) 290-WF-171994, 02/25/2010

♦♦
LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

Set Lead 2: (Action)

WASHINGTON FIELD

AT WASHINGTON, DC

(U) [redacted] b1 b3 b7D

1325015-000-8860

FBI INFO.
CLASSIFIED BY: NSICG
REASON: 1.4 (B,D)
DECLASSIFY ON: 12-31-2035
DATE: 05-07-2018

b6
b7C

Precedence: PRIORITY Date: 02/25/2010

To: International Operations Attn: Africa Unit
UC
SSA
FOS
Interpol
SSA
IA

Washington Field Attn: CR-11
SSA
SA

Miami Attn: C2
SSA

Criminal Investigative Attn: Financial Crimes Section
National Mortgage Fraud Team

Counterterrorism Attn: TFOS
ITOS II/ETIU II
SSA
IA

b6
b7C

From:
Contact: Legat

b7D
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b7C

Approved By:

Drafted By: :bjm

Case ID #: (U) 290-WF-171994 (Pending)

Title: (U) HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

*Checked Indices - No Reference to anything outside of bank fraud 2/26/2010 (MA) *

(U)
Synopsis: (~~S//NF~~)

b1
b3
b7D

~~Derived From : FBI NSISCG-20080301~~
~~Declassify On: 20350125~~

Reference: (U) 290-WF-171994 Serial 938
(U) 290-WF-171994 Serial 939

(U)
Details: (~~S//NF~~)

b1
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b7D

Case ID : 290-WF-171994 Serial : 942

~~(S)~~

b1
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(U) ~~(S//NF)~~

b1
b3
b7D

**
LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

Set Lead 2: (Action)

WASHINGTON FIELD

AT WASHINGTON, DC

(U)

(S)

b1
b3
b7D

1325015-000-8863

CLASSIFIED BY: NSICG [redacted]
REASON: 1.4 (B,D)
DECLASSIFY ON: 12-31-2035
DATE: 05-03-2018

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

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b7C

~~SECRET~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/11/2010

To: Washington Field **Attn:** Squad CR-11
SA [redacted]
b6
b7C

International Operations **Attn:** Middle East Unit
UC [redacted]
SSA [redacted]
FOS [redacted]

b7D

From: [redacted]
Contact: IA [redacted]
b6
b7C

Approved By: [redacted] TM

Drafted By: [redacted] :dlc

(U) **Case ID #:** (S) 290-WF-171994 -945 (Pending)

(U) **Title:** (S) HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

(U) **Synopsis:** (S) [redacted]
b7D

~~**Derived From :** Multiple Sources~~
(U) ~~**Declassify On:** 20341221~~

Administrative: (S) [redacted]
b1
b3
b7D

(U) **Details:** (S) [redacted]

b1
b3
b7D

~~SECRET~~

Old Version
See New Version:
File # 290-WF-171994
Serial #: 944

New Version
See Old Version:
File #: 290-WF-171994
Serial #: 945

1325015-000-8864

To: Washington Field From: [redacted] b7D
(U) Re: ~~(S)~~ 290-WF-171994 (Pending), 03/11/2010

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

(U) For information only.

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1325015-000-8865

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 04/27/2010

To: [redacted]
International Operations **Attn:** Africa Unit
SSA [redacted]
Criminal Investigative **Attn:** National Mortgage Fraud Team
SSA [redacted]
Counterterrorism **Attn:** TFOS
SSA [redacted]

b6
b7C
b7D

From: Washington Field
CR-11/Northern Virginia RA
Contact: SA [redacted]

b6
b7C

Approved By: [redacted] VHS

Drafted By: [redacted] pys PHS

Case ID #: 290-WF-171994 (Pending) -947

Title: HIDDEN INTERESTS
MAJOR CASE # 38
OO:WF

Synopsis: To request Legat [redacted]

b7D

Administrative: Reference e-mail and telcal exchanges between SSA [redacted] and Legat [redacted]

b6
b7C

Details: As background, captioned matter was an investigation of the secret ownership interests in U.S. financial institutions by the Bank of Credit and Commerce International (BCCI). The collapse of world-wide BCCI was at the time the largest bank failure in history. The only remaining investigation related to captioned matter is a fugitive investigation for Ghaith Pharaon, who has multiple variants of his name.

Pharaon participated in a conspiracy with BCCI and its principal officers to defraud the U.S. Government and individual investors. With the assistance of Pharaon, and by employing fraudulent methods such as deceptive stock purchases, hidden stock pledges, nominee agreements, non-recourse loans, and false applications filed with various state and federal regulatory agencies in the U.S., BCCI acquired and controlled the National

1325015-000-8873

To: [redacted] From: Washington Field b7D
Re: 290-WF-171994, 04/27/2010

Bank of Georgia in Atlanta, Georgia, Independence Bank in Encino, California, and Centrust Savings Bank in Miami, Florida. Both Independence Bank and Centrust Savings Bank eventually failed, causing the U.S. Government and its citizens to incur millions of dollars in losses.

BCCI used Pharaon to secretly acquire the National Bank of Georgia and Independence Bank. Although Pharaon was the purported purchaser, BCCI and Pharaon had an agreement whereby the stocks of both banks, with its voting rights, were pledged to BCCI. As a result, BCCI exercised significant control over the personnel and operational decisions of the banks. At no time were U.S. banking regulators informed of the secret agreements between Pharaon and BCCI or of BCCI's true interest in acquiring the banks.

BCCI officials assisted Pharaon in facilitating a fraud by manipulating the financial market for an offering of subordinate debentures issued by Centrust Savings Bank (CSB) in Miami, Florida. In January 1988, Pharaon acquired approximately 25 percent of the stock in CSB. During the same year, CSB received regulatory approval to raise capital by selling 150 million dollars worth of subordinated debentures. Within a few days prior to the issuance date, CSB had not found subscribers for all the debentures. Pharaon and CSB made an agreement wherein BCCI would purchase $25 million dollars worth of debentures, thus ensuring the debenture offering would appear to be fully subscribed. The purchase by BCCI was not a bona fide purchase as BCCI's funds were never at risk. Approximately eight weeks after the issue date, CSB repurchased the debentures from BCCI, at full value plus interest, per the stated agreement. Pharaon and CSB used BCCI to artificially inflate the demand for the debentures and thereby deceived investors as to the true value of the notes. The Miami Division investigation of CSB was maintained as 290-MM-49881, titled "MAJOR CASE # 33; CENTRUST BANK; et al." Pharaon is also a fugitive in the Miami investigation.

The BCCI fraud was a world wide scandal. It was one of the largest commercial frauds and the largest bank failures in history. The fall of BCCI resulted in almost $12 billion dollars in depositors' moneys being lost and it left some 250,000 unpaid creditors around the world. Thousand of families lost their life savings in the bank's collapse. Within the United States, BCCI's fraudulent activities caused the closure of two banks.

To: [redacted] From: Washington Field b7D
Re: 290-WF-171994, 04/27/2010

In an indictment filed on November 15, 1991, in the U.S. District Court for the District of Columbia, Pharaon was charged with Conspiracy to Commit Wire Fraud, Wire Fraud, Conspiracy to Commit Racketeering, and Aiding and Abetting. A warrant for Pharaon's arrest was issued on the same date. On January 15, 1993, the aforementioned indictment was superseded by one which incorporated the initial indictment and broadened the alleged conspiracy. Other major defendants in this investigation included:

AGHA HASAN ABEDI, Founder of BCCI and former Director and President of BCCI Holdings. ABEDI was a principal of BCCI Holdings, BCCI Overseas, BCCI SA and ICIC Overseas. He is now deceased.

[redacted] BCCI Holdings, BCCI Overseas, BCCI SA and ICIC Overseas. Described as [redacted] BCCI. [redacted] BCCI after ABEDI's illness in 1983. [redacted] was brought to the United States and plead guilty to [redacted] b6 b7C

Since Pharaon's indictment, the FBI has expended a great deal of effort attempting to locate and arrest Pharaon. One part of that effort throughout the years has been the tracking of the "Le Pharaon," a yacht owned by Pharaon. [redacted] b7D

Pharaon is aware of the FBI's efforts to locate and arrest him and is believed to restrict his travel to countries where authorities would not assist the U.S. in his arrest and extradition. Pharaon's arrest warrant and his Interpol Red Notice, Number A355/8-1992, are active and valid.

Through Legat Algiers, WFO was notified Pharaon may have interests in Algeria and may regularly travel to and from that country. Based on this information, WFO requests that a [redacted] b7D

To: [redacted] From: Washington Field b7D
Re: 290-WF-171994, 04/27/2010

LEAD(s):

Set Lead 1: (Action)

[redacted] b7D

Set Lead 2: (Info)

ALL RECEIVING OFFICES

Read and clear.

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S:\CR-11\[redacted]2010 04 27.wpd b6 b7C b7D

1325015-000-8876

FBI INFO.
CLASSIFIED BY: NSICG
REASON: 1.4 (B,D)
DECLASSIFY ON: 12-31-2035
DATE: 05-03-2018

b6
b7C

~~SECRET//NOFORN~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/02/2010

To: International Operations **Attn:** Africa Unit
UC
SSA
FOS

b6
b7C

Criminal Investigative **Attn:** Financial Crimes Section
National Mortgage Fraud Team

Counterterrorism **Attn:** TFOS/EFOU
SSA
SOS
ETIU 1
SSA
IA

Washington Field **Attn:** Squad CR-11
SSA
SA

From:

b7D
b6
b7C

Contact: Legat

Approved By:

Drafted By: BJM

Case ID #: (U) 290-WF-171994 (Pending) - 951

(U) **Title:** ~~(S)~~ HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

(U)

Synopsis: ~~(S//NF)~~

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b7D

~~**Derived From :** FBI NSISCG 20090615~~
~~**Declassify On:**~~ 20350426

(U)

b7E

Reference: (U) 290-WF-171994 Serial 950
(U) 290-WF-171994 Serial 948

~~SECRET//NOFORN~~

1325015-000-8886

To: [redacted] From: [redacted]
Re: (U) 290-WF-171994, 04/29/2010

(U) Details: (S//NF) [redacted]

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b3
b7D

(U) (S//NF) [redacted]

b1
b3
b7D

(U) (S//NF) [redacted]

b1
b3
b7D

(U) (S//NF) [redacted]

(U) Lead covered.

b1
b3
b7D

To: [redacted] From: [redacted] b7D
Re: (U) 290-WF-171994, 04/29/2010

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

(U) Read and clear.

♦♦

CLASSIFIED BY: NSICG
REASON: 1.4 (B,D)
DECLASSIFY ON: 12-31-2035
DATE: 05-03-2018
ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

b6
b7C

~~SECRET//NOFORN~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/09/2010

To: International Operations **Attn:** Africa Unit
UC
SSA
FOS
Interpol
SSA
IA

Washington Field **Attn:** CR-11
SSA
SA

Miami **Attn:** C2
SSA

Criminal Investigative **Attn:** Financial Crimes Section
National Mortgage Fraud Team

b6
b7C

From:
Contact: Legat

b7D
b6
b7C

Approved By:

Drafted By: bjm

Case ID #: (U) 290-WF-171994 (Pending) -952

Title: (U) HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

Synopsis: (U)

b7D

~~Derived From : FBI NSISCG-20080301~~
~~Declassify On: 20350125~~

Details: ~~(S//NF)~~

b1
b3
b7D

~~SECRET//NOFORN~~

To: International Operations From: [redacted] b7D
Re: (U) 290-WF-171994, 08/09/2010

[redacted]

[redacted] b7D

[redacted]

♦♦
LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

To: International Operations From: [redacted] b7D
Re: (U) 290-WF-171994, 08/09/2010

Set Lead 2: (Action)

WASHINGTON FIELD

AT WASHINGTON, DC

(U) (S) [redacted] b1 b3 b7D

b6
b7C

[redacted] (WF) (FBI)

From: [redacted] (WF) (FBI) b6 b7C
Sent: Friday, August 06, 2010 3:33 PM
To: [redacted] (WF) (FBI)
Subject: RE: FILE REVIEW

UNCLASSIFIED
NON-RECORD

H[redacted] b6 b7C

Per the request, I reviewed 29O-WF-171994 serial 675 and 29O-WF-171994-FUG3 serial 328. Both serials are the same document, further described as an insert dated approximately January 1996, which documented the receipt of an email document from [redacted] regarding potential assets of Ghaith Pharaon (a subject of the WF investigation). No identifying information regarding [redacted] was listed in the document and it was not possible to determine whether the file is identifiable to [redacted] DOB [redacted] b6 b7C

SA [redacted] b6 b7C
WFO, NVRA
[redacted]

From: [redacted] (WF) (FBI) b6 b7C
Sent: Thursday, August 05, 2010 11:21 AM
To: [redacted] (WF) (FBI)
Cc: [redacted] (WF) (FBI)
Subject: FILE REVIEW

UNCLASSIFIED
NON-RECORD

GOOD MORNING, HQ IS REQUESTING THE FOLLOWING FILES/SERIALS BE REVIEWED BY A2 PERTAINING TO [redacted] dob: [redacted] SSAN: [redacted] HE IS THE HUSBAND OF [redacted] PLS REVIEW : 290-WF-171994 SERIAL 675, & 29B-WF-171994-FUG3 SERIAL 328. DETERMINE IF THE FILE IS IDENTIFIABLE TO [redacted] SPOUSE. REPORT YOUR FINDINGS TO PSS [redacted]. PLS DO NOT INCLUDE MY NAME ON YOUR EMAIL. b6 b7C

THANKS/mb

[redacted] b6 b7C

PERSONNEL SECURITY SPECIALIST
SQUAD A2/ GALLERY PLACE
[redacted]

For more information about the Investigative Support capabilities of Squad A-2, please visit our website at
[redacted] b7E

-953

1325015-000-8892

290-WF-171994

UNCLASSIFIED

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/25/2010

To: Counterterrorism **Attn:** NTCS
International Operations **Attn:** Asia Unit
New Delhi **Attn:** Legat

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :mrs

Case ID #: 62F-HQ-C1353064-C (Pending) -696
290-WF-171994 (Pending) -954

Title: INTERNET ACTIVITY REPORT-FUGITIVES

HIDDEN INTERESTS;
MAJOR CASE #38;
et al;
FIF

Synopsis: Response to Internet Activity Report number 2600703.

Reference: 62F-HQ-C1353064-C Serial 654

Details: Per information received in referenced serial, further described as Internet Activity Report (IAR) number 2600703, [redacted] is residing in Hyderabad City, Andhra Pradesh, India and [redacted] Goldstone Technologies LTD, Sharma Apts., Opp, Sangeeth Theatre, S.D Road, Secunderabad. The IAR complainant alleged [redacted] was associated with the collapse of BCCI in which he borrowed over $30,000,000 through fraudulent acts. b6 b7C

As the IAR contained information that [redacted] was involved in the collapse of BCCI, writer queried UNI and ACS and located two serials referencing [redacted] within WFO's BCCI investigation, 290-WF-171994. Within serial 688, further described as a teletype dated April 19, 1996, WFO contacted the New York District Attorney's Office (DANY) to discuss an individual involved in the DANY investigation of [redacted] At the time, WFO had no investigation regarding [redacted] Within subfile D, serial 218, further described as a FD-302 dated August 4, b6 b7C

UNCLASSIFIED

Lead Covered 8/26/2010 MA

1325015-000-8894

10235MS1.wpd

To: Counterterrorism From: Washington Field
Re: 62F-HQ-C1353064-C, 08/25/2010

1992, WFO conducted an interview at the Small Business Administration (SBA) regarding the liquidation of assets from Falcon Capital Corporation, an investment company [redacted] [redacted] No additional serials referencing [redacted] were located during the review. b6 b7C

Through ACS, it was determined that [redacted] was the main subject of a Charlotte Division bank fraud investigation, 29B-CE-64886. Through a review of 29B-CE-64886, serial 54, it was noted that in 1990, [redacted] was accused of loan fraud involving BB&T Bank. [redacted] fled to India. DANY indicted [redacted] for similar activities and began extradition. On May 10, 2002, the extradition was denied by India and [redacted] remained in India. b6 b7C

On August 11, 2010, WFO conducted a query of NCIC and noted an outstanding arrest warrant for [redacted] from the New York City Police Department, telephone number (646) 610-5030. The warrant entry described [redacted] as follows: b6 b7C

Name: [redacted]
Race: White
Sex: male
DOB: [redacted]
SSAN [redacted]
Offense: [redacted]
Date of Warrant: 06/24/1993

update UNI record

b6 b7C

On August 23, 2010, writer telephonically contacted the NYPD, Central Warrants Section, to provide them with the information regarding [redacted] location. NYPD indicated that given the warrant date and the location of [redacted] outside the U.S., that absent an arrest of [redacted] NYPD would take no action on the information. b6 b7C

On August 25, 2010, writer telephonically contacted [redacted] DANY Warrants Section, telephone number [redacted] and subsequently sent a summary of the IAR information to Leary at his electronic mail account, [redacted] b6 b7C

WFO considers the lead in referenced serial covered and will conduct no further investigation on this matter.

To: Counterterrorism From: Washington Field
Re: 62F-HQ-C1353064-C, 08/25/2010

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

♦♦

1325015-000-8896

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b7C

From:
Sent: Wednesday, August 25, 2010 9:36 AM
To:
Subject:

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Hi

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As a follow-up to our telephone call earlier this morning, here's a summary of the information the FBI received (through an FBI Internet website) from an individual in India regarding the current location of fugitive Ponnapula male, DOB SSAN

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b7C

is residing in Hyderabad City, Andhra Pradesh, India, residence telephone numbe is Goldstone Technologies LTD, Sharma Apts., Opp, Sangeeth Theatre, S.D. Road, Secunderabad.

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b7C

I queried NCIC for the arrest warrant regarding The warrant was issued 06/24/1993, the OCA is and the ORI was the NYPD. I believe was indicted by DANY for larceny, possibly related to the BCCI investigation.

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If you have any questions or need additional information regarding this matter, please contact me at Thanks for your assistance in forwarding this to the appropriate section.

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SA
FBI, Washington Field Office
Northern Virginia Resident Agency

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b7C

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 08/09/2010

To: International Operations Attn: Africa Unit
UC [redacted] b6 b7C
SSA [redacted]
FOS [redacted]
Interpol
SSA [redacted]
IA [redacted]

[redacted] Attn: Legat

Washington Field Attn: CR-11
SSA [redacted] b7D
SA [redacted]

Miami Attn: C2
SSA [redacted]

Criminal Investigative Attn: Financial Crimes Section
National Mortgage Fraud Team

From: [redacted]
Contact: Legat [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:bjm

Case ID #: (U) 290-WF-171994 (Pending) -955

Title: (U) HIDDEN INTERESTS;
MAJOR CASE # 38
OO:WF

Synopsis: (U) To advise WFO and [redacted] b7D

[redacted]

Details: (U) In response to previous communication between WFO and [redacted] b7D

[redacted]

UNCLASSIFIED

[redacted] b6 b7C

1325015-000-8899

To: International Operations From: [redacted] b7D
Re: (U) 290-WF-171994, 08/09/2010

[redacted] b6 b7C b7D

(U) [redacted] are listed as: b6 b7C

- [redacted] DOB [redacted]
POB ALGERIA
- [redacted] DOB [redacted] POB
MOROCCO
- [redacted] DOB [redacted] POB ALGERIA
- [redacted] DOB [redacted]
POB ALGERIA
- [redacted] DOB [redacted] POB
ALGERIA.

To: International Operations From: [redacted] b7D
Re: (U) 290-WF-171994, 08/09/2010

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/08/2011

To: Washington Field **Attn:** [redacted] b6 b7C

From: Counterterrorism
NTCS/Public Access Center Unit/Room 4933
Contact: SSA [redacted] b6 b7C

Approved By: [redacted] CM/MB

Drafted By: [redacted]

Case ID #: 290-WF-171994-958 (Pending)

Title: HIDDEN INTERESTS

Synopsis: **Internet Activity Report number 2836501.** The information contained herein was received on the FBI's Internet web site as possibly being related to terrorist or other criminal activity. The submitted text has been incorporated into this communication.

Details: On 3/8/2011, [redacted] b6 b7C Germany 45481, telephone number [redacted] email address: [redacted] reported information concerning the whereabouts of wanted fugitive, Dr. Ghaith Pharaon. Pharaon resides at Villa in the mountains between Damascus and Lebanon, near the Motorway. [redacted] advised that he has Pharaon's mobile phone number and contact information.

ACS research conducted by the FBIHQ Public Access Center Unit (PACU) regarding Ghaith Pharaon yielded Case ID, 290-WF-171994 Serial 10 (Main-Pending), Case Agent [redacted], Squad CR11. b6 b7C

Submitted Text:

"Information regarding "Dr" Ghaith Pharaon
I have meet Mr. Pharaon last year in his ofice in Damascus, as we were asked to advice one of his companies (Tartous Cement). I have also meet with him together the director of the General Organisation for Cement & Building Materials and the environmental Minister of Syria. Mr. Pharaon lives in a nice Villa in the Mountains between Damascus and Lebanon- near to the Motorway.

I didnt knew that he is on your "most Wanted" List until I have made some internet research on his company, as they want to work with us- in the field of advice /consultancy in Cement Businuess.
If you are still looking for him- i have his mobile phone number and contact details. [redacted] wanted to visit us as well. b6 b7C
Just contact me if you need further information, with best regards
[redacted]

Submitted ID:

Date: 3/8/2011 7:20:04 AM EST [3/8/2011 12:20:04 PM GMT]
First Name: [redacted] b6 b7C
Middle Name:
Last Name: [redacted]
Phone: [redacted]
Email: [redacted]
Street 1: [redacted]
Street 2:
Suite:
City: Mülheim an der Ruhr
State:
Zip: 45481
Country: DEU

Remote IP Address: [redacted] b6 b7C
Remote Host:
User Browser Info: : Mozilla/4.0 (compatible; MSIE 7.0; Windows NT 6.0; GTB6.6; SLCC1; .NET CLR 2.0.50727; .NET CLR 3.5.30729; .NET CLR 3.0.30729; .NET4.0C; .NET4.0E)

LEAD(s):

Set Lead 1: (Info)

WASHINGTON FIELD

AT WASHINGTON, DC

Attn: [redacted] Squad CR11. For information and investigation deemed appropriate. b6 b7C

♦♦

1325015-000-8946

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/26/2012

To: Washington Field **Attn:** SA [redacted] Sq CR11 b6 b7C
Criminal Investigative **Attn:** A/UC [redacted]
Financial Intelligence Center
Financial Crimes Section

From: Criminal Investigative
Financial Crimes Section/FinCEN Liaison/Rm 3883
Contact: SSA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] dee

Case ID #: 29A-WF-171994-960 (Pending)

Title: HIDDEN INTERESTS
MAJOR CASE #38
OO:WF

Synopsis: [redacted]

Enclosure(s): [redacted] b7D b3

Details: FinCEN has forwarded the enclosed [redacted] FinCEN provided a courtesy copy of this information to the FBI Liaison at FinCEN. The information is being forwarded to your division for information. This information cannot be shared outside the FBI without first obtaining the approval of FinCEN, which can be coordinated through SSA [redacted] b6 b7C

UNCLASSIFIED

UPLOADED BY: dee 4-27-12

1325018-000 8947

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FEDERAL BUREAU OF INVESTIGATION
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C-5

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 11/14/1996

To: CID **Attn:** SSA [redacted] b6 b7C
IRU#1 [redacted] b7E

WFO **Attn:** SA [redacted] C-5
London **Attn:** Legat

From: Rome
Acting Legat
Contact: ALAT [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] jgh

Case ID #: 29B-WF-171994 (Pending) -733

Title: HIDDEN INTEREST;
MAJOR CASE #38;
[redacted] b6 b7C
FIF; FAG

ARMED AND DANGEROUS b6 b7C

Synopsis: Legat Rome is in receipt of DOJ-OIA instructions to the American Embassy Riyadh, for a request to the Government of Saudi Arabia to expel, deport or extradite [redacted]

Reference: 29B-WF-171994 Serial 685

Details: Referenced telephone conversation of Rome ALAT [redacted] b6 b7C and SA [redacted] of WFO 11/8/96 and Rome facsimile of 11/8/96.

As discussed in referenced telephone call, Legat Rome received via fax from Department of Justice, Office of International Affairs, Criminal Division, Washington, D.C., a copy of request to the American Embassy Riyadh, Saudi Arabia for the assistance of the Government of Saudi Arabia in the expulsion, deportation, or extradition from Saudi Arabia of [redacted] b6 b7C should he flee there from England. In the referenced facsimile, WFO was provided with the extradition request along with supporting documentation which was sent to the American Embassy in Riyadh (which was faxed to Rome). Legat Rome's assistance was requested by DOJ-OIA.

-733

29B-WF-171994

SEARCHED INDEXED
SERIALIZED FILED
DEC 18 1996
FBI — WASH. FIELD OFFICE

132501E-000-8470

To: CID From: Rome
Re: 29B-WF-171994, 11/14/1996

[redacted] has been held extraditable to the U.S. but was freed on a procedural technicality from detainment in London. It is believed he may flee to Saudi Arabia sometime within the 45 days subsequent to his release and prior to resubmission of the charges in England. [redacted] was awaiting extradition to the U.S. where he is being charged by the State of New York in connection with grand larceny and other violations in the Bank of Commerce and Credit International (BCCI) investigation.

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b7C

The purpose of this communication is to seek guidance from WFO, as well as to alert WFO to the status of the request. At this time, [redacted] Riyadh will be contacted and advised that the FBI is in receipt of above request and of the interest in [redacted]

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b7D

1325015-000-8471

To: CID From: Rome
Re: 29B-WF-171994, 11/14/1996

LEAD(s):

Set Lead 1:

RO

AT RIYADH, SAUDI ARABIA

Legat Rome, at Riyadh, Saudi Arabia, will address DOJ-OIA request for assistance with [redacted] b7E

Set Lead 2:

WASHINGTON FIELD

AT WASHINGTON, D.C.

WFO is requested to advised Legat Rome of any action to be pursued at this time including the placing of a "Red Notice" with Interpol in the event [redacted] flees elsewhere. b6 b7C

ARMED AND DANGEROUS

♦♦

1325015-000-8472

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 11/14/1996

To: CID **Attn:** SSA [redacted]
IRU#1 [redacted]

WFO **Attn:** SA [redacted] C-5
London **Attn:** Legat

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b7C
b7E

From: Rome
Acting Legat
Contact: ALAT [redacted]

b6
b7C

Approved By: [redacted]

Drafted By: [redacted]:jgh

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
[redacted]
FIF; FAG

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b7C

b6
b7C

ARMED AND DANGEROUS

Synopsis: Legat Rome is in receipt of DOJ-OIA instructions to the American Embassy Riyadh, for a request to the Government of Saudi Arabia to expel, deport or extradite [redacted]

Reference: 29B-WF-171994 Serial 685

Details: Referenced telephone conversation of Rome ALAT [redacted] and SA [redacted] of WFO 11/8/96 and Rome facsimile of 11/8/96.

b6
b7C

As discussed in referenced telephone call, Legat Rome received via fax from Department of Justice, Office of International Affairs, Criminal Division, Washington, D.C., a copy of request to the American Embassy Riyadh, Saudi Arabia for the assistance of the Government of Saudi Arabia in the expulsion, deportation, or extradition from Saudi Arabia of [redacted] should he flee there from England. In the referenced facsimile, WFO was provided with the extradition request along with supporting documentation which was sent to the American Embassy in Riyadh (which was faxed to Rome). Legat Rome's assistance was requested by DOJ-OIA.

b6
b7C

1325015-000-8473

03/07/97
09:20:22

View Document Attributes

ECFVA0M0

Orig. Office : PA
Document Type : FAX
Document Date : 10/02/96
To . . . . . : PARIS
From . . . . : OIA
Case ID . . . : 29B-WF-171994 Serial : 734
Topic . . . . : [redacted] HARD COPY OF AG LETTER ALREADY FAXED TO [redacted] b6 b7C
Author . . . :
Approver . . :
Ref. Case ID :

Responses :
Text . . :
FIF . . . :

Serial :

Class Level : SN Authority : Duration : SCI :
Rule 6(e) . : Caveats . : FD-501 . :

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F15=PrevDoc F16=NextDoc

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/03/1997

To: FBIHQ, CID **Attn:** INFO
SSA [redacted]
IRU, [redacted]

LEGAT LONDON **Attn:** INFO
LEGAT ROME **Attn:** ALAT [redacted]

From: WFO
C-5/NVRA
Contact: SA [redacted] (202) 324-6415

Approved By: [redacted]

Drafted By: [redacted] ch

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
Major Case #38;
FIF; FAG;
OO: WFO

Synopsis: WFO response to Legat Rome's request regarding [redacted].

Reference: 29B-WF-171994, Serial 733

Details: Referenced 11/14/96 Rome EC was received at WFO on 12/18/96.

As stated in referenced Rome EC, Legat Rome has received a request for assistance from DOJ-OIA regarding [redacted] DOJ-OIA is pursuing extradition proceedings on [redacted] at the request of the District Attorney of New York, New York (DANY). The FBI and WFO have no interest in [redacted] at this time and are unfamiliar with the eventual prosecution of [redacted] by DANY.

♦♦

29B-WF-171994-736

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 0 . 1997
FBI — WASH. METRO FIELD OFFICE

BCC: ROME.EC

1325015-000-8478

Routing Slip
FD-4 (Rev. 8-8-89)

Date 2/8/97

To: ☐ Director
Att.: _____

☒ SAC WFO
☐ ASAC _____
☐ Supv. _____
☐ Agent _____
☐ OSM _____
☐ Rotor # _____
☐ Steno _____
☐ Typist _____
☐ M _____
Room _____

FILE # _____
Title _____
RE: _____

☐ Acknowledge
☐ Assign ☐ Reassign
☐ Bring file
☐ Call me
☐ Correct
☐ Deadline _____
☐ Delinquent
☐ Discontinue
☐ Expedite
☐ File

☐ For Information
☒ Handle
☐ Initial & return
☐ Leads need attention
☐ Mark for indexing
☐ Open case
☐ Prepare lead cards
☐ Prepare tickler
☐ Recharge file ☐ serial
☐ _____
☐ Send to
_____

☐ Return assignment card
☐ Return file ☐ serial
☐ _____
☐ Return with action taken
☐ Return with explanation
☐ Search and return
☐ See me
☐ Type

original serial being sent back to Office of Origin!

b6
b7C

29B-WF-171994
Serial 738

SAC

Office Legal Rome

_____ See reverse side

*U.S. Government Printing Office: 1990 — 282-066/25201

1325015-000-8479

When High Fliers Become Frequent Fliers

Fugitive Financiers Still Have Plenty of Places to Run, but Fewer to Hide

1. ROBERT VESCO
DATE FLED 1972
WANTED FOR Fraud
WHEREABOUTS Imprisoned in Cuba last year

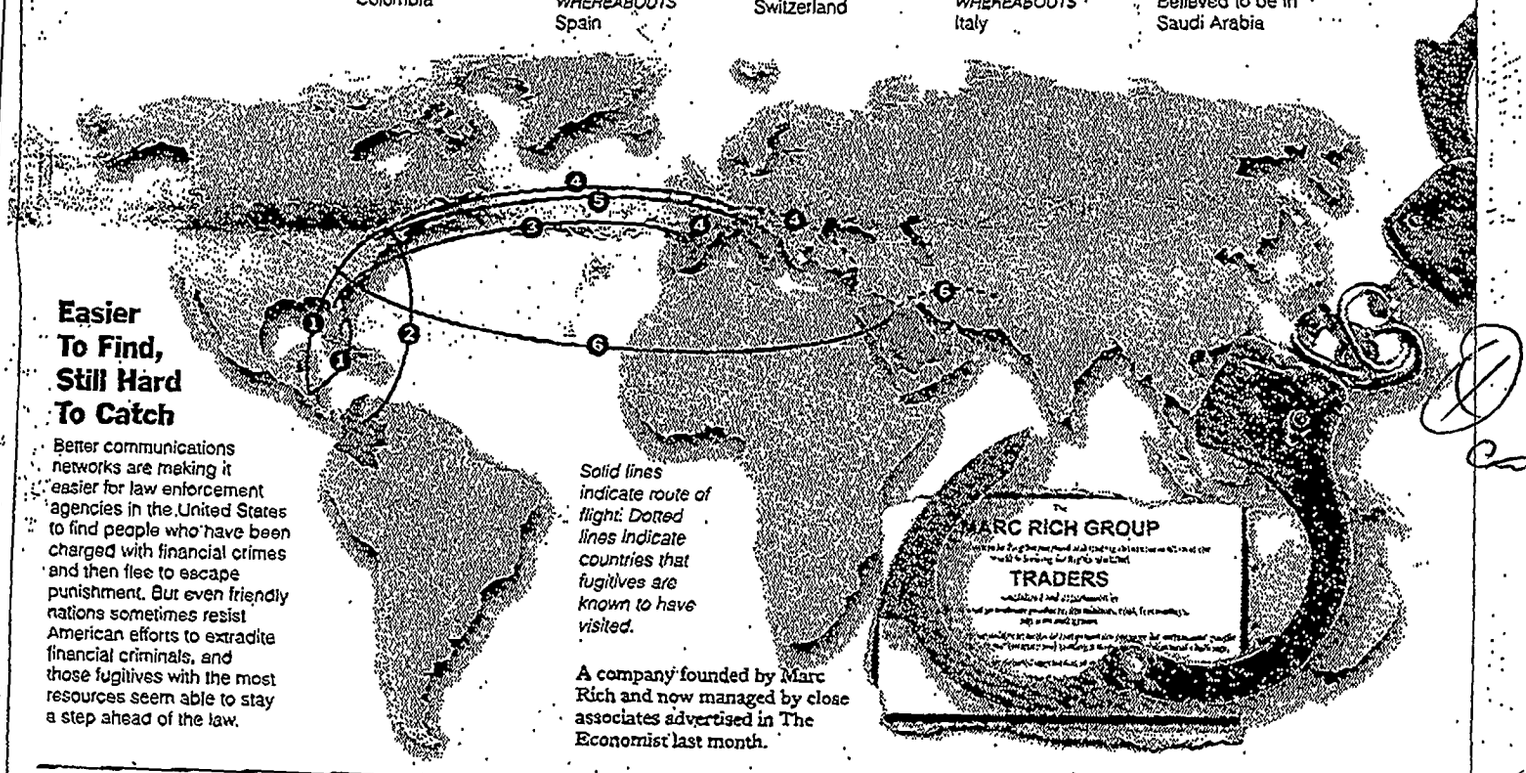
2. DARIO GARCES-VELEZ
DATE FLED 1994
WANTED FOR Money laundering
WHEREABOUTS Colombia

3. MIGUEL GONZALO BECAREY JR.
DATE FLED 1987
WANTED FOR Conspiracy, bribery, fraud
WHEREABOUTS Spain

4. MARC DAVID RICH
DATE FLED 1982
WANTED FOR Tax evasion, illegally trading oil with Iran
WHEREABOUTS Switzerland

5. GIANCARLO PARRETTI
DATE FLED 1997
WANTED FOR Perjury and evidence tampering
WHEREABOUTS Italy

6. GHAITH R. PHARAON
DATE FLED 1991
WANTED FOR Fraud and racketeering
WHEREABOUTS Believed to be in Saudi Arabia



Easier To Find, Still Hard To Catch

Better communications networks are making it easier for law enforcement agencies in the United States to find people who have been charged with financial crimes and then flee to escape punishment. But even friendly nations sometimes resist American efforts to extradite financial criminals, and those fugitives with the most resources seem able to stay a step ahead of the law.

Solid lines indicate route of flight. Dotted lines indicate countries that fugitives are known to have visited.

A company founded by Marc Rich and now managed by close associates advertised in The Economist last month.

By PETER TRUELL

Giancarlo Parretti, the flamboyant former Hollywood mogul, could well be visiting his aging parents these days at the family olive farm just outside Orvieto, a medieval hilltop city some 70 miles north of Rome, his American lawyers say. They are not sure, though, since they communicate with him solely by fax.

Mr. Parretti, who mounted a $1.3 billion takeover of Metro-Goldwyn-Mayer Inc. in 1990 only to lose control of the studio a year later amid allegations of financial mismanagement, is, after all, a man on the run.

The financier jumped bail and fled to his native Italy shortly before a Jan. 6 sentencing hearing in Delaware, his lawyers said early this month. At the hearing, he faced as much as 10 years in prison on perjury and evidence-tampering convictions growing out of the legal battle for control of the studio.

Exactly how and when the 55-year-old Mr. Parretti left the United States is a mystery. But by skipping the country, he has become the latest addition to the band of rogue financiers who have put off their date with American justice. And in joining the likes of Marc D. Rich and Robert Vesco, he has entered the shadowy — and shifting — world of the high-powered fugitive.

Because of technological advances in international police work — chiefly the explosive growth in computer data bases and the lightning-fast transmission of photos — those fugitives are finding that they can hide, but not run, at least not easily after the initial flight. Those who last the longest find a safe haven and hunker down, law enforcement officials say, avoiding high profiles and unnecessary movement.

The authorities say that no fugitive is ever really safe in an age when the next-door neighbor or the kid down the block can be the kind of vigilant citizen who regularly checks out the Justice Department's wanted list on the World Wide Web. Tracking down fugitives "is getting a little bit easier using these sophisticated programs," said James Carney, an inspector with the United States Marshals Service, the agency that brings them back.

But for all that, the wheels of justice can still turn awfully slowly. The United States has had little success in persuading even friendly nations to tighten laws that provide safe harbors for financial fugitives. And often there are serious questions about how hard anyone tries to find these international scofflaws.

In Mr. Parretti's case, for instance, an arrest warrant has been issued by Delaware authorities and a

Continued on Page D6

ORIGINAL SERIAL

92-NY-236972 29B-WF

ORIGINAL SERIAL

29B-WF-171994-738

1325015-000-8480

High Fliers as Frequent Fliers: For Fugitive Financi(

Continued From First Business Page

bail-forfeiture hearing has been set for Jan. 24, according to Paul R. Wallace, the state prosecutor handling the case. But no American officials have been dispatched to Orvieto or anywhere else abroad to find Mr. Parretti, Mr. Wallace said, explaining that such bilateral matters take time to work out.

Even if he is found, it may be some time before he returns to the United States, if ever. One measure of how hard it can be to win extradition is that in fleeing the United States, Mr. Parretti left behind another legal battle in Los Angeles, where he had been fighting an arrest warrant issued by the French Government for other MGM-related charges.

The United States has been trying to get its hands on some fugitives for years, even decades. For example, Mr. Rich, a suave international commodities trader, has lived openly in Zug, Switzerland, since 1982 after fleeing the United States to avoid prosecution in a tax case. Mr. Vesco left the country in 1972, when he fled Federal charges that he defrauded mutual fund investors of $224 million. He is now serving 13 years in a Cuban jail for other matters.

Ghaith R. Pharaon, the former front man for the Bank of Credit and Commerce International and its illegal purchases of financial institutions in the United States, was indicted on fraud and racketeering charges in 1991. He now flits between his native Saudi Arabia and Pakistan, former associates say.

The number of fugitive financiers is growing, said an official at the Office of International Affairs in the Department of Justice's criminal division, though the official, who spoke on condition of anonymity, declined to provide specific figures. It is simply easier now than it was some years ago to get on a plane and disappear, at least at first, the official said, particularly since English has been increasingly adopted as the international language.

Meanwhile, the number of extraditions, relating to financial crimes and otherwise, has remained relatively flat. During the 12-month period ended Sept. 30, 160 people were extradited in all categories of crime, according to the Marshals Service. There were 191 extraditions for the period ending Sept. 30, 1995, and 177 for the year before that.

What hurts the "recovery" rate, Federal officials say, is that some countries, like Cuba, have no extradition treaty with the United States, while others, like Switzerland, make distinctions among forms of financial skulduggery that provide a safe haven to some.

"When you talk of financial crimes, you have to be careful," said Erwin Jenni, head of the extradition service at the Swiss Justice Department in Bern. In Switzerland, he explained, financial crimes involve fraud or embezzlement. Then there are so-called fiscal offenses, he said, which cover tax matters. "We don't extradite for fiscal and customs offenses," Mr. Jenni said, a policy that allows Mr. Rich, who has been indicted in the United States on charges of evading $48 million in income taxes, to live in Alpine comfort in Zug.

Another problem, said Mr. Carney of the Marshals Service, occurs when a fugitive successfully applies for citizenship in a foreign country. "Only some countries will extradite their own citizens," he explained.

To improve the Justice Department's record for capturing big-time fugitives, Attorney General Janet Reno last month started an interagency fugitive alert service, in conjunction with the United States Information Agency and the Voice of America. The effort includes a site on the World Wide Web (http://www.usdoj.gov/criminal/olafug/fugitives.htm) showing pictures of the most wanted fugitives.

In August, the Justice Department and the Voice of America began a radio broadcast, "International Crime Alert," that highlights a different fugitive each week. The program is heard in more than 50 countries.

While the new efforts have yet to bring in any well-known fugitive financiers, they did lead to the recent arrest in Guatemala of Leslie I. Roggé, a convicted bank robber who escaped from an Iowa prison, F.B.I. officials said. An American teenager living in Guatemala recognized Mr. Roggé from a picture on the F.B.I. web site, they said. Mr. Roggé had been working in the teen-ager's neighborhood as a handyman.

Most big-time fugitives have been a lot luckier than that. The anecdotal evidence suggests that those fugitives who have substantial reserves of money, like Mr. Rich, have a good chance of remaining at large. Mr. Rich even formed a new commodities trading firm in Zug. The firm, now run by others, has been a huge success — and a galling symbol of frustration to American authorities.

A fistful of passports also seems to help. Most of the long-term financial fugitives on the Justice Depart-

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ers, Fewer Places to Hide

For businessmen on the run, the challenge is to keep a low profile.

ment's list appear to hold at least two. Mr. Rich, for example, has American, Israeli and Spanish citizenship, sometimes visiting Spain and Israel on secret sojourns out of Switzerland. Mr. Pharaon, of the B.C.C.I. case, is believed to have both Saudi and Pakistani passports.

It is not that the American authorities give up trying to recapture those fleeing overseas. There have, for example, been occasional negotiations through intermediaries between Mr. Rich's lawyers and American law enforcement agencies to see if his return could be arranged. A variety of elaborate ruses to catch Mr. Rich outside Switzerland have also been considered and sometimes tried. In one such attempt, the American authorities staged a complicated commodities deal in an unsuccessful effort to lure Mr. Rich either to Kazakstan or Monte Carlo.

Some famous fugitives find it hard to stay out of trouble. Mr. Vesco is now languishing in jail following his conviction in Havana in August on charges of "fraud and illicit economic activity."

Others raise their public profile too high. David Friedland, a former New Jersey state senator who masterminded a plot to defraud $20 million from a local teamsters pension fund, found that out. After faking a fatal diving accident in 1985 in the Bahamas, Mr. Friedland moved to the Maldive Islands in the Indian Ocean. Using an alias, he bought and ran a number of scuba-diving schools there and even had his picture printed on a postcard. Such showmanship helped American authorities track him down in 1987. Mr. Friedland, who pleaded guilty to racketeering charges, was extradited and sentenced to 15 years in jail.

Eddie Antar, a fugitive from fraud charges for two years after the collapse of the Crazy Eddie electronics discount chain he co-founded, also has himself to blame for getting caught. The authorities got on his trail after he went to the police in Switzerland in 1992 and demanded help in gaining access to a $32 million bank account he kept under an alias.

Mr. Antar was arrested a short time later in Israel and extradited to the United States, where he faced charges that he defrauded shareholders of more than $74 million. After Federal convictions were overturned, Mr. Antar pleaded guilty last year to one racketeering count. Mr. Antar, who has already served four years in prison, is expected to receive three to five years more at a hearing next month.

The failure of Mr. Friedland and Mr. Antar to stay hidden highlights a key problem for a fleeing financier. Often, the flamboyance and egotism that helped bring riches in the first place cannot be repressed. The fugitive finds it hard to keep out of the public eye, let alone out of trouble.

Mr. Parretti, who began his career as a hotel waiter, has a history of high living and may find it tough to avoid the limelight now. When he took over MGM, he bought a Rolls-Royce, a jet and a $9 million mansion even as the studio bounced checks to stars like Dustin Hoffman and missed interest payments on bonds.

But for the moment, Mr. Parretti seems to be lying low. Manlio Morcella, his lawyer in Orvieto, did not reply to questions sent to his office, though he has given short interviews in Italy to say that Mr. Parretti had returned to face separate charges there relating to criminal bankruptcy and tax fraud.

Getting in trouble in a number of jurisdictions generally bodes ill for a fugitive, making it that much harder to remain at large.

In addition to his Delaware convictions and the charges in Italy, Mr. Parretti is accused of fraud in France relating to the hundreds of

took over the studio after accusing Mr. Parretti of defaulting on the loans and of gross mismanagement. It recently sold the studio to a group that includes Kirk Kerkorian, the investor who originally sold MGM to Mr. Parretti.

With all the legal swords hanging over his head, Mr. Parretti may find a much-needed sense of sanctuary in Orvieto. The city is famed for its soft white wine. It is also known for a fresco-filled marble cathedral, where many come to pray.

TOTAL P.04

1325015-000-8483

03/07/97
09:17:59

View Document Attributes

ECFVA0M0

Orig. Office : LO
Document Type : OTHER
Document Date : 01/16/97
To . . . . . : LONDON
From . . . . : SECSTATE WASHDC
Case ID . . . : 29B-WF-171994 Serial : 737
Topic . . . . : [redacted] TO TRAVEL TO LONDON
Author . . . :
Approver . . :
Ref. Case ID :

Responses :
Text . . :
FIF . . . :

b6
b7C

Serial :

Class Level : SN Authority : Duration : SCI :
Rule 6(e) . : Caveats . : FD-501 . :

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F15=PrevDoc F16=NextDoc

29B-WF-171994
DCR/dcr

[redacted] The following investigation was conducted by SA [redacted] on 12/20/96:

b6
b7C

SA [redacted] received a telephone call from [redacted] Naval Intelligence, [redacted] regarding the vessel La Pharoan. [redacted] advised that as of 11/27/96, the La Pharoan was in dry dock in DUBAI. [redacted] advised that she will notify SA [redacted] of any change in the whereabouts of the La Pharoan.

b6
b7C

29B-WF-171994
DCR/dcr

[redacted] The following investigation was conducted by SA [redacted] on 12/20/96: b6 b7C

SA [redacted] received a telephone call from [redacted] b6 b7C
Naval Intelligence, [redacted] regarding the vessel La Pharoan. [redacted] advised that as of 11/27/96, the La Pharoan was in dry dock in DUBAI. [redacted] advised that she will notify SA [redacted] of any change in the whereabouts of the La Pharoan.

29B-WF-171994-740

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 0 . 1997
FBI - WASH. METRO FIELD OFFICE

BCI. INS

1325015-000-8488

Federal Bure[redacted] Investigation
Interna[redacted]ting Slip (rev.7/23/96)

To	Room	Name/Title
	7443	Mr [redacted]
	7455	Mr [redacted]
		International Relations Section
	7443	Mr [redacted] acant
	7443	Mr [redacted]
		International Relations Unit 1
	7458	Mr. [redacted] Mrs. [redacted]
	7458	Ms. [redacted]
	7458	Mrs [redacted]
	7458	Mrs [redacted]
	7458	Mr. [redacted]
	7458	Mrs [redacted]
	7458	Mr. [redacted]
		Protocal Affairs Unit
	7458	Mr [redacted]
	7458	Mr [redacted]
	7458	Mr [redacted]
	7458	Ms [redacted]
	7458	Mr [redacted]
	7458	Mis [redacted]
		International Relations Unit 2
	7458	Mr [redacted] Ms [redacted]
	7458	Mrs [redacted]
	7458	Mrs [redacted]
	7458	Ms. [redacted]
	7458	Mr. [redacted]
	7458	Ms. [redacted]
	7458	Ms. [redacted]
		Legat Support Unit
	7455	Ms [redacted]
	7455	Mr [redacted]
	7455	Mr [redacted]
	7455	Mr [redacted]
	7455	Ms [redacted]
	7455	Mr [redacted]
	7455	Mr [redacted]
	7455	Ms [redacted]
		Interpol
	7458	Mr [redacted]
	7458	Mr [redacted]

To	Room	Name/Title
	7176	The Director
	7142	Mr [redacted]
	7116	Mr. [redacted]
	11861	Mr. [redacted]
	Quantico	Mr. [redacted]
	6012	Mr. [redacted]
	5829	Ms. [redacted]
	7110	Mr. [redacted]
	3090	Mr. [redacted]
	7427	Mr. [redacted]
	7129	Mr. [redacted]
	6032	Mr. [redacted]
	7240	Mr. [redacted]
	7901	Mr. [redacted]
		WFO Attn: 29 Desk
	7116	Mr [redacted]
	3012	Mr [redacted]
	5129	Admin/Budget Unit
	5173	Automation Unit
	4981	Samms Board
	1B327	Mail Room (Legat Clerk)
	5734	Records Branch
	6248	Reading Room
		International Cooperation Unit
	7436	Mr [redacted] Ms. [redacted]
	7436	Mr [redacted]
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	7436	Mrs [redacted]
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b6 b7C b6 b7C b6 b7C b6 b7C b6 b7C b6 b7C

- ☐ Call Me
- ☐ See Me
- ☐ Appropriate Action
- ☐ Initial
- ☐ For Your information
- ☐ Prepare Response
- ☐ Status/ Facts
- ☐ Per inquiry

Briefing Book Yes No

Attached is being furnished to you for info. A search of Bureau indices revealed several 29B cases out of WFO

b6 b7C

Criminal Investigative Division

Room 7458 Phone 4631

1325015-000

1/1/2

CREW LIST re: M.V. L.E PHARAON DATE 10 Dec 94 PORT OF ENTRY Gibraltar

6/12

CREW / PASSENGER LIST

NAME OF YACHT LE PHARAON NATIONALITY REPUBLICA DE PANAMA PORT OF REGISTRATION PANAMA

REGISTRATION NO. 20661-93-A REGISTERED OWNER LAITH TRADING AND CONTRACTING CO. LTD. ADDRESS P.O.BOX 2620 JEDDAH SAUDI

TIME AND DATE OF ARRIVAL 12:25hrs. 10.12.94 FROM BARCELONA TO LAS PALMAS OR ANTIGUA

DESCRIPTION OF VESSEL

TONNAGE 414 LENGTH 55M BREADTH 9.45m DEPTH 3.10m COLOUR White

KETCH [ ] SLOOP [ ] POWER BOAT [ ] CABIN CRUISER [✓] CATAMARAN [ ] OTHER [ ]

(Tick appropriate box)

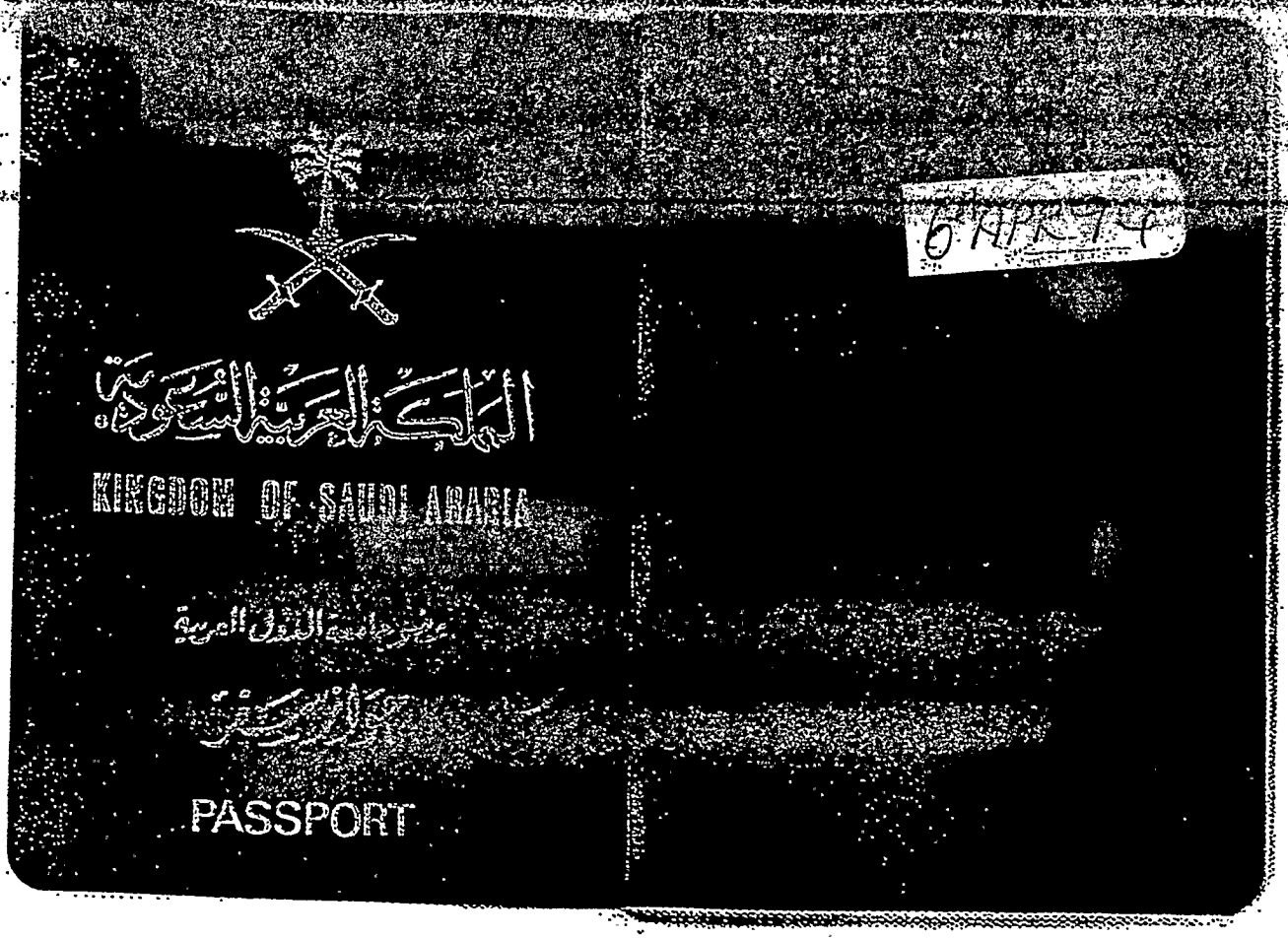
SURNAME(S)	CHRISTIAN NAMES	PROF.	NAT.	DATE OF BIRTH	PLACE OF BIRTH	SEAMAN'S BOOK/PASSPORT/EEC I/C NUMBER	ISSUED	DATE
CREW LIST ATT *								

BERTH No 10 BERTH AGENTS /

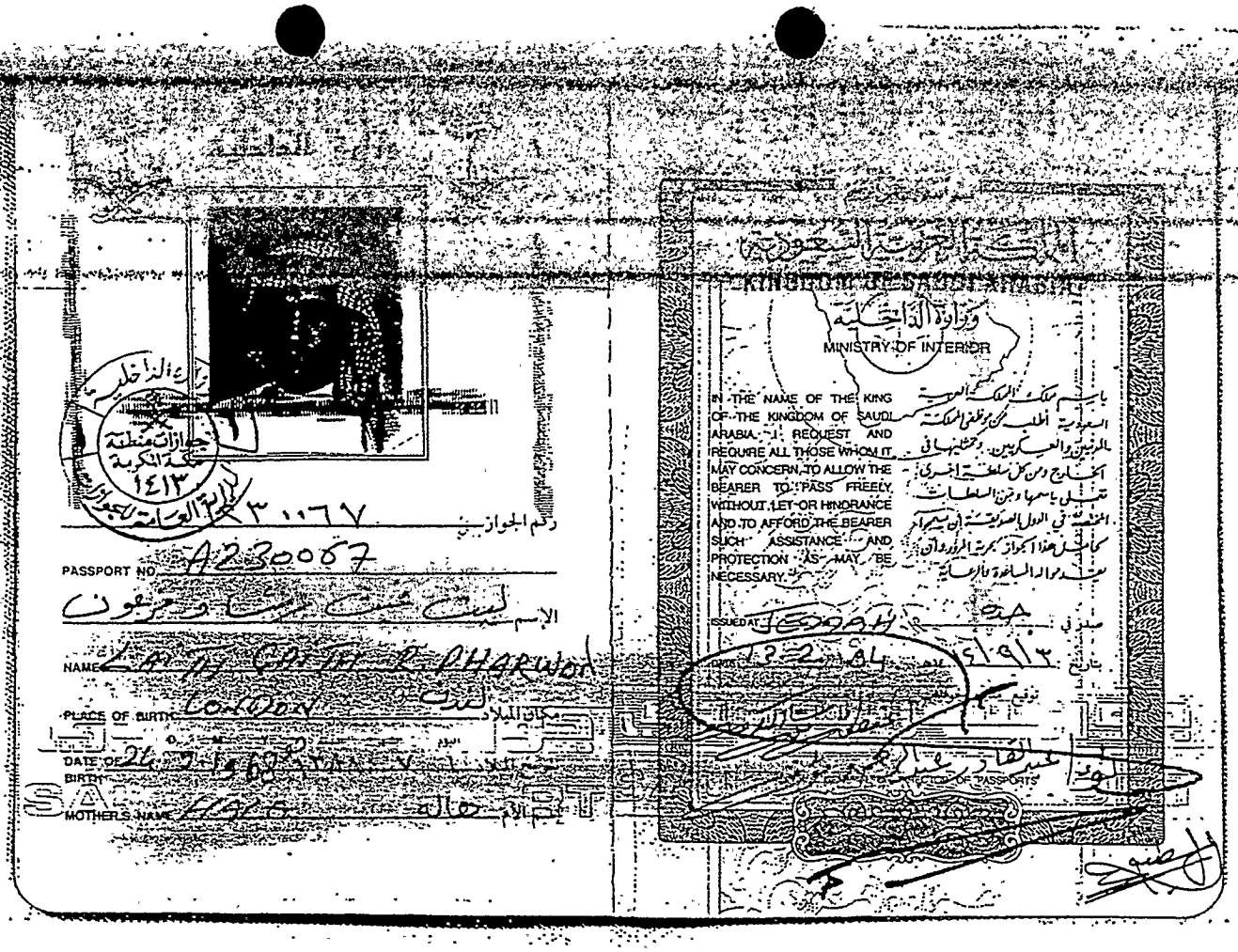
VEHICLES / MASTER'S SIGNATURE

SIGNATURE OF OFFICER ATTENDING

b6
b7C
491



1325015-000-8492



KINGDOM OF SAUDI ARABIA

وزارة الداخلية
MINISTRY OF INTERIOR

IN THE NAME OF THE KING OF THE KINGDOM OF SAUDI ARABIA, I REQUEST AND REQUIRE ALL THOSE WHOM IT MAY CONCERN, TO ALLOW THE BEARER TO PASS FREELY, WITHOUT LET OR HINDRANCE AND TO AFFORD THE BEARER SUCH ASSISTANCE AND PROTECTION AS MAY BE NECESSARY.

باسم ملك المملكة العربية السعودية أطلب من موظفي المملكة المدنيين والعسكريين وتحثيهاني الخارج ومن كل سلطة أخرى تمثل باسمها وتحت السلطات المختصة في الدول الصديقة أن يسمحوا كما أسمل هذا الجواز بحرية المرور وأن تعد له المساعدة والحماية

ISSUED AT JEDDAH صدر في

DATE 3-2-84 بتاريخ ١٤٠٤/٢/٣

DIRECTOR OF PASSPORTS

جوازات منطقة مكة المكرمة ١٤١٣

رقم الجواز ٣٠١١٦٧

PASSPORT NO A230057

الإسم

NAME LADY CAROLINE PHARWOOD

PLACE OF BIRTH LONDON مكان الميلاد

DATE OF BIRTH 24-7-1968 تاريخ الميلاد

MOTHER'S NAME اسم الأم

SAL

3 2 1

MARITAL STATUS SINGLE الحالة الاجتماعية أعزب

PROFESSION Employee المهنة موظف

DOMICILE JEDDAH محل الإقامة جدة

DESCRIPTION الأوصاف

HEIGHT 165 CM الطول

COLOUR OF EYES BROWN لون العينين بني

COLOUR OF HAIR BLACK لون الشعر أسود

PECULARITIES NIL العلامات المميزة بدون

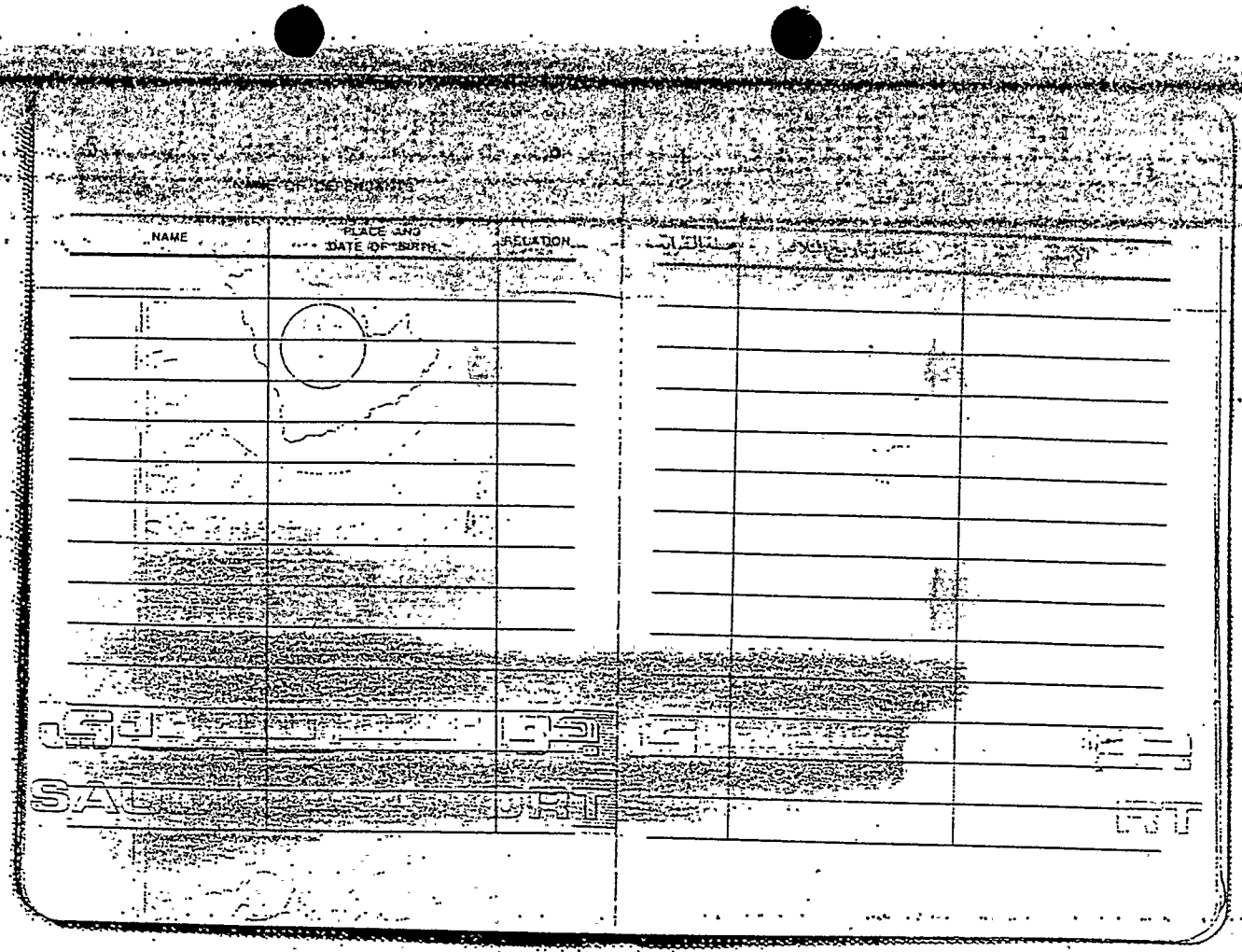
SIGNATURE التوقيع

WIFE OR HUSBAND'S NAME اسم الزوجة أو الزوج

PLACE OF BIRTH SA

DATE OF BIRTH تاريخ الميلاد

1325015-000-8494



NAME OF DEPENDENTS

NAME	PLACE AND DATE OF BIRTH	RELATION

SAMPLE

7

THIS PASSPORT IS VALID FOR THE FOLLOWING COUNTRIES

الدول العربية ، الباكستان ، بنجلاديش ، اندونيسيا
ماليزيا ، الهند ، سريلانكا ، [illegible] ، كوريا الجنوبية ، اليابان
تركيا ، قبرص ، اليونان ، ايطاليا ، سويسرا ، النمسا ،
المانيا ، بلجيكا ، هولندا ، سكندنافيا ، البرتغال ،
الدول الاسكندنافية ، استراليا ، دول امريكا الشمالية ،
بريطانيا ، ايرلندا ، فنزويلا ، الارجنتين ، البرازيل ،
الشيلي ، الكاميرون ، [illegible] ، نيجيريا

ARAB COUNTRIES, PAKISTAN, BANGLADESH, INDONESIA,
MALAYSIA, INDIA, SRILANKA, [illegible], KOREA, JAPAN,
TURKEY, CYPRUS, GREECE, ITALY, SWITZERLAND, AUSTRIA,
GERMANY, BELGIUM, HOLLAND, SCANDINAVIA, PORTUGAL,
[illegible], ENGLAND, IRELAND, VENEZUELA, ARGENTINA,
BRAZIL, CHILE, CAMEROON, [illegible], NIGERIA

Travel is not allowed to the non – stated countries

8

THE PASSPORT IS ISSUED TO

THE HOLDER OF

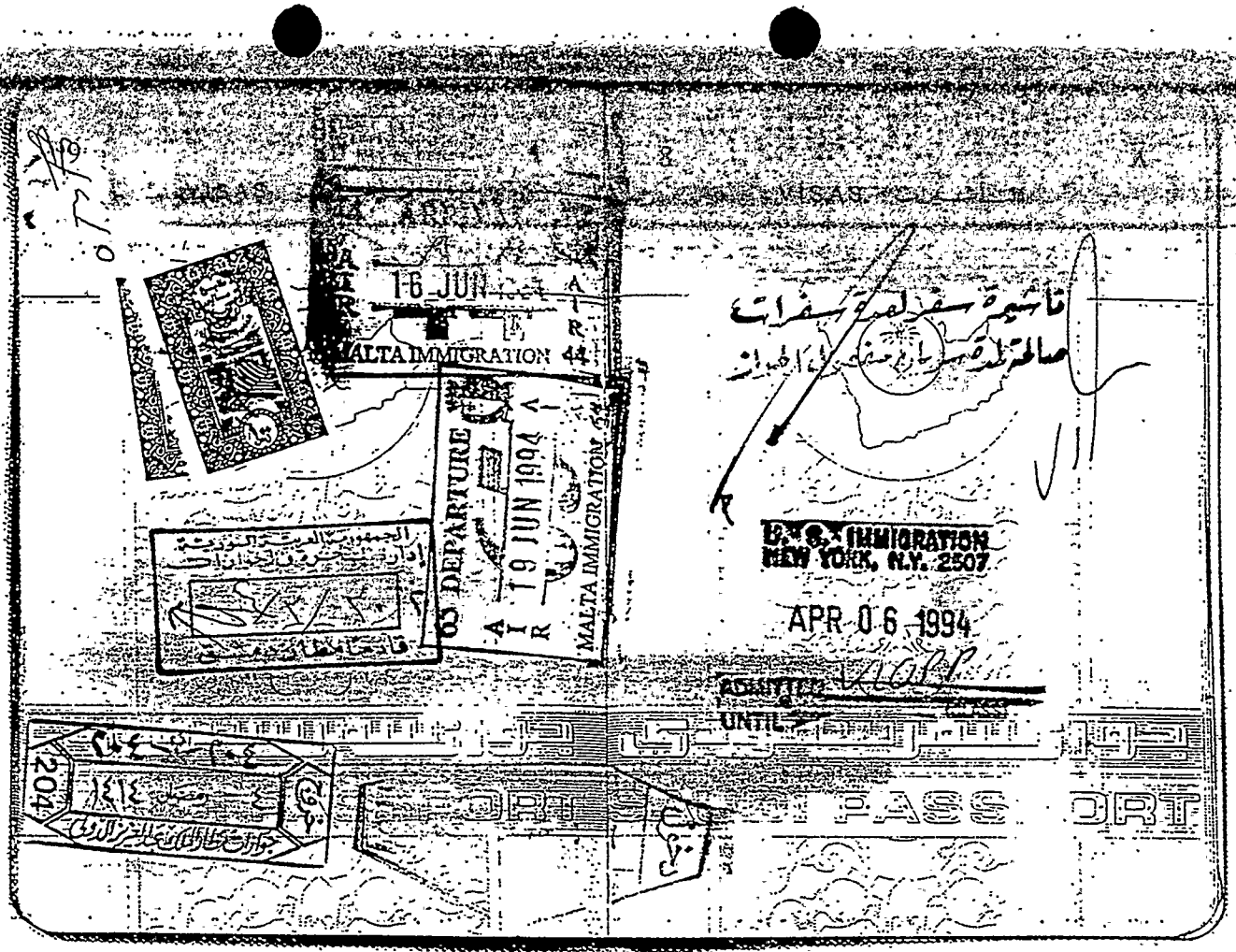
د / حفيظة النفوس او البطاقة ١٠٠١٧٨٠٥٤
NATIONALITY CARD

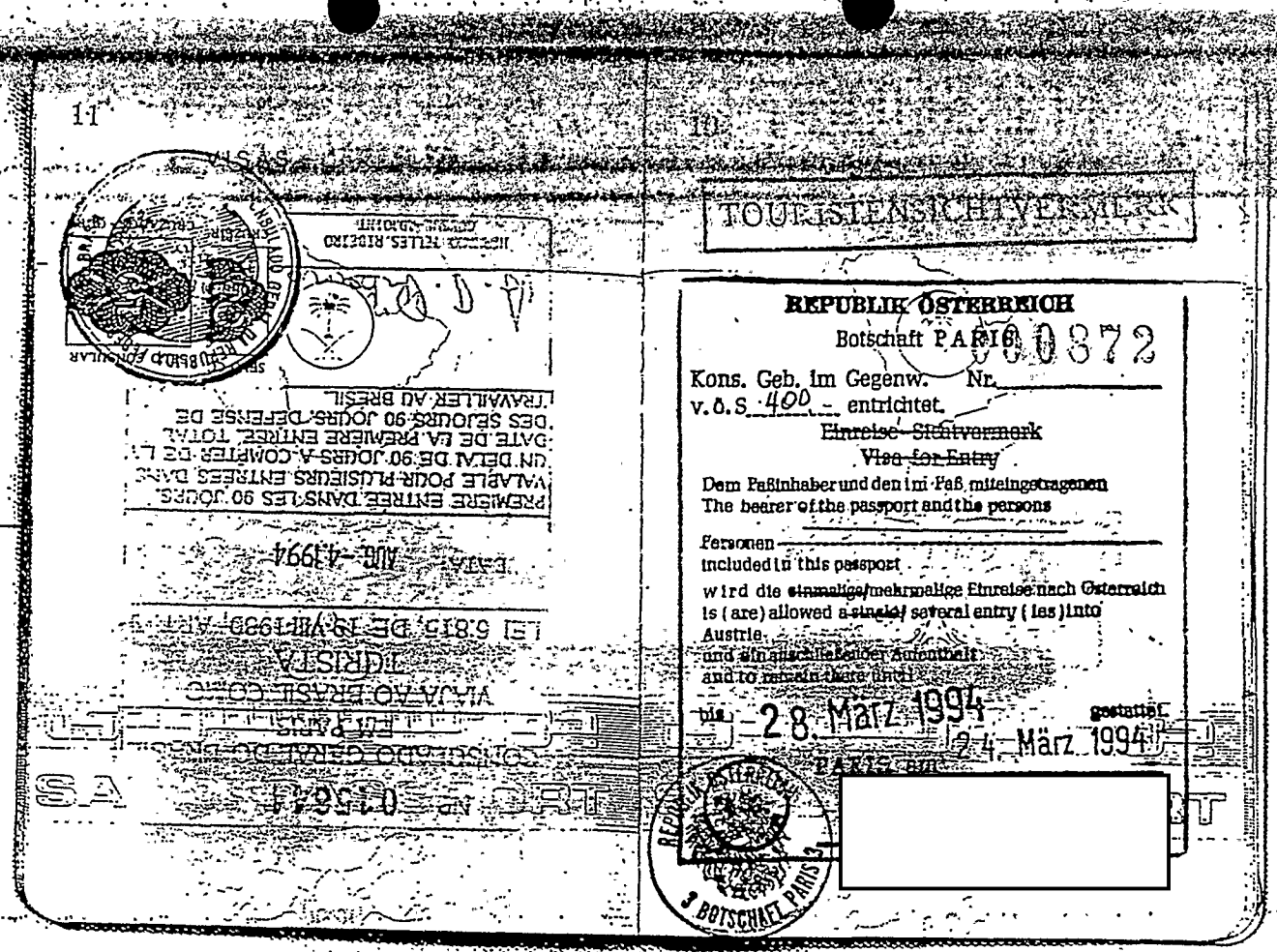
ج / جواز سفر
PASSPORT

ينتهي العمل بهذا الجواز في ١٤١٩/٩/٢٢
THE VALIDITY OF THIS PASSPORT EXPIRES ON 22-12-1998

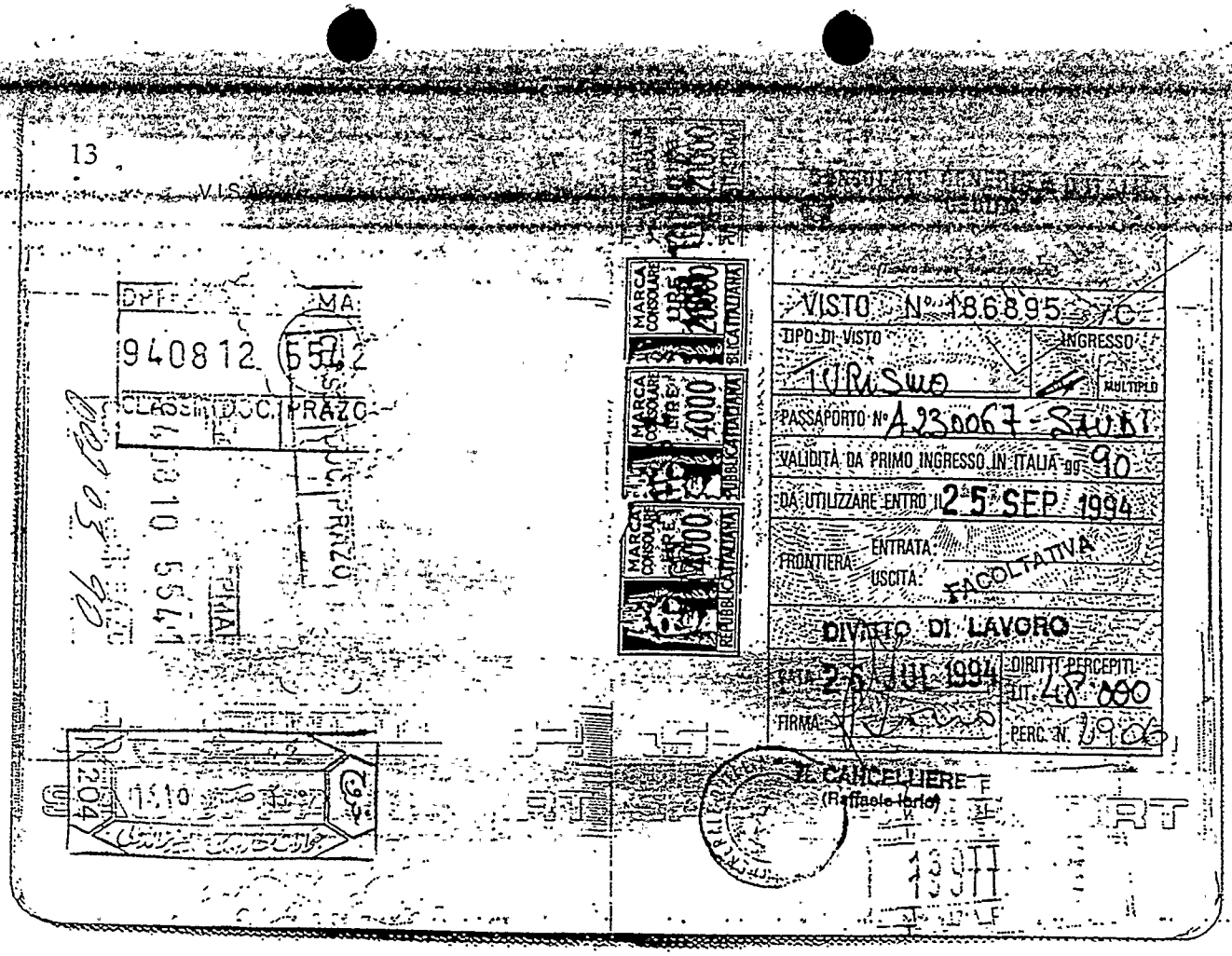
يحتوي هذا الجواز على ٤٨ صفحة
THIS PASSPORT CONTAINS 48 PAGES

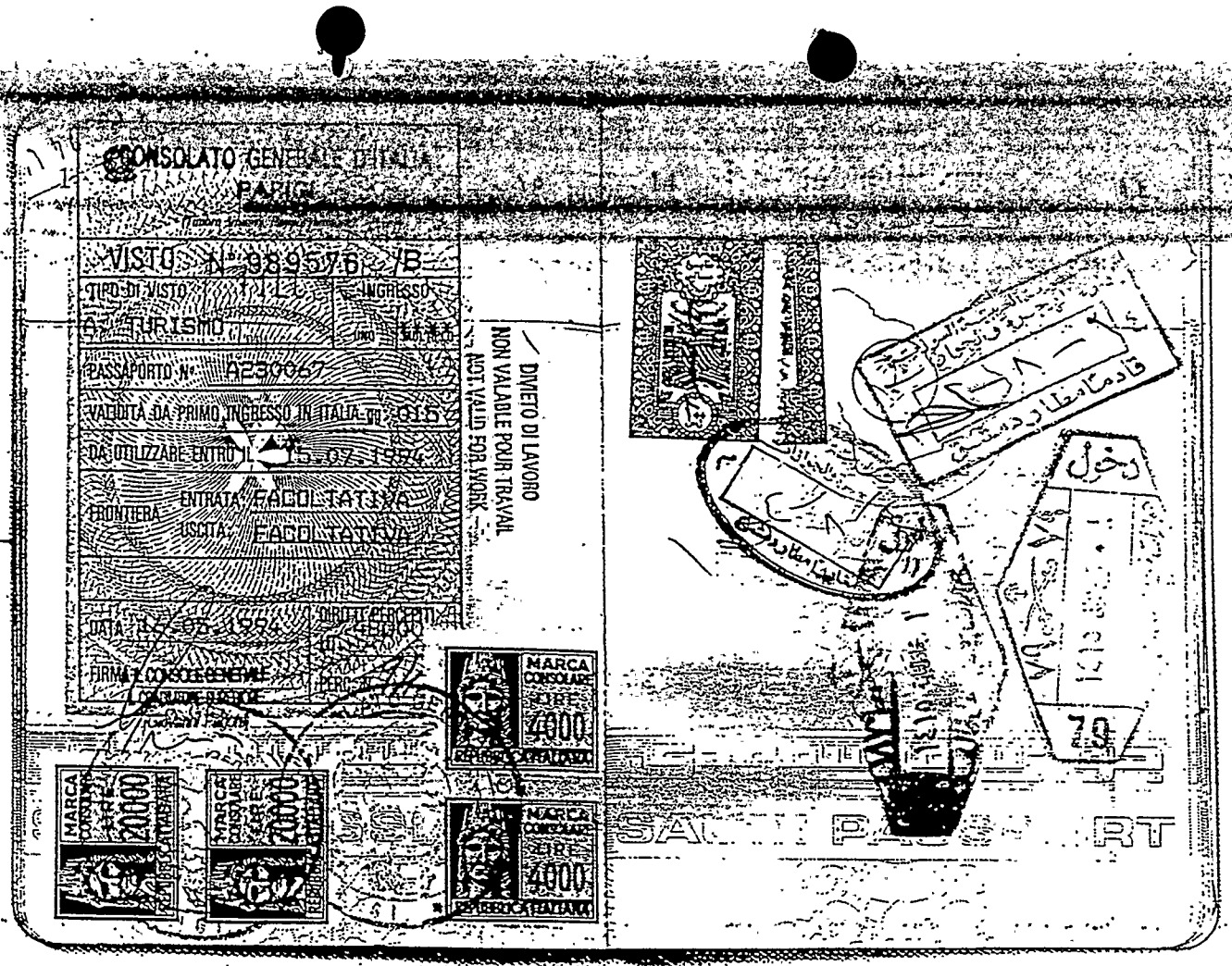
1325015-000-8496


VISAS
16 JUN
MALTA IMMIGRATION
DEPARTURE
19 JUN 1994
MALTA IMMIGRATION
U.S. IMMIGRATION
NEW YORK, N.Y. 2507
APR 06 1994
ADMITTED
UNTIL
PASSPORT


TOURISTENSICHTVERMERK
REPUBLIK ÖSTERREICH
Botschaft PARIS
Kons. Geb. im Gegenw. Nr.
v.H.S. 400 entrichtet.
Einreise-Sichtvermerk
Visa for Entry
Dem Paßinhaber und den im Paß miteingetragenen
The bearer of the passport and the persons
Personen
included in this passport
wird die einmalige/mehrmalige Einreise nach Österreich
is (are) allowed a single/several entry (ies) into
Austria
und ein ununterbrochener Aufenthalt
and to remain there (for)
bis 28. März 1994
gestattet
24. März 1994
PARIS
BOTSCHAFT PARIS

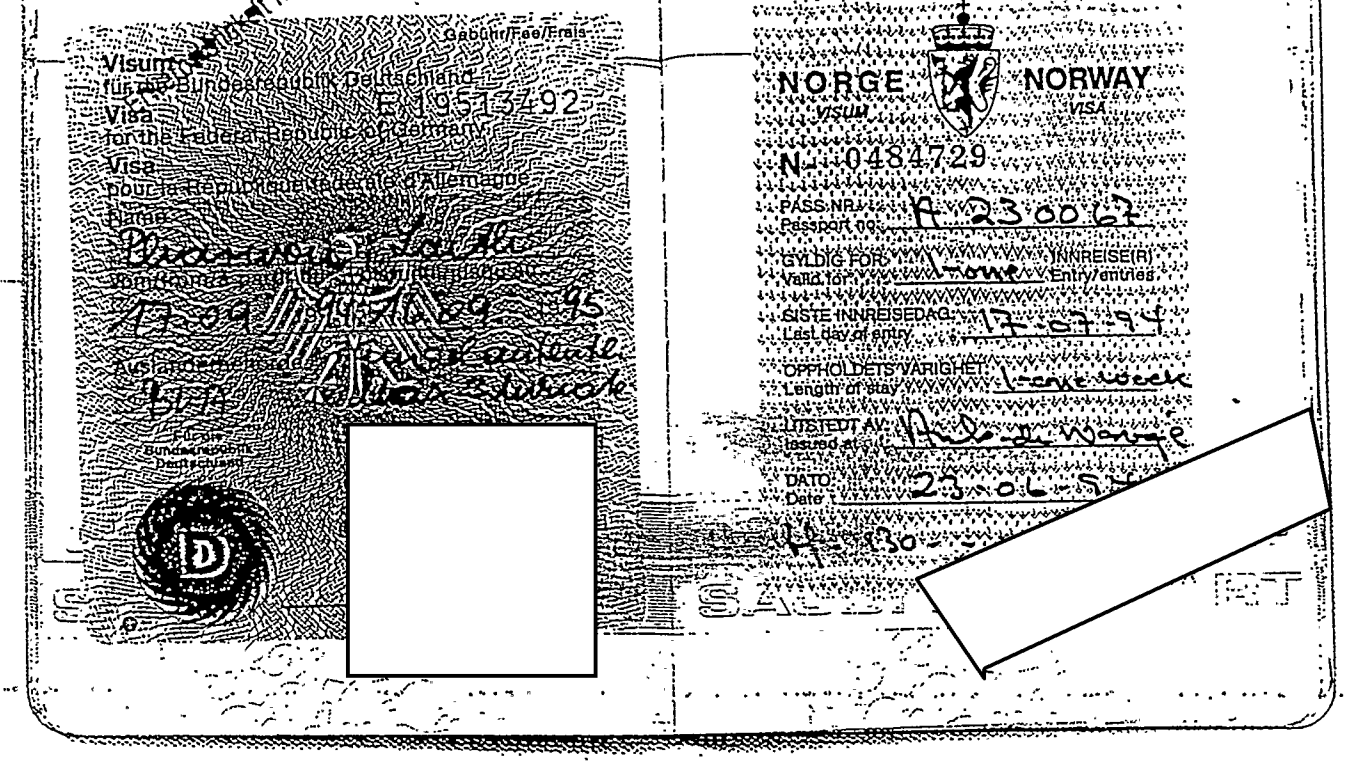
b6
b7C


13
VISTO N° 186895 /C
TIPO DI VISTO
INGRESSO
TURISMO
MULTIPLO
PASSAPORTO N° A230067 - SAUDI
VALIDITÀ DA PRIMO INGRESSO IN ITALIA gg 90
DA UTILIZZARE ENTRO IL 25 SEP 1994
FRONTIERA ENTRATA
USCITA FACOLTATIVA
DIVIETO DI LAVORO
DIRITTI PERCEPITI
IT. 40 000
PERC. N. 0906
IL CANCELLIERE
(Raffaele Ierlo)
940812
MARCA CONSOLARE
REPUBBLICA ITALIANA

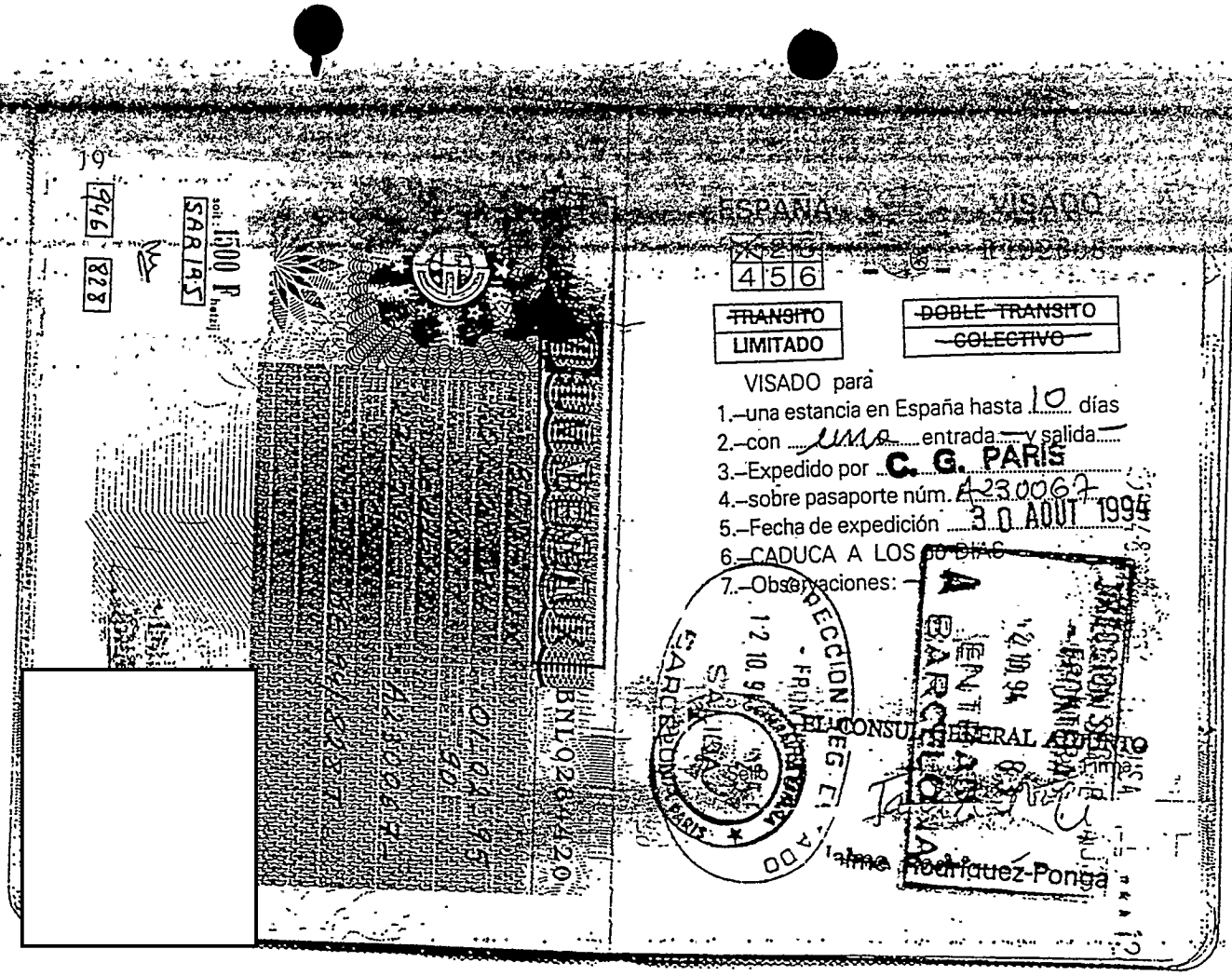

CONSOLATO GENERALE D'ITALIA
PARIGI
VISTO N. 08957 B
TIPO DI VISTO
A - TURISMO
INGRESSO
PASSAPORTO N. A23067
VALIDITÀ DA PRIMO INGRESSO IN ITALIA GG. 015
DA UTILIZZARE ENTRO IL 15.07.1984
FRONTIERA ENTRATA FACOLTATIVA
USCITA FACOLTATIVA
DIRITTI PERCEPITI
DATA 15-06-1984
FIRMA E CONSOLE GENERALE
DIVIETO DI LAVORO
NON VALABLE POUR TRAVAIL
NOT VALID FOR WORK
MARCA CONSOLARE
4000
SALTI PASSPORT

17

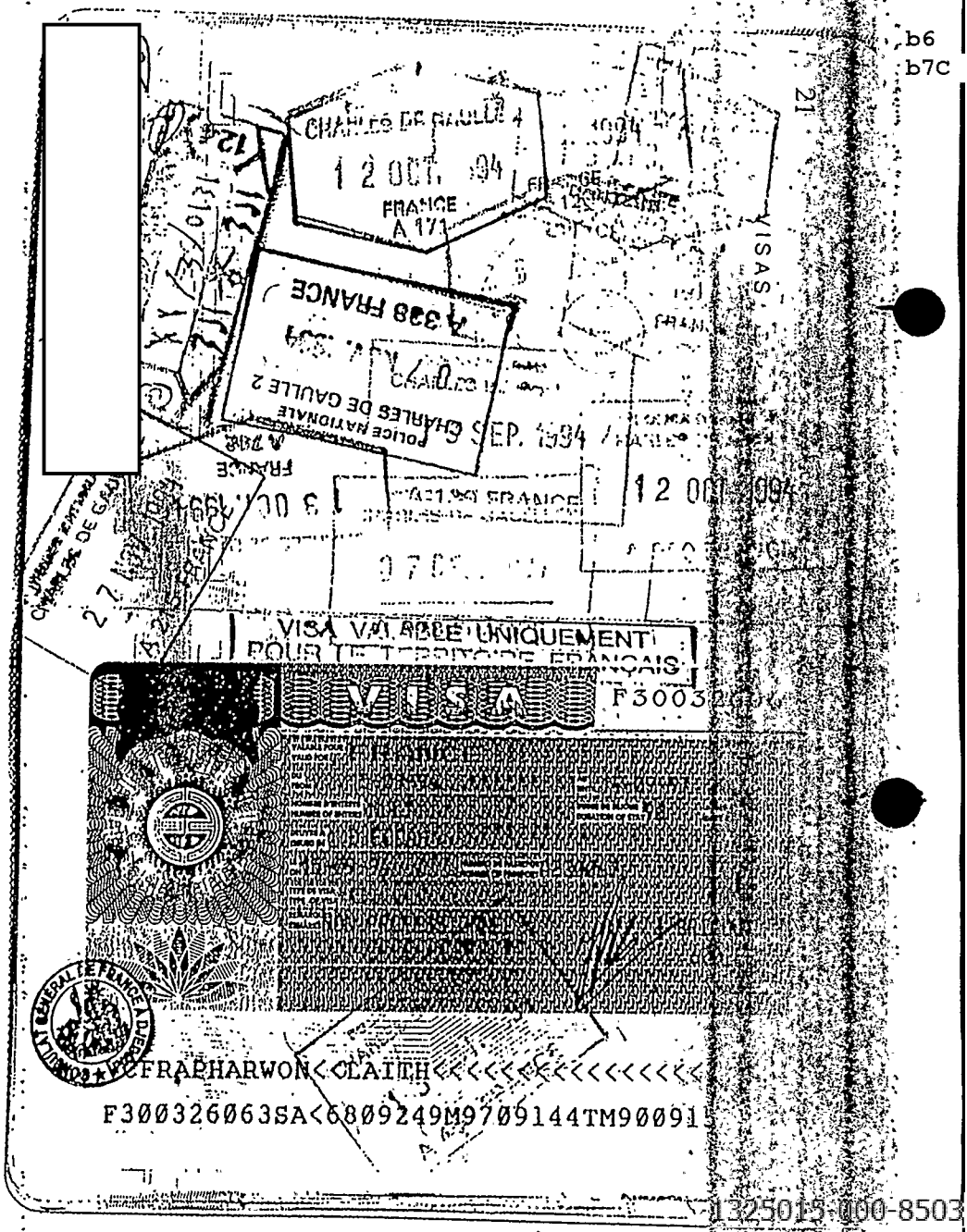
VISAS



b6
b7C


ESPAÑA
VISADO
456
TRANSITO LIMITADO
DOBLE TRANSITO COLECTIVO
VISADO para
1.–una estancia en España hasta 10 días
2.–con una entrada y salida
3.–Expedido por C. G. PARIS
4.–sobre pasaporte núm. A230067
5.–Fecha de expedición 30 AOUT 1994
6.–CADUCA A LOS
7.–Observaciones:
EL CONSUL GENERAL ADJUNTO
Jaime Rodríguez-Ponga

b6
b7C



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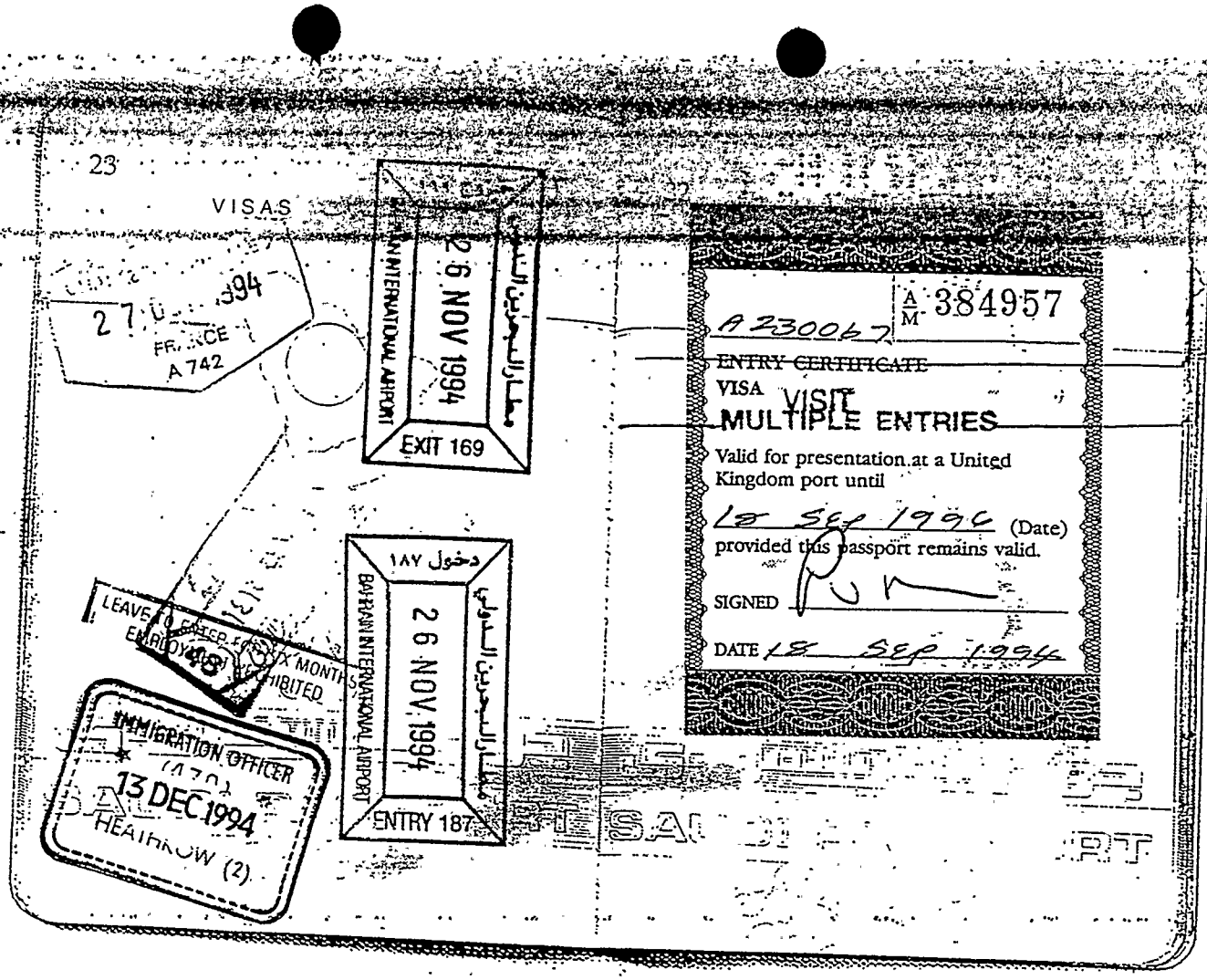
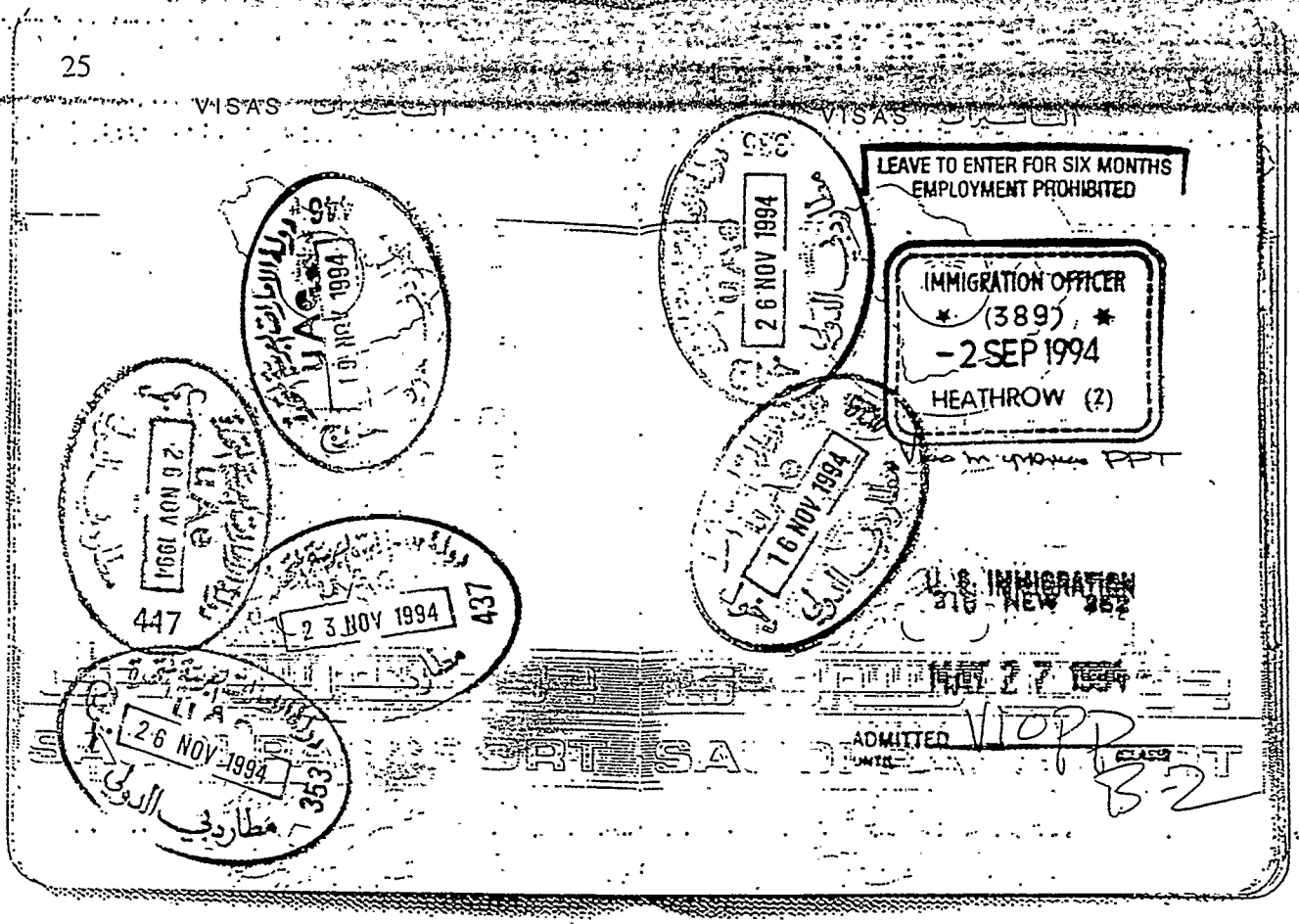
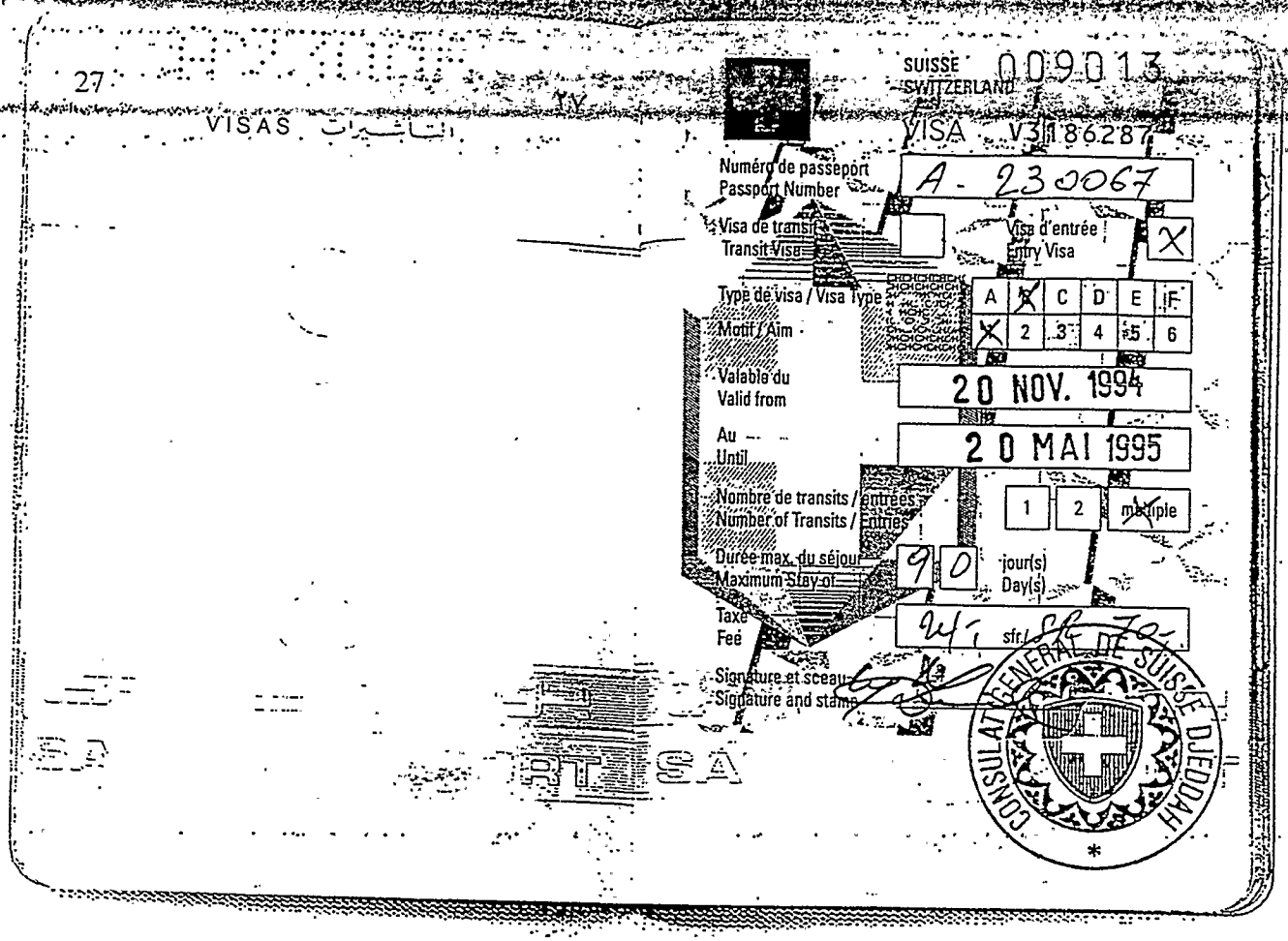
b7C

1325015-000-8503


23
VISAS
27 U 94
FRANCE
A 742
BAHRAIN INTERNATIONAL AIRPORT
26 NOV 1994
EXIT 169
A 230047
A/M 384957
ENTRY CERTIFICATE
VISA VISIT
MULTIPLE ENTRIES
Valid for presentation at a United Kingdom port until
1st Sep 1996 (Date)
provided this passport remains valid.
SIGNED
DATE 1st SEP 1994
BAHRAIN INTERNATIONAL AIRPORT
26 NOV 1994
ENTRY 187
IMMIGRATION OFFICER
13 DEC 1994
HEATHROW (2)

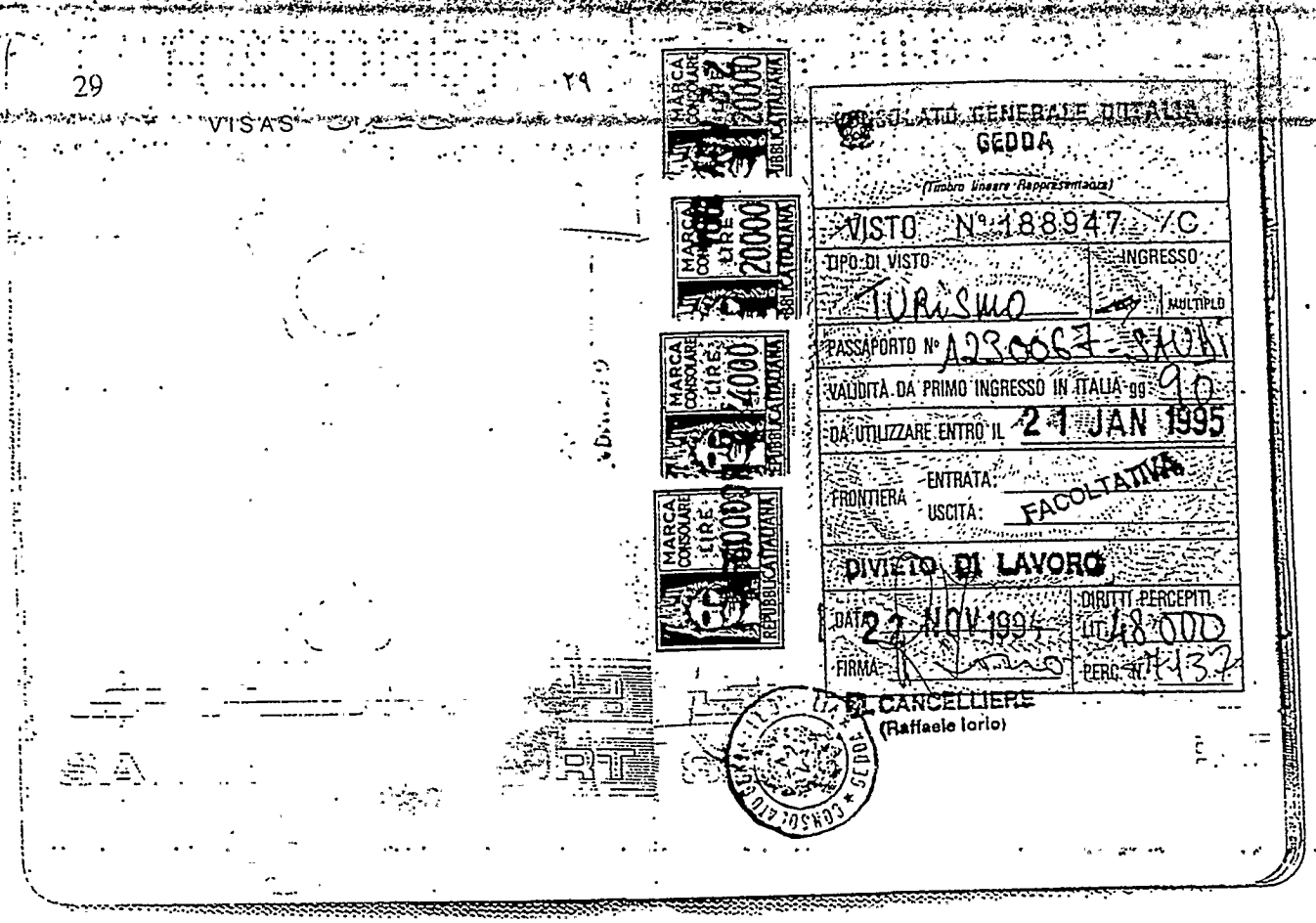

VISAS
VISAS
LEAVE TO ENTER FOR SIX MONTHS
EMPLOYMENT PROHIBITED
IMMIGRATION OFFICER
(389)
-2 SEP 1994
HEATHROW (2)
26 NOV 1994
16 NOV 1994
23 NOV 1994
447
437
353
U.S. IMMIGRATION
ADMITTED
VISIT

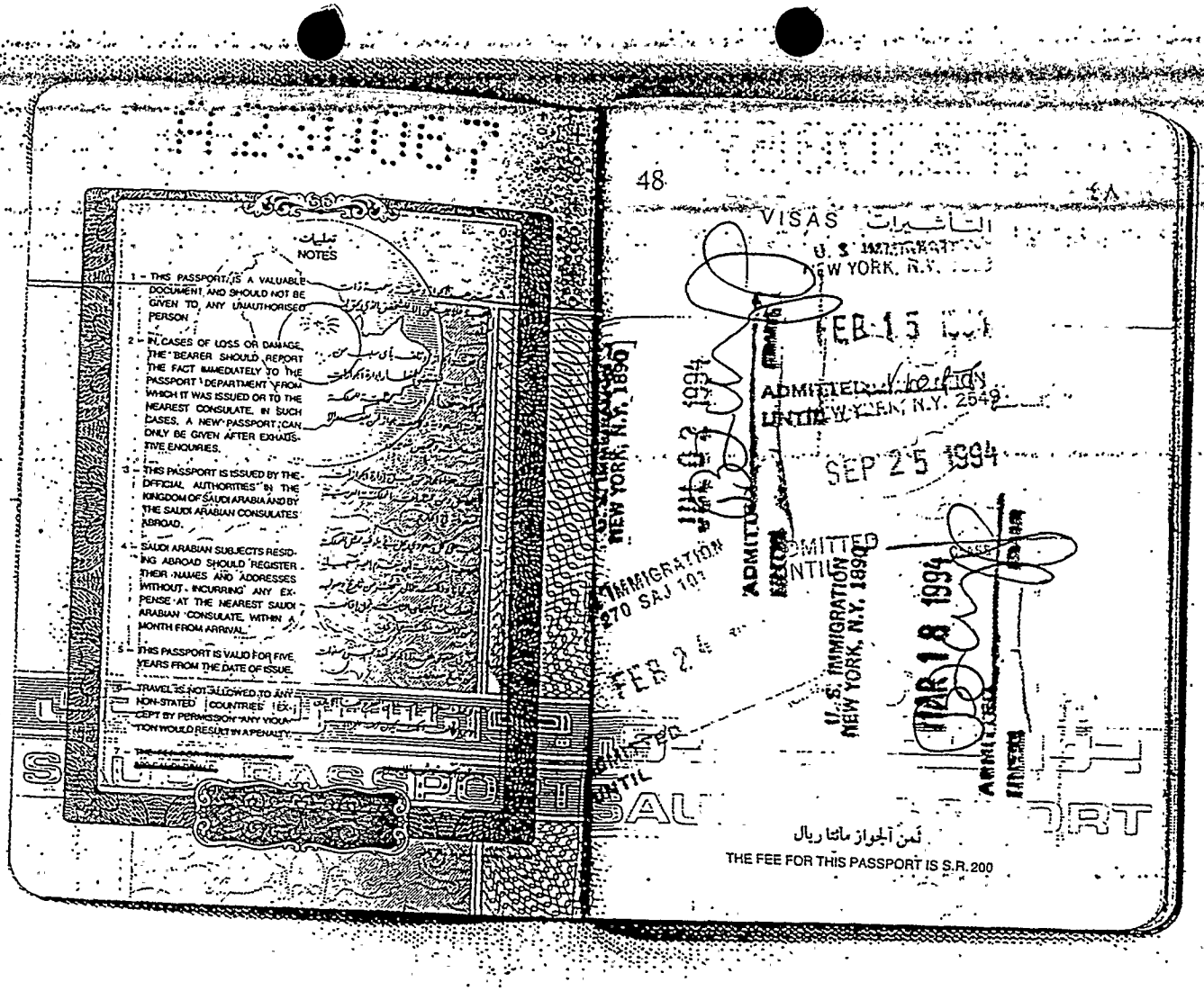


1325015-000-8506

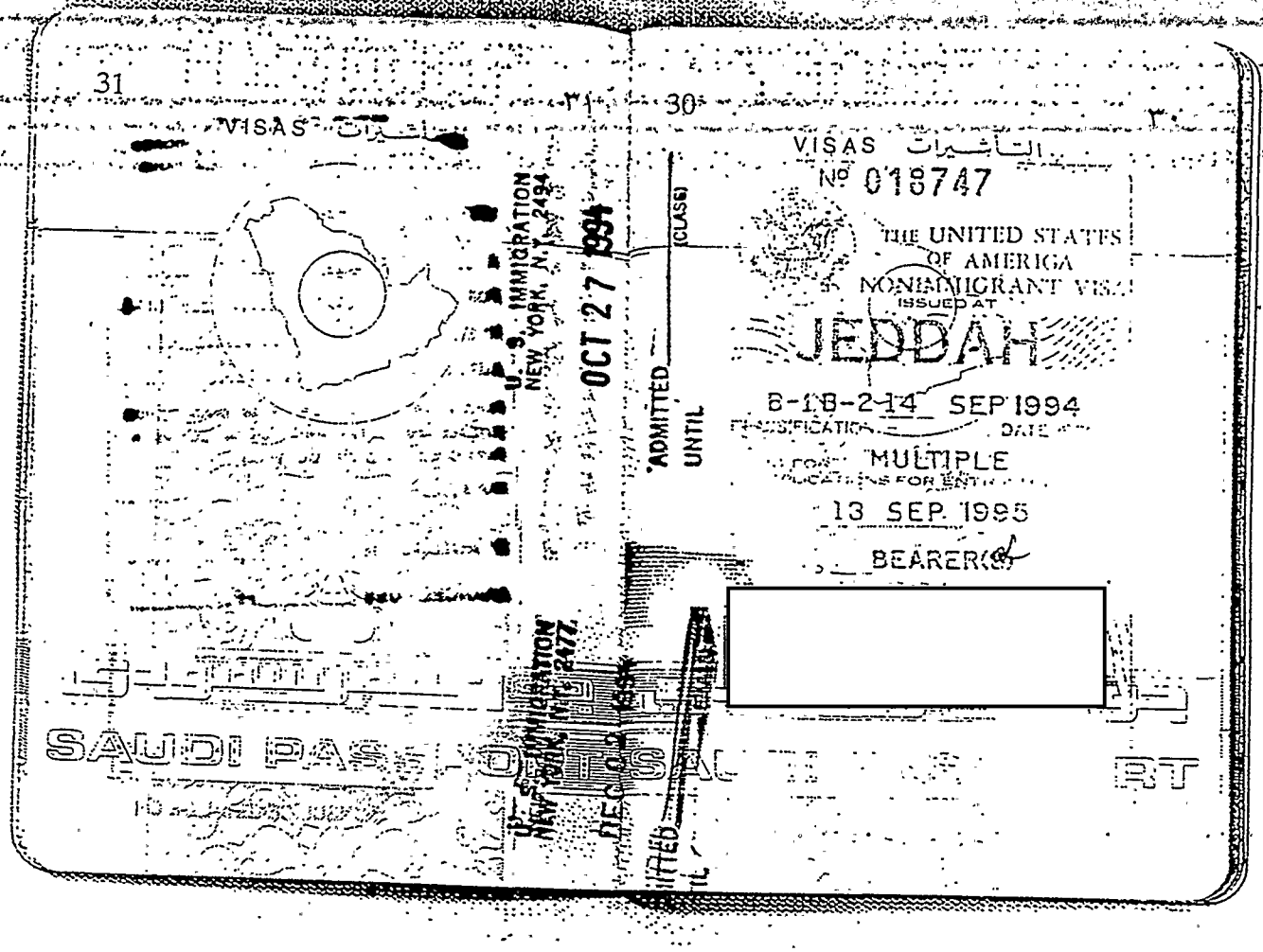
29 ٢٩

VISAS


MARCA CONSOLARE LIRE 20000 REPUBBLICA ITALIANA
MARCA CONSOLARE LIRE 20000 REPUBBLICA ITALIANA
MARCA CONSOLARE LIRE 4000 REPUBBLICA ITALIANA
MARCA CONSOLARE LIRE 80000 REPUBBLICA ITALIANA
CONSOLATO GENERALE D'ITALIA
GEDDA
(Timbro lineare Rappresentanza)
VISTO N° 188947 /C
TIPO DI VISTO
TURISMO
INGRESSO
MULTIPLO
PASSAPORTO N° A23006[illegible] PAOLI
VALIDITÀ DA PRIMO INGRESSO IN ITALIA gg 90
DA UTILIZZARE ENTRO IL 21 JAN 1995
FRONTIERA ENTRATA:
USCITA: FACOLTATIVA
DIVIETO DI LAVORO
DIRITTI PERCEPITI
DATA 21 NOV 1994
LIT. 48 000
FIRMA:
REG. N. 4132
IL CANCELLIERE
(Raffaele Iorio)



1325015-000-8508


31
VISAS
U.S. IMMIGRATION
NEW YORK, N.Y. 2494
OCT 27 1994
ADMITTED
(CLASS)
UNTIL
VISAS
No 018747
THE UNITED STATES
OF AMERICA
NONIMMIGRANT VISA
ISSUED AT
JEDDAH
8-18-2-14 SEP 1994
MULTIPLE
13 SEP 1995
BEARER(S)
SAUDI PASSPORT
DEC 22 1994

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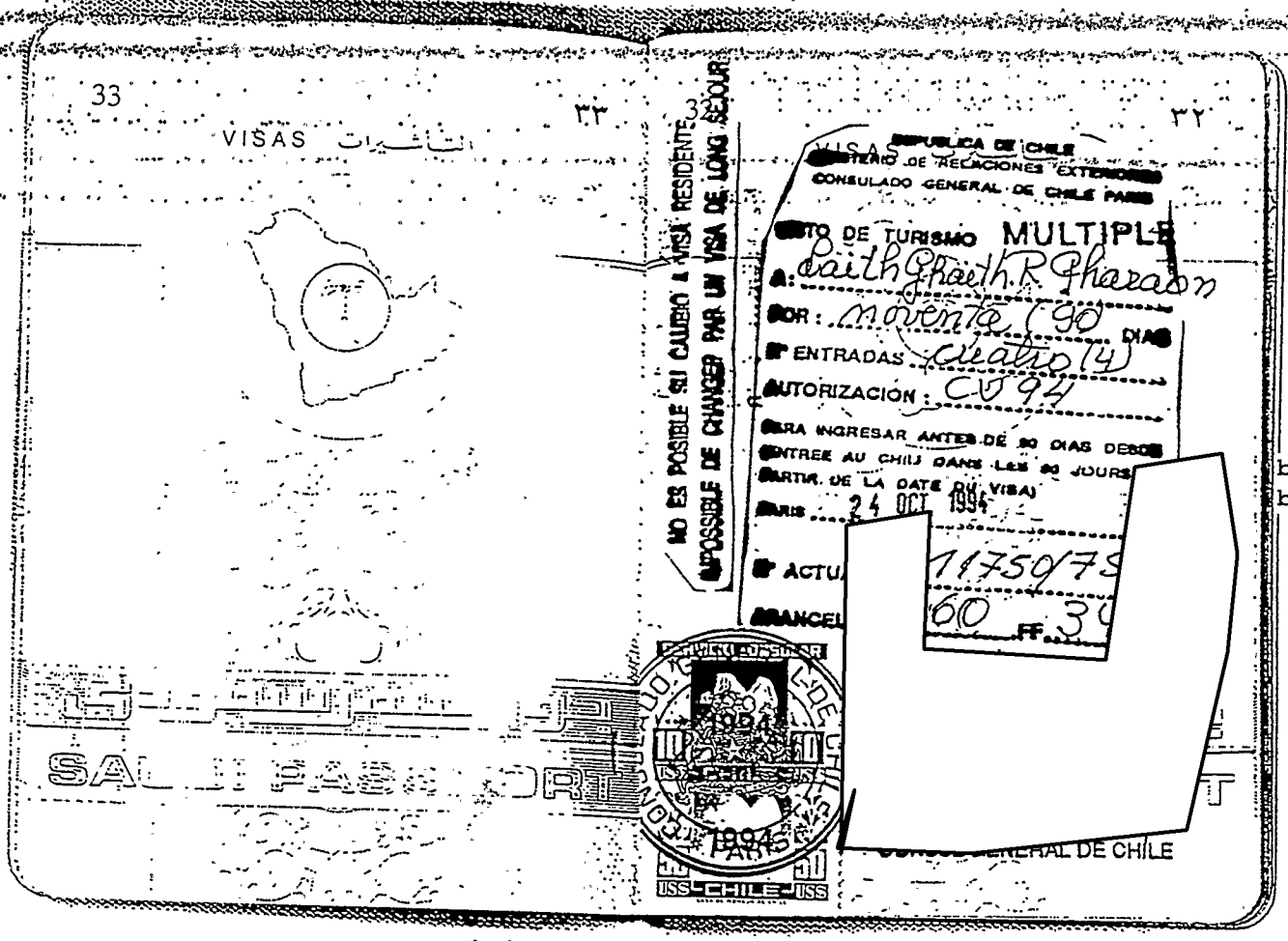
b7C


33
VISAS
٣٣
SALIDA PASSEPORT
REPUBLICA DE CHILE
CONSULADO GENERAL DE CHILE PARIS
TO DE TURISMO MULTIPLE
A: Faith G Faith R Pharaon
OR: noventa (90) DIAS
ENTRADAS cuatro (4)
AUTORIZACION: CV 94
RA INGRESAR ANTES DE 90 DIAS DESDE
NTREE AU CHILI DANS LES 90 JOURS
RTIR DE LA DATE DU VISA)
RIS 24 OCT 1994
ACTU 1750/75
ANCEL 60 FF 30
NO ES POSIBLE SU CAMBIO A VISA RESIDENTE
IMPOSSIBLE DE CHANGER PAR UN VISA DE LONG SEJOUR
1994
PARIS
USS-CHILE-USS
CONSULADO GENERAL DE CHILE

b6
b7C

35
VISAS
ESPAÑA
VISADO
1 3
4 5 6
Y 0430548
ORDINARIO
MULTIPLE
VISADO para
1.–una estancia en España hasta 90 días
2.–con TRES entradas y salidas
3.–Expedido por C. G. PARIS
4.–sobre pasaporte núm. A 230067
5.–Fecha de expedición 29 NOV. 1994
6.–CADUCA Á LOS 90 DIAS
7.–Observaciones:
DIRECCION GRAL. SEG. ESTADO
-FRONTERAS-
07. 12. 94 200
ENTRADA
BARCELONA
CONSULADO GENERAL DE ESPAÑA
Sello
PARIS

b6
b7C

CREW LIST m.y. LE PHARAON DATE PORT OF ENTRY

	NAME	RANK	NATIONALITY	BIRTH DATE	PLACE OF BIRTH	PASS No.
01			AMERICAN		U.S.A.	
02			FILIPINO		PHILIPPINES	
03			FILIPINO		PHILIPPINES	
04			URUGUAY		URUGUAY	
05			AMERICAN		KOREA	
06			FILIPINO		PHILIPPINES	
07			FILIPINO		— " —	
08			FILIPINO		— " —	
09			FILIPINO		— " —	
10			AMERICAN		U.S.A.	
11			FILIPINO		PHILIPPINES	
12			FILIPINO		— " —	

b6
b7C

M.I. LE

PANAMA GRT 814
REG. # 20681-93

1325015-000-8512

Master

8/12

CREW / PASSENGER LIST

NAME OF YACHT LE PHARAON NATIONALITY REPUBLICA DE PANAMA PORT OF REGISTRATION PANAMA

REGISTRATION NO. 20661-93-A REGISTERED OWNER LAICH TRADING AND CO. ADDRESS P.O.BOX 2620 JEDDAH SAUDI ARAB

TIME AND DATE OF ARRIVAL 12:25hrs. 10:12:94 FROM BARCELONA TO LAS PALMAS OR ANTIGUA

DESCRIPTION OF VESSEL

TONNAGE 814 LENGTH 55m BREADTH 9.45m DEPTH 3.10m COLOUR white

KETCH ☐ SLOOP ☐ POWER BOAT ☐ CABIN CRUISER ☑ CATAMARAN ☐ OTHER ☐

(Tick appropriate box)

SURNAME(S)	CHRISTIAN NAMES	PROF.	NAT.	DATE OF BIRTH	PLACE OF BIRTH	SEAMAN'S BOOK/PASSPORT/EEC I/C NUMBER	ISSUED	DATE
CREW LIST ATT.*								

BERTH Nº10 BERTH AGENTS —

STOWAWAY — VEHICLES — MASTER'S SIGNATURE

ANIMALS — PERIOD OF STAY 6 HRS SIGNATURE OF OFFICER ATTENDING

b6
b7C

015-000-8518

CREW LIST m.y. LE PHARAON DATE 10 Dec 94 PORT OF ENTRY Gibraltar

	NAME	RANK	NATIONALITY	BIRTH DATE	PLACE OF BIRTH	PASS No.
01-			AMERICAN		U.S.A.	
02-			FILIPINO		PHILIPPINES	
03-			FILIPINO		PHILIPPINES	
04-			URUGUAY		URUGUAY	
05-			BRITISH		GREAT BRITAIN	
06-			AMERICAN		KOREA	
07-			FILIPINO		PHILIPPINES	
08-			FILIPINO		PHILIPPINES	
09-			FILIPINO		PHILIPPINES	
10-			FILIPINO		PHILIPPINES	
11-			AMERICAN		U.S.A.	
12-			FILIPINO		PHILIPPINES	
13-			FILIPINO		PHILIPPINES	
X			DUTCH		NETHERLAND	
			BRITISH		GREAT BRITAIN	

b6
b7C

b6
b7C

M.Y. LE PHARAON
PANAMA CRT B14
REG. #20681-93

1325015-000-8519

DECLASSIFIED BY: NSICG
ON 05-01-2018

b6
b7C

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☒ Teletype
☐ Facsimile
☐ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☒ Routine

CLASSIFICATION:
☐ TOP SECRET
☒ ~~SECRET~~
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 4/17/95

~~SECRET~~

FM LEGAT PANAMA CITY (29B-WF-171994)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

INFO FBI MIAMI/ROUTINE/

BT

~~S E C R E T~~

CITE: //5460:PAN050.107//

PASS: HQ: CID, WCCS, FIFU; IRB, CID, IRU-II, ROOM 7458.

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; FIF; FAG; OO: WMFO.

THIS ENTIRE COMMUNICATION IS CLASSIFIED "~~SECRET~~" IN ITS ENTIRETY.

FOR THE INFORMATION OF RECIPIENTS, RECORD CHECKS CONDUCTED BY THE PANAMANIAN TECHNICAL JUDICIAL POLICE (PTJ) ON LAITH TRADING AND CONTRACTING CO., LTD. AND MARCONI INTERNATIONAL MARINE CO., LTD. WERE NEGATIVE.

744

29B-WF-171994 -
SEARCHED
INDEXED
FILED
SERIALIZED

~~SECRET~~

Approved: _____ Original filename: PAN050W.107

Time Received: _____ Telprep filename: PAN050S0.107

MRI/JULIAN DATE: _____ ISN: _____

FOX DATE & TIME OF ACCEPTANCE: Sent 4/19/95 AU

1525018-000-8524

IMMIGRATION CHECKS CONDUCTED ON GHAITH RACHAD PHARAON WERE NEGATIVE.

SUCRE, ARIAS, CASTRO AND REYES IS A LAW FIRM LOCATED ON CALLE 48 ESTE AND BELLA VISTA, PANAMA CITY, PANAMA.

ON APRIL 11, 1995, LEGAT, PANAMA CITY CONTACTED MR. [redacted] AS INSTRUCTED BY THE BUREAU. b6 b7C

THE FOLLOWING ARE QUESTIONS ASKED BY LEGAT, PANAMA CITY AND ANSWERED BY MR. [redacted]

1) WHAT TYPE OF INFORMATION AND/OR STATEMENTS DID [redacted] b6 b7C [redacted], ALSO KNOWN AS [redacted] GIVE YOU ABOUT CORRUPT PRACTICES AND PAYMENTS OF BRIBES BY BCCI TO UNITED STATES AND FOREIGN OFFICIALS? WHAT DO YOU RECALL AND UNDER WHAT CONTEXT DID THE DISCUSSION TAKE PLACE?

[redacted] WAS VERY DISCONTENT WITH HIS BOSS, MR. [redacted] b6 b7C [redacted] AND WITH HIS JOB. THIS IS THE REASON WHY [redacted] MADE THE STATEMENT ABOUT SUPPOSEDLY CORRUPT PRACTICES BY SOME INDIVIDUALS WHICH HE, [redacted] DOES NOT RECALL ANY NAMES.

2) DID [redacted] SHOW YOU ANY DOCUMENTS? NO b6 b7C

DID [redacted] HAVE ANY DOCUMENTS WITH HIM OR WERE THEY ELSEWHERE?

NO

3) WHAT OFFICIALS OR CATEGORIES OF OFFICIALS WERE NAMED BY [redacted] AS RECIPIENTS OF BRIBES? b6 b7C

DOES NOT REMEMBER

4) DID [redacted] TRY OR WAS HE ABLE TO CORROBORATE HIS ALLEGATIONS? NO b6 b7C

5) DO YOU HAVE ANY INDEPENDENT KNOWLEDGE SUCH AS INFORMATION OR DOCUMENTS, WHICH WOULD EITHER CORROBORATE OR ADD TO [redacted] ALLEGATIONS? NO b6 b7C

6) DO YOU HAVE ANY KNOWLEDGE OF ANY OTHER ILLEGAL ACTIVITIES ON THE PART OF BCCI INVOLVING THE U.S., OTHER THAN THOSE ALREADY MENTIONED? NO b6 b7C

7) WHO ELSE COULD KNOW ABOUT THIS INFORMATION BESIDES [redacted]?

[redacted] BCCI IN JAMAICA IN 1990. [redacted] IS DESCRIBED AS PAKISTANIAN, PROBABLY NATURALIZED U.S. CITIZEN, LATE 50'S OR EARLY 60'S; ABOUT 5'5", MUSTACHE, 140 POUNDS, WEARS GLASSES. HAD BYPASS HEART SURGERY. [redacted] SUPPOSEDLY OWNS PROPERTIES IN THE MIAMI, FLORIDA AREA. b6 b7C

8) WHEN DID YOU LAST COMMUNICATE WITH [redacted]? b6 b7C

b6
b7C

^PAGE 4 PAN 29B-WF-171994 ~~S E C R E T~~

IN 1990 HE WAS STILL MARRIED TO HIS WIFE, [redacted], WHO IS A U.S. CITIZEN.

9) DO YOU KNOW WHERE [redacted] IS AT THE PRESENT TIME? b6 b7C

DOES NOT KNOW WHERE HE IS AT.

IS [redacted] HIS LAST NAME OR IS IT [redacted] IS HIS LAST NAME.

10) WHERE CAN WE CONTACT YOU IN THE FUTURE?

MR. [redacted] IS STILL IN THE PROCESS OF MOVING TO A NEW b6 b7C RESIDENCE, HOWEVER CAN BE CONTACTED AT WORK [redacted]

MR. [redacted] FURNISHED THE FOLLOWING PHYSICAL DESCRIPTION b6 b7C OF [redacted] PAKISTANIAN, 5'9", DARK EYES, DARK SKIN, MUSTACHE, 190 POUNDS, LATE 30'S EARLY 40'S, NO CHILDREN, WIFE [redacted] SPEAKS ENGLISH WITH HEAVY PAKISTANIAN ACCENT.

[redacted] WAS LAYED OFF IN AUGUST, SEPTEMBER OF 1990. b6 b7C

MR. [redacted] FURTHER ADVISED THAT HE WILL TRY TO FIND OUT THE WHEREABOUTS OF BOTH [redacted] AND WILL CONTACT LEGAT, PANAMA CITY IF ANY POSITIVE INFORMATION IS DEVELOPED. b6 b7C

~~C BY 6747; DECL ON OADR.~~

BT

C-5

March 11, 1997

CERTIFIED RETURN RECEIPT

Ms. [redacted] b6 b7C
Asset Forfeiture and Money Laundering Section
Criminal Division
Department of Justice
1400 New York Avenue, N.W.
Room 10100, BOND Building
Washington, D.C. 20005

RE: $60,000,000.00 IN U.S. CURRENCY b6
FBI SEIZURE NUMBER: 3920-97-F-0028 b7C

Dear Ms. [redacted]

On December 13, 1996, a petition for remission or mitigation of the forfeiture of the above-described property was filed with the Federal Bureau of Investigation by Mr. [redacted] b6 b7C on behalf of Mr. [redacted]

A review of the captioned matter indicates that the property is subject to criminal forfeiture. The matter has been referred to the Criminal Division, Department of Justice, for forfeiture. No administrative forfeiture of this property will occur.

Inasmuch as this matter will proceed as a judicial forfeiture, we are enclosing a copy of the original petition for you. A copy of the original petition is being sent to the Chief, Asset Forfeiture and Money Laundering Section, Criminal Division, U.S. Department of Justice. We are terminating our administrative forfeiture of this property and will not be ruling on the petition.

Enclosure

29B-WF-171994 - 745
SW SW

(1) - WFO (29B-WF-171994)
Attention: Paralegal Specialist

MAR 12 1997

1325015-000-8528

Ms. [redacted] b6 b7C

The Petitioner has been advised of the referral of the petition to your office by letter. A copy of that letter is enclosed. The Washington Field Division will submit to you a copy of a Petition Investigation Report concerning this matter.

Sincerely yours,

[redacted] b6 b7C
Acting Unit Chief
Legal Forfeiture Unit
Office of the General Counsel

1325015-000-8529

March 11, 1997

CERTIFIED RETURN RECEIPT

Gerald E. McDowell, Chief
Asset Forfeiture and Money Laundering Section
Attn: Nancy L. Rider, Deputy Chief
Criminal Division
Department of Justice
1400 New York Avenue, NW
Room 10100, BOND Building
Washington, D.C. 20005

RE: $60,000,000.00 IN U.S. CURRENCY
FBI SEIZURE NUMBER: 3920-97-F-0028

Dear Ms. Rider:

On December 13, 1996, a petition for remission or mitigation of the forfeiture of the above-described property was filed with the Federal Bureau of Investigation by Mr. [redacted] on behalf of Mr. [redacted]

b6
b7C

A review of the captioned matter indicates that the property is subject to criminal forfeiture. The matter has been referred to the Criminal Division, Department of Justice, for judicial action. No administrative forfeiture of this property will occur.

Inasmuch as this matter will proceed as a judicial forfeiture, we are enclosing a copy of the original petition for you. We are terminating our administrative forfeiture of this property and will not be ruling on the petition.

Enclosure

29B-WF-171994-746

SW SW

MAR 12 1997

FBI-WF

(1) - WFO (29B-WF-171994)
Attention: Paralegal Specialist

1325015-000-8530

Gerald E. McDowell, Chief

The Petitioner has been advised of the referral of the petition to your office by letter. A copy of that letter is enclosed. The Washington Field Division will submit to you a copy of a Petition Investigation Report concerning this matter.

Sincerely yours,

[redacted] b6 b7C

Acting Unit Chief
Legal Forfeiture Unit
Office of the General Counsel

1325015-000-8531

March 11, 1997

CERTIFIED RETURN RECEIPT

Mr. [redacted] b6 b7C
Stanley E. Stein & Associates Co., L.P.A.
75 Public Square, Suite 714
Cleveland, Ohio 44113-2078

RE: $60,000,000.00 IN U.S. CURRENCY b6 b7C
FBI SEIZURE NUMBER: 3920-97-F-0028

Dear Mr. [redacted]

The petition for remission or mitigation of forfeiture of the above-described property, filed by you on behalf of Mr. [redacted] dated December 13, 1996, has been received at this office. b6 b7C

A review of this matter indicates that the property is subject to criminal forfeiture. The administrative forfeiture action has ceased and the matter has been referred to the Criminal Division, Department of Justice, for judicial action. As a result, your petition has been forwarded to the Asset Forfeiture and Money Laundering Section, Criminal Division, Department of Justice for a determination and ruling. This office (Federal Bureau of Investigation) will not be ruling on your petition.

29B-WF-171994 - 747
SW SW

1 - WFO (29B-WF-171994)
Attention: Paralegal Specialist

MAR 12 1997

1325015-000-8532

Mr. [redacted] b6 b7C

You should address any questions you have concerning this petition to the Chief, Asset Forfeiture and Money LaunderingSection, Criminal Division, Department of Justice, 1400 New York Avenue, N.W., Room 10100, BOND Building, Washington, D.C. 20005, telephone number (202) 514-1263.

Sincerely yours,

[redacted] b6 b7C
Acting Unit Chief
Legal Forfeiture Unit
Office of the General Counsel

1 - Chief, Asset Forfeiture and Money Laundering Section

1 - [redacted] b6 b7C
Asset Forfeiture and Money Laundering Section

1325015-000-8533

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/13/1997

To: ADIC, WFO

From: WFO
C-5
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
FIF;FAG;
OO:WFO

Synopsis: Request to reassign captioned matter.

Details: Due to the transfer of SA [redacted] it is recommended that this matter be reassigned. b6 b7C

The investigation remaining is centered around locating and apprehending fugitive GHAITH PHAROAN. To this end, the following investigation should be conducted:

1. Review case files to become acquainted with the contacts initiated between the former case agent and Naval Intelligence, regarding the whereabouts of PHAROAN'S yacht.

2. Contact DOJ Attorney's [redacted] b6 b7C regarding possible contact with PHAROAN'S attorney to negotiate a surrender and subsequent plea.

3. Provide FBIHQ with a current update regarding the status of the investigation.

It should be noted that SA [redacted] is co-case agent, and is also currently under transfer to Oklahoma City Division. b6 b7C

Reassign to SA [redacted] b6 b7C

-748

[redacted]
released as co-agent 3-24-97

3-28-97 SW PB

29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 2 1997
FBI — WASH. METRO FIELD OFFICE

RCCI, EC

1325015-000-8534

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 4/2/97

[redacted] at BAACH, ROBINSON and LEWIS, One Thomas Circle, Suite 200, Washington, D.C., (202) 833-8900, was telephonically contacted, in Canada [redacted] provided the following information. b6 b7C

[redacted] advised GHAITH PHARAON had been served with Civil legal papers, while in Islamabad, Pakistan, which were stated to be an "Application to Appear in Court". PHARAON was served on March 31, 1997 and he was to appear in a Pakistan court on April, 2, 1997. PHARAON departed Islamabad, Pakistan on April 1, 1997. b6 b7C

PHARAON apparently met with the Chief Minister of the Province of Punjab, Pakistan. [redacted] could not recall the name of the Chief Minister, however he knew to be the brother of the Prime Minister of Pakistan. [redacted] believes that this is PHARAON's contact into Pakistan. PHARAON also traveled to Karachi, Pakistan and visited the Attock Cement Company. b6 b7C

[redacted] had no other information concerning PHARAON's travel and/or current business dealings with and within Pakistan. b6 b7C

-749

Investigation on 4/2/97 at Falls Church, VA (telephonically)

File # 29B-WF-171994 Date dictated 4/2/97

by SA [redacted] :rhm b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-8535

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 4/2/97

[redacted] at BAACH, ROBINSON and LEWIS, One Thomas Circle, Suite 200, Washington, D.C., (202) 833-8900, was telephonically contacted, in Canada [redacted] provided the following information. b6 b7C

[redacted] advised GHAITH PHARAON had been served with Civil legal papers, while in Islamabad, Pakistan, which were stated to be an "Application to Appear in Court". PHARAON was served on March 31, 1997 and he was to appear in a Pakistan court on April, 2, 1997. PHARAON departed Islamabad, Pakistan on April 1, 1997. b6 b7C

PHARAON apparently met with the Chief Minister of the Province of Punjab, Pakistan. [redacted] could not recall the name of the Chief Minister, however he knew to be the brother of the Prime Minister of Pakistan. [redacted] believes that this is PHARAON's contact into Pakistan. PHARAON also traveled to Karachi, Pakistan and visited the Attock Cement Company. b6 b7C

[redacted] had no other information concerning PHARAON's travel and/or current business dealings with and within Pakistan. b6 b7C

-749

SEARCHED INDEXED
SERIALIZED FILED
1997
FBI — W... OFFICE

Investigation on 4/2/97 at Falls Church, VA (telephonically)

File # 29B-WF-171994 Date dictated 4/2/97

by SA [redacted] rhm b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

RM970921.302

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/07/1997

To: WFO

From: WFO
C-5/NVRA
Contact: SA [redacted] 4-6409

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

Synopsis: Results of Legat's investigation.

Enclosures: 1 - Legat's EC
2 - State Department Cable

Details: The attached communications provide a time line of events which took place in Islamabad, Pakistan regarding the attempted arrest of GHAITH PHARAON.

♦♦

29B-WF-171994-750

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
APR - 1997
FBI — WASH. METRO FIELD OFFICE

RM970971.EC

132501E-000-8537

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/27/97

[redacted] Deloitte-Touche regarding the liquidation of the Bank of Credit and Commerce International (BCCI) was contacted by the writer at his residence. After being advised of the identity of the interviewing agent and of the purpose of the interview [redacted] provided the following information: b6 b7C

[redacted] was contacted by his client [redacted] did not provide the name), who is currently in Islamabad, Pakistan. [redacted] client advised he/she had heard that GHAITH PHARAON was going to be travelling to Islamabad to meet with Prime Minister SHARIF (phonetic - ph) to discuss possible business dealings. PHARAON is suppose to arrive, via an airline, in Islamabad on March 28th, 1997, the time and airline was unknown. The source of the original information is apparently [redacted] (ph), who at one time worked for PHARAON at ATTOCK, a company owned by PHARAON. [redacted] is supposed to be close to Prime Minister SHARIF. [redacted] is not [redacted] client who has provided the above and following information. b6 b7C

Along with meeting the Prime Minister, PHARAON may have other meetings with other individuals within the Pakistan Government. PHARAON had apparently invited Prime Minister SHARIF to Saudi Arabia in the past, however it was not known if the Prime Minister travelled to meet PHARAON. [redacted] further advised that PHARAON had purchased 15,000 acres of land in Pakistan and this could be the impetus for PHARAON's travel. b6 b7C

On 3/27/97, [redacted] telephonically contacted the writer to advised his client had just heard that [redacted] (ph), the [redacted] ATTOCK, had advised the [redacted] of Pakistan, [redacted] (ph), that PHARAON is a criminal and it might not be in the best interest to meet with PHARAON. [redacted] had no information as to what [redacted] was planning concerning the possible meeting with PHARAON. b6 b7C

-751

Investigation on 3/26/97 at Herndon, VA (telephonically)

File # 29B-WF-171994 Date dictated 3/28/97

by SA [redacted] :rhm b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/27/97

[redacted] Deloitte-Touche regarding the liquidation of the Bank of Credit and Commerce International (BCCI) was contacted by the writer at his residence. After being advised of the identity of the interviewing agent and of the purpose of the interview LEWIS provided the following information: b6 b7C

[redacted] was contacted by his client [redacted] did not provide the name), who is currently in Islamabad, Pakistan. [redacted] client advised he/she had heard that GHAITH PHARAON was going to be travelling to Islamabad to meet with Prime Minister SHARIF (phonetic - ph) to discuss possible business dealings. PHARAON is suppose to arrive, via an airline, in Islamabad on March 28th, 1997, the time and airline was unknown. The source of the original information is apparently [redacted] (ph), who at one time worked for PHARAON at ATTOCK, a company owned by PHARAON. [redacted] is supposed to be close to Prime Minister SHARIF. [redacted] is not [redacted] client who has provided the above and following information. b6 b7C

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On 3/27/97, [redacted] telephonically contacted the writer to advised his client had just heard that [redacted] (ph), the [redacted] had advised the [redacted] of Pakistan, [redacted] (ph), that PHARAON is a criminal and it might not be in the best interest to meet with PHARAON. [redacted] had no information as to what [redacted] was planning concerning the possible meeting with PHARAON. b6 b7C

-751

RM 97100 1.302

Investigation on 3/26/97 at Herndon, VA (telephonically)

File # 29B-WF-171994 Date dictated 3/28/97

by SA [redacted] rhm

INDEXED SERIALIZED FILED

1997

FBI — WASH. METRO FIELD OFFICE

b6 b7C

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FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/28/97

[redacted] at BAACH, ROBINSON and LEWIS, One Thomas Circle, Suite 200, Washington, D.C., (202) 833-8900, telephonically contacted the writer. [redacted] provided the following information. b6 b7C

[redacted] source advised GHAITH PHARAON had arrived in Islamabad, Pakistan on the morning of March 28, 1997. PHARAON is suppose to be staying at the Marriott Hotel in room 517. PHARAON is scheduled to depart Pakistan on April 1, 1997, via Saudi Arabian Airlines for Jedda. During his stay PHARAON has scheduled meetings at Attock Oil offices and Attock Refinery/Pakistan Oilfields. These meetings are to take place on Saturday March 29, 1997. On Sunday PHARAON is to Chair an Attock Board meeting. b6 b7C

Investigation on 3/28/97 at Falls Church, VA (telephonically)

File # 29B-WF-171994 Date dictated 3/28/97 752

by SA [redacted] rhm b6 b7C

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1325015-000-8547

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/28/97

[redacted] at BAACH, ROBINSON and LEWIS, One Thomas Circle, Suite 200, Washington, D.C. (202) 833-8900, telephonically contacted the writer. [redacted] provided the following information. b6 b7C

[redacted] source advised GHAITH PHARAON had arrived in Islamabad, Pakistan on the morning of March 28, 1997. PHARAON is suppose to be staying at the Marriott Hotel in room 517. PHARAON is scheduled to depart Pakistan on April 1, 1997, via Saudi Arabian Airlines for Jedda. During his stay PHARAON has scheduled meetings at Attock Oil offices and Attock Refinery/Pakistan Oilfields. These meetings are to take place on Saturday March 29, 1997. On Sunday PHARAON is to Chair an Attock Board meeting. b6 b7C

29B-WF-171994-752

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 3 1 1997
FBI — WASH. METRO FIELD OFFICE

Investigation on 3/28/97 at Falls Church, VA (telephonically)

File # 29B-WF-171994 Date dictated 3/28/97

by SA [redacted] rhm b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

RM970922.302

1325015-000-8548

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 03/28/1997

To: CID/WCCS/FIFU
WFO **Attn:** SA [redacted] C-5

From: Islamabad
Contact: Legat [redacted] 011-92-51-826161, ext 2205 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] ale

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG;
OO:WF

Synopsis: [redacted] b7D

Administrative: WFO telcals to IS, 3/27/97; DOJ/OIA telcal to IS, 3/27/97; WFO telcal to IS on 3/28/97; USDS cable SECSTATE 56962, dated 3/28/97.

Enclosures: Memo and brief report [redacted] regarding Pharaon. b7D

Details: Referenced Washington Field Office (WFO) telephone calls on 3/27/97 provided that information existed that Ghaith Pharaon was to travel on 3/28/97 from Jedda, Saudi Arabia to Islamabad, Pakistan, to meet with newly elected Pakistan prime minister, Nawaz Sharif. No further information was available regarding Pharaon's itinerary.

Islamabad was aware of the outstanding indictment and the 1994 extradition request to the [redacted] b7D based upon Pharaon's involvement with the captioned case. Islamabad was also aware of Pharaon's alleged travel in and out of Pakistan in the past.

[redacted] b7D

29B-WF-171994
-153

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
[illegible] 1997
FBI — WASH. METRO FIELD OFFICE

1329015-000-8549

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

To: CID From: Islamabad
Re: 29B-WF-171994, 03/28/1997

[redacted] b7D

However, based upon the referenced U.S. Department of State cable, Islamabad discussed this matter on the morning of 3/28/97 with [redacted] b6 b7C b7D

1325015-000-8550

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

To: CID From: Islamabad
Re: 29B-WF-171994, 03/28/1997

Lead(s):

Set Lead 1:

Washington Field Office

AT WASHINGTON D.C.

Pass this EC and enclosures to [redacted], DOJ, Office of International Affairs, fax number 202/514-0080.

b6
b7C

♦♦

1325015-000-8551

DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
Legal Attache Office Islamabad

MEMORANDUM

To: Mr. [redacted]

Date: 28 March 97

b6
b7C
b7D

From: Mr. [redacted]
Legal Attache

Subject: GHAITH PHARAON

Re: Telephone Conversation, 3/28/97.

[redacted]

b7D

29B-WF-171994-755

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW

APR 28 1997

FBI — WASH. METRO FIELD OFFICE

1325013-000-8562

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
Legal Attache Office Islamabad

GHAITH RASHAD PHARAON, born 7 September 1940, Saudi Arabian passport number 100182/31, is wanted by the U.S. Government to stand trial on a number of federal and state charges arising out of his association with the Bank of Credit and Commerce International. There is an outstanding U.S. indictment and a formal extradition request was made to the Government of Pakistan in October, 1994.

The U.S. Government has received information that Mr. PHARAON may be traveling from Saudi Arabia to Pakistan - possibly from Jedda to Islamabad - as early as today, 28 March 1997. An Interpol notice - File No. 38304/91; Control No. A-355/8-1992 - is on file for Mr. PHARAON.

The U.S. Government remains committed to the prosecution of Mr. PHARAON, [redacted] b7D

cc: GOP Secretary of Interior

1325015-000-8563

DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
Legal Attache Office Islamabad

b6
b7C
b7D

MEMORANDUM

To: [redacted]

Date: 28 March 97

From: Mr. [redacted]
Legal Attache

b6
b7C

Subject: GHAITH PHARAON

Please find attached a brief report regarding the above captioned subject. As indicated in the report, the U.S. Government remains committed to the prosecution of Mr. PHARAON, [redacted]

b7D

b6
b7C
b7D

Thank you in advance for your anticipated cooperation.

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
Legal Attache Office Islamabad

GHAITH RASHAD PHARAON, born 7 September 1940, Saudi Arabian passport number 100182/31, is wanted by the U.S. Government to stand trial on a number of federal and state charges arising out of his association with the Bank of Credit and Commerce International. There is an outstanding U.S. indictment and a formal extradition request was made to the Government of Pakistan in October, 1994.

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The U.S. Government remains committed to the prosecution of Mr. PHARAON, [redacted] b7D

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE Date: 03/28/1997

To: CID/WCCS/FIFU
WFO Attn: SA [redacted] C-5

From: Islamabad
Contact: Legat [redacted] 011-92-51-826161, ext 2205

Approved By: [redacted] b6 b7C

Drafted By: [redacted] ale

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG;
OO:WF

Synopsis: [redacted] b7D

Administrative: WFO telcals to IS, 3/27/97; DOJ/OIA telcal to IS, 3/27/97; WFO telcal to IS on 3/28/97; USDS cable SECSTATE 56962, dated 3/28/97.

Enclosures: Memo and brief report [redacted] b7D

Details: Referenced Washington Field Office (WFO) telephone calls on 3/27/97 provided that information existed that Ghaith Pharaon was to travel on 3/28/97 from Jedda, Saudi Arabia to Islamabad, Pakistan, to meet with newly elected Pakistan prime minister, Nawaz Sharif. No further information was available regarding Pharaon's itinerary.

Islamabad was aware of the outstanding indictment and the 1994 extradition request to the [redacted] b7D based upon Pharaon's involvement with the captioned case. Islamabad was also aware of Pharaon's alleged travel in and out of Pakistan in the past.

[redacted] b7D

29K-WF-171994-756

SEARCHED SERIALIZED APR 28 1997 FBI — WASH. METR.

132501[illegible]000-8566

FEDERAL BUREAU OF INVESTIGATION

To: CID From: Islamabad
Re: 29B-WF-171994, 03/28/1997

[redacted] b7D

However, based upon the referenced U.S. Department of State cable, Islamabad discussed this matter on the morning of 3/28/97 with [redacted] b6 b7C b7D

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

To: CID From: Islamabad
Re: 29B-WF-171994, 03/28/1997

Lead(s):

Set Lead 1:

Washington Field Office

AT WASHINGTON D.C.

Pass this EC and enclosures to [redacted], DOJ, Office of International Affairs, fax number 202/514-0080.

b6
b7C

♦♦

1325015-000-8568

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 8/22/1997

To: WFO

From: WFO
Squad C-5

Approved By: [redacted] b6 b7B

Drafted By:

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG
OO:WF b6 b7C

Synopsis: To reassign the above captioned file from to SA ROBERT M. ROTH to SA [redacted]

Details: The main investigative file in this matter was previously inadvertently reassigned to SA ROTH, Squad C-1. As such, the main file should be reassigned to SA [redacted] The Sub FF file and any Sub FF Sub files shall remain assigned to SA ROTH. b6 b7C

Reassign to
8/22/97

b6 b7C

1 - 29B-WF-171994
1 - Squad C-1 (SA Roth)

8-22-97 gmc

1

[redacted]

29B-WF-171994 -760

gmc gmc

FBI [redacted]

b6 b7C

EW97234l.EC

1325015-000-8569

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 09/18/1997

To: Criminal Investigative Attn: WCCS, FIFU
SSA [redacted] b6 b7C

From: WFO
C-5/NVRA
Contact: SA [redacted] 762-3414

Approved By: [redacted]

Drafted By: [redacted] :rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WFO

Synopsis: Investigation regarding GHAITH PHARAON.

Details: Since last determining PHARAON had traveled to and from Islamabad, Pakistan the following investigative steps have taken place:

Contact with SSA [redacted], the FBI's liaison with the [redacted] was made again to verify that all necessary steps have been taken in order to track PHARAON. b6 b7C b7E

Contact with the Department of Justice has also occurred regarding PHARAON. The 'Red Notice Letter' had previously been issued and is still active.

♦♦

29B-WF-171994

SI [redacted] RM97261 1.EC -762

SEARCHED [redacted] b6 b7C
SERIALIZED [redacted]
SEP 19 1997
FBI - MICROFILMED

132D015-000-8570

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE Date: 04/10/1997

To: Criminal Investigative Attn: AD Robert Bryant
[redacted] FIFU b6 b7C
IRU II
Washington Field Attn: [redacted] C-5

From: Islamabad
Contact: Legat [redacted] 011-92-51-826161, ext 2205

Approved By: [redacted] b6 b7C

Drafted By: [redacted] :sgj

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38
FIF; FAG;

Synopsis: [redacted] b5 b7D

Administrative: IS EC's to FBIHQ and WFO, dated 3/28 and 4/4/97.

Details: On 3/28/97 the Washington Field Office advised [redacted] b5 b7D

On the morning of 4/10/97 the [redacted] b5 b7D

[redacted] b5 b7D

Pharaon is possibly the largest individual investor in Pakistan. [redacted]

29B-WF-171994-764
SEARCHED INDEXED
SERIALIZED FILED
MAY 2 / 1997
FBI

1325015-000-8572

FEDERAL BUREAU OF INVESTIGATION

To: Criminal Investigative From: Islamabad
Re: 29B-WF-171994, 04/10/1997

[redacted] b5 b7D

[redacted] b5 b7D

[redacted]

Legat's comments are merely an attempt to facilitate the FBI's ultimate goal, and hopefully will not be construed as taking a less than hard line stance. [redacted] b5 b7D

[redacted]

♦♦

1325015-000-8573

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 04/10/1997

To: Criminal Investigative **Attn:** AD Robert Bryant
FIFU
IRU II

Washington Field **Attn:** C-5

From: Islamabad
Contact: Legat 011-92-51-826161, ext 2205

Approved By:

Drafted By: (sgj)

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38
FIF; FAG;

Synopsis:

Administrative: IS EC's to FBIHQ and WFO, dated 3/28 and 4/4/97.

Details: On 3/28/97 the Washington Field Office advised

On the morning of 4/10/97 the

Pharaon is possibly the largest individual investor in Pakistan.

29B-WF-171994 - 765

SEARCHED INDEXED
SERIALIZED FILED

1997

FBI — WASH. METROPOLITAN FIELD OFFICE

132501 7000-8574

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

To: Criminal Investigative From: Islamabad
Re: 29B-WF-171994, 04/10/1997

b5
b7D

[redacted]

b5
b7D

[redacted]

b5
b7D

Legat's comments are merely an attempt to facilitate the FBI's ultimate goal, and hopefully will not be construed as taking a less than hard line stance.

[redacted]

1325015-000-8575

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/18/1997

To: ADIC, WF

From: SA [redacted] b6 b7C
SQUAD C-5/NVRA
Contact: [redacted] 762-3416

Approved By: [redacted]

Drafted By: [redacted] :GJL

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG
OO:WF

Synopsis: Copy of [redacted] British passport finished to his attorney. b6 b7C

Details: On 8/15/97, [redacted] telephone number [redacted] attorney for [redacted] contacted the writer and requested that a copy of his client's British passport be provided to him. [redacted] stated that [redacted] turned over his passport to the FBI when he was arrested in 1994. [redacted] stated that the passport had expired and he was in the process of obtaining a new passport for [redacted] in anticipation of his release from prison in July, 1999. b6 b7C

A review of the captioned file showed that [redacted] passport was in the 1A section of the file in the 1A numbered 474. On this same date a copy of the passport was made and left for pickup on the second floor by a messenger from [redacted] firm. b6 b7C

♦♦
1 - 29B-WF-171994

29B-WF-171994-766
SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 21 1997
FBI — [redacted]

H:\WP51\NAQV1P

0325015-000-8576

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/27/1997

To: Criminal Investigative **Attn:** [redacted] FIFU IRU II b6 b7C

Washington Field **Attn:** [redacted] C-5

From: Islamabad
Contact: [redacted] 011-92-51-826161, ext 2205

Approved By: [redacted]

Drafted By: [redacted] :ale

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG;

Synopsis: To advise WFO of possible travel by Ghaith Pharaon.

Administrative: ISLAMABAD HAS NO MEANS TO DIRECTLY ACCESS ANY BUREAU SYSTEM, AND THIS COMMUNICATION HAS NOT BEEN ENTERED INTO ACS. IT HAS BEEN FORWARDED BY FACSIMILE ONLY.

This EC has been forwarded to DOJ, Office of International Affairs, [redacted] b6 b7C

Details: On 8/27/97, Legat IS learned from a letter written to the Ambassador on 8/23/97 from Stuart Sybersma, Deloitte and Touche Chartered Accountants, that Ghaith Pharaon may have visited Islamabad sometime during the week of 8/11/97. Pharaon's visit was apparently limited to less than 24 hours and he arrived and departed on a private plane. He is reported to have met with the Federal Minister of Interior, Chaudry Shujat Hussain.

This information has not yet been confirmed. Legat IS will continue to apprise WFO and FBIHQ of details as they become available.

♦♦

29B-WF-171994-767

1325015-000-8577

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/09/1997

To: Criminal Investigative **Attn:** [redacted] FIFU IRU II b6 b7C

Washington Field **Attn:** [redacted] C-5

From: Islamabad

Contact: [redacted] 011-92-51-826161, ext 2205

Approved By: [redacted]

Drafted By: [redacted] sgj

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38
FIF; FAG

Synopsis: [redacted] b7D

Administrative: [redacted] b7D

Details: On 9/2/97 Legat IS [redacted] b7D

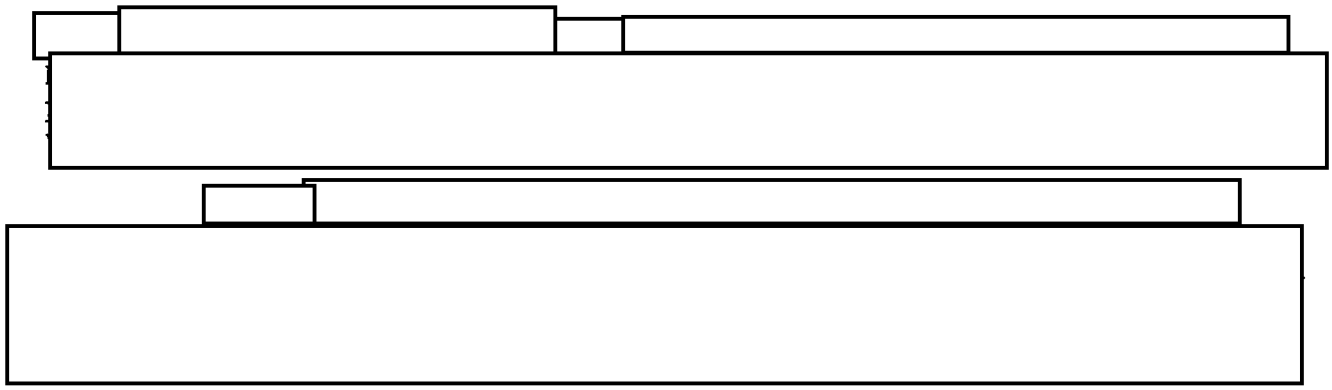
On 3/31/97 [redacted] b7D

Confronted with the fact that, regardless of his personal knowledge [redacted] b7D

Upon learning of the [redacted] b7D

29B-WF-171994-768

1325015-000-8578



b7D

b7D

♦♦

1325015-000-8579

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 10/21/1997

To: Criminal Investigative Atth: [redacted] FIFU b6 b7C
Washington Field Attn: [redacted] C-5

From: Islamabad
Contact: [redacted] 011-92-51-826161, ext 2205

Approved By: [redacted]

Drafted By: [redacted] ale

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38
FIF; FAG

Synopsis: To inform FBIHQ and WFO of Legat Islamabad's request for [redacted] b7D

Administrative: **ISLAMABAD HAS NO MEANS TO DIRECTLY ACCESS ANY BUREAU SYSTEM, AND THIS COMMUNICATION HAS NOT BEEN ENTERED INTO ACS. IT HAS BEEN FORWARDED BY FACSIMILE ONLY.**

Re USDS cable SECSTATE 189660

Details: The referenced USDS cable stated that the Department of Justice, Fraud Section, requested the American Embassy, Islamabad verify and confirm [redacted] b7D

[redacted]

Legat IS will notify FBIHQ and WFO of any positive information.

♦♦

29B-WF-171994 - 769

FAX TRANSMISSION

LEGAL ATTACHE OFFICE
ISLAMABAD, PAKISTAN
Telephone #: 011-92-51-826161, EXT 2205
Fax #: 011-92-51-278342

To: Legat Support Group
Attn:

Date: October 22, 1997

Fax #: 202/324-1633

Pages: two, including this cover sheet.

Voice #:

From: OA [redacted]

b6
b7C

Subject: HIDDEN INTEREST

COMMENTS:

REQUEST OF LSG:

Please provide FBIHQ copy to FIFU

Please fax to WFO, C-5

FORWARDED TO all addressees
BY LSG 10/22/97 NAIT/LSG

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/07/1998

To: Criminal Investigative **Attn:** [redacted] FIFU
Washington Field **Attn:** [redacted] C-5

From: Islamabad
Contact: [redacted] 011-92-51-826161, ext 2205

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] L:ale

Case ID #: 29B-WF-171994-773 (Pending)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG

Synopsis: To provide WFO with requested [redacted] b7D

[redacted]

Administrative: Re USDS cable SECSTATE 189660, dated 10/7/97.

Enclosures: Enclosed for WFO is [redacted] b7D

[redacted]

Details: Referenced USDS cable requested Legal Attache Islamabad (IS) to verify [redacted] b7D

[redacted]

♦♦

UPLOADED ACS QC
DATE 4/7/98

DATE: _____

TO: WFO

FROM: LEGAT ROME

RE: File number 29B-WF-171994

Attached are the following original serials for your file.

775

_____

_____

_____

_____

DATE: _____

TO: WFO

FROM: LEGAT ROME

RE: File number 29-WF-171994

Attached are the following original serials for your file.

776

_____

_____

_____

_____

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE Date: 05/08/1998

To: Athens ATTN: LEGAT Athens
FBIHQ SSA [redacted] - ECU

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416 b6 b7C

Approved By: [redacted], JR.

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: Activity of fugitive GHAITH PHARAON.

Details: For the information of LEGAT ATHENS. PHARAON is a fugitive, having been indicted on bank fraud charges in the United States in 1991. PHARAON is known to live in Jiddah, Saudi Arabia and to travel throughout the Middle East.

PHARAON often travels via his yacht "LE PHARAON". On May 5, 1998 WFO was informed that PHARAON's yacht docked at the port in Limassol, Cyprus on May 3, 1998. The yacht had previously docked at Limassol on April 6, 1998 and departed for Syria on April 8, 1998. It was unknown when the yacht departed Syria, but it did arrive back in Limassol on May 3, 1998. Source information indicated that PHARAON was in Syria at the same time his yacht was at Syria. It is unknown if PHARAON departed Syria aboard the yacht.

The writer notified FBI Headquarters and the Department of Justice (DOJ) Fraud Section and Office of International Affairs (OIA) - Fugitive Section on May 5, 1998. DOJ advised there is an outstanding extradition treaty with Cyprus and that they would notify the State Department regarding PHARAON. DOJ-OIA notified Interpol regarding PHARAON.

On May 7, 1998, WFO contacted Special Agent [redacted] at Interpol, who advised that Interpol sent a message for Interpol to search the yacht "LE PHARAON" to determine if PHARAON is on the yacht. It is WFO's understanding that if PHARAON is located the Cyprian authorities have been requested to arrest PHARAON. There is an outstanding 'Red Letter Notice' on PHARAON. Should other information develops LEGAT Athens will be notified.♦♦ b6 b7C

29B-WF-171994-777 gmc

S: [redacted] Rm98128l.EC

1325015-000 b6 b7C

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
New York, N.Y. 10013
(212) 335-9000

ROBERT M. MORGENTHAU
District Attorney

FAX DOCUMENT COVERSHEET

FAX # (212) 335-9807

Date: 3/17/93

To: Laurence Urgenson

Fax # 202-514-0409

Location: Criminal Division, D.O.J.

From: [redacted] b6 b7C

Address: New York County District Attorney

Room: 730 Fax # (212) 335-9807

# of Pages: 10 Phone # (212) 335-9505

✓ URGENT ___ ROUTINE

(A)

Message: _____

Received from AUSA Urgenson 3/18/93

[redacted] b6 b7C

SEARCHED _____ INDEXED _____
SERIALIZED _____ FILED _____
MAR 16 1993
FBI — WASH. FIELD OFFICE

288-WF-171994 Main-778

1325015-000-8603

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
NEW YORK, N.Y. 10013
(212) 335-9000

ROBERT M. MORGENTHAU
DISTRICT ATTORNEY

Fax Number: (212) 335-9807

March 17, 1993

[redacted] b6 b7C

Patton, Boggs & Blow
2550 M Street NW
Washington, DC 20037

Re: Abu Dhabi Parties

Dear Mr. [redacted] b6 b7C

In order to advance our meeting this coming Monday at 9:00 a.m. I am enclosing a tentative draft agreement.

I also expect that you will be able to advise me concretely about expeditious access to the three persons that we have discussed.

Finally, at Monday's meeting I would like to discuss with you at the meeting the ownership structure and mortgage details of the building at 330 Madison Avenue in New York.

Sincerely,

[redacted] b6 b7C

Ass[illegible]istrict Attorney

cc: Laurence A. Urgenson

[redacted]

TENTATIVE DRAFT FOR DISCUSSION PURPOSES

AGREEMENT

This agreement embodies all promises, understandings, and agreements in existence between {Abu Dhabi parties} ("Abu Dhabi parties"), the New York County District Attorney's Office ("DANY") and the United States Department of Justice ("DOJ") regarding the hereinafter described "BCC scandal":

PREAMBLE

1. In _____, an individual, Agha Hasan Abedi, gained the trust of the ruling family of Abu Dhabi. He told them that he wanted to create a world wide banking institution. He told them that that bank would assist the development of Third World countries. The bank that Abedi and his associates described received the financial support of the ruling family of Abu Dhabi, and Abedi and his associates thereby gained access to billions of dollars, prestige and the trust of others. Further, Abedi and his associates were entrusted by the ruling family of Abu Dhabi and given broad authority to use and handle billions of dollars in additional funds. The resulting conduct by Abedi and those who associated with him through the BCC Group of companies and through the management of the billions of dollars to which Abedi and his associates were given access is what has become known as the BCC scandal. The BCC Group was comprised of the Bank of Credit and Commerce International Holdings, S.A., its subsidiaries and affiliates, including but not limited to Bank of Credit and

Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited, ICIC Apex Holding, and their subsidiaries and affiliates.

2. The BCC scandal resulted in many victims. Numerous persons worldwide, many who can ill afford it, lost _____ of dollars. Several Third World countries had their treasuries depleted of millions of dollars. And, the ruling family of Abu Dhabi is now unable to account for billions of dollars entrusted to Abedi.

3. The ruling family of Abu Dhabi continues to express a moral concern over the losses to the victims of the BCC scandal.

4. The investigation into the facts and circumstances of the BCC scandal and to seek out those persons who share responsibility for it is a task of monumental proportions. The parties to this agreement agree that that investigation should bring to light all those who share that responsibility and agree to cooperate in that effort and to take all available steps to do so. The parties also agree that corruption in any form cannot go unrevealed.

5. This agreement is based upon the following main principles. First, the Abu Dhabi parties desire to cooperate with the investigations being conducted by or in conjunction with DOJ and DANY into the BCC scandal and to make available to them all evidence and witnesses for use in their respective investigations and court proceedings. Second, DOJ and DANY desire to cooperate with the investigations being conducted by the Government of Abu

1325015-000-8606

Dhabi into the BCC scandal and to make available to it all evidence and witnesses for use in their respective investigations and court proceedings. Third, the Abu Dhabi parties desire to continue its efforts to mitigate the plight of those who have suffered from the BCC scandal.

6. The result of this agreement is that DOJ and the DANY, on the one hand, and the Abu Dhabi parties, on the other hand, shall provide cooperation to one another in the separate and independent investigations described above against other persons who share the blame for criminal conduct in connection with the BCC scandal to the full extent of their powers and abilities to do so.

COMMITMENTS

1. Cooperation

A. To cooperate means, in connection with any matter relating to the BCC scandal,

(1) to produce any investigative information that is or can be within the control of the relevant party;

(2) to use best efforts to produce any investigative information in the custody or control of third parties;

(3) to use best efforts to produce any person that is or can be within the control of the relevant party to testify in any

1325015-000-8607

duly convened grand jury, court, or other criminal, investigative, or administrative proceeding;

(4) to use best efforts to persuade and to facilitate the appearance of any person requested who is not within the control of the relevant party to testify in any duly convened grand jury, court, or other criminal, investigative, or administrative proceeding;

(5) to waive all privileges, including the attorney-client, accountant-client, privileges against self-incrimination, bank secrecy, and work product privileges, possessed by the relevant party.

B. "Investigative information" includes documents, records, tangible evidence or other information, in whatever media they might exist including, but not limited to paper, microfilm, microfiche, computer disks or other media.

C. "Produce ... investigative information" means to obtain access to, provide originals of where practicable, make and provide copies of, and permit use of such information, as specified by the requesting party.

D. The Abu Dhabi parties agree to and shall use their joint and individual best efforts to cooperate in the independent investigations being conducted by DOJ and NYDA individually and

1325015-000-8608

conjunction with other law enforcement or regulatory authorities in connection with matters relating to the BCC scandal. In signing this agreement, the Abu Dhabi parties specifically waive the the privileges set forth in Commitments clause 1 (A)(5).

E. DOJ agrees to and shall use its best efforts to cooperate in the criminal investigations being conducted by the Government of Abu Dhabi in connection with matters relating to the BCC scandal. Nothing in this agreement shall be interpreted to require DOJ to violate the laws of the United States or treaties to which the United States is a party, or to produce investigative information that is confidential, secret, or classified by virtue of the laws of the United States or treaties to which the United States is a party.

F. DANY agrees to and shall use its best efforts to cooperate in the criminal investigations being conducted by the Government of Abu Dhabi in connection with matters relating to the BCC scandal. Nothing in this agreement shall be interpreted to require DANY to violate the laws of New York, or the laws of the United States or treaties to which the United States is a party.

G. The Abu Dhabi parties agree to assume the reasonable costs of the cooperation set forth above.

2. Financial Assistance To BCC Victims

A. The Abu Dhabi parties believe that the misuse of power, authority, and monies entrusted to Abedi and his associates

1325015-000-8609

resulted in harm throughout the world. While the ruling family of Abu Dhabi and others in Abu Dhabi, including the Government of Abu Dhabi, cannot now account for billions of dollars entrusted to Abedi, the ruling family of Abu Dhabi continues to seek ways to ensure that the harm suffered to the innocent victims of the BCC scandal is mitigated in the largest possible manner. The ruling family recognizes that had Abedi not been entrusted with the power, authority, and monies entrusted to him, the BCC Group would not have had the wherewithal to abuse the trust placed in him and cause this victimization. In light of this, the ruling family of Abu Dhabi desires, has agreed to, and shall:

(1) provide the funds and establish a reasonable mechanism to ensure that each creditor of the branches of BCCI S.A. and BCCI Overseas located in the jurisdictions of: _____ whose BCC deposit accounts therein and throughout the world when offset by their loan accounts and reimbursements from other sources (such as liquidations or governmental grants) results in a net loss shall be provided an amount that makes up at least $_____ of the net loss by no later than December 31, 1993;

(2) provide the funds and establish a reasonable mechanism to ensure that the losses to the treasuries of the following

1325015-000-8610

countries shall be made up by no later than December 31, 1993: _____;

(3) release all rights to their shares in CCAH, and their rights to the CCAH shares of any other CCAH shareholder, and all rights to any claim against debts owed by CCAH or its subsidiary companies by no later than _____, 1993;

(4) withdraw the claim of the Department of Private Affairs dated on or about September 8, 1992, against funds forfeited in connection with U.S. v. BCCI Holdings (Luxembourg), SA et al., by no later than _____, 1993;

(5) shall use their best efforts to utilize any monies or other property recovered in connection with any lawsuits or other proceedings brought by them or on their behalf relating to the BCC scandal to benefit all victims of the BCC scandal other than themselves.

3. Miscellaneous Provisions

A. The parties hereto agree to a tolling of any applicable statute of limitations to the extent that such is within their power as to criminal matters related to the BCC scandal during the term of this agreement and for 90 days thereafter.

TENTATIVE DRAFT FOR DISCUSSION PURPOSES

B. This agreement is the complete statement of all the promises, agreements, and understandings with respect to the subject matter of this agreement.

C. No amendments to this agreement shall be effective unless made in writing and signed by all parties. No representations, either orally or in writing, except those contained expressly in this agreement, were made to induce any of the parties to enter into this agreement. All prior negotiations, oral and written, are merged in this agreement. Evidence of such negotiations, including prior drafts, shall not be admissible for any purpose in any proceeding related to this agreement or its performance.

D. This agreement shall be governed by and construed in accordance with the laws of the state of New York, United States of America. Any dispute over this agreement shall be settled by action brought before in the courts of the state of New York, United States of America, and if any provision of this agreement is found to be unenforceable, this agreement shall be null and void (excepting the clause waiving statute of limitations rights) at the option of any of the parties to it.

D. This agreement may be executed in one or more identical counterparts, whether transmitted by telecopier or otherwise. Each such counterpart shall be deemed to be an original for purposes of this agreement.

Dated: _____
New York, New York

1325015-000-8612

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 3/23/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

The purposes of this memorandum are: to summarize a 3/18/93 meeting at DOJ, between Acting DAAG Laurence A. Urgenson, Attorney [redacted], ASAC [redacted], SSA [redacted] b6 b7C FBIHQ SSA [redacted] and myself; and to update you on efforts to capture GHAITH PHARAON.

The 3/18/93 meeting was held to discuss the status of the trial in New York; the prospects of trials of CLIFFORD and [redacted] occurring in the District of Columbia in or about June, b6 b7C 1993; and the existence and nature of additional, BCCI-related matters.

In the matter of the New York trial, [redacted] has been reviewing records at the [redacted] pursuant to a discovery order relating to witness statements. In doing so, [redacted] discovered indications that additional records (i.e., intercepts) relating to BCCI, CLIFFORD, [redacted] et al, exist at the [redacted] records which apparently have not been reviewed by anyone associated with the captioned matter. You will recall that only one [redacted] intercept was heretofore brought to our attention by DOJ Fraud Section Principal Deputy Chief [redacted] and we investigated that one. Supposedly, according to PDC [redacted] it was the only one which resulted from DOJ's inquiry t[redacted] knowledge, however, came from discussions wit[redacted] who reported having seen a large volume of possibly-relevant intercepts at [redacted] in or about mid-1991, when the [redacted] and other members of the Intelligence Community were drawing together records in response to judicial and congressional inquiries. [redacted] and ADAAG Urgenson agreed to assess exactly what DOJ had requested in the way of intelligence material, what was received, and what we now have on hand. b6 b7C b7E

1-WMFO

JNR:jnr
(1)

SSA [redacted] b6 b7C

29B-WF-171994 Main-779

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 2 3 1993
FBI [redacted] FIELD OFFICE

1325015-000-8613

With regard to any prosecution of CLIFFORD and [redacted] b6 b7C in WDC, the consensus seemed to be that, under the right circumstances, DOJ should dismiss the indictments against them, thereby deferring the prosecution of CLIFFORD to New York, then proceeding civilly, through the FED, against both CLIFFORD and [redacted] The "right circumstances" would include: CLIFFORD's surviving his scheduled (3/22/93) heart surgery and being pronounced able to stand trial; the NY trial of [redacted] getting underway and proceeding to some resolution; and the FED's readiness and willingness to proceed against them.

The avenues of further investigation would include: (1) attempts to capture, or negotiate deals with, fugitives [redacted] b6 [redacted] PHARAON, AGHA HASAN ABEDI and [redacted] b7C (2) forfeiture matters; (3) interviewing witnesses and reviewing records in Abu Dhabi, whose availability appears to be contingent on DOJ's and DANY's ability to strike a deal with the government of Abu Dhabi; and (4) identification and prosecution of an American subjects criminally involved in BCCI-related matters, particularly, in the areas of bribery, corruption and money laundering.

With regard to the fugitives, ADAAG Urgenson reported that efforts are continuing to get access to [redacted] once he is b6 extradited to the U.K. In the matter of PHARAON, negotiations b7C with his counsel were continuing, with the most likely place for b7D receiving [redacted] himself, now being Casablanca, Morocco.

There was some discussion of the propriety and value of attempting to negotiate with ABEDI. It was agreed that, using the rationale that we should be seeking to identify and prosecute culpable Americans, and realizing that capturing ABEDI is highly unlikely anyway, an attempt should be made to contact him in a negotiating-posture, initially through [redacted], who b6 reputedly is still in close communication with him. We will b7C explore this through DOJ [redacted] currently detailed to the NY prosecution, where [redacted] is to testify.

On the matter of forfeitures, efforts are continuing to identify and acquire control over all of BCCI's U.S. assets. Currently, information is being received from [redacted] b6 [redacted] to the trustee for the sale of First American b7C Bankshares, who is examining such things as whether BCCI actually owned of the building at 350 Park Avenue, NY, NY, in which FAB leased space.

With regard to the status of Abu Dhabi, vis-a-vis the captioned matter, DOJ and DANY are "pushing in the direction of" striking an agreement with Abu Dhabi in which the latter would

1325015-000-8614

pay an additional $230 million to the U.S. and grant unlimited access to the records and witnesses--e.g., [redacted]--now under its control. ADAAG Urgenson was to travel to NY on 3/22/93, to jointly, with DANY, meet with attorneys for Abu Dhabi in furtherance of the negotiations. b6 b7C

ADAAG Urgenson reported that DANY Robert Morganthau and ADANY [redacted] both have stated their beliefs that U.S. Senator Orrin Hatch was bribed by BCCI. ADAAG Urgenson intends to formally request that DANY provide any "hard" evidence it has. b6 b7C

Concerning GHAITH PHARAON, on 3/19/93, Legat Rome reported having been in contact with [redacted] in Amman, Jordan, regarding whether PHARAON came into that country recently, as a source had reported to [redacted]. As of 3/22/93, Rome had determined that, on 3/16/93, PHARAON did enter Amman to testify as a defendant in a civil proceeding. The source of the information, [redacted] reportedly identified PHARAON from [redacted] and told that [redacted] that PHARAON's [redacted] PHARAON [redacted] Rome further reported that, although Jordan and the U.S. have no MLAT or extradition treaty, [redacted] believed that Jordan would entertain a request for assistance. b7D b7E

On 3/19/93, after talking with Rome, I immediately discussed the information about PHARAON with ADAAG Urgenson. Without hesitation, he agreed with me that, although negotiations leading [redacted] seem to be progressing, that should in no way preclude taking advantage of an opportunity to capture him. ADAAG Urgenson said he would contact DOJ OIA immediately. On 3/22/93, OIA Assistant Director Linda Candler informed me that one of [redacted] had spoken with [redacted] in Amman, who reportedly told OIA that, although neither he nor the ambassador was optimistic that the Jordanians would assist, the ambassador was willing, if DOJ wanted it, to personally approach the Jordanian minister of justice with a request for assistance. I recommended to AD Candler that the ambassador be asked to proceed with making the request. b6 b7C b7D b7E

1325015-000-8615

29B-WF-171994
RHM:rhm

On 12/8/97, Special Agent [redacted] of the New Rochelle Resident Agency (914-633-6056), telephonically contacted the writer and advised he had received information that GHAITH PHARAON was attempting to sell his property which was located in Georgia. PHARAON's company Interredic is located on this property. b6 b7C

[redacted] advised that the attorney for Interredic advised that the court ordered monitor knows that the property is trying to be sold. b6 b7C

On 12/8/97, the writer contacted the following individuals in order to inform them about the property sale: Department of Justice Attorneys - [redacted] and [redacted] Board of Governors of the Federal Reserve System. b6 b7C

[redacted] advised she would advise [redacted] of the Federal Reserve. However, they knew about the possibility of the sale. [redacted] added that the sale can not go through without the permission of the court appointed monitor and no funds can be given directly to PHARAON. The Federal Reserve has frozen all of PHARAON's and Interredic's assets. b6 b7C

On 12/12/97, DOJ Attorney [redacted] telephonically contacted the writer by leaving a voice mail. DOJ Attorney [redacted] advised that [redacted] of BAACH ROBINSON & LEWIS had contacted her and advised that PHARAON would be in BAHRAIN on Monday, December 15, 1997. [redacted] is the attorney for the BCCI liquidators. PHARAON is suppose to have a meeting at the offices of PEAT-MARICK KPMG. Her message further stated she would contact DOJ Attorney [redacted] b6 b7C

The writer telephonically contacted SSA [redacted] at FBIHQ and advised him of PHARAON's intended travel. SSA [redacted] advised he would try and determine if there is some type of extradition treaty with BAHRAIN. The writer then left a voice mail with DOJ Attorney [redacted] relaying the information. b6 b7C

29B-WF-171994 FBI

1225013/000-6618

29B-WF-171994
RHM:rhm

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S:\[redacted]\RM97346I.INS b6 b7C

29B-WF-171994-781

1325015-000-8619

29B-WF-171994
RHM:rhm

On 12/12/97, the writer telephonically contacted [redacted] b6 b7C of BAACH ROBINSON & LEWIS. [redacted] advised that GHAITH PHARAON would be in BAHRAIN on Monday, December 15, 1997. [redacted] is the [redacted] BCCI liquidators. PHARAON is suppose to have a meeting at the offices of PEAT-MARICK KPMG. [redacted] did not know the form of travel, but he assumes PHARAON will be driving across the causeway which connects Saudi Arabia and Bahrain. [redacted] further advised he is going to attempt to contact an attorney who is a member of the Bahrain Royal family.

The writer telephonically contacted SSA [redacted] b6 b7C at FBIHQ. SSA [redacted] advised he is sending a teletype to the Legat in Ryaid, Saudi Arabia regarding the travel. SSA [redacted] is in contact with [redacted] (who provided the name of the attorney in Bahrain). SSA [redacted] also is in contact with DOJ Attorney [redacted] OIA, DOJ.

29B-WF-171994-782

1325015-000-8620

29B-WF-171994
RHM:rhm

On 12/12/97, the writer telephonically contacted [redacted] b6 b7C of BAACH ROBINSON & LEWIS. [redacted] advised that GHAITH PHARAON would be in BAHRAIN on Monday, December 15, 1997. [redacted] is the [redacted] BCCI liquidators. PHARAON is suppose to have a meeting at the offices of PEAT-MARICK KPMG. [redacted] did not know the form of travel, but he assumes PHARAON will be driving across the causeway which connects Saudi Arabia and Bahrain. [redacted] further advised he is going to attempt to contact an attorney who is a member of the Bahrain Royal family.

The writer telephonically contacted SSA [redacted] b6 b7C at FBIHQ. SSA [redacted] advised he is sending a teletype to the Legat in Ryaid, Saudi Arabia regarding the travel. SSA [redacted] is in contact with [redacted] (who provided the name of the attorney in Bahrain). SSA [redacted] also is in contact with DOJ Attorney [redacted] OIA, DOJ.

S: [redacted] b6 b7C

RM973462-INS.

29B-WF-171994-782

1325015-000-8621

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 12/13/1997

To: Legat Riyadh **Attn:** [redacted], Legat

From: Criminal Investigative
Financial Crimes Section/FIFU/Room 7373
Contact: [redacted] Extension

b6
b7C

Approved By: [redacted] WAP/RJ

Drafted By: [redacted] rjd

Case ID #: 29B-WF-171994

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Enclosures: 1) EC to OPCA from Criminal Investigative Division, dated, 9/25/97, requesting captioned case be placed on FBI Website (background information for Riyadh); 2) Letterhead Memorandum dated 2/13/92 (background information); 3) print of DOJ fugitive website regarding Pharaon, located at the Internet site http:\www.usdoj.gov/criminal/oiafug/fugitive10.htm; 4)Interpol application, Wanted International Criminal, Form Nr. 1; 5) Interpol International Red Notice reference A-355/8-92; 6)Interpol International Red Notice reference A-495/10-1991; 7) various photographs of Gaith Rashad Pharaon.

Synopsis: FBIHQ is in receipt of information regarding the planned attendance by Gaith Rashad Pharaon to a meeting at the public accounting office of Peat Marwick KPMG, 12/15/97, in Bahrain.

Details: [redacted] Attorney, Baach Robinson Lewis, 1 Thomas Circle, Washington, D.C., telephone number [redacted] home telephone number [redacted] advised that Gaith Rashad Pharaon will meet with a Partner of Peat Marwick KPMG on, 12/15/97. Baach Robinson Lewis is the BCCI liquidator in the U.S. The Pharaon meeting will occur at the firm's office in Bahrain, KPMG Fakhro. The purpose of the meeting is to discuss a civil suit, Pharaon vs. BCCI, case number 2159-93, in which Pharaon is fighting BCCI's claim that he is obligated to BCCI regarding a financial debt totaling $300 million. KPMG Fakhro is considered the monetary authority or bank regulator for Bahrain. Based upon a report prepared for the Bahrain government by KPMG Fakhro, a Bahrain court rendered a decision in favor of BCCI declaring Pharaon's obligation regarding the debt .

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[redacted] obtained the information from [redacted] public accounting firm of Deloitte Touche, in

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b7C

183 me
29B-WF-171994

1325015-000-8622

Riyadh, Saudi Arabia. [redacted] is a native of Pakistan. Deloitte Touche is the liquidator for BCCI in Bahrain. [redacted] obtained the information from [redacted] Khalifa Law Firm, a private firm hired by Deloitte Touche to handle BCCI liquidation matters in Bahrain. The Khalifa Law Firm is located in Hawar Building A, Suite 201, Diplomatic Area, Manawa. [redacted] can be reached at telephone number [redacted] facsimile number 011 973 537 117. She is willing to provide additional information to the FBI regarding Pharaon's whereabouts and the KPMG Fakhro meeting.

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This information has been provided to the FBI Washington Field Office and the DOJ Office of International Affairs.

1325015-000-8623

LEAD (s):

Set Lead 1:

LEGAT RIYADH

AT RIYADH

Contact [redacted] at telephone number [redacted] to obtain additional information regarding Pharaon's whereabouts and the, 12/15/97, meeting at KPMG Fakhro. Attempt to arrange Pharaon's arrest or detainment for U.S. authorities in Bahrain.

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♦♦

1325015-000-8624

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 12/14/1997

To: Legat Riyadh **Attn:** [redacted] Legat

From: Criminal Investigative
Financial Crimes Section/FIFU/Room 7373
Contact: [redacted] Extension

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] rjd

Case ID #: 29B-WF-171994

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference: EC from CID to Legat Riyadh, dated, 12/13/97, regarding the travel of Gaith Rashad Pharaon to Bahrain.

Synopsis: Additional intelligence has been obtained regarding the travel of Gaith Rashad Pharaon to Bahrain, on 12/15/97.

Details: [redacted] of Deloitte Touche, London, England, home telephone number [redacted] is a colleague of [redacted] Deloitte Touche is the liquidator for BCCI in London. [redacted] obtained the following additional information from [redacted]

b6
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Gaith Pharaon is currently in Jeddah, Saudi Arabia. On 12/15/97, he will travel by commercial airline or private jet to Bahrain. He will be accompanied by [redacted] Pharaon and [redacted] will attend an 11:00am meeting with [redacted] KPMG Fakhro. The meeting will occur at the office of KPMG Fakhro, located on the first floor of the Bahrain Chamber of Commerce Building.

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b7C

[redacted] acquired knowledge of the KPMG/Pharaon meeting directly from [redacted]. She is aware of the current effort to apprehend Pharaon and is willing to provide information directly to U.S. authorities. [redacted] do not know [redacted] has alerted BCCI liquidators of the meeting and would not be sympathetic with U.S. efforts to arrest Pharaon. **They should not be contacted.**

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b7C

29B-WF-171994

1325015-000-8625

If Pharaon and [redacted] travel by commercial airline the following potential flight itinerary exists: b6 b7C

12/15/97

Depart Jeddah
#SV-1108, 7:20am
Arrive Dehrain, 9:05am

Depart Dehrain
#GF/SV-102, 9:35am
Arrive Bahrain, 10:05am

Other federal investigative and national security entities are assisting in the development of intelligence to support this effort. The U.S. Embassy, Riyadh, was notified by Department of State cable on, 12/13/97. In Washington, two Department of State Officials, two U.S. Marshals and a military aircraft are on standby to immediately pick up and escort Pharaon to the U.S. The Deputy Chief of Missions, U.S. Embassy, Riyadh, and Legat Riyadh, will be briefed by FBIHQ, on 12/14/97, 8:00am, Riyadh time.

1325015-000-8626

Set Lead 1:

LEGAT RIYADH

AT RIYADH

This EC is to be brought to the immediate attention of the Legat, Riyadh

♦♦

1325015-000-8627

29B-WF-171994
ARH:arh

1

The following information was provided to SA [redacted] b6 b7C
on 12/14/97 at 9:30 A.M. by [redacted], U.S. Naval Intelligence:

The ship "La Pharon" was noted as passing southbound through the Suez Canal on 10/6/97. At that time its destination was declared as Dubayy.

According to [redacted] the "La Pharon" wintered in Dubayy. b6 b7C
She was unable to confirm at this time if this ship was in Dubayy but would have that information in a few days.

29B-WF-171994-785
1326015-0008628

29B-WF-171994
ARH:arh

1

The following information was provided to SA [redacted] b6 b7C
on 12/14/97 at 9:30 A.M. by [redacted] U.S. Naval Intelligence:

The ship "La Pharon" was noted as passing southbound through the Suez Canal on 10/6/97. At that time its destination was declared as Dubayy.

According to [redacted] the "La Pharon" wintered in Dubayy. b6 b7C
She was unable to confirm at this time if this ship was in Dubayy but would have that information in a few days.

29B-WF-171994-785
One
1325015-000-8629

AN 973491. INS

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 03/26/1998

To: WFO

From: WFO
C-5/NVRA
Contact: SA [redacted] 762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO:WFO

Synopsis: Contact with [redacted] Office of Naval Intelligence. b6 b7C

Details: [redacted], Office of Naval Intelligence (ONI), telephonically contacted the writer and advised that GHAITH PHARAON's yacht, Le PHARAON departed Dubia on March 17, 1998. The current travel plans and location of the yacht are unknown at this time. [redacted] will forward any additional information which is obtained by the ONI. b6 b7C

♦♦

S:\[redacted]\RM980851.EC b6 b7C

29B-WF-171994-787 gmz

1325015-000-8633

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 5/14/1998

To: WFO

From: WFO
C-5/NVRA
Contact: SA [redacted] 762-3416

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS
MAJOR CASE #38

Synopsis: LEGAT Bridgetown's File Destruction.

Details: WFO received from LEGAT Bridgetown the attached EC, along with attached documents regarding the above captioned matter. The documents were being sent as a result of Bridgetown closing the captioned matter. Bridgetown had covered all leads.

Most of the documents were teletypes that had previously been sent by WFO to Bridgetown or vice versa. WFO all ready possessed the teletypes in the 'HIDDEN INTEREST' investigative file. The writer destroyed those documents which were known to exist in the WFO file and retained all other documents. The attached documents are those which were retained.

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9: [redacted] FM 98 134 1. EC.

29B-WF-171994-788 gmc

1325015-000-8634

Memorandum

Date: 3/25/98

To: WASHINGTON FIELD

Case I.D.: 29B-WF-171994

From: Legat Bridgetown

Subject: File Destruction

Please find attached documents serialized by Legat Bridgetown. All leads have been covered by BB and this file is considered destroyed.

FEBRUARY 28, 1995

TO: AMERICAN CONSULATE
BARBADOS
WEST INDIES

[redacted] IS THE SISTER OF [redacted], ALSO A BRAZILIAN, WITH WHOM I HAVE BEEN SHARING LIFE WITH SINCE FEBRUARY 1990. [redacted] IS NOW THE MOTHER OF OUR DAUGHTER [redacted] AN AMERICAN BORN ABROAD ON [redacted]

[redacted] IS NOW GOVERNESS TO HELP [redacted] WITH [redacted] I AM [redacted] ON A 180 FOOT YACHT PRESENTLY IN THE WEST INDIES. [redacted] AND [redacted] ARE PRESENTLY ON BOARD THE YACHT AS CREW. WE HOPE TO HAVE TWO 2 WEEK HOLIDAYS IN THE NEXT THREE MONTHS DURING WHICH TIME [redacted] AND I HAVE HOPES TO VISIT THE UNITED STATES. WE WILL GO TO FLORIDA, ALABAMA AND TUCSON, ARIZONA TO VISIT FRIENDS. WE WILL TRAVEL IN A NEW CREW CAB TRUCK I HAVE IN STORAGE WITH A FRIEND IN ALABAMA.

[redacted] HAS BEEN WITH [redacted] CONSTANTLY DURING THE LAST 3 MONTHS OF PREGNANCY AND UNTIL NOW TO HELP CARE FOR [redacted] SHE HAS BEEN SUPPORTED BY ME AS GOVERNESS SINCE SEPTEMBER 1994 AND CONTINUE SO FOR SOME TIME.

DURING OUR LIVES TOGETHER, [redacted] AND I HAVE HAD SEVERAL TRIPS TO THE U.S.A. HER FIRST U.S.A. VISA WAS THANKFULLY GRANTED IN BARBADOS AND SINCE TWICE IN MARSEILLE; INCLUDING A STUDENT VISA WHICH WAS USED TO STUDY ENGLISH AT THE USC AT SAN DIEGO FOR 3 MONTHS. [redacted] CURRENT VISA EXPIRES IN 2 YEARS.

I WILL PROVIDE TOTAL FINANCIAL SUPPORT OF [redacted] DURING ANY STAY IN THE U.S.A. FOR HER UPKEEP AND WELL BEING. I ALSO MAINTAIN A WORLD WIDE EXTENSIVE MEDICAL INSURANCE POLICY FOR HER. MY COMBINED YEARLY INCOME FROM AIR FORCE RETIREMENT, YACHT [redacted] AND A MONTANA FARM IS IN EXCESS OF $100,000.

[redacted] CONSIDERATIONS

MAJOR USAF, RETIRED SERVICE NUMBER [redacted]
AMERICAN PASSPORT NO [redacted]

29B-WF-171994-24

MAR 7 1995
LEGAL ATTACHE - Bridgetown

1325015-000-8669

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/24/1996

To: Director, FBI **Attn:** SSA [redacted] IRU/2
SSA [redacted] FIFU

FBI WMFO **Attn:** SSA [redacted], NVRA

From: Legat Bridgetown
Legat Bridgetown
Contact: [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 (Pending)

Title: Hidden Interest;
Major Case #38;
FIF; FAG;
OO: WMFO

Synopsis: A review of the captioned file has determined that all investigative leads have been covered and reported.

Details: At this time, there are no outstanding leads in regards to the captioned matter. Therefore, this matter is being closed within Legat Bridgetown's territory.

♦♦

pls make leads covered.
OSM
CLOSE ON THIS
5/29/96
4 5 6

1 29B-WF-171994-709

SEARCHED ALL
SERIALIZED SLW
INDEXED
FILED ALL

WF994145.EC

1325015-000-8691

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/25/1997

To: OPCA **Attn:** National Press Office
[redacted] b6 b7C
Attn: Fugitive Publicity Subunit
[redacted]

From: Criminal Investigative
Financial Crimes Section/FIFU/Room 3865
Contact: [redacted] Extension 5660

Approved By: [redacted]

Drafted By: [redacted] :rjd

Case ID #: 29B-WF-171994 [redacted] b6 b7C

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WFO

Synopsis: Request for consideration of captioned case for placement on the FBI's Internet Home Page. Request is for placement of HIDDEN INTEREST, the Bank of Credit and Commerce International (BCCI), as well as the last remaining BCCI fugitive, Gaith R. Pharaon, in both the Major Investigations section of the FBI's Home Page and the Fugitives section of the FBI's Most Wanted category on the Home Page.

Enclosures: Enclosed for the National Press Office/Fugitive Publicity Office are two copies of the following:

1. World Wide Web Request Form.

2. World Wide Web Fugitive Publicity Request Form for fugitive Gaith R. Pharaon.

3. EC regarding captioned investigation and Pharaon's involvement.

4. Photographs of Gaith R. Pharaon.

Details: The worldwide closure of the Bank of Credit and Commerce International (BCCI) in 7/91, surfaced the greatest scandal in international banking history. The investigation in the United States focused on the secret ownership interest or attempted ownership interest by BCCI in American Banks.

Ghaith R. Pharaon participated in a conspiracy with BCCI and its principal officers, Agha Hasan Abedi and [redacted], [redacted] to defraud the United States government and individua[redacted] b6 b7C

789 gmc
29B-WF-171994 [redacted]

1325015-000-8692

investors. As part of the conspiracy, BCCI used Pharaon to secretly acquire the Independence Bank of Encino, California in 1985. Although Pharaon was the purported purchaser, BCCI and Pharaon had an agreement whereby 85 percent of the Independence Bank stock, with its voting rights, was pledged to BCCI. Thereafter, BCCI exercised significant control over the personnel and operational decisions of Independence.

At no time were state and federal regulators informed of the agreement between BCCI and Pharaon, or of BCCI's true interest in acquiring Independence. The concealment of this secret agreement and of BCCI's interest in Independence was a violation of federal regulations. This deception enabled Independence to fraudulently obtain insurance protection from the federal government, backed by the funds and the security of the United States.

Also as part of the conspiracy, Pharaon utilized BCCI to facilitate a fraud by manipulating the financial market for subordinated debentures issued by the CenTrust Savings Bank in Miami, Florida. In January 1988, Pharaon acquired approximately 25 percent of the stock in CenTrust. During that same year, CenTrust received regulatory approval to raise capital by selling 150 million dollars worth of subordinated debentures. In order to maximize its profits, it was important to CenTrust that there appear to be a demand for all 150 million dollars worth of the debentures. With the issuance date just several days away and CenTrust unable to find subscribers for all of the debentures, Pharaon and BCCI reached an agreement whereby BCCI would purchase 25 million dollars worth of the debentures, thus ensuring that the subordinated debenture offering would appear to be fully subscribed.

The purchase by BCCI was not a bona fide purchase, as BCCI's funds were not truly at risk. Approximately eight weeks after the issuance, pursuant to their agreement, CenTrust repurchased the debentures from BCCI, at full face value with interest, and CenTrust did not record the repurchase in its' financial records required by federal regulators. Thus, Pharaon and CenTrust used BCCI to artificially inflate the demand for the subordinated debentures and deceive investors as to the true value of the notes. Federal regulators were also deceived as to the true regulatory capital maintained by the bank.

On 11/15/91, Pharaon was indicted for Federal Wire Fraud and Racketeering offenses. He is one of the subjects of Indictment No. 91-655-7 (JHG), filed in the United States District Court for the District of Columbia. The indictment charges Pharaon with (1) Conspiracy to Commit Wire Fraud, in

1325015-000-8693

violation of Title 18, United States Code, Section 371; (2) Wire Fraud, in violation of Title 18, United States Code, Section 1343; (3) Conspiracy to Commit Racketeering, in violation of Title 18, United States Code, Section 1962(d); and (4) Aiding and Abetting, in violation of Title 18, United States Code, Section 2. A warrant for his arrest was issued on 11/15/97, by United States Magistrate Judge Alan Kay.

The offenses charged are felonies under United States law and are punishable by imprisonment of not more than 20 years, fines and/or court-ordered restitution. Pharaon has also been indicted in the Northern District of Georgia, the Southern District of Florida, and the State of New York. As a result, Pharaon is wanted on three federal warrants and one state warrant, all relating to fraud and racketeering.

The United States government has actively sought the apprehension of Pharaon since his indictment. The United States Department of Justice has made provisional arrest requests to various countries throughout the world, including France, Korea, the United Kingdom, Saudi Arabia, Pakistan, Syria, Jordan, Morocco, Italy, and others. A request for arrest also has been made by the FBI through Interpol.

Pharaon, a Saudi Arabian citizen, is extremely wealthy and considerably influential in the Middle East. He reportedly travels extensively between Morocco, Egypt, and Saudi Arabia. To date, he has been able to evade arrest and extradition. In the past, Pharaon was able to have his name removed from Interpol's computer when he traveled to Jordan. Previous investigation has determined that Pharaon's villa in Cannes, France, is next door to one belonging to the King of Jordan. Pharaon has been known to travel on his personal yacht, the Panamanian flag, marine vessel "Le Pharaon," which in the past year frequented the Caribbean.

Pharaon is believed to have been in Islamabad, Pakistan, between 3/28/97 and 3/30/97, to chair an Attock Oil Board meeting. It is believed he departed Pakistan for Jedda, Saudi Arabia, on 4/1/97. His current whereabouts are unknown.

Extradition will be requested if arrested in any country which has an extradition treaty with the U.S. for crimes that are clearly extraditable.

Anyone with information regarding the whereabouts of Gaith R. Pharaon should contact Unit Chief [redacted] or Supervisory Special Agent [redacted] Federal Bureau of Investigation, 935 Pennsylvania Avenue, N.W., Washington, D.C., b6 b7C

1325015-000-8694

20535-0001, telephone number (202) 324-3000.

LEAD (s):

Set Lead 1:

OFFICE OF PUBLIC AND CONGRESSIONAL AFFAIRS

AT NATIONAL PRESS OFFICE - ROOM 7230

National Press Office is requested to place the captioned case in the Major Investigations section of the FBI Home Page. It is also requested that a hypertext link be created linking the name Gaith R. Pharaon between the Major Investigations and Fugitives sections of the FBI Home Page.

AT FUGITIVE PUBLICITY SUBUNIT - ROOM 7222

The Fugitive Publicity Subunit is requested to place Gaith R. Pharaon in the Fugitives section of the FBI Home Page. It is also requested that a hypertext link be created linking the name Gaith R. Pharaon between the Fugitives and Major Investigations sections of the FBI Home Page.

CC: 1 - Mr.
1 - Mr. [redacted]

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1325015-000-8696

C-5

DATE: _____

TO: WFO

FROM: LEGAT ROME

RE: File number 29B-WF-171994

Attached are the following original serials for your file.

790

_____

_____

_____

_____

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 07/02/1998

To: Criminal Investigative **Attn:** SSA [redacted] IRU1
SSA [redacted] ECU

Washington Field **Attn:** SA [redacted]
C-5, NVRA

b6
b7C

From: Rome
Contact: Legat [redacted] 011 396 4674-2392

b6
b7C

Approved By: [redacted] ch

Drafted By: [redacted]

Case ID #: 29B-WF-171994 - 791

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: [redacted]

b7D

Reference: 29B-WF-171994 Serial 774

Details: Reference is made to EC, dated 06/05/1998.

Via communication received from [redacted] on 06/30/1998, Legat was advised as follows:

b7D

[redacted]

b7D

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C

[redacted]

1325017-000-8700

Investigation resulted in negative results insofar as [redacted] b7D

Rome considers this lead covered.

1325015-000-8701

LEAD (s):

Set Lead 1:

ALL RECEIVING OFFICES

Provided for information. Please read and clear in ACS.

♦♦

1325015-000-8702

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 07/07/1998

To: Criminal Investigative **Attn:** SSA [redacted] IRU1 b6 b7C
SSA ECU

Washington Field **Attn:** SA [redacted]
C-5, NVRA

From: Rome
Contact: Legat [redacted] 011 396 4674-2392 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 -792

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: [redacted] b7D

Details: Via communication received on 07/06/1998, [redacted] b7D

[redacted]

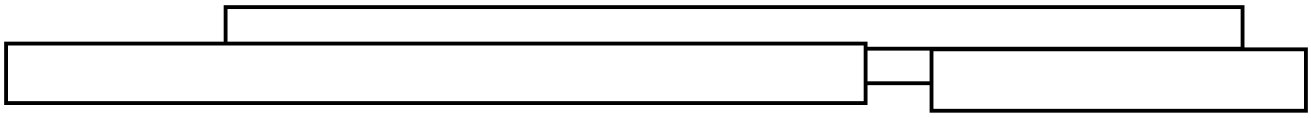
1325018-000-8704

LEAD (s):

Set Lead 1:

WASHINGTON FIELD

AT WASHINGTON, DC



b7D

Set Lead 2:

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

For information. Please read and clear.

♦♦

1325015-000-8705

Memorandum

24 July 1998

To : [redacted]

From : [redacted]
Assistant Legal Attache

Subject: Fugitive Ghaith Rashad Pharaon

[redacted]

Please reference Athens cable number 04514 detailing information regarding the possible location and apprehension of fugitive Ghaith Rashad Pharaon.

Enclosed you will find photographs of the fugitive as well as his yacht called "Le Pharaon". Hopefully, these will make the location and apprehension of Pharaon easier for you if he shows in your territory.

If you have any questions, please contact Assistant Legal Attache [redacted] at 301-725-3024. Thanks for your help, [redacted]

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b7E

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b7C

29B-WF-171994-798

1325015-000-8711

(12/31/1995)

c5

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/01/1998

To: Washington Field **Attn:** SA [redacted] b6 b7C
Criminal Investigative **Attn:** IRU 1
UC Sturm

From: Riyadh
Legat
Contact: LEGAT [redacted] 966-1-488-3800, X: 1566

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38,
FIF; FAG;

Synopsis: Riyadh's response to WFO's lead set forth in serial 332.

Administrative: WFO EC dated 7/6/98.

Details: Referenced serial set forth lead number 4 for Riyadh to obtain updated information regarding Pharaon's residence and telephone numbers in Jeddah, Kingdom of Saudi Arabia.

For the information of WFO, by way of background, on 13 - 14 December, 1997, LEGAT Riyadh was tasked by FBIHQ to approach [redacted] b7D

[redacted] b7D

A check in the 1998 Jeddah telephone directory revealed that in addition to the telephone numbers provided by WFO in serial 332, the following telephone number are also subscribed to by Gaith Rashad Pharaon:

29B-WF-171994-799 b6 b7C

8/7/98 [redacted] made overed 8/18/98

1325015-000-8712

b6
b7C

[redacted] (cellular)

A check of the Jeddah business directory revealed that **Dr. Gaith Rashad Pharaon** is one of the owners/shareholders of **UNITED COMMERCIAL AGENCIES (UCA) LIMITED.** The other owner is the **BIN LADIN MIDDLE EAST GROUP.** UCA specializes in all categories of insurance and reinsurance activities. The company address is P.O. Box 5019, Jeddah 21422, KSA. Telephone number 966-2-653-0068; Fax number 966-2-651-1936. UCA was established in 1979, and employs 80 individuals. UCA's financial data are as follows:

Total Sales	100,000,000	Saudi Riyals (SR)
Authorized Capital	15,000,000	SR
Paid Capital	15,000,000	SR
Total Assets	91,000,000	SR

b6
b7C

The [redacted] are listed below:

[redacted]

In addition to the Jeddah office, UCA has branches in Riyadh and Al-Khobar, in Saudi Arabia, as well as in Beirut, Lebanon.

b7D

[redacted] Inasmuch as all logical investigation has been conducted, Riyadh considers this lead covered.

To: Washington Field From: Riyadh
Re: 29B-WF-171994, 08/01/1998

LEAD (s):

Set Lead 1:

ALL RECEIVING OFFICES

Read and clear from ACS.

◆◆

1325015-000-8714

LEGAL ATTACHE OFFICE
AMERICAN EMBASSY
ROME, ITALY
TELEPHONE 39 6 4674-2392
FAX 39 6 4674-2593
If no answer, dial:
Embassy Fax No. 39 6 488-2672

PRECEDENCE: IMMEDIATE

DATE: July 30, 1998

This fax consists of 7 page(s)

FROM: LEGAT ROME (29B-WF-171994-FUG3)

TO: WFO

ATTN: SA [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38
29B-WF-171994-FUG3, SERIAL 332 "SET LEAD 4"

SPECIAL NOTES/INSTRUCTIONS:

FOR THE INFORMATION OF WFO

CAPTIONED LEAD SHOULD BE "RESET" TO LEGAT RIYADH! LEGAT RIYADH IS NOW OPERATIONAL AND ON-LINE. LEADS FOR RIYADH SHOULD BE STATED AS FOLLOWS IN LEAD SECTION OF THE EC:

SET LEAD 1:
RIYADH
AT RIYADH, SAUDI ARABIA

PLEASE ENSURE THAT ALL FUTURE COMMUNICATIONS AND/OR LEADS THAT PERTAIN TO LEGAT RIYADH ARE DIRECTED/SET TO LEGAT RIYADH! THIS EC HAS BEEN FORWARDED TO LEGAT RIYADH VIA FAX.

LEAD #4 SET FOR ROME AT RIYADH, SAUDIA ARABIA CONSIDERED COVERED/CLOSED AT LEGAT ROME.

9/2/98 HQS

THANK YOU. GG @ LEGAT ROME

[redacted] Reset Lead for Legat Rome to Legat Riyadh

29B-WF-171994-800 b6 b7C

1325015-000-8715

---- Working Copy ----

Precedence: ROUTINE Date: 07/06/1998

To: Athens Attn: Legat
Cairo Attn: Legat
Islamabad Attn: Legat
Madrid Attn: Legat
Paris Attn: Legat
Rome Attn: Legat
Tel Aviv Attn: Legat

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

ARMED AND DANGEROUS

Synopsis: Lead information.

Enclosures: Photograph of GHAITH PHARAON.
Photograph of the LE PHARAON' (PHARAON's yacht).
Copy of Red Notice'.

Details: For the information of all receiving LEGATs. PHARAON is a fugitive, having been indicted in the United States in 1991. PHARAON is known to live in Jidda, Saudi Arabia and to travel throughout the Middle East and Mediterranean.

Case ID : 29B-WF-171994-FUG3 Serial : 332

s/b Riyadh's - lead #4

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 28 [redacted]
[redacted] HE - ROME [redacted]

b6 b7C

---- Working Copy ----

Summary of case: In 1985, PHARAON and the Bank of Credit and Commerce International (BCCI) secretly acquired the Independence Bank of Encino, California. The concealment of this secret agreement was a violation of the federal regulation and enabled the Independence Bank to obtain insurance protection fraudulently from the Federal Government, backed by the funds and security of the United States. PHARAON and other BCCI officers used wire communications in order to transmit information to further this scheme. In January 1988, PHARAON participated in a conspiracy with BCCI and its principal officers to defraud the U.S. Government and individual investors. PHARAON used BCCI to facilitate a fraud by manipulating the financial market for debentures issued by the Centrust Savings Bank in Miami, Florida.

When they issued the offer, Centrust Savings Bank secretly agreed with PHARAON and BCCI to cause the price of the stock to go up by mean of a false transaction. Thus it appeared that BCCI had purchased US $25 million worth of the debenture offer. In reality, the debentures were bought by Centrust which wanted the issue to appear popular in order to inflate the price artificially.

An arrest warrant was issued on November 15, 1991, as a result of an indictment, by the judicial authorities in the District of Columbia, United States, for: Conspiracy to commit wire fraud; wire fraud; and racketeering conspiracy.

Extradition will be requested from all countries with which the United States has an extradition treaty currently in force which permits extradition for the offence charged.

PHARAON had business interests in the Middle East, United States and elsewhere. Currently all his assets in the United States are frozen, an estimate of which is $300 million. Currently there is a claim, by various enforcement agencies, against PHARAON's U.S. assets for about $110 million.

PHARAON has [redacted]. On the weekend of September 5-6, 1998, there will be a race held at Istanbul, Turkey. It is believed that on occasions

b6
b7C

---- Working Copy ----

G. PHARAON travels [redacted] probably when G. PHARAON feels safe. [redacted] Rainbow Offshore Racing Team. [redacted] Jolly Motor-Ferretti' team.

b6
b7C

G. PHARAON's means of transportation to the races is unknown. However, PHARAON often travels via his private yacht LE PHARAON'. PHARAON is known to have traveled via commercial air lines in the past.

The Office of Navy Intelligence (ONI) has been tracking PHARAON's yacht. ONI advised that the yacht has been located near Monte Carlo during the Monte Carlo Grand Prix. The yacht has been located at Cannes, France during the Cannes Film Festival. Finally, the yacht has spent the summer season on the French Riviera, mostly at Antibes near Nice, France.

The yacht was spotted at the port in Limassol, Cyprus on May 3, 1998. The yacht had previously docked at Limassol on April 6, 1998 and departed for Syria on April 8, 1998. It was unknown when the yacht departed Syria, but it did arrive back in Limassol on May 3, 1998. Source information indicated that PHARAON was in Syria at the same time his yacht was at Syria. It was unknown if PHARAON departed Syria aboard the yacht. IT IS KNOWN THAT THERE HAVE BEEN AUTOMATIC WEAPONS (SHOULDER WEAPONS) ON BOARD THE YACHT. Caution is warranted should the opportunity arise to board the yacht.

It is believed that PHARAON had contacts within INTERPOL in 1995. If at all possible contact with INTERPOL should be avoided. Should other information develop the appropriate LEGATs will be notified.

Descriptive Data:

Main Subject
Name -

Last:	PHARAON
First:	GHAITH
Middle:	RASHAD
DDN:	
Race:	U

---- Working Copy ----

Sex:	M	
DOB:	09/07/1940	
DOB:	09/07/1944	
POB:	Riyadh, Saudi Arabia	
POB:	Jidda, Saudi Arabia	
DBA:	Interredec	
DBA:	Attock Oil	
DBA:	Attock Cement	
INS:	A21710537	
PNO:	Saudi Arabian 100182/31	
PNO:	Saudi Arabian 100132/31	
SOC:	060-60-1841	
Alias (es) :		
Last:	PHARAON	
First:	GAITH	
Middle:	RACHAD	
DDN:		
Address -		
Post Direction:	[redacted]	b6 b7C
City:	Jidda	
Country:	Saudi Arabia	
Address -		
Street Suffix:	[redacted]	
City:	Jidda	
Postal Code:	21441	
Country:	Saudi Arabia	
Address -		
City:	Cannes	
Country:	France	
Address -		
City:	Paris	
Country:	France	
Address -		
City:	Riyadh	
Country:	Saudi Arabia	
Phone:	[redacted] (Jidda, SA)	b6 b7C
Phone:	(Jidda, SA)	
Phone:	(Jidda, SA)	
Phone:	(Jidda, SA)	
Miscellaneous -		
HGT	5' 9"	
WGT	250 lbs	

---- Working Copy ----

HAIR	Black & Gray (more gray now)
FACIAL HAIR	Goatee (most of the time)
NCIC	W665764502
WARRANT	91CR655-7 issued 11/15/91
RED NOTICE	A355/8-1992
	File # 38304/91
LANGUAGES	Arabic, English, French &
Greek	
RELATIVES	
	[redacted]
YACHT	LE PHARAON
	162 feet - All white yacht
	except for a blue & gold

b6
b7C

[redacted] (unk

death mask of King T

LEAD (s):

Set Lead 1:

ALL RECEIVING OFFICES

This information is being provided in order to advise the LEGATs of the ongoing fugitive investigation concerning PHARAON. Should further information develop individual LEGATs will be notified. Further, should LEGATs obtain information concerning PHARAON notify WFO and take appropriate actions. Finally, the photographs being provided are about 8 years old, should PHARAON's picture appear (i.e. television/newspaper) obtain a copy and provide same to WFO.

Set Lead 2:

ATHENS

AT ISTANBUL, TURKEY

Determine whether PHARAON is attending the speed boat race off of Istanbul, Turkey during the weekend of September 5-6, 1998. If it is determined PHARAON is in attendance take appropriate actions and notify WFO.

---- Working Copy ----

Set Lead 3:

PARIS

AT ANTIBES, FRANCE

Attempt to determine whether PHARAON and/or his yacht are in the area near Antibes, France.

Set Lead 4:

ROME

AT RIYADH, SAUDI ARABIA

Obtain updated residence/telephone information concerning PHARAON's residence in Jidda and Riyadh, Saudi Arabia.

ARMED AND DANGEROUS

1325015-000-8721

LEGAL ATTACHE OFFICE
AMERICAN EMBASSY
ROME, ITALY
TELEPHONE 39 6 4674-2392
FAX 39 6 4674-2593
If no answer, dial:
Embassy Fax No. 39 6 488-2672

PRECEDENCE: IMMEDIATE DATE: July 30, 1998

This fax consists of 4 page(s)

FROM: LEGAT ROME (29B-WF-171994-FUG3)

TO: WFO

ATTN: SA [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38
29B-WF-171994-FUG3, SERIAL 332 "SET LEAD 4"

SPECIAL NOTES/INSTRUCTIONS:

FOR THE INFORMATION OF WFO

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RIYADH
AT RIYADH, SAUDI ARABIA

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LEAD #4 SET FOR ROME AT RIYADH, SAUDIA ARABIA CONSIDERED COVERED/CLOSED AT LEGAT ROME.

THANK YOU. GG @ LEGAT ROME

29B-WF-171994-802

1325015-000-8724

---- Working Copy ----

Summary of case: In 1985, PHARAON and the Bank of Credit and Commerce International (BCCI) secretly acquired the Independence Bank of Encino, California. The concealment of this secret agreement was a violation of the federal regulation and enabled the Independence Bank to obtain insurance protection fraudulently from the Federal Government, backed by the funds and security of the United States. PHARAON and other BCCI officers used wire communications in order to transmit information to further this scheme. In January 1988, PHARAON participated in a conspiracy with BCCI and its principal officers to defraud the U.S. Government and individual investors. PHARAON used BCCI to facilitate a fraud by manipulating the financial market for debentures issued by the Centrust Savings Bank in Miami, Florida.

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PHARAON has [redacted] b6 b7C

[redacted]. On the weekend of September 5-6, 1998, there will be a race held at Istanbul, Turkey. It is believed that on occasions

---- Working Copy ----

G. PHARAON travels [redacted] probably when G. PHARAON feels safe. [redacted] Rainbow Offshore Racing Team. [redacted] Jolly Motor-Ferretti' team. b6 b7C

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The Office of Navy Intelligence (ONI) has been tracking PHARAON's yacht. ONI advised that the yacht has been located near Monte Carlo during the Monte Carlo Grand Prix. The yacht has been located at Cannes, France during the Cannes Film Festival. Finally, the yacht has spent the summer season on the French Riviera, mostly at Antibes near Nice, France.

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Descriptive Data:

Main Subject
Name -

Last:	PHARAON
First:	GHAITH
Middle:	RASHAD
DDN:	
Race:	U

---- Working Copy ----

Sex:	M	
DOB:	09/07/1940	
DOB:	09/07/1944	
POB:	Riyadh, Saudi Arabia	
POB:	Jidda, Saudi Arabia	
DBA:	Interredec	
DBA:	Attock Oil	
DBA:	Attock Cement	
INS:	A21710537	
PNO:	Saudi Arabian 100182/31	
PNO:	Saudi Arabian 100132/31	
SOC:	060-60-1841	
Alias (es) :		
Last:	PHARAON	
First:	GAITH	
Middle:	RACHAD	
DDN:		
Address -		
Post Direction:	[redacted]	b6 b7C
City:	Jidda	
Country:	Saudi Arabia	
Address -		
Street Suffix:	[redacted]	
City:	Jidda	
Postal Code:	21441	
Country:	Saudi Arabia	
Address -		
City:	Cannes	
Country:	France	
Address -		
City:	Paris	
Country:	France	
Address -		
City:	Riyadh	
Country:	Saudi Arabia	
Phone:	[redacted] (Jidda, SA)	b6 b7C
Phone:	(Jidda, SA)	
Phone:	(Jidda, SA)	
Phone:	(Jidda, SA)	
Miscellaneous -		
HGT	5' 9"	
WGT	250 lbs	

---- Working Copy ----

HAIR	Black & Gray (more gray now)
FACIAL HAIR	Goatee (most of the time)
NCIC	W665764502
WARRANT	91CR655-7 issued 11/15/91
RED NOTICE	A355/8-1992 File # 38304/91
LANGUAGES Greek	Arabic, English, French &
RELATIVES	[redacted] [redacted] (unk
YACHT	LE PHARAON 162 feet - All white yacht except for a blue & gold

b6
b7C

death mask of King T

LEAD (s):

Set Lead 1:

ALL RECEIVING OFFICES

This information is being provided in order to advise the LEGATs of the ongoing fugitive investigation concerning PHARAON. Should further information develop individual LEGATs will be notified. Further, should LEGATs obtain information concerning PHARAON notify WFO and take appropriate actions. Finally, the photographs being provided are about 8 years old, should PHARAON's picture appear (i.e. television/newspaper) obtain a copy and provide same to WFO.

Set Lead 2:

ATHENS

AT ISTANBUL, TURKEY

Determine whether PHARAON is attending the speed boat race off of Istanbul, Turkey during the weekend of September 5-6, 1998. If it is determined PHARAON is in attendance take appropriate actions and notify WFO.

---- Working Copy ----

Set Lead 3:

PARIS

AT ANTIBES, FRANCE

Attempt to determine whether PHARAON and/or his yacht are in the area near Antibes, France.

Set Lead 4:

ROME

AT RIYADH, SAUDI ARABIA

Obtain updated residence/telephone information concerning PHARAON's residence in Jidda and Riyadh, Saudi Arabia.

ARMED AND DANGEROUS

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 09/04/1998

To: Paris Attn: Legat

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

ARMED AND DANGEROUS

Synopsis: Fingerprints of GHAITH PHARAON.

Enclosures: Photocopy of fingerprints of GHAITH PHARAON.

Details: LEGAT Paris had previously requested fingerprints of GHAITH PHARAON. Enclosed is set of photocopied fingerprints of PHARAON which was provided by the Argentine Federal Police authorities.

♦♦

S: [redacted] b6 b7C

TM98247l.EC

29B-WF-171994-803

1525015-000-8731

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/09/1998

To: Criminal Investigative **Attn:** SSA [redacted] IRU1 b6 b7C
Attn: SSA [redacted] ECU
Washington Field **Attn:** SA [redacted]
C-5, NVRA

From: Rome
Contact: Legat [redacted] 011 3906 4674-2392 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 -807

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: [redacted] b7D

Reference: 29B-WF-171994 Serial 792

Details: Reference is made to Rome EC, [redacted] b7D

Via communication, dated 08 October 1998, the [redacted] b7D

[redacted] b7D

11/13/98
Assign WFO lead & mark covered
11/13/98

b6 b7C

29B-WF-171994-807 1325015-000-8735

LEAD (s):

Set Lead 1:

ALL RECEIVING OFFICES

For information. Please read and clear.

♦♦

1325015-000-8736

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 11/10/1998

To: WFO

From: WFO
C-5/NVRA
Contact: SA [redacted] 762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: Return of Passport. b6 b7C

Details: On 11/9/98, the writer returned the expired passport of [redacted] to his Attorney [redacted] of diGENOVA & TOENSING, 901 15th Street, Washington, D.C. (WDC).

[redacted], who is currently incarcerated, is due to be released sometime in 1999 and there was a need to obtain a renewed passport. [redacted] will turn over the new passport when it is received. b6 b7C

The passport was contained in 1A envelop #474.

♦♦

S: [redacted] \ rm 98314 to EC b6 b7C

29B-WF-171994-809

13250157000-8737

ALL FBI INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-30-2018 BY W43J99B18 NSICG

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY Date: 11/27/1998

To: National Security - RFU Attn: Unit Chief,

From: WFO
C-5/NVRA
Contact: 703-762-3416 b6 b7C

Approved By:

Drafted By: rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: Request for checks. b7E

Administrative: WFO is requesting that the Bureau contact and to determine if the following entities and names are associated with USAMA BIN LADIN (aka BIN LADIN): b7E

1. GHAITH PHARAON
2. UNITED COMMERCIAL AGENCIES LIMITED
   P.O. Box 5019
   Jeddah 21422, KSA
   Telephone number 966-2-653-0068
   Fax number 966-2-651-1936
3. BIN LADIN MIDDLE EAST GROUP
4. b6 b7C
5.
6.
7.
8.

Details: The captioned matter was an investigation into the Bank of Credit and Commerce International (BCCI) and its activities in the United States. Mainly, whether or not BCCI, its Officers, and PHARAON attempted to defraud the United States government and federal banking regulations by secretly acquiring Independence Bank of Encino, California. Also, whether or not BCCI, its Officers and PHARAON participated in a conspiracy to defraud the U.S. government by manipulating the financial market for an offering of subordinate debentures issued by the Centrust Savings Bank (CAB) in Miami, Florida.

S: m983311.EC b6 b7C

29B-WF-171994 - 810

1325015-000-8738

As a result of the investigation, PHARAON, along with AGHA HASAN ABEDI and [redacted] of BCCI), were indicted in November of 1991 by the judicial authorities in the District of Columbia, United States, for : [redacted] An arrest warrant was issued on November 15, 1991. ABEDI is deceased. [redacted] is incarcerated. PHARAON has since been a fugitive, living mainly in Saudi Arabia. b6 b7C

PHARAON has business ventures throughout the Middle East. It is believed that PHARAON had contacts within INTERPOL in 1995. Attempts to detain and extradite PHARAON have failed due to his high profile and closeness to the Government of Saudi Arabia.

In December of 1997, a request was made of Legat Riyadh to have Bahraini authorities detain and extradite PHARAON. Legat Riyadh advised that the Charge d'affaires of the U.S. embassy, Manama, was advised by the Bahraini Foreign Minister (FM), as well as the Minister of Interior (MOI), that although the Bahraini government desired to accommodate the U.S. government in the matter, they were also unwilling to create any ill-feelings with the Saudi government by detaining one of its most influential citizens. Due to this information no action was taken.

However, Legat Riyadh did conduct telephone and business checks regarding PHARAON. These checks revealed the following numbers were subscribed to PHARAON: [redacted] (cellular). The check of the business directory revealed that PHARAON is one of the owners/shareholders of UNITED COMMERCIAL AGENCIES LIMITED (UCA). The other owner is BIN LADIN MIDDLE EAST GROUP. UCA has offices in Jeddah, Riyadh and Al-Khobar, Saudi Arabia, as well as in Beirut, Lebanon. b6 b7C

WFO searched indices for the above companies and individuals and found no known association with BIN LADIN. In fact the only individual, except for PHARAON, in indices was [redacted] However, WFO was unable to determine if the SAWAH in indices was identical to the SAWAH associated with UCA. b6 b7C

WFO is in the process of submitting a request for a reward for the capture of PHARAON. But prior to submitting the request WFO needs to determine if there is any association between PHARAON and BIN LADIN.

♦♦

1325015-000-8739

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 12/11/1998

To: Criminal Investigative Attn: FIFU
SSA [redacted] b6 b7C

From: WFO
C-5/NVRA
Contact: SA [redacted] 762-3416 b6 b7C

Approved By: [redacted], JR

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: Information requested by SSA [redacted], per telephone conversation between SSA [redacted] and SA [redacted] regarding S-VISA for [redacted] b6 b7C

Administrative: WFO is requesting that FBIHQ determine whether or not an S-VISA application should be submitted for [redacted] and if so, what is the proper procedure for the request. In the referenced telephone conversation, SSA [redacted] requested some additional background information on [redacted] b6 b7C

Details: [redacted] Department of Justice (DOJ), Fraud Section, has requested that the Federal Bureau of Investigation (FBI) look into the possibility of obtaining the S-VISA for [redacted]. DOJ has advised that the Federal Reserve (FED) and the Liquidators of the Bank of Credit and Commerce International (BCCI) have requested that [redacted] stay in the United States, after his release sometime in 1999, in order to assist in locating assets of BCCI and the general workings of BCCI. The FED and the liquidators have been speaking with [redacted] while he has been incarcerated. It is also a possibility that [redacted] could be used at a trial of GHAITH R. PHARAON, a fugitive in the BCCI matter. b6 b7C

[redacted] is currently incarcerated in the Allenwood Federal Prison. [redacted] pled guilty on [redacted] to one count each of the following violations: [redacted] b6 b7C

[redacted]

S:[redacted]\fm98345l.EC b6 b7C

29B-WF-171994-BA

DJ015-000-8740

[redacted] was born in India and is a Pakistani citizen. However, [redacted] possesses a British Passport. His attorneys are in the process of obtaining a current British Passport. b6 b7C

Summary of case: In 1985, the Bank of Credit and Commerce International (BCCI) secretly acquired the Independence Bank of Encino, California. The concealment of this secret agreement was a violation of the federal regulation and enabled the Independence Bank to obtain insurance protection fraudulently from the Federal Government, backed by the funds and security of the United States. BCCI officers used wire communications in order to transmit information to further this scheme.

Further, in January 1988, BCCI officials participated in a conspiracy to defraud the U.S. Government and individual investors. BCCI Officials assisted GHAITH PHARAON in facilitating a fraud by manipulating the financial market for an offering of subordinate debentures issued by the Centrust Savings Bank (CSB) in Miami, Florida.

When CSB issued the subordinate debenture offer, CSB agreed with PHARAON to buy back the $25 million subordinate debenture purchase PHARAON had made. This made it appear that the subordinate debenture offering was fully funded. In reality, the subordinate debentures were bought by CSB which wanted the issue to appear popular in order to inflate the price artificially. PHARAON originally purchased the subordinate debentures with funds he had received from BCCI.

[redacted] was indicted on November 15, 1991, the result of an indictment, by the judicial authorities in the District of Columbia, United States, for: [redacted] b6 b7C

Again, it is anticipated that [redacted] would be able to assist in the ongoing investigations being conducted by the FED and the BCCI Liquidators. Further, [redacted] assistance in a trial of PHARAON, who is a fugitive related to the 1991 indictments, could be helpful and required. Thus knowledge of [redacted] whereabouts is important. b6 b7C

[redacted] had previously been under House Arrest in Abu Dhabi by the ruler SHEIK ZAYED BIN SULTAN AL-NAHYAN. It is unclear what actions would be taken by the other Governments (Pakistani, British or Abu Dhabi), should [redacted] return to said countries. b6 b7C

1325015-000-8741

Descriptive Data:

Main Subject	
Name -	[redacted] b6 b7C
Last:	
First:	
Middle:	
DDN:	
Race:	U
Sex:	M
DOB:	[redacted]
POB:	Agra, India
Alias (es) :	[redacted]
Last:	
First:	
Miscellaneous -	
HGT	5'7"
WGT	170 lbs
HAIR	Black (graying)

♦♦

1325015-000-8742

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/10/1999

To: Washington Field **Attn:** Squad 5
SA [redacted] b6 b7C

From: Atlanta
Squad 5
Contact: SA [redacted] (404) 679-6293 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] sjm

Case ID #: 29B-WF-171994 (Closed) -814

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: Provide Washington Field with the Atlanta portion of the captioned investigation.

Package Copy: Being forwarded under separate cover are volumes 1 through 6 and 1A1 through 1A77 of 29B-WF-171994.

Details: During 9/91, an investigation was initiated by the Washington Field Division concerning THE BANK OF CREDIT AND COMMERCE INTERNATIONAL. Washington Field opened a case with case number 29B-WF-171994. Investigation revealed that BCCI had secretly acquired THE NATIONAL BANK OF GEORGIA (NBG), Atlanta, Georgia. The Atlanta Division began an investigation regarding this matter and it was requested that the investigation be conducted under file number 29B-WF-171994. The Atlanta investigation produced 6 volumes and 77 1As, all under the 29B-WF-171994 case file number. Due to the file destruction program, Atlanta closed files wanted to destroy these volumes. These volumes cannot be destroyed due to the fact that GHAITH PHARON, a Subject in this case, is still a fugitive. The volumes and 1As are being returned to the OO office for storage.

♦♦

29B-WF-171994-814

1325015-000-8743

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/10/1999

To: Washington Field **Attn:** Squad C5
SA [redacted] b6 b7C

From: Atlanta
Squad 5
Contact: SA [redacted] (404) 679-6293 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :sjm

Case ID #: 29B-WF-171994 (Closed)

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: Provide Washington Field with the Atlanta portion of the captioned investigation.

Package Copy: Being forwarded under separate cover are volumes 1 through 6 and 1A1 through 1A77 of 29B-WF-171994.

Details: During 9/91, an investigation was initiated by the Washington Field Division concerning THE BANK OF CREDIT AND COMMERCE INTERNATIONAL. Washington Field opened a case with case number 29B-WF-171994. Investigation revealed that BCCI had secretly acquired THE NATIONAL BANK OF GEORGIA (NBG), Atlanta, Georgia. The Atlanta Division began an investigation regarding this matter and it was requested that the investigation be conducted under file number 29B-WF-171994. The Atlanta investigation produced 6 volumes and 77 1As, all under the 29B-WF-171994 case file number. Due to the file destruction program, Atlanta closed files wanted to destroy these volumes. These volumes cannot be destroyed due to the fact that GHAITH PHARON, a Subject in this case, is still a fugitive. The volumes and 1As are being returned to the OO office for storage.

♦♦

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/10/1999

To: Washington Field ✓ **Attn:** Squad C5
SA [redacted] b6 b7C

From: Atlanta
Squad 5
Contact: SA [redacted] (404) 679-6293 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] sjm

Case ID #: 29B-WF-171994 (Closed) -814

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: Provide Washington Field with the Atlanta portion of the captioned investigation.

Package Copy: Being forwarded under separate cover are volumes 1 through 6 and 1A1 through 1A77 of 29B-WF-171994.

Details: During 9/91, an investigation was initiated by the Washington Field Division concerning THE BANK OF CREDIT AND COMMERCE INTERNATIONAL. Washington Field opened a case with case number 29B-WF-171994. Investigation revealed that BCCI had secretly acquired THE NATIONAL BANK OF GEORGIA (NBG), Atlanta, Georgia. The Atlanta Division began an investigation regarding this matter and it was requested that the investigation be conducted under file number 29B-WF-171994. The Atlanta investigation produced 6 volumes and 77 1As, all under the 29B-WF-171994 case file number. Due to the file destruction program, Atlanta closed files wanted to destroy these volumes. These volumes cannot be destroyed due to the fact that GHAITH PHARON, a Subject in this case, is still a fugitive. The volumes and 1As are being returned to the OO office for storage.

♦♦

[redacted] b6 b7C

1325015-000-8745

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY Date: 01/05/1999

To: Hong Kong Attn: [redacted] b6 b7C

From: WFO JCC/
C-5/NVRA
Contact: SA [redacted] 703-762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 163H-HK-18337 -40 (Pending)

Title: [redacted] aka [redacted] b6 b7C
FPC - WDD MATTER (RECORD CHECKS)
OO:HK

Synopsis: Results of requested record search.

Reference: 163H-HK-18337 Serial 7

Enclosures: 1 - Copy of Serial 218 of 29B-WF-171994 Sub D
1 - Copy of Serial 11 of 29B-WF-171994 Sub U
1 - Copy of Serial 15 of 29B-WF-171994 Sub U

Details: Enclosed are copies of the requested serials, as well as, an additional serial (29B-WF-171994 Sub D 218) which was located.

♦♦

3/22/99 CJC
mark WFO
cleared
to
covered 1/5/99

b6 b7C

S: [redacted] FM990051.EC b6 b7C

29B-WF-171994-815

1325015-000-8746

Next Document

11 pages

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/18/92

[redacted], NEW YORK STATE BANKING DEPARTMENT (NYSBD), was contacted at his place of employment located at 530 Fifth Avenue, 7th Floor, New York, NY 10036, telephone number [redacted]. After being advised of the identity of the agent and the purpose of the interview, [redacted] furnished the following information:

[redacted] is currently employed with the NYSBD as a [redacted]. The BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A. (BCCI) was placed into receivership by the SUPERINTENDENT OF BANKS FOR THE STATE OF NEW YORK for liquidation. [redacted] was previously employed by BCCI where he was hired due to his strong background in commercial lending. However, shortly after [redacted] began his employment with BCCI, the bank was closed by authorities. Due to his previous work experience and knowledge of BCCI customers/loans, [redacted] was contracted by the NYSBD as a [redacted] and tasked [redacted]

Through his work with BCCI/NYSBD loans, [redacted] has learned of an apparent fraud and criminal violations regarding the loans of BCCI customer DR. [redacted] also known as DR [redacted] described it as the most complex series of fraudulent transactions that he has ever seen in his fifteen years experience in banking. [redacted] obtained loans totaling approximately $34 million from BCCI which were to be used in [redacted] related entities. [redacted] has failed to make payments on any of the debt except through refinancing both principal and accrued interest. In addition, [redacted] has discovered that loans were obtained through false representations as well as loan proceeds being misdirected from the intended purpose. In addition, it appears that two former BCCI officers may have aided and abetted [redacted] with his dealings at BCCI.

According to a credit report, [redacted] determined that [redacted] began his banking relationship with BCCI in 1987. The credit report associated [redacted] with companies known as SCANDIA INTERNATIONAL and MC DOWELL ENTERPRISES. However, no records

Investigation on 3/11/92 at New York, NY

File # 29B-WF-171994-Sub U
29B-WF-171994-Sub D

by SA [redacted] CWS

Date dictated 3/18/92

FBI - WASH. METRO FIELD OFFICE

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1325015-000-8748

were found at BCCI regarding those companies or [redacted] involvement with them. In late 1987 [redacted] had established a $1.5 million standby letter of credit to cover potential overdrafts in connection with a hotel acquisition project. This lending relationship lasted approximately six months. b6 b7C

[redacted] major borrowing at BCCI began in March 1988. CAPROCK PROPERTIES, INC. (CPI) and CAPROCK HOSPITALITY, INC. (CHI) were two "special purpose corporations" that [redacted] and/or his associates established in order [redacted] HOWARD JOHNSON HOTEL in Dumfries, Virginia and the HOWARD JOHNSON HOTEL in Raleigh, North Carolina, respectively. CPI and CHI [redacted] a company known as TITLE USA, which was a subsidiary of CAPROCK SAVINGS & LOAN (CAPROCK S&L) located in Dallas, Texas. b6 b7C

[redacted] recalled that CAPROCK S&L failed and its [redacted] was under indictment in Texas. DILLMAN's name appears in some of the [redacted] related documents involving a company known as MARKETPLACE GEORGIA. The registered addresses for CPI and CHI were the same as [redacted] ZURICH CORPORATION (ZURICH) and P.S. INVESTMENT COMPANY (PSIC), which were in Greensboro, North Carolina. This was unusual considering that CPI and CHI were owned by the Dallas, Texas based TITLE USA / CAPROCK S&L organization. b6 b7C

[redacted] believes that the common link between CAPROCK S&L and [redacted] is through [redacted] (phonetic). [redacted] CAPROCK S&L and has been charged criminally along with [redacted] in Dallas. [redacted] signature appears on some of the documents as [redacted] BELL PETROLEUM and as a [redacted] PHARMA CONTROL, which are both [redacted] related entities. Further, First Name Unknown (fnu) [redacted] was listed as [redacted] CAPROCK S&L and REGAL INTERNATIONAL. b6 b7C

[redacted] believes that [redacted] was [redacted] in CAPROCK S&L and obtained [redacted] CPI and CHI for S&L stock. Apparently [redacted] transferred the hotel properties into the corporations and the stock value was determined by the appraised value of the property less the existing debt against the hotels. [redacted] has learned that the appraisals were inflated explained that this procedure of trading the inflated stock values for S&L stock, created a fictitious capital injection to the S&L and made CAPROCK S&L appear to be more stable than it actually was. By rolling the inflated values b6 b7C

 b6 b7C

through TITLE USA and then to CAPROCK S&L, actually mislead regulators from the FEDERAL SAVINGS AND LOAN INSURANCE CORPORATION (FSLIC) into believing that CAPROCK S&L had received an additional capital injection through the acquisition of those properties. COOPERS & LYBRAND (C&L), a national accounting firm, conducted an audit of CAPROCK S&L as of December 31, 1988. [redacted] believes that the FSLIC relied upon C&L audit as a basis for allowing the S&L to continue in operation. [redacted] believes that the auditors from C&L did not go beyond the subsidiary company, TITLE USA, to verify the actual substance of the equity purported to be in CPI and CHI. Therefore, the false capital injection was insulted from regulators by making CPI and CHI subsidiary companies of TITLE USA. b6 b7C

In August 1988, BCCI made a $500,000 loan to CPI for the benefit of the HOWARD JOHNSON HOTEL located in Raleigh, N.C., which was actually owned by CHI. The [redacted] DR. [redacted] who was [redacted] CPI at the time. [redacted] is a medical doctor from Pittsburgh, Pennsylvania, and purportedly, was [redacted] the HOWARD JOHNSON HOTEL located in Dumfries, Virginia, to CPI. [redacted] had a management agreement/contract with CPI. [redacted] was uncertain whether [redacted] had such an agreement with CHI. b6 b7C

[redacted] was a [redacted] SRIVASTAVA. [redacted] also served as [redacted] ZURICH and REGAL INTERNATIONAL, INC., a publicly traded company that [redacted] subsequently [redacted] b6 b7C

[redacted] believes that [redacted] CPI series of transactions, and [redacted] followed the example at CHI. [redacted] was uncertain as to how [redacted]/BCCI became involved with CAPROCK S&L. b6 b7C

In November 1988, [redacted] HILTON HOTEL located in Lansing, Michigan. b6 b7C

In early 1989, BCCI funded a $500,000 loan to [redacted] - ZURICH or PSIC) for a project involving the RAMADA INN located in Chattanooga, Tennessee. BCCI obtained a second mortgage on the property and the BANK OF INDIA (BOI) held the first mortgage to secure its $3.5 million loan. b6 b7C

The $500,000 has never been repaid.

BCCI later learned that the BOI conveyed its first mortgage to POLYSTAR, which was believed to be another publicly traded company that [redacted], in exchange for a first mortgage position on another hotel property [redacted] by [redacted] SUMARA CORPORATION. Therefore, the BOI simply substituted collateral for [redacted] $3.5 million loan. [redacted] knew of no reason for BOI to assign its mortgage interest to POLYSTAR. b6 b7C

SUMARA CORPORATION owned various motels in Tennessee and the southeast. [redacted] believes that [redacted] is a former policeman from India who has a reputation of being a [redacted] b6 b7C

Subsequently, [redacted] JASAVI, which was [redacted] admitted during a deposition that JASAVI was set up as a shell company in order to default on loans allow them [redacted] group) to retain the hotel property. b6 b7C

In August 1989, BCCI made a $7.5 million loan to [redacted] DOWNTOWN HOTEL (formerly the HILTON HOTEL) located in Macon, Georgia. BCCI held the first mortgage as collateral. At the time of the loan presentation, the appraisal provided to BCCI by [redacted] and [redacted] reported that the property was valued at $13 million. However, in February 1991, BCCI had the property re-appraised and it was determined that the property was worth $6.4 million instead of $13 million. Later, it was discovered that [redacted] was an associate or employee of [redacted], and had [redacted] properties located in Dumfries, Virginia, Lansing, Michigan, and Raleigh, North Carolina. [redacted] noted that the property in Raleigh was appraised by [redacted] at $18 million, however the property was subsequently sold for $3 million. b6 b7C

In October or November 1989, [redacted] BCCI [redacted] and [redacted], made a trip to inspect the [redacted] properties located at COX TRAILERS, INC. (CTI) in Grifton, NC and the hotel in Raleigh, NC. After they returned [redacted] drafted an internal b6 b7C

b6
b7C

BCCI memorandum regarding 'Special Loans' that recommended that all those loans, including [redacted] loans, be handled by Senior Management. [redacted] recommended that [redacted] and another officer handle those loans. After the recommendation was sent out for approval, [redacted] crossed off the third loan officer's name, thus leaving himself [redacted] as the only two BCCI officers that should deal with those 'Special Loans.'

Also after their return from North Carolina, they [redacted] propose that the total Raleigh loan be taken out with a $11.5 million loan. In this manner, BCCI could acquire the first mortgage from the **RESOLUTION TRUST CORPORATION** (RTC) and the second mortgage held by the BANK OF BARODA (located in India). BCCI held a third mortgage on the property at the time. [redacted] explained that the RTC acquired its interest in the property after CAPROCK S&L failed and was turned over to the RTC for liquidation. Shortly thereafter, the Raleigh operation filed for bankruptcy under Chapter 11.

By this time, BCCI had already been criticized by bank examiners from the **FEDERAL RESERVE** for its large concentration in real estate loans as well as its credit concentration in one customer, [redacted] BCCI subsequently published a new policy advising its loan officers to reduce the amount of real estate loans made by the bank. However, BCCI officials continued to increase the [redacted] loans/credits from $4-5 million up to $34 million.

At the end of November 1989, [redacted] obtained a loan in the amount of $250,000 from BCCI, of which $100,000 went directly to [redacted] and $123,000 went into one of [redacted] entities. Prior to the loan, [redacted] had established a loan in the amount of $100,000 which was secured by deposit account balances owned by [redacted] believes that [redacted] needed cash at the time, so he arranged for [redacted] to represent to BCCI that he [redacted] company known as **MARKETPLACE GEORGIA (MG)**, which owned a shopping center in Valdosta, Georgia. [redacted] has since determined that [redacted] MG and later conveyed [redacted] DR. [redacted] Shortly after obtaining the loan, [redacted] filed for personal bankruptcy. In essence, [redacted] managed to obtain release of his $100,000 from

b6 b7C

BCCI by having [redacted] obtain a fraudulent loan and disbursing [redacted] collateral of $100,000 directly to him.

Through the bank's efforts to obtain repayment for the $250,000 MG loan, they began dealing with the reported MG named [redacted]

In January 1990, BCCI made a $14 million loan to [redacted] for the purpose of [redacted] QUALITY HOTEL AT LAGUARDIA AIRPORT in New York, New York. $10 million was allocated to [redacted] $4 million for the [redacted]. One of the conditions for the loan was that [redacted] DOWNTOWN HOTEL in Macon, Georgia, which [redacted] Subsequently, [redacted] furnished a sales agreement which disclosed that the (Macon) hotel [redacted]. The sales was never funded so no funds were received by [redacted] to service the existing debt against the Macon hotel.

During this time period, [redacted] REGAL INTERNATIONAL, INC. (REGAL), a publicly traded company. After [redacted] REGAL. Subsequently, [redacted] conveyed his [redacted] was replaced by [redacted] REGAL. [redacted] was the [redacted] ZURICH and CTI. In addition, fnu DEAN, who is a former U.S. AMBASSADOR to India, and [redacted] (phonetic), [redacted] EQUITABLE LIFE INSURANCE COMPANY, were appointed [redacted] REGAL.

In April 1990, [redacted] was hired by BCCI [redacted] was a very credible and respected banker who previously worked for the BANK OF AMERICA and CHASE-MANHATTAN BANK. [redacted] believes that [redacted] and his associates started to get worried at this time, because [redacted] would be monitoring the credits of [redacted]

In May 1990, a $500,000 loan was made by BCCI [redacted] for the benefit of COX DISTRIBUTING, INC. (CDI). A review of the credit file revealed that nothing was disclosed about the relationship between CDI and COX TRAILERS, INC. (CTI), as well as the relationships to ZURICH and PSIC. The [redacted] CDI [redacted] and the [redacted] At this time, it was known that [redacted] would be coming in soon

 b6 b7C

to BCCI to take over the operation. [redacted] emphasized that the amount of the loan, $500,000, because that was the maximum loan amount that the New York Division could lend without requiring approval from the CENTRAL CREDIT DIVISION, which is located at the BCCI-LONDON, ENGLAND. During the loan process, BCCI received an appraisal of $1 million for the CDI property which was located in Greensboro, NC. Subsequent investigation determined that the appraisal report was bogus because the appraiser and the appraisal company did not exist. In addition, the telephone number provided for the appraiser was apparently chosen at random because the subscriber of that number came back to an unrelated party. b6 b7C

Just prior to the funding of the $500,000 loan to CD, [redacted], an attorney, conveyed property described by [redacted] as a defunct gas station, to CD, and then filed a first mortgage against the property for CD for the benefit of BCCI. The cost of the property for according to the documents filed was $80,000. [redacted] has learned that the bogus appraisal for $1 million on the property was apparently designed to make it appear that the property owned and pledged on the loan included a warehouse that was located near the aforementioned gas station. However, the deeds conveying the property revealed that only the gas station was included in the conveyance. [redacted] has also learned that [redacted] was owed $25,000 for estate services by the lady who previously owned the gas station, however [redacted] was uncertain as to whether [redacted] had any knowledge of the fraudulent appraisal that was provided to BCCI. b6 b7C

In May 1990, [redacted] requested a $2 million draw on the $11.5 million loan facility in order to buy out the RTC's first mortgage in the Raleigh property. [redacted] received the money but the RTC was never paid. When confronted with the use of the money, [redacted] stated that he had incurred cost overruns on the LaGuardia hotel project and used the money there. Also in May 1990, [redacted] obtained a draw of $2.5 million from the Raleigh facility and used the funds [redacted] DAYS INN MOTEL AND LODGE located in Tarpon Springs, Florida instead of paying off the BANK OF BORDAN (Indian Bank) as represented. Most of the funds obtained from the $11.5 million loan were used to pay the interest current on existing debts. However, in June 1990, $1.2 million was also channelled from the $11.5 million loan to [redacted] in order for [redacted] to use the funds to maintain deposit account requirements mandated by the loan. b6 b7C

b6 b7C

Also in May 1990, the BCCI officers attempted to push through another loan in the amount of $500,000 to BELL PETROLEUM, which is another subsidiary of ZURICH, which is [redacted] b6 b7C The loan amount was approved locally, however it was somehow held up until the new BCCI-NY [redacted] arrived and was never funded.

In July 1990, the HOWARD JOHNSON HOTEL in Raleigh, NC, filed for bankruptcy. The [redacted] is fnu [redacted] b6 b7C [redacted] suggested that [redacted] be interviewed regarding the "looting" of property by [redacted] 'henchmen."

In September 1990, the LaGuardia hotel project was approximately 90% complete. [redacted] personally inspected the project and agreed that they [redacted] needed $200,000 to pay some bills or the project may fall into bankruptcy. The bank did not want to take over the hotel project and preferred that [redacted] complete it because the bank did not want to become involved with organized crime people that were always involved in the hotel and construction industries in the New York area. [redacted] explained that he had learned fro[redacted] that a company known as THE RIGHT CONNECTION COMPANY had been investigated for alleged Organized Crime connections with the GREEK MOB.

The bank decided to handle the payment of the sub-contractors and pay them directly on invoice. The bank made provided for a loan to [redacted] for $208,000 to cover the expenses. The checks were disbursed to a variety of sub-contractor companies. However, it was later discovered upon reviewing the endorsements on some of the checks, that the monies were endorsed back to [redacted] related entities by known associates of [redacted] endorsed at least one of the checks. [redacted] was listed in a DUNN & BRADSTREET (D&B) report as [redacted] HOWARD JOHNSON HOTEL in Dumfries, Virginia. However, [redacted] falsely represented to BCCI officials during an interview that he did not become employed by [redacted] until he began working at the QUALITY HOTEL AT LAGUARDIA AIRPORT in New York, New York. [redacted] provided the interviewing agent with photocopies of the original checks, which are presently maintained in the vault at [redacted] office.

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[redacted] believes that approximately $100,000 of the $208,000 was expended for legitimate costs associated with the project. [redacted] also believes that several of [redacted]

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associates posed as sub-contractors and furnished bogus invoices to support disbursements of the $208,000 loan and the funds were later funnelled back to [redacted]

b6 b7C

After [redacted] took over as [redacted] BCCI-NY, the bank requested photocopies of documents to support the funds that were advanced for the construction / renovation project at LaGuardia. Subsequently, [redacted] and/or his associates, provided photocopies of company checks, front side only, of the alleged disbursements. However without the reverse side of the checks, the bank could not determine if the checks had actually been paid or if they were just written out for purposes of giving the bank justification for the funds received by [redacted] explained that the loan documentation at BCCI-NY was very poor and he was uncertain as to whether the lack of documentation was intentional or not.

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[redacted] defaulted on his loans and the bank wanted to restructure [redacted] entire credit portfolio. [redacted] had no equity in many of the projects and was advanced funds in order to pay the accrued interest on the loans. The bank insisted that [redacted] restructure all of his loans at BCCI-NY. [redacted] expressed his displeasure because it was not consistent with his previous dealings with BCCI.

In October 1990, BCCI exercised its right of offset and applied $2,100,000 of [redacted] deposit account balances at the New York Agency to the loans, as well as $422,000 of deposits at BCCI-Bombay. [redacted] recalled that this upset [redacted] and put him in a defensive position. At that time, BCCI-NY was trying to get approval from the London office to foreclose on some of the loans. [redacted] was not cooperating with the bank's efforts to restructure the loans. [redacted] believes that [redacted] had someone at the bank that was keeping [redacted] apprised of the bank's activities. [redacted] recalled having telephone conversations with [redacted] wherein [redacted] would use the same words as [redacted] had used in a memorandum to the file two days before the telephone conversation.

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[redacted] told [redacted] THE RIGHT CONNECTION COMPANY [redacted] also stated that he had other bills that needed to be paid and if the bank would advance [redacted] $50,000, he [redacted] would agree to and sign a restructured loan

 b6 b7C

agreement. Originally, [redacted] had a list of several creditors that he wanted to disburse the $50,000 advance to, however he [redacted] later decided to pay the entire amount to THE RIGHT CONNECTION COMPANY. As a condition of the $50,000 loan, [redacted] b6 b7C pledged $100,000 of accounts receivable from the airline companies that were owed to the LaGuardia hotel. [redacted] verified the receivables and felt that the $50,000 loan was adequately secured.

The restructuring agreement was completed in March 1991. It provided for COOPERS & LYBRAND (C&L), a public accounting firm, to audit and monitor the cash flow of [redacted] b6 various operations. After signing the agreement, [redacted] flew to b7C India. Later, when auditors from C&L tried to conduct their audit procedures, [redacted] associates, consisting primarily of his brothers and brother-in-laws, denied the auditors access to the companies' books.

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At the present time, C&L is compiling an accounting analysis for the civil lawsuit which has identified eighty (80) different bank accounts relating to [redacted] and his affiliated entities.

In November 1991, NEW YORK STATE BANKING DEPARTMENT (NYSBD) filed a Civil RICO lawsuit against [redacted] wife, b6 b7C ZURICH CORPORATION and P.S. INVESTMENT COMPANY. Representatives from the NYSBD and its outside counsel, went to the hotel located at LaGuardia to search for documents. At that time, the found [redacted] employees shredding business records. [redacted] recalled that the shredder was still in the box and just the top of the box had been ripped open in order to start using the machine. The NYDA's office helped NYSBD with the legal process in retrieving the documents at LaGuardia.

[redacted] has also learned of six (6) other boxes of b6 b7C records that were allegedly removed from the LaGuardia location with the help of one of the LaGuardia employees, to a relative of [redacted] who resides on Middle Island in New York.

One particular item found at the LaGuardia hotel during the search and seizure of records was an original contract dated August 1990 between [redacted] and [redacted] BCCI- [redacted] which stated that [redacted] was to be b6 b7C paid $12,000 per month for consulting services provided to

b6 b7C

[redacted] During that time period, [redacted] was still employed by BCCI.

b6 b7C

After the problems with the [redacted] related loans surfaced and BCCI was attempting to rectify the situation, [redacted] associates started depositing checks into each others' spouse's accounts before writing checks back to their own wife's accounts, in an apparent effort to disguise the source and recipient of the funds.

b6 b7C

[redacted] believes that [redacted] and his associates may have "prepaid themselves" before filing for bankruptcy on the Raleigh hotel project in North Carolina. Also, it appeared that [redacted] associates did not realize that federal income taxes withheld from employee's paychecks are not dismissed under bankruptcy, and now they are trying to generate $100,000 in order to satisfy a claim filed by the [redacted] in connection with the bankruptcy filed for the hotel operation in Dumfries, Virginia.

b6 b7C b7E

[redacted] also learned that one of [redacted] law firms had faxed instructions to [redacted] advising how to document a transfer of funds from a corporation to [redacted] so it appeared to have occurred at an earlier date than it actually did.

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[redacted] is an attorney that has worked with [redacted] since the time the alleged BCCI informant told [redacted] that the bank was planning on foreclosing on [redacted] loans.

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3 pages.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/17/92

[redacted], SMALL BUSINESS ADMINISTRATION (SBA) was contacted at his office located at 677 11th Street N.W., Washington, D.C., telephone number [redacted]. b6 b7C

After being advised of the identities of the interviewers, [redacted] furnished the following information:

[redacted] is a contract employee for the SBA and tasked with [redacted] FALCON CAPITAL CORPORATION (FALCON), which was remanded to the SBA for liquidation by a federal court order dated December 17, 1991 in the Eastern District of North Carolina. b6 b7C

[redacted] explained that FALCON is a SBA Small Business Investment Company (SBIC) and as such, obtained loans from the SBA to loan to other small businesses. The court order (91-100-CIV-4-F) also awarded a judgement in the amount of $1,265,590.01. b6 b7C

The SBA was unable to locate FALCON's accounting records and identify the company's assets (loans) for liquidation. [redacted] learned that [redacted] representing ZURICH CORPORATION (ZURICH) was in possession of some of FALCON's company records. ZURICH is a company that is owned by FALCON's [redacted] (DR. [redacted]) In addition, [redacted] also determined that there were FALCON records at an accountant's office in Washington, North Carolina, as well as another [redacted] COX TRAILERS, INC. Through his efforts in reconstructing the company's assets for liquidation, [redacted] compiled a variety of records in an effort to identify FALCON's loan customers and the amounts owed. ADAMS provided a list of 32 borrowers with outstanding loans totaling $1,960,499.00. b6 b7C

[redacted] FALCON in approximately 1983 and provided loans to related parties and affiliates. [redacted] explained that the regulations governing SBICs loan policies did not permit the SBA funds to be loaned to the SBIC owners. b6 b7C

Investigation on 8/4/92 at Washington, D.C. File # 29B-WF-171994-Sub-D

by FA [redacted] SA [redacted] CWS Date dictated 8/17/92 b6 b7C

INDEXED SERIALIZED FILED FBI - WASH. FIELD OFFICE

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FALCON's records disclosed a loan in the amount of $100,000 was made to **BELL RUBBER** on February 13, 1986. [redacted] has learned that BELL RUBBER, located at East Highway 31, P.O. Box 1237, Corsicana, Texas, is a subsidiary company of **REGAL INTERNATIONAL, INC.** (**REGAL**), a publicly traded company. REGAL also obtained a loan in the amount of $80,000 from FALCON on November 3, 1989. [redacted] REGAL. [redacted] REGAL.

FALCON's records also disclosed a loan in the amount of $75,000 to a company known as **DIAMONDS & DENIMS, INC.**, located at 3554 West Lake Drive, Martinez, Georgia 30907, telephone number 404/860-4981. The [redacted] **DR. (MRS.)** [redacted] is the wife of [redacted], **also known as** [redacted] has been involved with [redacted] as an employee or business partner on other entities. The funding of the loan was made with two (2) cashier's checks that were purportedly for inventory. In depositions, [redacted] testified that the funds received from FALCON were used to purchase inventory from an overseas supplier. A review of FALCON's disbursements revealed that the checks were paid to [redacted] (Greenville, NC) and **CAPROCK SAVINGS & LOAN** (Dallas, Tx) for an apparent loan regarding a [redacted] hotel in Tennessee. [redacted] is allegedly involved in several bingo parlors that [redacted] is [redacted]

DIAMONDS & DENIMS, INC. had a fire that resulted in a $1 million insurance claim that was filed by the [redacted] has learned that there were questions as to the validity of the claim because it appeared unlikely that the [redacted] had purchased that large of an amount of inventory and that the warehouse did not appear to be large enough to contain that amount of stock. However, the case went to trail and, although it appeared to be an insurance fraud, the [redacted] prevailed. That case is currently under appeal.

In addition to the disbursement of funds from the DIAMONDS & DENIMS, INC. loan to [redacted] FALCON's records revealed that loans were also made to them under other business names. On February 28, 1988 and June 7, 1988, $50,000 was loaned ($100,000 total) to [redacted] **HALLOW WINDOW & DOOR**, C/O **LOU'S BINGO 10TH STREET**, Greenville, NC 919/758-6846. In addition, FALCON loaned $100,000

b6 b7C

to [redacted] MAJESTIC INNS, 6597 Poplar Woods Circle South #3, Memphis, Tennessee 38138, telephone number 901/753-4273.

[redacted], obtained a loan from FALCON on May 4, 1987 in the amount of $100,000.00. [redacted] contacted [redacted] regarding the repayment to SBA and [redacted] told [redacted] that he did not receive the loan proceeds. [redacted] advised that [redacted] asked him to sign the loan papers and even allowed [redacted] (FALCON) to file a second lien on his [redacted] house because [redacted] "needed a reason to make the loan." [redacted] claimed that he merely endorsed the loan proceeds check over to [redacted] admitted that he had been in several business deals with [redacted] in the past.

FALCON's list of notes receivable also disclosed a loan dated January 25, 1988 in the amount of $75,000 to [redacted] [redacted] was a [redacted] BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). [redacted] has researched this loan and determined that [redacted] operated [redacted] for two attorneys, [redacted] advised [redacted] that $50,000 was loaned to his [redacted] sister as a "bridge loan" for the purpose of a house, until the long term financing was available. The remaining $25,000 went to [redacted] who represented MR. [redacted] who purchased a deli from a bankruptcy auction, entered into a shareholder's agreement with [redacted] to [redacted] New York. The $25,000 represented [redacted] investment in the business. $23,833.33 was used to payoff the bankruptcy trustee in back rent.

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SCANDIA INTERNATIONAL TRADING CO. (SCANDIA), 60 E. 42nd Street, New York, New York 11050, also obtained a loan in the amount of $100,000 on March 12, 1987 from FALCON.

Several other loans made by FALCON revealed a direct benefit to [redacted] has also interviewed some of the borrowers who admitted that the loan funds were diverted back to [redacted]

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[redacted] provided for review various documents and files that he had accumulated regarding FALCON. Photocopies of selected items were obtained by the interviewers.

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Dr. P.S. Prasad allegedly owes $34 million to BCCI — more than any other U.S. citizen. The bank's liquidator wants the money, but his lawyer says, "I don't think he'll be back here tomorrow."

ZB-WF-171994 SCS
Serial 1325015-000-8764

A PASSAGE BACK TO INDIA

A Greenville psychiatrist heads home after dealing his way into the world of Milken, failed S&Ls and BCCI.

By David Mildenberg

Banker Kurt Lewin doesn't mince words about Dr. P.S. Prasad, a psychiatrist who gave up mending sick minds to cut slick business deals: "He was a con artist."

Nevertheless, Lewin understands why so many people were charmed by Prasad. "He had this facade that he was a good ol' Christian boy," Lewin says. "When he talked with you, he wanted you to think he was so sincere and friendly. But I always knew there was more to the book than the cover."

The book on Ponnapula Sanjeeva Prasad has a convoluted, twisted plot and many chapters, the last of which has yet to be written. Operating out of Greenville, an unlikely base for an Indian-born wheeler-dealer, he spent the '80s spinning a web of complicated transactions that brought him together with some of the most controversial figures in American business, including junk-bond king Michael Milken; crooked Texas S&L operators; and Bert Lance, Robert Altman and other key players in the scandal surrounding the Bank of Credit and Commerce International, better known as BCCI.

Because most of his major deals involved out-of-state businesses, he gained little notoriety in North Carolina. But his impact within the state was considerable: Prasad played a part in running a major North Carolina savings and loan into the ground, sticking two Tar Heel banks with more than $2.5 million in unpaid loans and destroying Cox Trailer Inc., a boat-trailer manufacturer that for 80 years was an institution in the tiny Pitt County town of Grifton.

Now Prasad's empire has crumbled, and even those investigating his affairs are unsure how much money he has. "He apparently just walked away from it," says Ernest Richardson, the trustee overseeing the Cox Trailer liquidation. "He's disappeared."

Treywick "Buzzy" Stubbs, a New Bern lawyer representing Prasad's company, says the 46-year-old psychiatrist is back in India with his wife and two daughters. They're evading angry litigants scattered across the country, including Derrick Cephas, New York's superintendent of banking, who alleges that Prasad fraudulently received $34 million in loans from BCCI — more than any other U.S. citizen — without any intention of paying it back. "There's so much flack here," Stubbs says, "I don't think he'll be back here tomorrow."

Many in Greenville still respect Prasad, who converted to Christianity before coming to the United States. They remember him as a generous supporter of Trinity Free Will Baptist church and his businessmen's prayer group. Few know much about Prasad, who attracted scant media attention.

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Most tend to think that Prasad got overleveraged and stumbled trying to do too much.

"Whatever he told us, you could hang your hat on it," says Max Ray Joyner, a Greenville insurance-agency owner and former chairman of the defunct North State Savings & Loan Association, of which Prasad was a major borrower and stockholder. "He never cost [North State] any money that I know of. Highfliers reach a peak, and then they get bumped off. It happens all the time."

Others aren't so charitable. "He was a thief," contends Claire Sites, spokeswoman for the New York banking superintendent. "He owed more money to people than most of us will ever dream about in our lifetime." Adds Lewin, who worked for North State and its successor, Barclays Bank of North Carolina, from 1985 to 1989: "To say that Dr. Prasad's loans had no part in the demise of North State is like saying that atom bombs didn't end World War II."

Prasad liked to tell why he moved from medicine to mortgages, recalls Mike Allison, his pilot from 1988 to 1990. Back in the early '80s, Allison says, Prasad "was making $55,000 a year at Walter Jones [Rehabilitation Hospital] when he made a ridiculous, low-ball offer for a house on a Tuesday. For some reason, the sellers accepted his offer. So Dr. Prasad on that Friday agreed to sell the house to someone else. He made $70,000 on the deal, and he says he went home and told [wife] Indrani that he was in the wrong business. That's what started all of this."

Medicine was Prasad's ticket to the United States. After graduating from Gandhi Medical College in India in 1970 and completing a residency in Binghamton, N.Y., he came to North Carolina in 1974 to work at John Umstead Hospital, the state psychiatric hospital in Butner. Eighteen months later, he moved to Greenville, where he became clinical director of the 76-bed Walter Jones alcohol-rehabilitation center. Like many physicians within an hour's drive of East Carolina University's new medical school, he received a clinical faculty appointment that put him in occasional contact with students and professors. "As a psychiatrist, he was considered a perfectly ethical person," says Dr. James Mathis, former chairman of the psychiatric department at the ECU medical school. "But once he was into the business world, it was said you'd better watch yourself when you were around him."

As an Indian with a thick accent trying to help North Carolinians overcome alcoholism, Prasad was at a disadvantage, says Ken Walker, assistant director of the Jones hospital. "He was a knowledgeable fellow, but I don't think he understood the culture of Eastern North Carolina very well." Mathis recalls asking a patient of Prasad's how her counseling was going. "She told me, 'Oh, we're doing fine. But, hell, I can't understand a word of what he says.' "

According to Walker, Prasad's commercial real-estate investments started with a small Greenville office building where the doctor had a part-time private practice. "He rented out all of the offices, then sold it for a profit, and he got hooked. From there, he was on his way."

Prasad bought his first motel, in Wrightsville Beach, followed by one in Greensboro, then one near Jekyll Island, Ga., his former colleague says. He also spent more than $300,000 renovating and expanding his two-story brick house to more than 6,500 square feet. "At the time, when he was making a lot of money, I remember kicking myself for not having the money to invest with him," Walker says.

Mathis, too, almost got involved in a Prasad deal. "He once tried to sell me some land that sounded good but which I later learned was totally inaccessible," Mathis says. "And I think he knew damn well what he was doing."

In 1982, Prasad, then 36, left Walter Jones to devote full time to his investments. Though his personality was subdued, his ambition wasn't, associates say. "He was full of ideas on how to get rich, and he said he really wanted to help India," says Norma Doty, who went to work for Prasad on April 1, 1983, and served as his office manager for

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nearly eight years. He also wanted to help Greenville. "Once he was even audited by the IRS because they couldn't believe how much he gave to religious groups," Doty says. "But we had the checks that showed he had done all of this."

Because of the burgeoning medical school, Greenville real estate was booming. And Prasad didn't have to look far for financing. Formed in 1980 by a group of Greenville businessmen, North State Savings & Loan grew to $216 million in assets within four years by offering high certificate-of-deposit rates and acquiring thrifts in New Bern, Windsor, Wilson and Southern Pines. It was a classic, highflying early '80s S&L, paying above-market wages to lure attractive tellers from competing banks and providing company cars to more than two dozen employees. Forging a tight relationship with North State President William Reagan Jr., also in his late 30s, Prasad quickly became intricately involved in North State's business.

By March 1983, he had acquired 7% of the thrift's stock, worth more than $150,000 at the time. North State and Prasad became equal partners in North State Service Corp., a joint venture intended to combine North State's money with Prasad's skills at trading real estate. It was an instant success, reporting a profit of $1.37 million during the year ended March 31, 1983. North State's share totaled $695,772.

Since North State's net income that year was $504,497, it's easy to see why Prasad quickly became a golden boy to the board of directors. Without his deals, it appears that North State would have reported a loss. Without that reported profit, it probably couldn't have outbid a Kinston S&L to acquire First Colony Savings & Loan Association, a Southern Pines institution full of ill-advised loans on real-estate developments in South Carolina, Colorado and Florida. The disastrous $11.5 million merger in 1983, which doubled North State's size, led to its collapse by the following year.

"His deals had a very positive effect on North State initially," says Tony Gaeta, a New Bern lawyer who worked on North

Prasad wasn't a long-term investor. "He only wanted to own things for a short period of time," Max Ray Joyner says.

State's acquisitions. "It was a time when all the S&Ls were diversifying and looking for ways to make money. And Dr. Prasad was a prominent, smart guy who brought in transactions that in the short term were very profitable."

North State executives shoveled money at Prasad about as fast as he could take it, adds Don Beason, who headed the state-chartered fund that insured the S&L's deposits. "In most of those deals, North State's management went looking for him," Beason contends. "It wasn't a case of where he was coming in the back door looking for money."

But long-term investing wasn't Prasad's style. "He was a trader," Joyner says. "He only wanted to own things for a short period of time." The short-term gains from Prasad's deals often turned into expensive, long-term problems. One of Prasad's early winners was the acquisition of a motel near Houston's Astrodome for $1.8 million. Less than a month later, North State Service Corp. sold the hotel to a group of Taiwanese investors for $3.3 million, says Lewin, who later investigated the deal. North State put the profit on its books, and Prasad came home a hero. There was just one catch: North State had lent more than $3 million to the new buyers, who eventually had financial problems.

"This motel was 20 years old, and the

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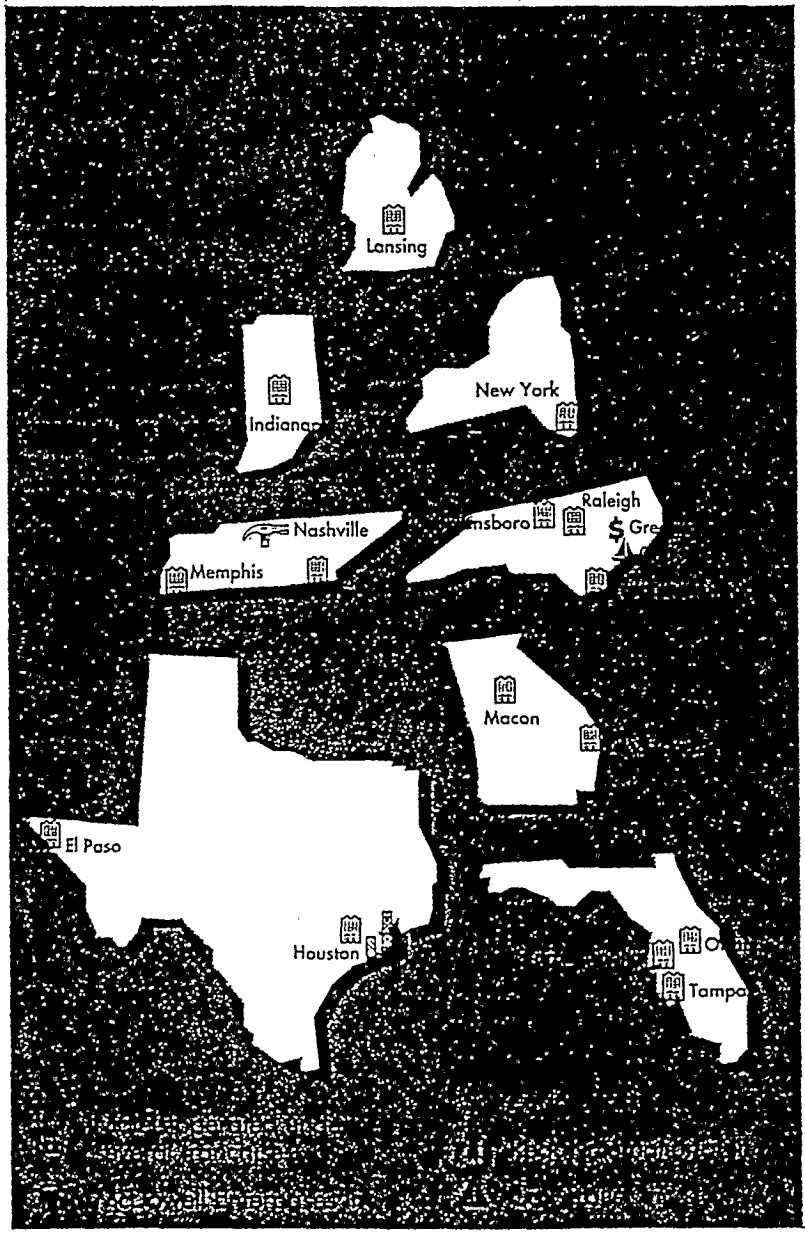
deferred maintenance was terrible," banker Lewin says. "It was in Houston's Tenderloin district, and they rented out rooms by the hour. I remember the first time I saw the property at night, I said, 'I'm not going to stay there.' "

Nearly a decade later, however, people knowledgeable about North State's demise contend that Prasad's deals didn't hurt the S&L. "As far as I know, the dealings he had with North State didn't contribute to their losses," says Bob Jacobson, North Carolina's S&L administrator since 1989.

Beason also doesn't pin blame on Prasad. "I didn't feel like he was a crook," Beason says. "The business judgment of the deals was questionable, but at the time no one raised the question of Prasad's integrity."

Somebody should have, says Lewin, who later tried to collect on several of the loans that Prasad had arranged. "North State allowed Dr. Prasad to go into parts of the country that were light-years away from Greenville, buy a dilapidated, aging motel, then provide the financing for the flip." Barclays Bank, which took over North State in a deal arranged by state regulators, ended up losing money on Prasad-related motel ventures in Houston, Memphis and El Paso, Lewin says. The bank also has been unable to collect on a $450,000 judgment in Pitt County Superior Court against Prasad for other unpaid loans.



Prasad, however, emerged from North State with his reputation intact — and his net worth unharmed by the collapse of the S&L's stock. He told acquaintances that he had sold his shares long before they became worthless. More than $6 million of stockholders' equity was wiped out when Barclays took over North State's operations in 1986. The S&L's demise ended up costing the state's private insurance fund and Barclays more than $50 million.

North State had also lent Prasad $525,000 in early 1983 to acquire Falcon Capital Corp., a small-business investment company regulated by the Small Business Administration. Prasad used Falcon as a vehicle to help finance a variety of ventures. "He treated it as his own personal bank," Doty says.

Among Falcon's loans was $20,000 to Betty Williams, who with Mairead Corrigan won the Nobel Peace Prize in 1976 for their work in uniting Catholics and Protestants in Northern Ireland. By the mid-'80s, Williams was living in Florida and wanted to start a business that made Irish-style dolls. As collateral, Prasad asked her to hand over her Nobel award. "She felt very foolish for having to put it up as collateral," says Doty, who drove Williams to the Greenville airport after her meeting with Prasad. Williams later defaulted on the loan; the statuette is now in the possession of the state

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of New York, which claimed it late last year after seizing several of Prasad's businesses.

As for Falcon, it was placed into liquidation in April 1990, owing the federal government $1 million.

Not satisfied with small motel and apartment investments, Prasad yearned to be involved in larger deals. What got him interested in bigger hotels, Allison says, was the big profit he made from trading a Hilton Hotel in Lansing, Mich. "P.S. told me that the hotel had been on the books for $15 million, but he was able to buy it for less than $4 million," he says. "He only held onto it for six months, then sold it for 30% more than he had paid. And he also made $700,000 [in operating profits] while he was running it."

Then, in January 1985, he made his biggest strike: His Keystone Financial Corp. paid several million dollars for a 49% stake in McDowell Enterprises, a Nashville, Tenn.-based asphalt-paving and construction company with annual revenues of about $90 million.

In doing so, Prasad bought into a company listed on the American Stock Exchange that had lost money for four consecutive years. But the doctor was enormously proud of the acquisition, associates say. "To buy a publicly traded American company really made him something back in India," Doty says. Several of his associates say impressing people back home was important to Prasad, who boasted of his close relationship to the administration and family of former Indian Prime Minister Rajiv Gandhi.

But there was no turnaround in McDowell's fortunes, and the acquisition quickly soured. By September 1985, Prasad had installed himself as chairman and CEO and put himself and his accountant, William Zachmann of Washington, N.C., on the board. The losses continued.

By early 1987, Prasad had sold off McDowell's construction businesses and got into generic-drug manufacturing through a merger with a Long Island, N.Y.-based company called Interpharm. Reflecting the change, McDowell was renamed MaxPharma Inc., and headquarters was moved to Greenville. Prasad said the name change and move was intended "to rebuild [the company's] reputation with the financial community," according to a *Nashville Banner* story in 1987. That's not how Harry McMullen III remembers it, however.

"The business had severe operational problems that were a reflection of bad management, and it had ceased to exist by the time of the move," says McMullen, a Washington, N.C., native and Oklahoma City businessman who had accepted Prasad's offer to invest in McDowell in 1985. "I bitterly regret getting involved in that venture. It was very expensive."

McDowell stock, which once had traded for $17.75 a share and was in the $5 range when Prasad's group took control, became worthless. By 1988, control of MaxPharma had passed into the hands of wealthy Virginia developer Mohammed Hadid and John Roberts Jr., a Plano, Texas, S&L owner who later was convicted of bank fraud. On Nov. 15, 1990, MaxPharma filed for bankruptcy in federal court in Oklahoma City.

McMullen was also involved with Prasad in two Florida motel deals, including a Days Inn in Tarpon Springs on which he still holds a second mortgage. "My theory from having known him is that his original intent was to be a successful business person, but that as some things went wrong, he began using money from one place to pay a more pressing demand at another place," McMullen says. "It started out small and controllable, but ended up, as dishonesty often does, as a monster.

"I think it was a case of a basically good person who got caught in a bad situation and was unwilling to admit defeat. So he ended up causing 10 to 20 times as much harm as he would have had he stopped."

Like the North State collapse, McDowell's problems appeared to do little to slow down Prasad. On the contrary, the connections made through McDowell propelled him into a new, wider sphere of contacts and deals. It was during this period

"Dr. Prasad was caught in the excitement of the time," former office manager Norma Doty says. "Yes, I think he became a deal junkie."

that Prasad twice attended the annual Predators' Ball, the gathering of financiers held in California by Drexel Burnham Lambert and Michael Milken, who is now serving a 10-year prison sentence for violating securities laws. Though Prasad talked with Drexel officials on several occasions, Doty says she doubts that he became part of Milken's network.

"Dr. Prasad was caught in the excitement of the time," she says. "With the deregulation of the S&Ls, people were fawning over him, and he thought he was becoming important, making deal after deal. Yes, I think he became a deal junkie."

McDowell also served as Prasad's entree to T. Bert Lance, a company director who had been Jimmy Carter's first budget director. According to several people close to Prasad, Lance linked Prasad to the complex, 62-nation BCCI operation. Several of Prasad's associates believe Lance introduced the doctor to officials of Atlanta-based National Bank of Georgia and Washington-based First American Bank, both of which were illegally acquired in the late '80s by BCCI. (Lance had sold the Georgia bank to Atlanta businessman Ghaith Pharaon, who later sold it to First American.) Lance, now a business consultant in Calhoun, Ga., could not be reached for comment.

Prasad often mentioned his relationship with Lance, who visited Greenville at least three times. According to a *Dallas Morning News* story last year, Lance had guaranteed a $3 million loan to Prasad from the National Bank of Washington. That loan was later assumed by Hadid and Roberts when they took over MaxPharma, the newspaper reported. The Washington bank, headed for many years by former NCNB executive Luther Hodges Jr., failed last year.

About the same time, Prasad began his relationship with BCCI's New York agency office, one of the three official U.S. offices of the bank, which was started in Pakistan and based in Luxembourg. In January 1988, BCCI lent $5.5 million to Prasad's PS Investments Inc. to acquire the 314-room Raleigh Inn, which had gone bankrupt twice since opening as the capital's largest hotel in 1973. After overseeing a $6 million renovation of the hotel and changing its affiliation to the Howard Johnson chain, Prasad sold the inn on Oct. 1, 1988, to Dallas-based Caprock Savings & Loan Association.

Less than a year later, in August 1989, Caprock was taken over by the federal Office of Thrift Supervision. The S&L was officially closed in September 1990 at an estimated cost of $299 million. Chairman and CEO George Dillman and director William Hatfield were convicted in March of bank fraud, misapplication of bank funds and money laundering. Both men are appealing the convictions.

Prasad's plan for the Raleigh hotel was the same approach that had worked dozens of times before, says Allison, who recalls flying Prasad to meetings with New York bankers on more than 100 occasions. "His thing was to buy a hotel where they said they were going to pull the franchise, do some minor renovations and put in new carpet and wallpaper and bedspreads and whatever it took to satisfy the hotel company, then sell it to somebody else," he says.

But Caprock's financial problems ended up costing Prasad heavily because he had received stock from the S&L rather than cash when the hotel was sold, Allison says. "He told me that he lost $762,000 in six months on that hotel." Providence Baptist Church now owns the property and uses the ballroom as its sanctuary.

The problems in Raleigh, however, apparently did little to change Prasad's style. That's because BCCI's New York office was pouring money into his operations, even though the loans weren't being repaid. Among BCCI's loans to Prasad

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during the next 18 months: $500,000 in May 1989 for a Ramada Inn in Chattanooga, Tenn.; $7.5 million in August 1989 for a Hilton in Macon, Ga.; $14.1 million in January 1990 for a Quality Inn next to New York's LaGuardia airport; and $500,000 in May 1990 for Cox Trailers.

Several of the loans were based on appraisals by Charles Smith of Durham. Andrew Tulloch, a consultant who investigated BCCI for the New York State Banking Department, said in a deposition in December that Smith's appraisals were "grossly inflated." Contacted in March, Smith said Tulloch's comment was "a gross misstatement" that showed an ignorance of the appraisal process. Smith based his appraisals on income projections submitted by Prasad, not comparable values of similar hotels. That Prasad's projections turned out to be wildly optimistic is not the appraiser's fault, Smith says. "It says in there that the appraisal is based on certain conditions," he adds. "If there's fraud involved, what are you going to do?"

Separately, Prasad came up with more than $2 million in February 1990 to acquire 45% control of Regal International Inc., a Corsicana, Texas-based drilling-equipment manufacturer. Speculating on a rebound in oil and gas drilling had little to do with Prasad's investment. Rather, the doctor picked Regal because it was the lowest-priced stock on the New York Stock Exchange, trading for about a quarter per share, and he thought the listing in itself was quite valuable, according to former business partner Gary Sharma. "Some company that isn't public might want to join Regal, which could significantly increase the value of the stock," says Sharma, an Augusta, Ga., businessman.

But Regal had lost money for eight consecutive years, and its annual sales had fallen from $22 million in 1981 to $9.8 million in 1990. Despite its puny stock price, Regal is held by more than 25,000 investors, most of whom received their shares when it was spun off in the early '80s by Texas International Corp.

There was no turnaround, however, as Regal continued to lose money. Compounding the problem, Prasad got into a fight with Ruben Aragon, Regal's CEO since 1986. Aragon resigned in January 1991 when Prasad's group ordered him to appoint an Indian to the management team, according to a letter Aragon sent to Regal's board of directors. Aragon later sued Regal for breaching his employment contract, leading to a $420,000 settlement last October. Then last year, Prasad gave up his interest in the company to Sharma, who had lent him $2.5 million, according to a Securities and Exchange Commission filing.

Staffing his hotels and companies with Indians was typical of Prasad. At its peak, the headquarters office in downtown Greenville employed about 15 people, including a couple of the doctor's relatives. His top assistants since 1988 were Vijay Dandapani, a graduate of Cornell University's School of Hotel Administration, and Mahesh Shetty, a certified public accountant who is now Regal's chief executive officer. Dandapani is back in India, according to several of Prasad's associates.

His operations were scattered all over the nation, but one of Prasad's final deals involved an old North Carolina business. Formed in 1903, Cox Trailer was a long-established manufacturer of boat trailers. But slow sales in the marine industry and conflict among Cox family members prompted the decision to sell. Oldest brother Bill Cox favored selling to a competing manufacturer in 1985, but he says his brothers Gerald and David nixed the idea. Four years later, with the business needing a capital infusion, they finally agreed it was time to get out.

One of his final deals was a Pitt County business started in 1903. Within two years, Cox Trailer was out of business, owing more than $4 million.

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1325015-000-8771

At the time, David Cox was taking flying lessons from Mike Allison, Prasad's pilot. Within a month after Allison mentioned to Prasad that Cox Trailer was for sale, the doctor had acquired the business. "He wanted it because of the name, which was highly respected," Allison says.

But other evidence suggests Prasad had little interest in making boat trailers. To acquire Cox in 1989, Prasad's Zurich Corp. borrowed $1.5 million from the Bank of Oman, a Middle Eastern BCCI affiliate that received a first deed of trust on the property. Six months later, according to bankruptcy court trustee Ernest Richardson, Zurich borrowed $2.5 million from BB&T — which received an identical deed of trust on the property. BB&T made the loan based on a deed of release showing that the Bank of Oman had given up its first-lien position. "I don't think there is any doubt that the deed of release was forged," Richardson says.

The forgery didn't stop there, however. Zurich based its loan application on an appraisal by Greenville real-estate appraiser Bruce Sauter. Trouble is, Sauter says his name was forged on a document that put the Cox property value at $2 million — double the value of his previous appraisal. "Someone took my appraisal, changed the cover sheet and made up a fictitious appraisal company, then forged my name," he says.

Meanwhile, Cox Trailer continued a Prasad business tradition: It flopped, closing in December 1990 with 400 trailers completed or in progress on site. The bankruptcy file lists total assets of $944,000, dwarfed by liabilities of $4.67 million, most owed to BB&T and the Bank of Oman. About 40 people lost their jobs.

BB&T made the loan to Prasad because of his excellent credit record at the bank during the previous decade, says Horst Vann, the bank's business services manager in Greenville. Prasad had owned the business for a year, and he had $500,000 in a BB&T account, Vann adds. That account has been seized, leaving BB&T out $2 million. All in all, it was another example of Prasad's superb ability to use other people's money.

"He was a practicing, licensed psychiatrist, and he was very, very good," Kurt Lewin, now a banker in Key West, Fla., says. "He had the capability of getting money. We tried chasing Prasad, and we tried finding the money, but we never could because he kept doing these

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leveraged transactions. I've spent hours thinking about it, and I'm sure there's a box somewhere with money in it."

Investigators for the state of New York have told Richardson that Prasad may have gotten away with as much as $25 million. That's nonsense, says Stubbs, Prasad's lawyer. He says Prasad's brother, Pasha, is now trying to raise money to resurrect Zurich, which is being reorganized in federal bankruptcy court in Raleigh. The company's main assets, hotels in Macon, Chattanooga and New York City, are being managed by a Florida-based hotel company.

Zurich was one of the many companies Prasad created for his holdings. Former employees say the doctor had a box full of corporate seals used in his ventures.

"I think [Pasha will] be able to get that [New York] hotel back again after the Chapter 11 reorganization," Stubbs says, adding that he expects Zurich to lose the Macon and Chattanooga hotels through foreclosures. New York regulator Cephas, however, considers the transfer of Zurich from Prasad to his brother to be a sham transaction. Cephas has sued Prasad under the federal Racketeer Influenced and Corrupt Organizations (RICO) Act.

Others who were close to Prasad question whether he made off with much money. Though she knows he had bank accounts in Switzerland, Norma Doty doubts if Prasad got rich off his decade of deal-making. "The last few months [until Prasad turned over his company to his brother in March 1991], he was a nervous wreck," she says. "I had a litigation file that was incredible, and we had law bills that were staggering."

The financial stress may have showed when his home — on which Prasad's brother held the title — was foreclosed, and Prasad moved his family to an apartment in Greenville. "They wanted to get away from people," Doty says, "but when you have two big Mercedes parked in front of an apartment it's pretty hard to hide."

Though his dealings proved costly to thousands of people and businesses, the doctor showed a more humane side. Last year, after Prasad had fled Greenville, he called Allison and asked, "Are you doing OK, my friend?" Allison told him that he was $400 short on a house payment. The next morning, a Federal Express package arrived with a $400 check, written on the account of the Days Inn in Tarpon Springs, Fla. ■

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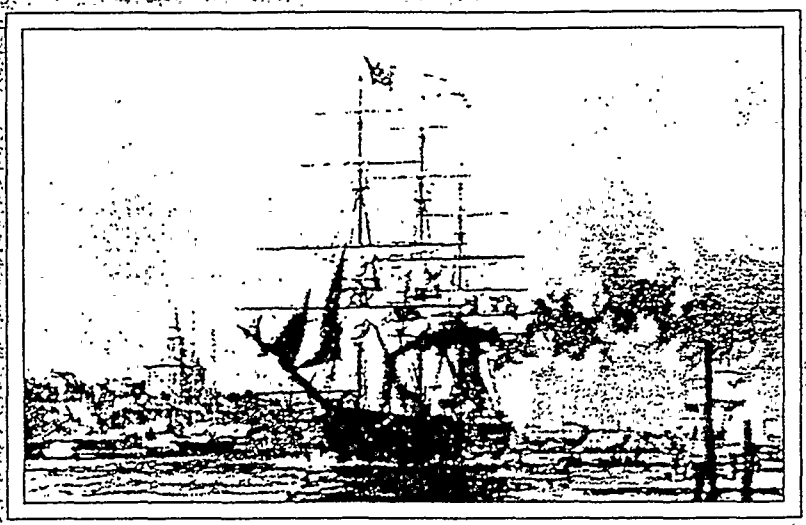

"Savannah," World's First Steam Ship Leaving Savannah, Georgia, May 20, 1819. From the Collection of Morris Newspaper Corporation.

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10

1325015-000-8773

Precedence: PRIORITY Date: 5/18/1998

To: Criminal Investigative Attn: [redacted] IRU II
WF Attn: Investigative Assistants
(fax 202 278-2478)

b7E

From: HONG KONG
Contact: [redacted] (852)2841-2356; HM [redacted]
FAX (852)2522-6843;

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] JMW

Case ID #: 163H-HK-18337 (Pending)

Reference: Serial

Title: [redacted] aka [redacted]
FPC - WCC MATTER (RECORD CHECKS)
OO:hk

b6
b7C

Synopsis: THE [redacted]

b7D

Details: For the information of WFO, Legat Hong Kong is [redacted]

b7D

[redacted] is a former Indian Minister of Petroleum and Natural Gas who defrauded the Indian government in millions. He is allegedly using [redacted] in the U.S. to remit/funnel/launder money back to him in India.

b6
b7C

Legat Hong Kong conducted an ACS search and notes that [redacted] is listed a a reference in 29B-WF-171994 (FIF matter), serials 11P6; 15P8. A review of ACS determined that those serials are not uploaded and therefore cannot be viewed.

b6
b7C

LEAD(s):

Set Lead 1:

WF

AT WASHINGTON, D.C.

Will pull aforementioned 29 file, review serials 11

It appears this was responded to w/ the dated 11/5/99 - I believe I already faxed the info

---

Case ID : 163H-HK-18337 Serial : 7

b6
b7C

and 15 and fax the pertinent serials/information to Legat Hong Kong (fax 852-2522-6843)

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/24/1999

To: Washington Field **Attn:** SA [redacted] b6 b7C
NVRA

From: Athens
Contact: [redacted] 011-30-1-725-3024 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] jps

Case ID #: 29B-WF-171994 (Pending) 816

Title: HIDDEN INTERESTS

b7E

Synopsis: Requests reimbursement for expenditures made by the [redacted] in Ankara, Turkey, in support of instant investigation.

Administrative: Re telcall between SA [redacted] and Legal Attache [redacted] b6 b7C

Enclosures: Enclosed for SA [redacted] are copies of receipts obtained by [redacted] who provided investigative and administrative support for instant matter regarding a fugitive believed to be in Istanbul, Turkey. [redacted] worked with [redacted] in response to a lead set re instant. b6 b7C b7E

Details: Pursuant to re telcall, WFO is requested to facilitate reimbursement in the amount of $294.60 to [redacted] provided assistance requested by Athens [redacted] in support of a lead set by WFO regarding instant matter. b6 b7C

The original receipts are no longer available; however, receipts enclosed include those for individual expenses, to include $153.57 for room rental; $75.00 for the rental of a boat and crew; $23.40 for food served on board the boat; $25.20 for film developing; and $17.43 for the purchase of film, for which there is no receipt; for a reimbursement total of $294.60.

Current Legal Attache Athens has reviewed this matter and, while recognizing that this situation is unusual, believes that the reimbursement is both reasonable and justified. While it is the opinion of Legat Athens that these expenditures should have been incurred by [redacted] since they were at his request and in support of a Bureau investigation, it is also his opinion that every effort should be made to facilitate reimbursement in a timely manner. b6 b7C

Rette Rm
Here's the hard
copy of lead.

29B-WF-171994-816 1325015-000-8776

b6
b7C
b7E

Should WFO require any additional information or supporting documentation, although all currently available documentation is enclosed herein, it is requested that Legat Athens be contacted as soon as possible to provide a timely response to [redacted]

Legat Athens appreciates WFO attention to this matter, recognizing that [redacted] should have addressed this situation in a more appropriate manner.

b6
b7C

1325015-000-8777

To: Washington Field From: Athens
Re: 29B-WF-171994, 03/24/1999

LEAD (s):

Set Lead 1: (Adm)

WASHINGTON FIELD

AT NVRA

WFO at NVRA is requested to process the attached receipts for reimbursement for expenses made by [redacted] American Embassy, Istanbul, Turkey, in support of instant investigation. It is also requested that Legat Athens be contacted and advised accordingly so that [redacted] can be contacted and provided with the status of this request.

b6
b7C
b7E

♦♦

1325015-000-8778

PHARAON DOSSIER NO: [redacted]

b6
b7C

FBI FILE: 29B-WF-171994

[illegible]

[illegible]

[illegible]

Receipt 9/1 1998 No. 09261

FROM [redacted]

$ 75.00

DOLLARS

FOR RENT
FOR Hiawatha Cruise - Sept. 4

FROM 0830 TO 1230

ACCT.
PAID
DUE

cash
check
money order

b6
b7C

Photo Developing
TL 7,000,000 =
25.20
9/8/98

Boat/Crew Rental
75.00
9/4/98

UAKKORAMA
RUMELİ GİYİM TİC. A.Ş.
RUMELİ CAD.80 NİŞANTAŞI
MARMARA K.VD:9220035784
TEL:0.212.2244030

06.09.1998 FİŞ NO:000380
SAAT:17.54

ARMAĞAN " %15*5000.000

TOPKDV *652.174
TOPLAM *5000.000

NAKİT *5000.000
/F BJ 00038122

Food / Beverages
TL 5,000,000 =
18.00
9/6/98

[illegible]
İŞİTLAR: İNŞ.TUR2
İŞLT.AŞ.S.ERCAN
CAD.N:24/1ER.ENKY
S.TAŞ 4680009852
06.09.1998
FİŞ NO: 0057
SAAT: 10.21

YEM/K %15*750000
YEM/K %15*750000

KDV *195653
TOP *1500000

O A
/FBC 0002995

Food / Beverages
TL 1,500,000 =
5.40
9/6/98

https://archive.org/details/0001379

Detach here and return upper portion with check or money order. Do not staple or fold.

Summary of Government Card Account

Retain this portion for your files.

AMERICAN EXPRESS Government Services

Government Cardholder Name	Government Account Number	Statement Closing Date
		09-23-98

b6
b7C

Previous Balance	New Charges	Other Debits	Payments Received	Other Credits	Balance Due
$.00	$153.57	$.00	$.00	$.00	$153.57

Reference Number	Item Number	Description of Monthly Activity	Charges	Credits
		PREVIOUS BALANCE	$.00	
132253		POS-GOKTRANS TRZ.AS./HYAT TURKEY		
		419,207.50 TURKISH LIRA BILLED AS	153.57	
		TOTAL CHARGES AND CREDITS	$153.57	
		BALANCE DUE	$153.57	

PAID IN FULL
BY Personal check
692
10/5/98.

PAGE 1 OF 1

S5

Payments or credits received after closing date above will appear on next month's statement.

FOR INQUIRIES ABOUT YOUR ACCOUNT, CALL TOLL-FREE 1-800-492-4922 OR WRITE US AT P.O. BOX 297812, FT. LAUDERDALE, FL 33329-7812.

AMERICAN EXPRESS GOVERNMENT CARD CONTRACT EXPIRES NOVEMBER 29. CHARGING PRIVILEGES WILL TERMINATE AT THAT DATE.

BGQ01318

3509

Please see reverse side for important information regarding certain types of charges.

1325015-000-8780

Statement of Government Card Account

AMERICAN EXPRESS Government Services

Payable upon Receipt in U.S. Dollars with a check drawn on a bank located in the U.S., or a money order, or by electronic payment. Please enter Government Card Account number on all checks and correspondence.

8 R9 0 1

TERMS - PAYABLE IN FULL UPON RECEIPT OF STATEMENT.

☐ Check here if address or telephone number has changed. Please note changes on reverse side.

Government Account Number	Statement Closing Date	Total Amount Due
[redacted]	09-23-98	$153.57

b6
b7C

MAIL PAYMENT TO:

AMERICAN EXPRESS
P.O. BOX 1270
NEWARK NJ 07101-1270

8384375708 0001535700001535 74

[redacted]
Taylor 3-87
of State
D.C. 20520

b6
b7C

692

October 5 19 98 68-7534/2560

Pay to the order of AMERICAN EXPRESS GOVERNMENT CARD $ 153.57

ONE-HUNDRED FIFTY-THREE and 57/100 Dollars

STATE DEPARTMENT
FEDERAL CREDIT UNION
1630 KING STREET
ALEXANDRIA, VIRGINIA 22314-2745

Memo [redacted]

b6
b7C

1325015-000-8781

	(GROSS)	(VAT)	(NET)
KDV 15%	3552075	4633143	30887607
TOTAL		4633143	30887607

10:56am 07/

Hyatt Regency Istanbul
Taşkışla Caddesi
80090 Taksim, Istanbul, Turkey

Tel.: 90 - 212 - 225 70 00
Telex: 226 80 HRI TR
Fax: 90 - 212 - 225 70 07

GÖKTRANS TURİZM VE TİCARET A.Ş.
İsmet İnönü Cad. Tümşah Han No.: 70/4
80090 Gümüşsuyu / İstanbul
Beyoğlu V.D.: 4060022000
Sicil No.: 257790 - 205362

GUEST FOLIO

FOLIO # 397253 ROOM # 910 PAGE NO 1

MR [redacted] b6 b7C
AMERICAN CONSULATE GENERA HAK/TEL [redacted]

ISTANBUL
TURKEY

ARRIVED 06 SEP 05:27pm
DEPART 07 SEP

PAX	ACC			DEBIT	CREDIT	BALANCE
1	06 SEP 98	ATP	RO-910 18:46 0002.30 6361171	181000		
2	06 SEP 98	ATP	RO-910 20:46 0004.30 5477356	272000		
3	06 SEP 98	ATP	R1-910 22:43 0001.6 02164937	181000		
4	06 SEP 98	NAA	RM-RM-910	34343750		
5	07 SEP 98	ATP	RO-910 06:35 0001.54 6971942	181000		
6	07 SEP 98	ATP	RO-910 06:37 0001.12 6971942	181000		
7	07 SEP 98	ATP	RO-910 06:43 0001.48 6971942	181000		
8	07 SEP 98	ZEY	MBAB-MINIBAR BEVERAGE	6400000		

TOTAL BALANCE	41,920,750
DEPOSIT AMOUNT	0
NET BALANCE	41,920,750

	(GROSS)	(VAT)	(NET)
KDV 15%	41920750	5467926	36452824
TOTAL	41920750	5467926	36452824

10:58am 07/09/98

Adıma düzenlenen işbu faturanın bildirilen kurum veya şahıs tarafından ödenmemesi halinde talebiniz üzerine derhal ödeyeceğimi kabul ve beyan ederim.

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or association falls to pay for any part or the full amount of these charges.

A&G 013 - 07/98

İmza [redacted] *Signature* [redacted] b6 b7C

1325015-000-8782

NET BALANCE 35,520,750

	(GROSS)	(VAT)	(NET)
DV 15%	35520750	4633143	30887607
OTAL	35520750	4633143	30887607

10:58am 07/09/98

Hyatt Regency Istanbul
Taşkışla Caddesi
80090 Taksim, Istanbul, Turkey

Tel.: 90 - 212 - 225 70 00
Telex: 226 80 HRI TR
Fax: 90 - 212 - 225 70 07

GÖKTRANS TURİZM VE TİCARET A.Ş.
İsmet İnönü Cad. Tümşah Han No.: 70/4
80090 Gümüssuyu / Istanbul
Beyoğlu V.D.: 4060022000
Sicil No.: 257790 - 205362

GUEST FOLIO

FOLIO # 397253 ROOM # 910 PAGE NO 1

R [redacted] b6 b7C
MERICAN CONSULATE GENERA HAK/TEL- [redacted]
STANBUL
URKEY

ARRIVED 06 SEP 05:27pm
DEPART 07 SEP

AX	ACC			DEBIT	CREDIT	BALANCE
1	06 SEP 98	ATP	RO-910 18:46 0002.30 6361171	181000		
2	06 SEP 98	ATP	RO-910 20:46 0004.30 5477356	272000		
3	06 SEP 98	ATP	R1-910 22:43 0001.6 02164937	181000		
4	06 SEP 98	NAA	RM-RM-910	34343750		
5	07 SEP 98	ATP	RO-910 06:35 0001.54 6971942	181000		
6	07 SEP 98	ATP	RO-910 06:37 0001.12 6971942	181000		
7	07 SEP 98	ATP	RO-910 06:43 0001.48 6971942	181000		
8	07 SEP 98	ZEY	MBAB-MINIBAR BEVERAGE	6400000		

TOTAL BALANCE	41,920,750
DEPOSIT AMOUNT	0
NET BALANCE	41,920,750

	(GROSS)	(VAT)	(NET)
DV 15%	41920750	5467926	36452824
OTAL	41920750	5467926	36452824

10:58am 07/09/98

Adıma düzenlenen işbu faturanın bildirilen kurum veya şahıs tarafından ödenmemesi halinde talebiniz üzerine derhal ödeyeceğimi kabul ve beyan ederim.

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, company or association fails to pay for any part or the full amount of these charges.

A&G 013 - 07/98

İmza [redacted] *Signature* [redacted] b6 b7C

1325015-000-8783

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 04/13/1999

To: Islamabad Attn: Legat

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WFO

Synopsis: Lead requesting fingerprints, photographs and interview of [redacted] b6 b7C

Enclosures: 6 applicant fingerprint cards (FD-258).
6 copies of Form I-854 (with instructions).
6 copies of Form G-325 (with instructions).

Details: For the information of the Islamabad Legat, the Washington Field Office (WFO) is attempting to obtain an S-Visa for [redacted] and his immediate family members mentioned above in the synopsis. [redacted] is currently incarcerated in LSCI Allenwood, PA. b6 b7C

[redacted] is assisting on the captioned matter and it is anticipated that he will be able to continue to assist as the investigation goes forward. b6 b7C

Each member of [redacted] immediate family needs to be interviewed regarding the information on the form I-854, Part A questions 3 - 7, and they need to sign Part B #1 - Alien Certification. The signature requires a witness as well. b6 b7C

Each member of [redacted] family needs to provide the appropriate information for form G-325 (biographical information) as well as signing the form. b6 b7C

Finally, each family member needs to provide two sets of fingerprints on an FD-285 Applicant Fingerprint Card, as well as, two colored photographs against a white background. The

29B-WF-171994-817

S:[redacted]\fm991061.EC b6 b7C

Lead to Legat - Islamabad

1325915-000-8784

photographs need to be of the face and fit into an 1 3/16 inch square box (an example and directions are being provided).

[redacted] provides the following background concerning his relatives living in Pakistan: b6 b7C

Name [redacted] (Spouse) b6 b7C
Address [redacted]
Karachi 75500, Pakistan
Telephone # [redacted]

Name [redacted] (Son)
Address Same as above

To: Islamabad From: WFO
Re: 29B-WF-171994, 04/13/1999

LEAD (s):

Set Lead 1:

ISLAMABAD

AT KARACHI, PAKISTAN

Interview, fingerprint (two sets for each individual) and photograph (two sets of each individual) [redacted] b6 b7C There is an example of the proper type of photograph enclosed. The information requested can either be hand written on a plain piece of paper or filled in on the forms. However, have the two individuals sign two blank forms of each type (I-854 & G-325) and WFO will type in the information.

The interview only needs to obtain the information necessary for the two forms. However, should one of the items in Part A of Section 7 on Form I-854 be answered in the positive, please provide a detailed explanation. Each item checked needs to be explained.

♦♦

1325015-000-8786

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 04/26/1999

To: WFO Attn: ADIC J.C. Carter

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] RHM

Case ID #: 29B-WF-171994 (Pending)

Title: Hidden Interests;
Major Case # 38;
FIF; FAG;
OO:WFO

Synopsis: Request for signature of Assistant Director In-Charge J.C. Carter on S-Visa application for [redacted] b6 b7C

Details: Attached is an S-Visa application which requires the signature of ADIC J.C. Carter and the U.S. Attorney's signature.

The S-Visa application is for [redacted]. Mr. [redacted] b6 b7C is applying for this S-Visa in order that he may stay in the United States upon release from prison. Mr. [redacted] plead and then was sentenced in the BCCI investigation. Since his sentencing Mr. [redacted] has been cooperating in identifying assets of BCCI which are then forfeited.

Mr. [redacted] should be able to continue to assist in b6 b7C identifying assets of BCCI. It is also anticipated that Mr. [redacted] would be able to provide testimony against Ghaith Pharaon, a fugitive in the BCCI investigation, should Pharaon ever be arrested and extradited to the United States. Further the Federal Reserve currently has all of Pharaon's assets in the United States frozen, it is estimated to be near 300 million. Of the 300 million the United States Government has a claim against approximately 110 million.

The Department of Justice, Fraud Section, has requested that the FBI be the sponsoring Law Enforcement Agency for Mr. [redacted]. In addition to Mr. [redacted], his spouse and one of his sons b6 b7C living in Pakistan are also in the process of applying for an S-Visa. That paperwork is yet to be completed as the Legat in Islamabad is trying to obtain the necessary information. When

b6 b7C

S:\ [redacted] \Tm991161.EC

29B-WF-171994-818

1325015-000-8787

that information is received it will be forwarded to you for your signature.

Program Analyst [redacted], FBIHQ, Sensitive Information Unit, advised SA [redacted] that the paperwork on Mr. [redacted] could be submitted to FBIHQ separately since Mr. [redacted] is the main subject of the S-Visa application. b6 b7C

Once the S-Visa is signed it should be returned to SA [redacted] C-5, in order that it be taken to the U.S. Attorney's Office. b6 b7C

♦♦

1325015-000-8788

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

Washington DC 20535

May 19, 1999

Honorable Wilma A. Lewis
United States Attorney
District of Columbia
5th Floor 555 Fourth Street, N.W.
Washington, D.C. 20001

Dear Ms. Lewis:

Enclosed is a S-Visa application which requires the signature of the United States Attorney from the District of Columbia.

The application is for [redacted], who is applying for the S-Visa in order that he may stay in the United States upon release from prison. Mr. [redacted] plead guilty and then was sentenced in the Bank of Credit and Commerce International (BCCI) investigation. Since his sentencing, Mr. [redacted] has been cooperating in identifying assets of BCCI which are then forfeited. b6 b7C

Mr. [redacted] should be able to continue to assist in identifying assets of BCCI. It is also anticipated that Mr. [redacted] would be able to provide testimony against Ghaith Pharaon, a fugitive in the BCCI investigation, should Pharaon ever be arrested and extradited to the United States. Further, the Federal Reserve currently has all of Pharaon's assets in the United States frozen and are estimated to be near $300,000,000. Of the $300,000,000 the United States Government has a claim against approximately $110,000,000. b6 b7C

The Department of Justice, Fraud Section, has requested that the Federal Bureau of Investigation (FBI) be the sponsoring law enforcement agency for Mr. [redacted] In addition to Mr. [redacted] request, his spouse and one of his sons still living in Pakistan are also in the process of applying for S-Visas. That paperwork is yet to be completed as the Legat in Islamabad is trying to obtain the necessary information. When their information is received, S-Visa applications will be completed and forwarded to your office for your signature. b6 b7C

H:\ Rtrm 1460.LET

29B-WF-171994-819 1325015-000-8789

To: Honorable Wilma A. Lewis
Re: [redacted] S-Visa

b6
b7C

Assistant Director in Charge, J.C. Carter of the Washington Field Office of the Federal Bureau of Investigation has already reviewed and signed the application.

Please notify Special Agent (SA) [redacted] b6 b7C of the FBI, at telephone number 703/762-3416, when Mr. [redacted] application has been signed and SA [redacted] will pick the package up from your office.

Thank you very much for your attention to this matter.

Sincerely yours,

J.C. Carter
Assistant Director in Charge

By: [redacted] b6 b7C
Supervisory Special Agent

Enclosure
1-Addressee
1 (29B-WF-171994)
RHM:lrr
(2)

1325015-000-8790

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 06/03/1999

To: Criminal Investigative **Attn:** [redacted] IRU II
Washington Field **Attn:** [redacted] C-5/NVRA

From: Islamabad
Contact: [redacted] 011-92-51-827-833

Approved By: [redacted]

Drafted By: [redacted] ale

Case ID #: 29B-WF-171994-820 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38;

Synopsis: To provide results of lead set to Islamabad.

Reference: 29B-WF-171994 Serial 817

Enclosures: Enclosed for WFO are completed fingerprint cards (2 each), passport photos (2 each) and completed Forms I-854 and G-325 for [redacted]

Details: On 5/14/99, Legal Islamabad (IS) requested the [redacted] Karachi, Pakistan contact [redacted] and obtain fingerprints, passport photos and the required documents for an S-Visa. On 5/21/99, the [redacted] provided IS with the requested items which are being forwarded to WFO.

IS considers this lead covered.

♦♦

UPLOADED ACS
DATE 6/4/99

29B-WF-171994 - 820 1325015-000-8791

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 07/13/1999

To: Islamabad Attn: Legat

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WFO

Synopsis: Lead requesting Birth Certificate(s) and Marriage Certificate.

Reference: 29B-WF-171994-817

Details: Islamabad Legat has previously obtained information from [redacted] regarding a lead sent by the Washington Field Office (WFO). WFO is attempting to obtain an S-Visa for [redacted] and his immediate family members mentioned above. b6 b7C

WFO has sent [redacted] S-Visa application to FBIHQ. FBIHQ has advised there is a need for a Birth Certificate of [redacted] and a Marriage Certificate for the marriage between [redacted] b6 b7C

[redacted] provides the following background concerning his relatives living in Pakistan:

Name [redacted] (Spouse) b6 b7C
Address [redacted]
Karachi 75500, Pakistan
Telephone # [redacted]

Name [redacted] (Son)
Address Same as above

S[redacted] FM 991942-EC pc w/An b6 b7C
~~FM 991942-EC~~

1325015-000-8792

29B-WF-171994-822 HB

To: Islamabad From: WFO
Re: 29B-WF-171994, 07/13/1999

LEAD (s):

Set Lead 1:

ISLAMABAD

AT KARACHI, PAKISTAN

Re-contact [redacted] Obtain or have them express mail a copy (not an original) of [redacted] marriage certificate and a copy (not an original) of [redacted] birth certificate. Please forward said items onto WFO as expeditiously as possible. b6 b7C

♦♦

1325015-000-8793

Automated Serial Permanent Charge-Out
FD-5a (1-5-94)

Date: 07/15/99 Time: 08:22

Case ID: 29B-WF-171994 Serial: 821

Description of Document:

Type : EC
Date : 04/12/99
To : WASHINGTON FIELD
From : WASHINGTON FIELD
Topic: SAC AUTHORITY REQUESTED TO PAY EXPENSES OCCURRING

Reason for Permanent Charge-Out:

document was typed into wrong case id number.

Employee: [redacted] b6 b7C

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 07/20/1999

To: WFO Attn: ADIC J.C. Carter

From: WFO
C-5/NVRA
Contact: SA [redacted], 703-762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:RHM

Case ID #: ~~29B~~-WF-171994 (Pending)

Title: Hidden Interests;
Major Case # 38;
FIF; FAG;
OO:WFO

Synopsis: Request for signature of Assistant Director In-Charge J.C. Carter on S-Visa application for [redacted] b6 b7C

Details: Attached are two S-Visa applications which require the signature of ADIC J.C. Carter and the U.S. Attorney's signature.

The S-Visa applications are for [redacted] b6 b7C The [redacted] are applying for these S-Visas in conjunction with an S-Visa submitted by [redacted] is currently in prison in the United States as a result of his plea in the above captioned matter. [redacted] is applying for the S-Visa in order that he may stay in the United States upon release from prison. [redacted] plead and then was sentenced in the BCCI investigation. Since his sentencing [redacted] has been cooperating in identifying assets of BCCI which are then forfeited.

[redacted] should be able to continue to assist in identifying assets of BCCI. It is also anticipated that [redacted] b6 b7C would be able to provide testimony against Ghaith Pharaon, a fugitive in the BCCI investigation, should Pharaon ever be arrested and extradited to the United States. Further the Federal Reserve currently has all of Pharaon's assets in the United States frozen, it is estimated to be near 300 million. Of the 300 million the United States Government has a claim against approximately 110 million. b6 b7C

The Department of Justice, Fraud Section, has requested that the FBI be the sponsoring Law Enforcement Agency for [redacted] b6 b7C

S:\[redacted]\FMSS 2011.EC

29B-WF-171994-823

1325015-000-8795

[redacted] In addition to [redacted], his spouse [redacted] and one of his sons [redacted] who are currently living in Pakistan, are permitted to apply for an S-Visa. This is the paperwork which is being submitted at this time. [redacted] paperwork has previously been submitted and signed off on. b6 b7C

Once the S-Visa is signed it should be returned to SA [redacted], C-5, in order that it be taken to the U.S. Attorney's Office. b6 b7C

♦♦

1325015-000-8796

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

Washington DC 20535

August 2, 1999

Honorable Wilma A. Lewis
United States Attorney
District of Columbia
555 Fourth Street 5th Floor
Washington, D.C.

Dear Ms. Lewis:

Enclosed are two S-Visa applications which require the signature of the U.S. Attorney from the District of Columbia.

The applications are for [redacted]. They are the wife and son of [redacted], who is also applying for a S-Visa. [redacted] is applying for the S-Visa in order that he may stay in the United States upon release from prison. [redacted] plead and then was sentenced in the Bank of Credit and Commerce International (BCCI) investigation. Since his sentencing, [redacted] has been cooperating in identifying assets of BCCI which were then forfeited. b6 b7C

[redacted] should be able to continue to assist in identifying assets of BCCI. It is also anticipated that [redacted] would be able to provide testimony against Ghaith Pharaon, a fugitive in the BCCI investigation, should Ghaith Pharaon ever be arrested and extradited to the United States. Further, the Federal Reserve currently has all of Pharaon's assets in the United States frozen, and are estimated to be near 300 million. Of the 300 million, the United States Government has a claim against approximately 110 million. b6 b7C

The Department of Justice, Fraud Section, has requested that the Federal Bureau of Investigation (FBI) be the sponsoring Law Enforcement Agency for [redacted] Our office had previously submitted [redacted] S-Visa application for your signature. b6 b7C

H: RHM 22402-LT

1325015-000-8797

29B-WF-171994-B24

To: Honorable Wilma A. Lewis
Re: S-Visas, [redacted] b6 b7C

Please notify Special Agent [redacted] at telephone number 703/762-3416, when the application has been signed and agent [redacted] will pick-up the package from your office. b6 b7C

Thank you for your assistance in this matter.

Sincerely yours,

J.C. Carter
Assistant Director in Charge

7

By: [redacted] b6 b7C
Supervisory Special Agent

1-Addressee
1-(29B-WF-171994)
RHM:lrr
(2)

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 9/29/1999

To: WFO

From: WFO
C-5/NVRA
Contact: SA [redacted] 762-3416

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: ~~29B-WF-171994~~ (Pending)
29B-WF-171994 Sub LGT

Title: HIDDEN INTERESTS
MAJOR CASE #38

Synopsis: Creating Sub File 29B-WF-171994 Sub LGT

Details: The writer is requesting to open a sub file for the above captioned matter. This sub file will be to retain original serials which are being returned from Legats when they close their files.

♦♦

S. [redacted] FM 992721, EC

b6
b7C

29B-WF-171994-830

dgs

1325015-000-8799

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 11/30/1999

To: Criminal Investigative **Attn:** [redacted] IRU II
Washington Field **Attn:** [redacted] C-5/NVRA

From: Islamabad
Contact: [redacted] 011-92-51-2080-2205 b6 b7C

Approved By: [redacted] CR

Drafted By: [redacted] ale

Case ID #: 29B-WF-171994-833 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WFO

Synopsis: To provide WFO with requested Birth Certificate(s) and Marriage Certificate.

Reference: 29B-WF-171994 Serial 822

Enclosures: Enclosed for WFO is one (1) copy each of Register of Birth for [redacted] and Marriage Certificate for [redacted] b6 b7C

Details: Legat Islamabad (IS) regrets the delay in responding to this lead. On 8/4/99 [redacted] submitted copies of his birth certificate and an affidavit for his parents marriage to the U.S. Consulate [redacted] as requested in the referenced communication. The same documents were then forwarded to IS on 8/14/99 and are being forwarded to WFO. b6 b7C b7E

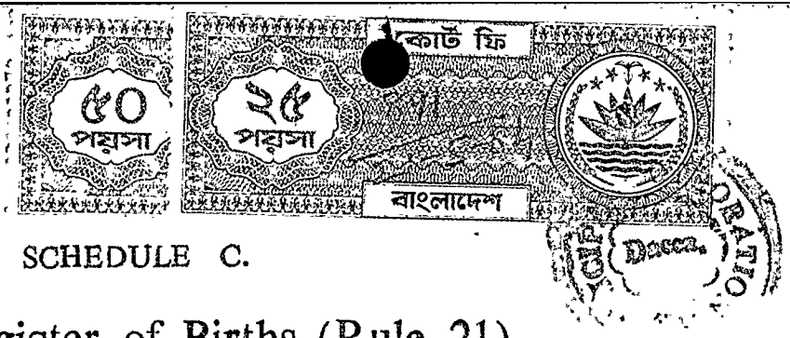
IS considers this lead covered.

♦♦

UPLOADED ACS
DATE 12/1/99

29B-WF-171994-833

1325015-000-8807



SCHEDULE C.

Extract from Register of Births (Rule 21)

1. Serial No. [redacted] b6 b7C
2. No. in Register [redacted]
3. Date of birth [redacted]
4. Place of birth Dhaka Medical college Hospital. Dhaka.
5. Name, if any [redacted]
6. Sex Male.
7. Name of father [redacted] b6 b7C
8. [redacted] Late. S. Afzal Hussain Naqvi.
9. Father's residence [redacted]
10. Religion of child's father. Islam.
11. Name of Reporter of birth [redacted] (By Application)
12. When registered [redacted]
13. Remarks, if any D.C.S. Memonc 581(Ene)Rd. Dated. 20-5-84
14. Signature of the officer in charge of the Register [redacted]

Certified to be a true extract

Chief Health Officer
Dhaka Municipal Corporation Dhaka, Bangladesh

DHAKA CORPORATION Dacca.

Compared
Sulaiman
21-5-84

Dated 21-5- 1984

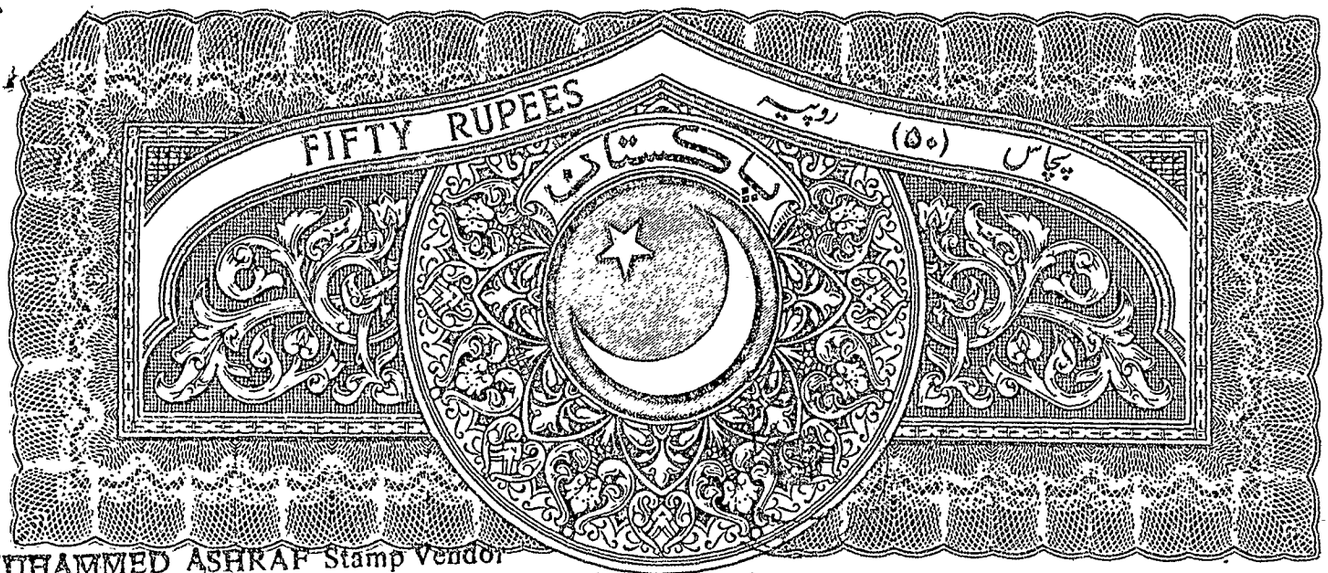
Printed by : Tip Top Press, Dhaka.

Inspector of Vaccination
&
Registerer of Birth & Death
Dhaka Municipal Corporation

1325015-000-8808

MAN

50 RS.



MUHAMMED ASHRAF Stamp Vendor
Lic. No. 10 Shop No. 6, Zaman Centre, 02 AUG 1999
Block-7,
1406
VALUE RS. 50/- ATTACHED
STAMP - VENDOR'S SIGNATURE

b6
b7C

AFFIDAVIT

I, , s/o , b6 b7C
holder of National Identity Card # resident of
Karachi, Pakistan, do
hereby solemnly state that:

1). , s/o , b6 b7C
and holder of National Identity
Card# married d/o
and holder of National Identity
Card# , on January 17,1957, at Temple
Road, Lahore Pakistan.

2). I was witness to the above marriage ceremony.

3). It was not customary to obtain a marriage certificate in those days and a such, none was obtained in this case.

4). This was the first and only marriage for , b6 b7C
whereas, this was the second
marriage for

5). had previously been married to (late) Dr. , b6 b7C
s/o from whom she
was legally divorced prior to her marriage with

6). To the best of my knowledge and belief the above statements are true and correct. b6 b7C

Signed this 2nd day of August,1999

Witness
NIC No

Witness

ATTESTED
Notary Public
Karachi Pakistan

Notary Public
Karachi Pakistan

1325015-000-8809

FD-315 (Rev. 8-16-88)

Federal Bureau of Investigation
INS Lookout Notice

INS Use Only
SDX-

Name *(Last, First, Middle)* [redacted]

Aliases *(Last, First, Middle)*

b6
b7C

Address *(Number and Street, City, State)*

Date of Birth *(Include mo, dy, yr)*	**Nationality**	**Passport**	**Reason for Lookout Notice**
[redacted]	POB: Citizenship: U.S.	Number: Country:	☐ Security/Terrorism ☐ Arrest Warrant *(explain charge)* ☐ Other Reason *(explain)*
Date of Request *(Include mo, dy, yr)*	**Cancellation Date** *(Include mo, dy, yr)*	**INS File Number**	
		A-	
Type of Request/Action	**Requesting FBI Office**	**Other Identifying Numbers**	
☐ Caution *(explain)* ☐ F-1 ☐ Place ☐ F-2 ☒ Remove ☐ F-3 ☐ Amend	Washington Field Office **FBI File Number** 29B-WF-171994	SSAN - [redacted] INS Nails # - [redacted]	

b6
b7C

Miscellaneous:

Please remove Donald Kuhn's name from the INS Lookout Notice list.

Mail To: Assistant Commissioner Inspections
Immigration and Naturalization Service
425 "Eye" Street, N.W., Washington, D.C. 20536

b6
b7C

SA [redacted] - FBI
703-762-3416 -

Faxed on 1/6/00 to
INS -

29B-WF-171994-834

1325015-000-8810

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/19/2000

To: WFO **Attn:** Evidence Room [redacted] b6 b7C

From: WFO
C-5/NVRA
Contact: SA [redacted], 762-3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: Hidden Interests;
Major Case # 38;
FIF; FAG;
OO:WFO

Synopsis: Information concerning the contents of 1B30.

Reference: [redacted] E-mail dated 1/3/00 from [redacted] to SA [redacted] b6 b7C

Enclosure(s): Copy of 29B-WF-171994 Sub H 1B30, with attachments. Copy of 'Order of Forfeiture' relating to contents of 1B30.

Details: Attached please find the documentation concerning the forfeiture of items which are referenced in 1B30 of case number 29B-WF-171994. These items appear to have been forfeited back in 1993.

♦♦

29B-WF-171994-835

S: [redacted] \FM000242.EC b6 b7C

1325015-000-8811

and have amassed a collection of over 2.5 million pieces of paper, to date, that are in my custody and control. Additionally, should it become necessary, I will provide an affidavit as to the chain of custody of the materials you provide.

As this matter is somewhat time sensitive, I would appreciate it if we could make arrangements to move the documents sometime next week. Please let me know what day would be best for you.

Thank you for your attention to this matter. Should you have any questions, please call.

Sincerely,

Richard A. Small
Special Counsel

1325015-000-8617

BOARD OF GOVERNORS
OF THE
FEDERAL RESERVE SYSTEM
WASHINGTON, D. C. 20551

DIVISION OF BANKING
SUPERVISION AND REGULATION
TELEPHONE: (202) 452-5235
FACSIMILE: (202) 736-5641

August 29, 1997

[redacted] b6 Per FBI b7C

Special Agent
Federal Bureau of Investigation
Washington Field Office
Washington, D.C.
Fax: 703-762-3420

Dear [redacted] b6 Per FBI b7C

Pursuant to our recent telephone conversation, I write with regard to the materials now in possession of the FBI that were obtained from Ghaith Pharaon during a search of his offices and residence in Savannah, Georgia.

As you may be aware, in 1996, after an extensive hearing on the merits, a $37 million penalty was assessed against Pharaon as the result of an action brought against Pharaon by the Federal Reserve. We have now begun the process of attempting to forfeit the penalty from funds that we have frozen in the United States. A federal District Judge recently allowed us to begin the proceedings that, we hope, will eventually allow us to obtain funds.

To this end, I believe that the materials in the possession of the FBI will be provide us with information that will assist in this matter. Therefore, I propose that the FBI provide the documents to us for our use in this matter. I would note, that we currently are in possession of other "Pharaon" documents that were originally in the possession of the FBI, but we turned over to us for use in our prosecution of Pharaon.

For your information, once the materials are received by us, they will be placed in a locked storage facility, within the Federal Reserve buildings in Washington. Access to this locked storage facility is limited to those individuals assisting in the Pharaon matter and controlled by me. I am in possession of the only key to this facility.

So that the record is clear, I have been accumulating, sensitive documents since the beginning of the BCCI investigation

780

FBI SEARCHED / INDEXED SERIALIZED / FILED
AUG 29 1997
FBI-WASH. METRO FIELD OFFICE
1325015-000-8616

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 5
Page 3 ~ b7A - Per Interpol;
Page 4 ~ b7A - (Per Interpol);
Page 5 ~ b7A - (Per Interpol);
Page 6 ~ b7A - (Per Interpol);
Page 7 ~ b7A - (Per Interpol);

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(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY Date: 06/05/1998

To: Rome Attn: LEGAT ROME - [redacted]
FBI Headquarters Attn: SSA [redacted] - ECU

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416

Approved By: [redacted] ECW/AFM b6 (Per FBI) b7C

Drafted By: [redacted] :rhm

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WFO

Synopsis: Fugitive GHAITH RASHAD PHARAON (aka GAITH).

ARMED AND DANGEROUS

Enclosures: Copy of "RED NOTICE" first issued 1991.
Copy of information sheet on PHARAON.
Copy of print out of a fugitive Web page.

Details: For the information of LEGAT ROME. PHARAON is a fugitive, having been indicted on bank fraud charges in the United States in 1991. PHARAON is known to live in Jiddah, Saudi Arabia and to travel throughout the Middle East and Mediteranean.

PHARAON has [redacted] b6 (Per FBI) b7C throughout the world. On the weekends of June 7, 1998 and June 14, 1998 there will be races held off the coast of Italy. The June 7th race is supposed to be held at Taranto. The June 14th race is to be held at Bari. It is believed that on occasions GHAITH PHARAON travels to [redacted] probably when GHAITH PHARAON feels safe.

[redacted] Rainbow Offshore Racing Team'. [redacted] 'Jolly motor-Ferretti' team. b6 (Per FBI) b7C

GHAITH PHARAON's means of transportation to the races is unknown. However, PHARAON often travels via his private yacht "LE PHARAON". PHARAON is known to have traveled via commercial air lines in the past. b7A (Per Interpol)

[redacted]

S:\[redacted] b6 (Per FBI) b7C RM98 1561.EC

1325015-000-8584

29B-WF-171994-774

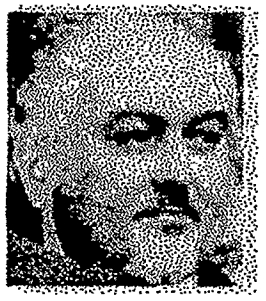
CHAITH RACHAD PHARAON
1991

International Crime Alert

b7E

WANTED BY THE U.S. FEDERAL BUREAU OF INVESTIGATION and THE INTERNAL REVENUE SERVICE

Gaith Rashad PHARAON



DESCRIPTION: Born on September 7, 1940, in Saudi Arabia, Gaith Rashad Pharaon is a white male, 175 centimeters in height and weighing 113 kilograms. He is of stocky build with thinning black hair, graying at the temples. He normally wears a small pointed beard, but has been seen with only a moustache.

Pharaon is a citizen of Saudi Arabia and travels on a Saudi passport. He speaks Arabic, French, English, and some Greek. He smokes cigars, and wears traditional Arab clothing when in Saudi Arabia. In other countries, he usually wears Western-style business attire.

Pharaon owns a yacht named "Le Pharaon" with a picture of the Egyptian Sphinx painted on the stern. Its home port is believed to be London. Since 1992, Pharaon has traveled through Europe, North Africa, the Caribbean and Latin America, and Asia.

CASE DETAILS:It was one of the largest commercial frauds and the largest bank failure in history. The fall of the Bank of Credit and Commerce International, or B. C. C. I., took almost twelve billion dollars in depositors' money and left some two hundred fifty thousand unpaid creditors around the world. Thousands of families lost their life savings in the bank's collapse. B. C. C. I. officials and their agents are charged with bribing bank regulators and central bankers in Pakistan, Nigeria, Morocco, Senegal, Tunisia, Ivory Coast, Congo, Zambia, Argentina, and Peru. In some cases, B. C. C. I. funds were used to defraud lending agencies, including the International Monetary Fund.

In the United States, B. C. C. I. illegally purchased American banks and defrauded American investors and the U. S. Government. A key

should be avoided. Should other information develop LEGAT ROME will be notified.

LEAD (s):

Set Lead 1:

ALL RECEIVING OFFICES

Through appropriate liaison contacts attempt to determine if GHAITH PHARAON and/or his yacht 'Le Pharaon' are at the boat races. If located, arrange for the arrest and detention of GHAITH PHARAON through the proper Italian Authorities. Immediately contact SA [redacted] (703-762-3000 operations center; 202-592-3964 pager). IT IS BELIEVED THAT THERE ARE WEAPONS ON BOARD THE YACHT.

b6 (Per FBI)
b7C

ARMED AND DANGEROUS

♦♦

1325015-000-8585

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 219
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Page 44 ~ b6; b7C; b7D;
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Page 46 ~ b6; b7C; b7D;
Page 47 ~ b6; b7C; b7D;
Page 48 ~ b6; b7C; b7D;
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Page 51 ~ b5; b6; b7C;
Page 52 ~ b5; b6; b7C; b7E;
Page 53 ~ b5; b6; b7C;

Page 54 ~ b5; b6; b7C;
Page 55 ~ b5; b6; b7C;
Page 78 ~ Referral/Consult;
Page 79 ~ Referral/Consult;
Page 80 ~ Referral/Consult;
Page 151 ~ Referral/Consult;
Page 152 ~ Referral/Consult;
Page 153 ~ Referral/Consult;
Page 154 ~ Referral/Consult;
Page 155 ~ Referral/Consult;
Page 156 ~ Referral/Consult;
Page 157 ~ Referral/Consult;
Page 158 ~ Referral/Consult;
Page 159 ~ Referral/Consult;
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Memorandum

To : SAC, WMFO (29B-WF-171994) (C) Date 5/11/93

From : SA [redacted] b6 b7C

Subject: [redacted]
ET AL;
FIF;
OO:WMFO

For information, on 5/12/93 SA [redacted] b3 b6 b7C
[redacted] Federal Grand Jury Subpoena. The documents were returned to [redacted] by the FBI in captioned matter.

SA [redacted] executed an FD 597 which was signed by [redacted] b6 b7C and is maintained in an FD 340.

Main
29B-WF-171994-601

1- WMFO (29B-WF-171994)
DCR/dcr

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MAY 13 [illegible]
FBI - WASH. METRO FIELD OFFICE

1325015-000-8969

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date /10/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Attached is a copy of a [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

1-WMFO (Att. 1)

JNR:jnr
(1)

29B-WF-171994 Main - 602

SSA [redacted] b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUN 1 6 1993
FBI — [redacted] OFFICE

1325015-000-8970

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 6/10/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Attached is a 6-page document, captioned "Areas of Inquiry for [redacted] which contains proposed [redacted] b6 b7C b7D b7E

to FBIHQ FIFU SSA [redacted] DOJ Attorney [redacted] Denver SA John [redacted] Tampa AUSA [redacted] and Tampa SA [redacted] They were also discussed, in part, with LA SA [redacted] on 6/9/93. Assuming no problems arise with the review and [redacted]

1-WMFO (att. 1)

JNR:jnr
(1)

SSA [redacted] b6 b7C

29B-WF-171994 Main -603

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SERIALIZED [redacted] FILED [redacted]
JUN 1 [illegible] 1993
FBI — [illegible] FIELD OFFICE

1325015-000-9015

Memorandum

To : SAC, WMFO (66-5859) Date 6/11/93
TSS

From : SSA [redacted] b6 b7C
C-5 (BCCI)

Subject: ALARM SYSTEM;
REDESIGNATION OF RESPONDENTS;
ACCOUNT #538
500-1ST STREET, NW
WASHINGTON, D.C.

Effective immediately, due to the fact that BCCI-case personnel no longer occupy or even regularly use the captioned offsite, the following names should be removed from the list of designated respondents to offsite alarm account #538:

SSA [redacted] b6 b7C
SA
SA

Currently, the space is being used by personnel working on matters assigned to WMFO NVMRA Squads C-8 and C-14.

4-WMFO
(1-66-5859)
(1-SSA [redacted] b6 b7C
(1-SSA
(1-29B-WF-171994)

JNR:jnr
(4)

29B-WF-171994 Main -604

SSA [redacted] b6 b7C

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JUN 1 1 1993
FBI — [redacted]

62-125015-000-9022

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI C-5) Date 6/11/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

The purpose of this memorandum is to summarize my 6/3/93 discussion with DOJ Attorney/Advisor [redacted] and what has occurred since. b6 b7C

We discussed prospective questions to submit to the [redacted] ongoing debriefing of [redacted] b6 b7C b7D

[redacted] for [redacted] relating to the captioned matter, was sent to FBIHQ, DOJ, FBI Tampa and Denver, and to the USA, Middle District of Florida, where [redacted]

On 6/10/93, MDF AUSA [redacted] called to say he had received, reviewed and approved of my list of questions for [redacted] b6 b7C b7D

[redacted] per AUSA [redacted] is being only partially truthful (I agree), particularly with regard to questions about the relationship between Capcom and BCCI. She reasons that, if [redacted] tells the truth, i.e., that Capcom was just another arm of BCCI, then the liquidator can look to Capcom for money and records.

On 6/3/93, A/A [redacted] related a conversation he recently had with Wall Street Journal [redacted] in which he was told that [redacted] had provided FBIHQ SSA [redacted] b6 b7C

(1) WMFO

JNR:jnr (1)

SSA [redacted]
SA [redacted]
SA [redacted]

29B-WF-171994 Main-605

SEARCHED [redacted] INDEXED [redacted]
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FBI — [redacted]

b6 b7C

1325015-000-9023

[redacted] with a copy of a 1986 document, purporting to be a proposal from [redacted] On 6/3/93, I contacted SSA [redacted] and learned that he had received such a document from [redacted] several months earlier and had turned it over to SA [redacted] on the BCCI Squad. b6 b7C

A/A [redacted] also heard from [redacted] had very recently been subpoenaed by the Senate Ethics Committee, apparently in re the committee's inquiry into whether [redacted] was bribed on behalf of BCCI by MOHAMMED M. HAMMOUD. On 6/4/93, I informed DOJ Fraud Section Trial Attorney [redacted] of what A/A [redacted] had said, and asked her if, as part of the [redacted] investigation (our Lead #45), she had sought the cooperation of the Ethics Committee. She responded that, as of 6/2/93, DOJ's Office of Legislative Affairs was finalizing a letter to the committee, requesting access to its witnesses and records. TA [redacted] also said she had requested that SA [redacted] analyze a "small amount" of subpoenaed Senate Credit Union records on [redacted] account, which, she says, appear to show several, large wire-transfers to that account from BCCI. b6 b7C

Next, in re Lead #73 (which seeks to determine what, if any, role BCCI played in the "Iran-Contra Affair"), we agreed to continue--and hopefully complete--our review of records at [redacted] during the week of June 14-18, 1993. Subsequently, I arranged wit [redacted] that A/A [redacted] and I will come there on 6/15/93. The [redacted] is researching a list of BCCI-related names we gave them to determine if any were "targets" of [redacted] collections. b6 b7C b7E

Also with regard to Lead #73, A/A [redacted] reported having learned from the OIC that the OIC had been unsuccessful in tracing the source of [redacted] money any further than its coming from BCCI/Monaco. I agreed to send a request to the liquidator, via the [redacted] to determine if the records of BCCI/Monaco are available. On 6/8/93, a letter with that request was sent. b6 b7C b7D

In anticipation of the possible travel of GHAITH PHARAON to Amman, Jordan, on 6/7/93, A/A [redacted] called DOJ OIA attorney [redacted] during our meeting to request that a reminder of the U.S.' interest in his capture and prosecution be passed to the Jordanian foreign ministry. [redacted] said she was aware that a diplomatic note--requesting Jordan to expel PHARAON if he should come there--had been passed to Jordan's foreign minister prior to PHARAON's last scheduled visit. She assured us that DOJ OIA would request the State Department to follow up with a reminder. As you will recall, 6/7/93 came and went in Jordan, but apparently PHARAON did not. As of 6/9/93, Legat Rome was b6 b7C

1325015-000-9024

still attempting to gather more information on what happened in Amman on 6/7/93; but it appears that the American Embassy's efforts to monitor the situation were stymied by several factors: the judge hearing the Jordanian civil case against PHARAON was away on a pilgrammage to Mecca, and had transferred the case to an unknown place; the "whole government" in Jordan had changed in the last ten days, leaving the U.S. ambassador to deal with a new, uninformed group of officials; and the added confusion of the Regional Security staff trying to deal with a death threat against the ambassador.

On 6/3/93, I informed A/A [redacted] of Legat Hong Kong's [redacted] b6 b7C b7D b7E

Laurence A. Urgenson has on his desk and is considering [redacted] request for a dismissal of the MDF charges, but is waiting "until all U.S. interests have been satisfied" before acting on the request. A/A [redacted] and I agreed that we should interview [redacted] at the earliest opportunity, at least about: his knowledge of and participation in the workings of the "inner circle" of BCCI management, otherwise known as ABEDI's "kitchen cabinet"; corruption matters; BCCI's role in intelligence-community activities; and [redacted] ability and willingness to approach ABEDI to ascertain whether ABEDI would consider a deal with the U.S., such as, immunity in the U.S. in return for complete cooperation regarding any U.S. subjects. A/A [redacted] says that, according to [redacted] is still close to ABEDI and could act as a facilitator for the U.S.

We also discussed and agreed that we should interview [redacted] when he has completed testifying in NY (which should occur sometime within the next two weeks). The purpose for the interview would be to ascertain [redacted] knowledge on the remaining areas of concern in the captioned matter, i.e., BCCI-related federal violations by U.S. citizens. b6 b7C

1325015-000-902

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 6/18/93

From : SSA [redacted] (BCCI C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

On this date, the following Bell Atlantic Pagers, which originally were issued to be used by the agents assigned to captioned matter, were turned in to TSS Technical Specialist [redacted] as they are no longer required: b6 b7C

[redacted]

2-WMFO
(1-TSS)
(1-29B-WF-171994 MAIN)

JNR:jnr
(2)

29BWF-171994 Main — 6006

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JUN 13 1993
FBI — WASH. FIELD OFFICE

1325015-000-9026

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 7/16/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

The purpose of this memorandum is to summarize recent events in the captioned matter.

DOJ Attorney/Advisor [redacted] informed me on 7/12/93 that a hearing would take place before Judge Joyce Hens Green at 2:00 p.m., 7/13/93, in U.S. District Court, WDC, on motions relating to the disbursement of funds in the trust holding FAB, et al. [redacted] trustee, have told ADAAG Urgenson and A/A [redacted] that they want to wait for the outcome of this hearing before allowing anyone to examine the documents on which the civil RICO suit recently filed by the FAB shareholders is based. b6 b7C

A/A [redacted] further reported that, during his review of [redacted] records for discovery in the New York case, he has found some information which relates to BCCI's participation in the "Iran/Contra Affair" and which may be of investigative interest in the captioned matter. When he completes the writing of the status report on which he is currently working for ADAAG Urgenson (to use in briefing the incoming AAG), we will review the [redacted] records. I reminded A/A [redacted] that, unless there is a discernable tie to the captioned matter, any investigation predicated by the information would be handled as a separate matter. b6 b7C b7E

With regard to our inquiry into whether BCCI had anything other than a passive role in the "Iran/Contra Affair" (i.e., Lead #73), A/A [redacted] and I plan to complete it by interviewing [redacted] and by finishing the reviewing of [redacted] documents. The interview of North should occur next week. b6 b7C b7E

The hearing on 7/13/93 was mainly on the motion filed

(1)-WMFO

JNR:jnr
(1)

ASAC Thompson

SSA [redacted]

29B-WF-171994 Main 607

b6 b7C

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SERIALIZED [redacted] FILED [redacted]
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FBI — WASH. FIELD OFFICE

1825015-000-9027

by attorneys for Sheik ZAYED, et al, who, in seeking distribution of the proceeds of the sale of FAB, have petitioned the court to intercede by ordering the "clarification of the application for the trust agreement," i.e., by setting criteria for the trustee to use in deciding what debts FAB has are "bona fide" and to not independently investigate those debts. Under the terms of the trust agreement, "bona fide debts" are to be identified by the trustee, and are due and payable when he does so.

With regard to the ongoing attempt to gain the assistance of the Jordanians in apprehending GHAITH RACHAD PHARAON, a call to Legat Rome on 7/16/93 to ascertain whether PHARAON had appeared in court in Amman as scheduled on 7/14/93 was unproductive: the Legat had heard nothing. Legat [redacted] said he would check with the RSO and report by 7/19/93. b6 b7C

1325015-000-9028

Memorandum

To : [redacted] Attorney/Advisor DOJ

Date 7/30/93

b6
b7C

From : SA [redacted]

Subject: BCCI NOMINEES

Pursuant to our recent discussions about including, in the "things-to-be-done" section of your upcoming report, a subsection on seeking prosecution of certain BCCI nominees, please consider the following:

The FBI believes sufficient evidence is already in hand or is known to exist to require and support prosecution of certain individuals or corporate entities which served as nominees for BCCI in its admitted RICO scheme. Based on the precedent set in the pleas of BCCI-nominees [redacted] -i.e., each of them, or a corporation each controlled, plead guilty to one minor fraud count, and was sentenced to pay a multi-million-dollar fine--the FBI believes that the U.S. should seek indictments of, or in lieu of that, negotiate pleas with:

b6
b7C

[redacted]

[*In early-1993, sought negotiations with DANY.]
[**Counsel (U.S.?) approached USAO, Washington, D.C., sometime in the first half of 1991, offering to negotiate. The offer was declined on the basis of the U.S. having too little knowledge of the facts to make an informed decision.]
[+Confidential-source information indicates nominee willing to negotiate on the same basis as [redacted]

b6
b7C

1-Addressee
(1)-29B-WF-171994
JNR:jnr
(2)

29B-WF-171994 Main - 608

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SERIALIZED [redacted] FILED [redacted]
[illegible] 2 1993
FBI — [illegible]

1225015-000-9029

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 8/9/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Re: WF airtel to NY, 8/10/93 (copy attached); My memo, dated 4/9/93 (copy attached).

PURPOSE:

[redacted] b7D

DETAILS:

Several weeks ago, DOJ Attorney/Advisor [redacted] and I began discussing ways of resolving the various, outstanding issues in the captioned matter. One such issue, the capturing and prosecution of extraterritorial fugitives--e.g., BCCI's founder and chairman, AGHA HASAN ABEDI--was seen as particularly troublesome. ABEDI, a Pakistani, who, in 1988, reportedly suffered a heart attack and, later, a stroke, is living in Pakistan and is in poor health. It is apparent from the lack of any response to DOJ's overtures that Pakistan has no interest in, or intention of, extraditing him to face the charges brought against him anywhere, including those in the 11/15/91 RICO indictment in Washington, D.C. b6 b7C

It should be recalled that WMFO and DOJ are in total agreement that further investigative efforts in the captioned matter should be directed at three goals: identification and prosecution of U.S. citizens, or others, who participated in BCCI's illegal activities in the U.S.; mounting successful

(2)-WMFO (att. 2)
(1-29B-WF-171994 MAIN)

JNR:jnr
(2)

ASAC THOMPSON

29B-WF-171994 Main-609

[redacted] b6 b7C

139-5015-000-9050

prosecutions of those already charged; and the identification and forfeiture of any of BCCI's U.S. assets. In attempting to reconcile the ABEDI-situation with those stated goals, A/A [redacted] and I agreed that consideration should be given to approaching ABEDI to see if he would be interested in giving a proffer on which an offer to negotiate a plea and his cooperation might be based. b6 b7C

[redacted] b6 b7C b7D

[redacted] to the FBI [redacted] and to WMFO relating to the captioned matter almost from its beginning--as set forth in the referenced memorandum: to use [redacted]

One of [redacted] (protect), [redacted] As set forth in the referenced memorandum, [redacted] b6 b7C b7D b7E

[redacted] b6 b7C b7D

[redacted] with FBIHQ FIFU SSA [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

1325015-000-9031

[redacted] b7D

[redacted] b6 b7C b7D

In our presence, [redacted] b7D

[redacted]

[redacted] b7D

As shown in the attached insert, on 8/8/93, [redacted] b7D

[redacted]

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

Based on the foregoing, SSA [redacted] (formerly the co-case agent on the captioned matter) and I have formulated a relatively-simple way to [redacted] b6 b7C b7D The plan would take into account several factors which we believe demand consideration:

(1) The above-stated goals for the captioned matter.

(2) The history of this case: arranging for and taking proffers from subjects and important witnesses has been a turbulent process, at best, due to the number of competing interests and attorneys and "investigators" involved, e.g., the Federal Reserve; District Attorney NY; USAs in Florida, Georgia, California, and WDC, not to mention our own DOJ Fraud Section; the British and the French.

(3) The need to protect sources and methods: this

plan, if implemented, would strictly be an FBI operation, which would involve the use of two Bureau informants and two Bureau agents, operating internationally and, to a certain degree, clandestinely, in a potentially dangerous situation.

(4) [redacted] b7D b7E

[redacted]

PROPOSAL:

With your concurrence and assistance:

(1) Consistent with the already-established line of communication with the lead prosecutor in the captioned matter (Acting Deputy Assistant Attorney General Laurence A. Urgenson), a letter would be sent to the Attorney General, through the Assistant AG for the Criminal Division, seeking DOJ support and authorization for the FBI (WMFO) to unilaterally implement a plan b7D b7E

[redacted]

(2) On receipt of an affirmative DOJ response, FBIHQ would be asked to approve and help to finance implementation, by SSA [redacted] and me, of the following plan: b6 b7C

(a) Through the influence and auspices of [redacted] SSA [redacted] and I would obtain multiple-entry visas for business-purposes, to be used in conjunction with our civilian passports. b6 b7C

(b) On or about 10/7/93 [redacted] would travel to [redacted] b6 b7C b7D b7E

[redacted]

1325015-000-9034

(c) On or about 10/9/93, [redacted]

b6
b7C
b7D
b7E

(d) On or about 10/11/93, SSA [redacted] and I would arrive [redacted]

b6
b7C
b7D

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 8/10/93

TO : ADIC, NEW YORK [redacted] b7D

FROM : SAC, WMFO (C-5 BCCI)

SUBJECT : [redacted]

Enclosed for NYO are an FD-209, with an insert attached, along with a second copy of the insert, all reporting information WMFO received directly from the captioned source in relation to "HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO" (29B-WF-171994), i.e., the BCCI investigation, between 7/15/93 and 8/8/93.

Enclosed for FBIHQ, for information, is one copy of an insert reporting information WMFO received from [redacted] b7D between 7/15/93 and 8/8/93.

ADMINISTRATIVE

On 8/4/93, [redacted] b7D b7E

2-NY (Enc. 2)
1-FBIHQ (Enc. 1)
1-WMFO

JNR:jnr
(4)

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-9036

FD-209 (Rev. 5-22-90)

Memorandum

To : SAC NEW YORK [redacted] Date 8/10/93

From : SA [redacted] (WMFO)

Subject: [redacted]

b6
b7C
b7D

Dates of Contact
7/15/93; 7/19/93; 7/28/93; 8/4/93; 8/8/93

File #s on which contacted (Use Titles if File #s not available)
29B-WF-171994

Purpose and results of contact

- [ ] NEGATIVE
- [X] POSITIVE
- [ ] STATISTIC

Description of Statistical Accomplishment	Title of Case	File No.

Information herein obtained confidentially; informant's name is not to be disclosed in a report or otherwise unless it has been decided definitely that this person is to be a witness in a trial or hearing.

PERSONAL DATA

JNR:jnr
(2)

1325015-000-9037

29B-WF-171994
JNR:jnr
1

HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On 7/15/93, [redacted] telephonically reported the following to WMFO SA [redacted]

b6
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[redacted]

b6
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[redacted]

On 7/19/93, [redacted]

b6
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[redacted]

On 7/28/93, [redacted]

b6
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[redacted]

On 8/4/93, [redacted]

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b7D

[redacted]

On 8/8/93 [redacted]

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b7C
b7D

[redacted]

29B-WF-171994
JNR:jnr
2

b6
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b7D

Memorandum

To : SAC, WMFO [redacted] Date 4/9/93

From : SSA [redacted] (C-5 BCCI)

Subject: [redacted]

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PURPOSE

The purpose of this memorandum is to support a request [redacted] "HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO" (i.e., the BCCI investigation).

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DETAILS

[redacted]

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(X)

Currently, MC #38 is at a point where singular, inside information is required to identify, investigate and prosecute any U.S. citizens, who were/are culpable in any illegal, BCCI-related activities. Also at this time, MC #38 has several fugitives, all foreign nationals, who could provide such inside information and whose capture and presentation for U.S. trial is, at best, problematic. These fugitives include: AGHA HASAN ABEDI, the founder and chairman of BCCI, who reportedly is in extremely poor health in his native Pakistan; [redacted] a Pakistani who [redacted] BCCI, who presently is being detained in Abu Dhabi, by order of its ruler, SHEIK ZAYED BIN SULTAN AL-NAHYAN; GHAITH RACHAD PHARAON, a Saudi Arabian, who was a major BCCI nominee and whose exact whereabouts are unknown; and

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(2) WMFO (1) - 29B-WF-171944)

JNR:jnr [redacted]
(2)

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29B-WF-171944 Main -599

SEARCHED [redacted] INDEXED [redacted]
FILED [redacted]

1993

FBI [redacted] OFFICE

Approved 4/13/93 DMB/MM

1825015-000-9040

[redacted] b7D

[redacted] another Pakistani, who was a BCCI [redacted] b6 b7C
[redacted] National Bank of Georgia.

There are also two witnesses--both Pakistanis and, therefore, for all intents and purposes, unavailable--who are either known or believed to possess very valuable information, some of which is immediately needed in the New York trial of [redacted] b6 b7C
[redacted] BCCI [redacted] SHEIK ZAYED's Department of Private Affairs as a finacial advisor, and who was present when BCCI's plot to acquire a U.S. bank was hatched, as well as later, when a BCCI nominee was coached to lie to U.S. regulators about BCCI's role in the acquisition.

In recent days, [redacted] b7D
[redacted]

[redacted] b6 b7C b7D

Deputy Assistant Attorney General Laurence A. Urgenson, DOJ, very recently stated that, in his opinion, the U.S. should expend its resources in discovering and prosecuting culpable U.S. citizens; that, given the distinct possibility that none of the foreign fugitives will ever appear here, it may be preferable to negotiate deals with them in return for cooperation. In that context, DAAG Urgenson said he would certainly value the cooperation of ABEDI and/or [redacted] if it were offered. b6 b7C

[redacted] b7D

1325015-000-9041

[redacted]

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[redacted]

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b7E

RECOMMENDATION

Based on the foregoing, [redacted]

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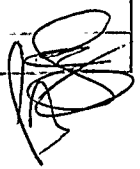
[redacted]

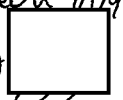
1325015-000-9042

29B-WF-171 994 Main - 610 (X)

See See



Rec'd 9/1/93 from



b6
b7C

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 9/1/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

The purpose of this communication is to advise the WMFO Security Office that DOJ Attorney/Advisor [redacted] will be working with Squad C-5, in WMFO space, on the captioned matter for an indeterminate period. b6 b7C

2-WMFO
(1-Security Office)
(1-29B-WF-171994 Main)

JNR:jnr
(2)

29B-WF-171994 Main - 611

1325015-000-9047

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 9/21/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

The purpose of this memorandum is to update you on the status of the prospective travel to Abu Dhabi to interview witnesses and review records in captioned matter.

On 8/25/93, AUSA [redacted] (currently on 1-year, DOJ detail to the U.S. Embassy in London, where she has primarily been working with the [redacted] b6 b7C b7D

[redacted]

On 9/7/93, DOJ Attorney/Advisor (A/A) [redacted] reported that Abu Dhabi, through its U.S. counsel, PATTON BOGGS & BLOW (PB&B), has requested further information from DOJ Acting Deputy Assistant Attorney General (ADAAG) Laurence A. Urgenson on who would be coming there and what they would be seeking. (ADAAG Urgenson's consistent reply to this same question has been that we want unconditional access to all records and witnesses--i.e., the detainees. The issue ADAAG Urgenson has delineated as critical in the U.S. dealing with Abu Dhabi is one of culpability: Should the U.S. view Abu Dhabi's ruler, as well as some of its officials and institutions, as BCCI's conspirators or victims? b6 b7C

On 9/20/93, AUSA [redacted] said she had asked [redacted] b6 b7C

1-WMFO

29B-WF-171994 MAIN -612

JNR:jnr
(1)

[redacted]

1325015-000-9048

[redacted] b6 b7C b7D

whether a copy of the S&S "list" of documents in Abu Dhabi was available, but was told that S&S had said that the negotiations in New York (between DOJ, DANY, the FED and PB&B) would produce the same type of result. [redacted] in Abu Dhabi at the time, also said that the [redacted]

On 9/21/93, A/A [redacted] reported that ADAAG Urgenson has a meeting scheduled with DANY and PB&B on 9/22/93, on the question of dealing with Abu Dhabi. As far as A/A [redacted] knows, ADAAG Urgenson's position remains the same: the primary purpose for which law enforcement officials, e.g., the FBI, would go to Abu Dhabi would be to interview the detainees and other witnesses. If, from those interviews, it became likely that evidence of criminal acts or forfeitable assets was present in the BCCI documents currently located there, then a review of only relevant documents would occur--neither DOJ nor the FBI is contemplating doing a general review of all the BCCI records currently in Abu Dhabi. b6 b7C

1325015-000-9049

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 8/25/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Re my memo of 8/24/93.

The purpose of this memorandum is to summarize the meeting which ASAC Donald Thompson, SSA [redacted] and I had on this date with DOJ CID Acting Assistant Attorney General (AAAG) Jack Keeny, Acting Deputy AAG Laurence A. Urgenson and Attorney/Advisor [redacted] b6 b7C

AAAG Keeny and ADAAG Urgenson had reviewed A/A [redacted] 8/20/93 report on the status of the BCCI investigation. With regard to the recommendations which A/A [redacted] made in his report, it was their consensus was that, while "we (i.e., DOJ and the FBI) can't do all of them, we must do some of them." The latter included: completion of the reviews of [redacted] records and an evaluation of the results of those reviews; completion of the "European issues," i.e., the payment of costs for document-production in France, and the execution there of the searches requested in the existing, supplementary letters rogatory; interviewing detainees and reviewing documents in Abu Dhabi. b6 b7C b7E

It was generally agreed that both A/A [redacted] and I should and would be assigned full-time to the accomplishment of the remaining BCCI-related investigation. b6 b7C

A discussion ensued on the topic of how the remaining work on BCCI would be financed. ADAAG Urgenson reported that he had called the Asset Forfeiture Office that day about using proceeds from the Asset Forfeiture Fund to pay the obligation in France and to finance other investigation, e.g., a trip to Abu Dhabi. AFO's preliminary response was that the AFF could pay some, but not all, of the costs, and that the matter was still being researched. Our consensus was that all BCCI-related matters have either demonstrated or anticipated forfeiture potential, which should be a pivotal factor in AFO's decision.

1-WMFO

JNR:jnr
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SSA [redacted] b6 b7C

29B-WF-171994 Main 613 b6 b7C
SW SW

1325015-000-9050

ADAAG Urgenson reported on the status of matters relating to investigation in Abu Dhabi. DOJ's goal is to determine Abu Dhabi's culpability in the BCCI case. Accomplishment of that goal is critical to the disposition of both civil and criminal issues. The civil issues include the necessity of DOJ (1) responding to District of Columbia District Court on whether Abu Dhabi is a bona fide debtor in the dissolution of the trust which holds First American Bank, and (2) deciding whether to support or refute the FAB shareholders' RICO suit. The criminal issues include determining whether DANY can charge Abu Dhabi officials and entities. Currently, DOJ is awaiting a letter from the State Department (due 9/30/93) on the issue of "sovereign immunity," i.e., on the "prosecutability" of Abu Dhabi officials and entities.

In negotiations with counsel for Abu Dhabi, DOJ is currently demanding (1) that an index of documents in Abu Dhabi be provided; (2) that counsel be appointed for the detainees; (3) that certain documents be delivered for review to the Abu Dhabi embassy in WDC; (4) that all conditions be expeditiously met.

For its part, Abu Dhabi has offered to make the [redacted] documents and, possibly, [redacted] available. In fact, [redacted] could be extradited to the U.S. for prosecution; although it remains undecided whether DANY or DOJ would get to prosecute [redacted] first. ADAAG Urgenson's position was that, since DANY got [redacted] and CLIFFORD first, DOJ should get [redacted]. From an investigative perspective, [redacted] should be of assistance in matters, such as, political corruption (e.g., Sen. Orrin Hatch; [redacted]; the intelligence community's role vis-a-vis BCCI; and matters yet unknown. b6 b7C

On the issue of the DOJ's and FBI's participation in the prospective investigation in Abu Dhabi, ADAAG Urgenson was adamant in his view that, given the fact that both the FED and DANY will be going, DOJ "can't not go" (if for no other reason than that the authors of the Kerry Report will, at some point, want to know what DOJ did with regard to the items which Kerry identified as being worthy of further, criminal inquiry). It was agreed that it would be impractical, at best, to try to review all documents in Abu Dhabi--no matter what the actual number might be; that the roles of DOJ and the FBI there would be to first interview the detainees and (Abu Dhabi official) [redacted] and, from that exercise, to determine what, if any, documents should be sought. b6 b7C

Anticipated investigation at the [redacted] b7E

[redacted]

1325015-000-9051

ADAAG Urgenson reported having just learned from [redacted] at the FED that, on 9/2/93, [redacted] would be part of a group going to Casablanca, Morocco, to interview GHAITH RACHAD PHARAON. The group is to include an SA and AUSA from Miami on the CenTrust Savings Bank matter; [redacted] from the FED; and DOJ Fraud Section Trial Attorney [redacted] on National Bank of Georgia matters. ADAAG said he had condoned the trip on the understanding that those going had no authority to obligate or speak for DOJ in any negotiated settlement of the charges PHARAON faces. It was agreed that this was not to be a general debriefing of, or proffer from, PHARAON, as had been discussed with PHARAON's attorneys on an earlier occasion; that it was not necessary for WMFO to participate. ADAAG Urgenson was to continue negotiating for a full proffer from PHARAON.

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1325015-000-9052

FD-809a (3-26-93)

INVESTIGATIVE INFORMATION REQUEST FORM

FBI, Savannah Information Technology Center
220 East Bryan Street
Savannah, Georgia 31401
▹ Commercial Telephone or FTS: (912) 944-0824 thru 0828
▹ FAX: (912) 231-1076 and (912) 231-0974

ITC Use Only: SITC Record #: 12980
Date/Time In: 10/6 10:51 ☒ am ☐ pm
Date/Time Out: 10/7 5:20 ☒ am ☐ pm
Database(s) Used:
1. EB 5. NCIC 9.
2. IN 6. 10.
3. TRW 7. 11.
4.
Handled By:

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b7E

* faxed on 9-30-93 * NO LOCATE

TO: FBI, SAVANNAH INFORMATION TECHNOLOGY CENTER
Date: 10-5-93
Forfeiture/Seizure Related: ☐ **Type of Request:** ☐ FAX ☒ Telcal ☐ Mail **Reply:** ☒ FAX ☐ Telcal ☐ Mail
Requestor: SA (Requestor Name is Required) **Phone #:** 202-324-6408 **FAX #:** 202-324-6426 **UCFN:** 29B-WF-171994 (The UCFN (File #) is Required)
Office/RA: Tysons RA - WMFO **Precedence:** ☐ ROUTINE ☒ PRIORITY ☐ IMMEDIATE

Fugitive: ☐ Yes ☐ No NCIC Activity/Date:
CCH Conducted: ☐ Yes ☐ No Off-Line Searches Conducted:
Driver's Lic. Conducted: ☐ Yes ☐ No Subject: ☐ Yes ☐ No Vehicle: ☐ Yes ☐ No Driver's License: ☐ Yes ☐ No
Driver's License #: State: Vehicle Registration: State:

SEARCH CRITERIA (Attach additional sheets if necessary)
Name - Last: Middle:
Alias: Sex: DOB1: DOB2: / /
SSAN SSAN2: - - Spouse:

RESIDENCE
Street Address: (family address) City/State TX Zip: Phone

BUSINESS
Business Name: Street Address:
City/State: Zip: Phone: Business ID#:

CHECK DESIRED SEARCH PARAMETERS (please check only those that are needed)
☐ 1. Specific Information Desired National Commercial Bank of Saudi Arabia - Closed in 1992
☒ 2. Determine All Individuals Associated with Social Security Number(s)
☐ 3. Report Validity of Social Security Number
☐ 4. Employment Report (*subject to availability*) **INQUIRY WILL POST TO CONSUMER'S ACCOUNT**
☒ 5. Determine Who is Associated with Telephone Number(s)
☒ 6. Determine Address of Business/Person (__ U.S. ____, ____, ____ State(s)) possibly NY, NJ or CT
☐ 7. Determine Property Owned by Individual (__ U.S. ____, ____, ____ State(s))
☐ 8. Determine Who Owns Property Listed Above
☐ 9. Determine Who Resides at Address Listed Above
☐ 10. Determine Financial Background Info, Financial Associates/Institutions (NOT FULL CREDIT REPORTING)
☐ 11. Determine Corporate Business Info/Institutions Associated with:
(Person/Business)

Reply From: FBI, Savannah Information Technology Center (SITC)
29B-WF-171994 - 6M

Return Reply To:
SAC, WMFO / Tyson RA
Attention:

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Based on search criteria, marked records are attached:
☐ Possible Identifiable Records
☐ Other Peripheral Information
☐ Brief Synopsis of Information Found
☐ No Information Found

OCT 14 1993
FBI—WASHINGTON FIELD OFFICE

1325015-000-9053

********** TRW SOCIAL SEARCH **********
* FBI - SAVANNAH PUBLIC SOURCE INFORMATION GROUP *
* *
****

DATE: 10-05-1993 TIME: 23:07:36 SUBJECT ID: SOCIAL SEARCH

[redacted],V-04/042/3.34

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PAGE 1 DATE 10-05-93 TIME 20:10:26 PCR01 V205

SSN: [redacted]

FULL NAME/ADDRESS:

[redacted]

+++++ MORE

TSS 3097885 [redacted],V-04/042/3.34

1325015-000-9054

ABBREVIATED NAME/ADDRESS:

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NOT TO BE USED FOR CREDIT GRANTING
MAY CONTAIN INFORMATION FOR MORE THAN ONE CONSUMER

END -- TRW SOCIAL SEARCH

*** END OF REPORT ID: 10-05-1993/23:07:36 (ORN: 9) ***

********** TRANS UNION TRACE **********
* FBI - SAVANNAH PUBLIC SOURCE INFORMATION GROUP *
* *
****

DATE: 10-05-1993 TIME: 23:06:46 SUBJECT ID: TRACE

TRCE [redacted]

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TRANS UNION TRACE REPORT
FOR MKT/SUB INFILE DATE TIME
QHO2870232 15 SC 10/05/93 22:07CT
RPT ON SSN [redacted] DOB
* SOCIAL SECURITY NUMBER TRACE *
NAME/SPOUSE SSN OWNER
ADDRESS ADDR RPT DATE

[redacted]

SUBJECT
09/92

SUBJECT
02/87

SUBJECT
09/93
04/90

END OF NETWORK TRACE
COPYRIGHT 1993, TRANS UNION CORPORATION

GO
*** END OF REPORT ID: 10-05-1993/23:06:46 (ORN: 8) ***

********** EQUIFAX DTEC **********
* FBI - SAVANNAH PUBLIC SOURCE INFORMATION GROUP *
* *
****

DATE: 10-05-1993 TIME: 23:06:07 SUBJECT ID: DTEC

DTEC [redacted]

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[redacted]

END OF REPORT EQUIFAX AND AFFILIATES - 10/05/93

*** END OF REPORT ID: 10-05-1993/23:06:07 (ORN: 7) ***

LEVEL 1 - 86 OF 90 DOCUMENTS

PERSON LOCATOR

* * * THIS DATA IS FOR INFORMATION PURPOSES ONLY * * *

RESIDENT(S) APPROXIMATE BIRTH DATE

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DWELLING-TYPE: SINGLE FAMILY

HOMEOWNER PROBABILITY: CONFIRMED

YEAR RESIDENCE FIRST LISTED IN PHONE BOOK: 89

* * * U.S. CENSUS BUREAU INFORMATION * * *

MEDIAN HOME VALUE BY CENSUS TRACT: $ 277,500

Press Alt-H for Help or Alt-Q to Quit.

INVESTIGATIVE INFORMATION SERVICES

In order to help us better serve your investigative needs, please complete the following and return to:

FBI, Savannah Information Technology Center
220 East Bryan Street
Savannah, Georgia 31401

SAVANNAH ITC RECORD #: 12980 UCFN: 29B-WF-171994
ANALYST: [redacted]

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Was the information provided helpful to your investigation?

☐ YES ☐ NO

If **NO**, please let us know how we could be more helpful to your investigation:_____

ACCOMPLISHMENT(S) resulting from information:

PERSON(S): (Enter **total number** applicable to each of the following)

_____ FBI Fugitive(s) Arrested: ☐ FBI ☐ Local Date_____

_____ Local Fugitive(s) Arrested: ☐ FBI ☐ Local Date_____

_____ Subject(s) ☐ Arrested ☐ Located ☐ Identified

_____ Witness(es) ☐ Located ☐ Identified

_____ New Witness(es) ☐ Located ☐ Identified

BUSINESS(ES): (Enter **total number** applicable to each of the following)

_____ New Business(es) Identified

_____ New Business Associates/Associations Identified

_____ Financial Audit Trail(s) Enhanced

ASSET(S): (Enter **total number** applicable to each of the following)

(TYPES: C = CASH R = REAL PROPERTY P = PERSONAL PROPERTY)

_____ Asset(s) ☐ Located ☐ Identified [VALUE: _____ TYPE: ___]

_____ Asset(s) Subject to Seizure/Forfeiture [VALUE: _____ TYPE: ___]

_____ Potential Economic Loss Prevented [VALUE: _____ TYPE: ___]

OTHER: (Enter **total number** applicable to each of the following)

_____ New Case(s) Initiated

_____ New Lead(s) Generated

COMMENTS:_____

1 - Case File - [redacted]
1 - SITC

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INVESTIGATIVE INFORMATION SERVICES

In order to help us better serve your investigative needs, please complete the following and return to:

FBI, Savannah Information Technology Center
220 East Bryan Street
Savannah, Georgia 31401

SAVANNAH ITC RECORD #: 12980 UCFN: 29B-WF-171994
ANALYST: [redacted]

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Was the information provided helpful to your investigation?

☐ YES ☐ NO

If **NO**, please let us know how we could be more helpful to your investigation:_____

_____

_____

ACCOMPLISHMENT(S) resulting from information:

PERSON(S): (Enter **total number** applicable to each of the following)

_____ FBI Fugitive(s) Arrested: ☐ FBI ☐ Local Date_____

_____ Local Fugitive(s) Arrested: ☐ FBI ☐ Local Date_____

_____ Subject(s) ☐ Arrested ☐ Located ☐ Identified

_____ Witness(es) ☐ Located ☐ Identified

_____ New Witness(es) ☐ Located ☐ Identified

BUSINESS(ES): (Enter **total number** applicable to each of the following)

_____ New Business(es) Identified

_____ New Business Associates/Associations Identified

_____ Financial Audit Trail(s) Enhanced

ASSET(S): (Enter **total number** applicable to each of the following)

(TYPES: C = CASH R = REAL PROPERTY P = PERSONAL PROPERTY)

_____ Asset(s) ☐ Located ☐ Identified [VALUE: _____ TYPE: ___]

_____ Asset(s) Subject to Seizure/Forfeiture [VALUE: _____ TYPE: ___]

_____ Potential Economic Loss Prevented [VALUE: _____ TYPE: ___]

OTHER: (Enter **total number** applicable to each of the following)

_____ New Case(s) Initiated

_____ New Lead(s) Generated

COMMENTS:_____

_____

_____

1 - Case File
1 - SITC

[redacted]

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1325015-000-9060

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 10/5/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Attached is a copy of a letter from the law firm of PATTON, BOGGS & BLOW (PB&B) to DOJ, dated 9/22/93.

The purpose of this memorandum is to summarize recent meetings with DOJ.

On 9/28/93, I attended a meeting with DOJ Acting Deputy Assistant Attorney General (ADAAG) Laurence A. Urgenson; DOJ Attorney/Advisor [redacted] New York County, NY, Assistant District Attorney [redacted] and Federal Reserve Board Special Counsel [redacted] The meeting was primarily for the purpose of discussing certain issues which affect the combined approach by DOJ, DANY and the FED to BCCI-related pleas and prosecutions: b6 b7C

(1) [redacted] is technically in default on his promised, 8/93 payment of $20 million. His attorney will be contacted.

There was some discussion about how [redacted] initial payment of $15 million had been parsed out: $3 million each (to defray the costs of investigations-?!) to DOJ, DANY and the FED; $4 million in a fine; and $2 million to the world-wide liquidator, [redacted] for the victim's fund.

(2) The still-upcoming trip to Abu Dhabi; particularly:
--the (attached) letter from PB&B to DOJ, et al, which essentially says that (a) they will deliver a copy of a requested document (a memorandum by [redacted] to the Abu Dhabi embassy for our review; (b) the index to the documents is incomplete, but they're working on it...; (c) the Abu Dhabi government must be diplomatically consulted and must approve both our trip and our

1-WMFO (Att. 1)

29B-WF-171994 MAIN- 615

JNR:jnr
(1)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 7 1993
FBI — WASH. FIELD OFFICE

1325015-000-9061

examination of documents; and (d) we should be aware that "(t)he documents (we) seek and the witnesses (we) wish to interview are in most cases not within the direct control of the BCCI Majority Shareholders, who do not have the legal authority to provide this access...absent the acts of competent authorities." It should be noted that, in the propaganda put out by the "BCCI Majority Shareholders" in various media--often in the form of full-page advertisements in which they declare themselves victims of BCCI--they identify themselves as the royal family (i.e., Sheik ZAYED, et al); the Department of Private Affairs; the Abu Dhabi Investment Authority (ADIA); and the Government of Abu Dhabi. As both a gesture of good faith and a means of establishing the veracity of Abu Dhabi's insistence that it wants to cooperate, ADAAG Urgenson intends to send an all-encompassing, "civil-discovery"-type of request for records and interviews to the Abu Dhabi attorney general, independent of and in addition to any request made through PB&B.

--the date for the trip, which had been 10/16/93, is now projected for some unspecified date in early December, 1993. DOJ's stated priorities for its own people and the FBI are (1) the interviews of the detainees, including [redacted] and (2) locating and reviewing records, NOT from a general review of all 7 million-plus documents, rather, only those which are either selected from the index, or identified and described by the detainees. ADAAG Urgenson is adamant when he says that no one involved in the BCCI investigation should or will be asked to go to Abu Dhabi unless and until the document index has been received and reviewed, and believable assurances from PB&B or the government of Abu Dhabi have been received, indicating that our demands will be met. Contrary to what the attached PB&B letter says, however, [redacted] reportedly was told on the day of this meeting by PB&B attorney [redacted] that, after having been in Abu Dhabi for 15 days [redacted] had decided all was in readiness for our visit, and that our visit would not be like the recently-completed visits of the [redacted] in which the [redacted] representatives were not given any access to the detainees and only limited access to records.

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(In my estimation, based on the work to be done [interviews of most, if not all, of the 17 detainees; and review of a portion of the millions of pages of BCCI records stored there) the FBI's contingent in Abu Dhabi should include 6 SAs, who should plan to be there for about a month: [redacted] LA; [redacted] MM; [redacted] AT; and from WMFO, [redacted] and myself.)

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On 10/1/93, a meeting of what ADAAG Urgenson (who convened the meeting) called "the BCCI team" was held at the DOJ Fraud Section. The overall purpose of the meeting was to

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sufficiently assess the status of the various aspects of the BCCI investigation to enable ADAAG Urgenson to report to the members of DOJ's hierarchy who have to decide on direction and resource issues. In addition to FBIHQ FIFU Unit Chief [redacted] and SSA [redacted] and myself, DOJ-attendees included newly-appointed AAG [redacted] ADAAG Urgenson, A/A [redacted] as well as the chiefs and representatives of the Fraud Section, Asset Forfeiture Office (AFO), Civil Division, and Office of International Affairs. b6 b7C

The topics discussed related to issues remaining with regard to BCCI, including (1) criminal investigations (i.e., what A/A [redacted] and I have been doing, and matters relating to the fugitives); (2) asset forfeiture, particularly, the "L-claims" which DOJ may have to litigate, and what resources are available or would be needed in that eventuality; (3) DOJ's need to decide and declare whether Abu Dhabi was culpable in BCCI's scheme to defraud; (4) whether Saudi Arabia, due to the participation of [redacted] NATIONAL COMMERCIAL BANK in BCCI's scheme, should be pressed to participate in any "global settlement" regarding BCCI's criminal and civil liabilities; and (5) what the U.S. government's position should be vis-a-vis the civil RICO suit brought by the FIRST AMERICAN trustee against BCCI, Abu Dhabi, et al. b6 b7C

With regard to the criminal investigations, UC [redacted] SSA [redacted] and I each pointed out that the FBI's commitment of resources in BCCI-related matters should and would be dependent on the existence of discrete matters to investigate with the goal and likelihood of a federal prosecution resulting. However, I also made the point that there is a "political" side to this case, which dictates that, at some point, law enforcement must be able to say and prove that it took every logical step to discover and resolve all BCCI-related crimes in the U.S. We further made the point that it is necessary to proceed with such avenues as gathering evidence to support prosecution of the existing indictments should the government suddenly find itself with (for example) GHAITH PHARAON in custody. b6 b7C

In regard to PHARAON, the matter of the need for $100,000.00 to defray the cost of the production of records in France was discussed. It was announced that the Fraud Section had received a favorable response from the Asset Forfeiture Fund (AFF) in this regard. (A subsequent teletype from Legat, Paris confirms that OIA is seeking an invoice to pay. The making of this payment should unfreeze the French court from its position of not approving supplemental letters rogatory requesting searches of three PHARAON-related locations in France. You will be kept apprised of developments and resource needs in that matter.)

The AFO and Civil Division have been dealing with "L-

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claims" numbering in the hundreds and varying in size from a few thousand dollars to Abu Dhabi's claim, which exceeds $91 million. The total dollar-value of the 40 L-claims in which litigation is still a possibility is about $160 million. Should U.S. District Court Judge Joyce Hens Green decide to order litigation in any or all of them, investigative assistance would be required. One claim--from Bangladesh, for $4 million--is likely to be litigated (to settle out of court would set bad precedent). Presently, AFO and the Civil Division are sufficiently staffed with attorneys, but they need at least one investigator to work on the Bangladesh and Abu Dhabi claims, and on some leads "of unknown value" which may lead to other forfeitable assets. Also, the claims-period just opened for the third forfeiture order, which relates to seizures exceeding $101 million. AFF Chief Administrator Lee Radek said he sees no reason why AFF would not provide financial support for any such investigation.

It was pointed out by AFO that, if successful in defending against all claims, the AFF presently stands to receive close to a billion dollars from BCCI forfeitures. Also, the BCCI case is setting nationwide-precedent: about half of all forfeiture case-law now on the books relates to BCCI.

DOJ is faced with the task of aiding Judge Green in deciding the questions of Abu Dhabi's standing as a bona fide debtor as it relates to the dissolution of the trust holding the proceeds of the sale of FIRST AMERICAN. Also before Judge Green and, therefore, DOJ and the U.S. State Department (USDS), are questions of whether Abu Dhabi's ruler, as well as certain officials and institutions, have such special dispensations as "head-of-state" immunity from criminal prosecution, or civil immunity as it relates to the trustee's civil RICO suit. As to whether Abu Dhabi is a "majority shareholder" in FIRST AMERICAN, the FRB is charged with determining what percentage of FIRST AMERICAN was owned by BCCI--which, at present, seems to have been about 72 percent. Abu Dhabi's various claims against funds under U.S. control are for (approximately): $220 million from FIRST AMERICAN in debts; $20 million in FIRST AMERICAN stock; and $91 million in the L-claim.

As to the Abu Dhabi trip, ADAAG Urgenson said the next projected date would be in or about the first two weeks in December, 1993. However, he is adamant that no travel should occur unless and until Abu Dhabi accedes to the U.S.' demands for unconditional access to witnesses and documents. DOJ will ask the USDS to deliver a "Civil-Rule-34-type" document demand to the attorney general for Abu Dhabi. Again, one primary goal for the Abu Dhabi trip is to provide DOJ with the evidence to determine Abu Dhabi's criminal culpability and civil liability (which, obviously, is closely tied to the question of whether Abu Dhabi should be

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judged to be a bona fide debtor), and ultimately, whether and how to negotiate some "global" settlement with Abu Dhabi (and whether Saudi Arabia's participation should be sought, due to the roles [redacted] NATIONAL COMMERCIAL BANK OF SAUDI ARABIA played with BCCI). The U.S. parties to such a settlement would be DOJ, DANY and the FRB, hence the need for all of them to participate in the Abu Dhabi trip. [redacted] of FIRST AMERICAN, [redacted] has asked to be included in access to documents and interviews, citing his belief that, by virtue of his position [redacted] DOJ is working on determining his legal status; but, for the moment, it would appear that the U.S. is paying the law firm of JONES DAY REAVIS & POGUE for its representation of the trustee in the civil RICO suit, with the money coming out of the proceeds of the sale of the U.S.' asset, FIRST AMERICAN.

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Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 10/12/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On 10/4/93, AUSA Lisa [redacted] who is TDY for DOJ in [redacted] b6 b7C b7D
the last two weeks in 9/93. It should be recalled that, in mid-9/93, AUSA [redacted] reported having been told of the trip, but not of its purpose.

In Karachi, the [redacted] b6 b7C b7D
by the [redacted]

On a separate matter--the [redacted] b6 b7C b7D b7E
PRICE WATERHOUSE is culpable in BCCI's illegal acts--AUSA [redacted] I agreed to request a search of the [redacted] and to call AD Dickson with the preliminary results. If it appeared productive to do so, a formal request and a formal response would follow. On 10/6/93, I asked DOJ paralegal [redacted] to conduct the search.

1-WMFO

29B-WF-171994 MAIN- 6/6

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SERIALIZED [redacted] FILED [redacted]
OCT 12 1993
FBI — [redacted]

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FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 11/24/93

To: Lee J. Radek, Chief, Asset Forfeiture Section, DOJ
(Name and Address of USA)

From: Anthony M. Daniels, Asst. Director in Charge
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: Hidden Interests; Major Case #38
(Name of Subject) Age Sex

You are hereby advised of action authorized by Trial Attorney [redacted] b6 b7C
(AUSA or AUSA)

on information submitted by Special Agent [redacted] 11/1/93
(Name) (Date)

(Check One)

- ☐ Request further investigation
- ☐ Immediate declination
- ☐ Filing of complaint
- ☐ Presentation to Federal Grand Jury
- ☐ Filing of information
- ☒ Other

For violation of Title 18, USC, Section(s) 1952

Synopsis of case: As requested in a memorandum to SA [redacted] from TA [redacted] dated 11/1/93, the following FD-302s (one copy each) accompany this communication: b6 b7C

NAME	DATE(S)
[redacted]	10/22-23/91; 7/8/92; 8/5/92
BANK OF NEW YORK	10/2-4/91
[redacted]	5/9/91

2-Addressee (Enc. 22)
1-WMFO

JNR:jnr (3)

29B-WF-171994 Main -6/7

Searched
Serialized SW
Indexed
Filed SW

NSD25015-000-9067

NAME	DATE(S)
CONFIDENTIAL INFORMANT	5/2/91
[redacted]	3/11/92
	9/22/92
	9/5/91; 11/12/91; 1/16/92; 7/10/92
	5/1/91; 6/27/91; 3/13/92
NEW YORK GRAND JURY TRANSCRIPTS	7/19-22/92
[redacted]	7/12/91; 8/9/91
	9/17/92; 9/18/92
	5/6-7/92

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b7C

Also included:

One copy of 12/7/92 Board of Governors of the Federal Reserve System memorandum from [redacted] to File on "Review of BCCI documents at Abu Dhabi Embassy."

1325015-000-9068

29B-WF-171994
HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO
SA [redacted] Squad C-5/NVMRA b6 b7C

This matter, which is "the BCCI case," was predicated on a criminal referral form, received from the Board of Governors of the Federal Reserve System (BGFRS) in 2/91, and which alleged that, at the behest of the BANK OF CREDIT AND COMMERCE INTERNATIONAL, Americans CLARK MCADAMS CLIFFORD [redacted] and a number of foreign nominees made false statements to the BGFRS that allowed BCCI to acquire, own and control a U.S. bank holding company, which in turn owned FINANCIAL GENERAL BANKSHARES, the predecessor to FIRST AMERICAN BANKSHARES. b6 b7C

This almost-three-year, complex, multidivision, international investigation has resulted in 5 indictments, including an outstanding RICO indictment in WMFO territory; 1 arrest; 6 WMFO felony, corporate pleas/convictions, which produced forfeitures now approaching $800 million (of which almost half was cash). Currently, WMFO is pursuing three goals: successful apprehension/prosecution of those already charged; identification/-prosecution of other U.S., BCCI-related crimes and subjects; and identification/forfeiture of BCCI's U.S. assets. Toward those ends, WMFO is:

(1) after 3 foreign fugitives: AGHA HASAN ABEDI (BCCI's founder and chairman, now in Pakistan); [redacted] (BCCI's [redacted] now in Abu Dhabi); and GHAITH RACHAD PHARAON (BCCI's leading nominee, now in Saudi Arabia). With regard to ABEDI, WMFO currently is receiving a his preliminary proffer, which will form the basis for further negotiations on a plea-and-cooperation agreement. b6 b7C

(2) seeking to review records and interview witnesses in Abu Dhabi, Luxembourg, France and Pakistan. Also, a continuing review of records at the U.S. [redacted] will likely result in a BCCI-related, spinoff, OOJ investigation. b7E

(3) assisting DOJ's Asset Forfeiture Office. One aspect is seeking to use Asset Forfeiture Fund resources to cover current and future investigative costs.

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SERIALIZED [illegible] FILED [illegible]
FBI — WASH. METRO FIELD OFFICE

29B-WF-171994 Main - 618

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What really was the BCCI Entity?

BCCI was basically an international financial institution, designed and built by Pakistani bankers AGHA HASAN ABEDI and [redacted] on a foundation of OPEC capital from the UAE and Saudi Arabia; and used to rapidly build deposits on short-term, illicit transactions, i.e., money laundering and flight capital. Legitimate commercial- or investment-banking accounts formed only a small share of its actual business. The management command and control of the illicit financial, corporate structures was primarily in London, with major illegal operations being run out of and booked in Luxembourg, Panama and Grand Cayman. In 1990, BCCI's operations were consolidated in Abu Dhabi; in 1991, it was almost universally shut down.

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MEMORANDUM

TO: ADIC, WMFO (29B-WF-171994) 1/12/94

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38'
FIF; FAG;
OO: WMFO

Attached is a copy of the agreement which the U.S. Government struck with "the Abu Dhabi parties" on 1/8/94 in Geneva, Switzerland. The copy was provided by DOJ Attorney/Advisor [redacted] b6 b7C on 1/11/94.

The following is a summary of the salient points which impact on the captioned matter:

"The Abu Dhabi parties" are Sheik ZAYED; [redacted] b6 b7C the Abu Dhabi Department of Finance; Sheik ZAYED's Department of Private Affairs (DPA); the Abu Dhabi Investment Authority (ADIA); and the members of ADIA's board of directors. (Preamble)

By 4/1/94, Abu Dhabi will deliver all original, BCCI books and records in its possession, or under its control, to the "liquidating authorities," unless Abu Dhabi reaches "binding, comprehensive agreements" with such authorities. (P.1, par. #2)

The Abu Dhabi parties agree to "cooperate fully" with ongoing state and federal investigations into violations of U.S. laws, and the U.S. agrees to "assist" the law enforcement authorities of the U.A.E. in their investigation. (P.3ff, par. #3) "Cooperation" defined as using all available, legal means to produce requested records and persons, and initially includes:

(a) the so-called [redacted] private records), in the U.S., within 45 days; b6 b7C
(b) access, starting 2 weeks after 1/8/94, to all detainees and other witnesses in Abu Dhabi;
(c) immediate access to all BCCI records in Abu Dhabi;
(d) [redacted] being turned over to the U.S. within 120 days to face charges.

1-WMFO (att. 1) 29B-WF-171994 MAIN 6/8X1

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(1)

ASAC THOMPSON

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 12 1994
FBI/DOJ

SSA [redacted] OFFICIAL b6 b7C

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The Abu Dhabi parties further agreed to renounce, by 1/22/94: (P. 9ff, par. #4)

(a) claim to (approximately $93 million in) forfeited funds from ICIC INVESTMENTS;
(b) all rights, claims and indebtedness of CCAH;
(c) all right, title and interest in shares of CCAH capital stock, to allow the Fed to establish a "restitutionary fund," to benefit innocent depositors, creditors and others who suffered losses at the hands of BCCI (none of which would, at any point, revert to Abu Dhabi).

The Abu Dhabi parties are immune from further U.S. civil or criminal actions, unless the agreement is "breached" (P. 12ff, par.#8), e.g.:

(a) [redacted] or his documents are not delivered on time; b6 b7C
(b) timely access not given to records or persons in Abu Dhabi;
(c) Abu Dhabi does not renounce titles and claims, as specified.

If the Abu Dhabi parties "unintentionally" renege on the agreement to provide records and persons, the U.S. parties may demand that they be brought to the U.S. within ten days after written notification. If a "willful and intentional violation" occurs, the Abu Dhabi parties will be liable for a payment of $5 million for each violation, up to a maximum of $100 million, into the "restitutionary fund."

For its part, the FIRST AMERICAN CORPORATION trustee agrees to settle its civil RICO suit against the Abu Dhabi parties within 14 days.

To avoid the issue of "sovereign rights," members of the Abu Dhabi royal family will not be required to appear personally.

1325015-000-9072

AGREEMENT

This Agreement dated January 8, 1994, including Exhibits A-E attached hereto and incorporated by reference herein, embodies all promises, understandings, and agreements in existence among the Abu Dhabi parties (as defined below), the United States Department of Justice ("DOJ"), the New York County District Attorney's Office ("DANY"), and the Board of Governors of the Federal Reserve System ("Board"), and certain promises, understandings and agreements with First American Corporation ("FAC"), the trustee of FAC appointed by the United States District Court for the District of Columbia pursuant to the Order Appointing Trustee entered June 23, 1992 ("FAC Trustee"), and First American Bankshares, Inc. ("FAB") regarding the hereinafter described matters related to BCCI. The "Abu Dhabi parties" are the following: (i) H.H. Sheikh Zayed bin Sultan Al-Nahyan, (ii) H.H. Sheikh Khalifa bin Zayed Al-Nahyan, (iii) H.H. Sheikh Sultan bin Zayed Al-Nahyan, (iv) H.H. Sheikh Mohammed bin Zayed Al-Nahyan, (v) Abu Dhabi Department of Finance, (vi) the Department of Private Affairs of Sheikh Zayed bin Sultan Al-Nahyan ("DPA"), (vii) Abu Dhabi Investment Authority ("ADIA"), and (viii) the members of the Board of Directors of ADIA, as set forth in Exhibit A hereto.

1. This Agreement relates to a series of entities that became known as the Bank of Credit and Commerce International. These entities grew rapidly through the 1970's and 1980's under the management of Agha Hasan Abedi [redacted] and, as ultimately structured, comprised the BCCI Holdings (Luxembourg),

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S.A., Bank of Credit and Commerce International, S.A., Bank of Credit and Commerce International (Overseas) Ltd., ICIC Apex Holding, Ltd., International Credit and Commerce Company (Overseas, Ltd., and/or any one or more of either of their direct and indirect affiliates, subsidiaries, or parent companies (all of which entities are hereinafter, for purposes of this Agreement only, collectively referred to as "BCCI"). Fraud and criminal conduct were involved in the operations of BCCI, and in 1991, BCCI was closed. The illicit activities and the circumstances that led to the closure of BCCI have become known (and are referred to herein) as "the BCCI affair."

2. The Abu Dhabi parties are entering into this Agreement because of their concern for victims of the BCCI affair and in furtherance of their desire to cooperate with and to assist DOJ, DANY and Board in matters relating to the BCCI affair. In addition to their own severe financial losses, the Abu Dhabi parties recognize that numerous innocent individuals and entities worldwide have suffered substantial economic losses, and agree to cooperate further with DOJ, DANY and Board in an effort to make accountable those persons responsible for such losses. Accordingly, the Abu Dhabi parties, at their expense, shall deliver or cause to be delivered without conditions, by April 1, 1994, to designated representatives of the court-appointed liquidators of the Bank of Credit and Commerce International, S.A. in Luxembourg and in England, the court-appointed liquidators of BCCI Holdings (Luxembourg), S.A. in Luxembourg, and the court-appointed

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liquidators of the Bank of Credit and Commerce International (Overseas) Limited in the Cayman Islands ("Liquidating Authorities"), at their request, all of the original books and records of BCCI that are within their collective or individual, actual or constructive possession, custody, or control. Such delivery of documents to the Liquidating Authorities shall not be necessary if, by April 1, 1994, the Abu Dhabi parties reach binding comprehensive agreements with the Liquidating Authorities (which are conditioned only upon the Liquidating Authorities' obtaining any court approvals that they require to enter into such agreements). In the case of documents relating to or property of the United Arab Emirates branches of BCCI, it shall be sufficient for the Abu Dhabi parties to deliver copies.

3. The Abu Dhabi parties further are entering into this Agreement with the intent to and in order to cooperate fully with the ongoing investigations by United States federal and state law enforcement and regulatory agencies of violations of United States laws and regulations relating to the BCCI affair, and shall cooperate in those investigations. In addition, the Government of the United States will assist the law enforcement authorities of the United Arab Emirates with respect to the latter's ongoing investigations in connection with the BCCI affair. "Cooperate" means, in connection with the investigations of DOJ, DANY, and Board into violations of United States federal and state laws and regulations relating to the BCCI affair, (i) to use best and all available legal efforts and means to produce (or cause to be

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produced) to DOJ, DANY, and Board any investigative information that is within the control of the relevant person, entity or party, or within the custody or control of third persons, entities or parties and (ii) to use best and all available legal efforts and means, in consultation with DOJ, DANY, and Board, and to the maximum extent practicable (taking into account the legal rights and obligations of the persons concerned), to persuade and facilitate the appearance of any person requested by DOJ, DANY or Board to testify in any duly convened grand jury, court, or other criminal, investigative, or administrative proceeding, or to facilitate alternative testimonial arrangements. "Investigative information" means documents, records, tangible evidence or other information in whatever media they might exist, including, but not limited to, paper, microfilm, microfiche, computer disks or other media (but not privileged documents) relevant to the investigations by DOJ, DANY, and Board into violations of United States federal and state laws and regulations. The Abu Dhabi parties shall consider the waiver of attorney-client and work product privileges in respect of documents that might assist in the prosecutions of third parties for violations of United States federal and state laws and regulations relating to the BCCI affair, on a case-by-case basis. For the avoidance of doubt, nothing in this Agreement constitutes any contractual obligation on the part of the Abu Dhabi parties to waive any privileges. "Produce . . . investigative information" means for purposes of DOJ, DANY, or Board investigations into violations of United States federal or state

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law or regulations, (i) to grant access to investigative information to DOJ, DANY or Board, (ii) to provide copies of investigative information to DOJ, DANY, or Board, and (iii) to make available originals of investigative information, where practicable, to DOJ, DANY, or Board, all at the expense of the party or parties producing the investigative information. DOJ, DANY, and Board have no objection to the retention of copies by the Abu Dhabi parties of any documents delivered or produced under this Agreement. The custodian of any original documents under this Agreement shall provide certified copies when so requested. The cooperation of the Abu Dhabi parties in the investigations of DOJ, DANY, and Board into violations of United States federal or state law or regulations relating to the BCCI affair shall include the following:

(a) The Abu Dhabi parties shall deliver (or cause to be delivered) to Board copies of the Naqvi documents, as described in Exhibit E, at the cost and expense of the Abu Dhabi parties, within 45 days of the effective date of this Agreement; provided that in the event that copies of all Naqvi documents have not been physically able to have been copied within such 45-day period, copies of all Naqvi documents then available shall be timely delivered and copies of other Naqvi documents shall be delivered as promptly as possible thereafter.

(b) The Abu Dhabi parties acknowledge that the judicial authorities of the United Arab Emirates have the legal

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power, ability, and authority to provide access in Abu Dhabi to the former officials of BCCI that are in the custody of United Arab Emirates authorities, namely the persons set forth in Part 1 of Exhibit B hereto, in order that DOJ, DANY, or Board may speak to them, privately or in the presence of their counsel, in the United Arab Emirates, and to provide copies of all statements made or given by such persons in connection with the BCCI affair. The Abu Dhabi parties covenant and agree that they shall, commencing within fourteen days of the effective date of this Agreement, cause the judicial authorities of the United Arab Emirates to provide to DOJ, DANY and Board such access to those persons listed in Part 1 of Exhibit B and to use best and all available legal efforts to provide such access to the persons listed in Part 2 of Exhibit B.

(c) The Abu Dhabi parties covenant and agree to provide access in Abu Dhabi and shall produce (or cause to be produced) expeditiously, beginning with the effective date of this Agreement to DOJ, DANY, and Board any books and records of BCCI that are within their collective or individual, actual or constructive possession, custody, or control.

(d) In relation to investigative information not constituting the books and records of BCCI that is within the collective or individual, actual or constructive

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possession, custody, or control of the Abu Dhabi parties and in connection with the investigations of any violation of any United States federal or state law or regulation relating to the BCCI affair that are being pursued by DOJ, DANY, or Board, the Abu Dhabi parties shall (i) provide access expeditiously, beginning with the effective date of this Agreement, to DOJ, DANY and Board in Abu Dhabi and (ii) shall produce (or cause to be produced) expeditiously, beginning with the effective date of this Agreement, to DOJ, DANY and Board investigative information that is material to such investigations. To the extent that the Abu Dhabi parties dispute a DOJ, DANY, or Board request for a copy of or removal of any documents, records, tangible evidence or other information ("disputed information") that are not the books and records of BCCI, said dispute shall be submitted to the Attorney General of the United States of America and the District Attorney of the County of New York, State of New York for determination, and the concurrence of both shall be required for a finding that the disputed information is material to an investigation by DOJ, DANY, or Board of a violation of United States federal or state law or regulation.

(e) Naqvi is presently on trial in the United Arab Emirates for crimes alleged to have been committed by him, and he has also been indicted in the United States. The Abu

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Dhabi parties wish to facilitate his speedy trials. Accordingly, the Abu Dhabi parties covenant and agree that, within 120 days of the effective date of this Agreement, the Abu Dhabi parties shall deliver or cause to be delivered Naqvi to the United States to face charges there. The Abu Dhabi parties will make arrangements in accordance with United Arab Emirates law, and in consultation with DOJ, DANY and Board, for Naqvi's physical removal and transfer into the United States. At the conclusion of any United States federal and state criminal or regulatory proceedings, including service of any sentence imposed, and provided that his presence is no longer required by United States federal or state law enforcement or regulatory authorities, Naqvi will be returned by the United States to the United Arab Emirates, subject to applicable United States law and treaties. While he is in the United States, DOJ, DANY, and Board agree to make Naqvi available to the Abu Dhabi parties for interviews or depositions in the United States, subject to any legally applicable privileges under United States law.

In the event that any person should attempt by any legal process, to obtain from DOJ, DANY or Board any investigative information or other documentation provided to DOJ, DANY, or Board under this Agreement by the Abu Dhabi parties, DOJ, DANY or Board shall promptly notify the Abu Dhabi parties of such

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attempt and, with respect to such investigative information or documentation shall, to the extent permitted by law, refrain from complying with such request or process until the Abu Dhabi parties have had an opportunity to be heard and to take whatever procedural or administrative steps may be open to them to prevent production of such materials.

4. To further assist victims of the BCCI affair, the Abu Dhabi parties agree to do the following by January 22, 1994:

(a) file a notice of withdrawal of the claim submitted on or about September 8, 1992, pursuant to 18 U.S.C. section 1963(l) by DPA in connection with the forfeiture of monies of ICIC Investments Limited in connection with U.S. v. BCCI Holdings (Luxembourg), SA et al.;

(b) release, assign to the debtor, or voluntarily discharge in a manner acceptable to the debtor and the Abu Dhabi parties, all rights, claims and indebtedness of the Abu Dhabi parties arising from the following debt instruments: (1) Credit and Commerce American Holdings, N.V. ("CCAH") convertible debentures; (2) loans to CCAH; (3) loans to FAC; (4) FAB senior notes; and (5) rights in the balance of a loan from Banque Arabe et Internationale d'Investissement to FAC, as further described in Exhibit C;

(c) assign and transfer (except for voting rights, which shall remain with the registered owners but which shall be exercised only in accordance with joint instructions

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to be provided by DOJ and DANY) all right, title, and interest of the Abu Dhabi parties in the shares of capital stock of CCAH, identified in Exhibit D annexed hereto, to the Federal Reserve Bank of New York ("Reserve Bank"), as agent of Board to be used to establish a restitutionary fund pursuant to 12 U.S.C. Section 1818(b), in accordance with the terms and conditions set forth in paragraphs 5-7, infra, and provide whatever documents are necessary to accomplish such a transfer under the laws of the Netherlands Antilles, so that such CCAH shares are delivered to the Reserve Bank in good deliverable form. The Abu Dhabi parties assert that they have no legal or equitable interest in any CCAH shares of capital stock owned of record by Burford Investments, Ltd. ("Burford"), or in any Burford shares, and that they will make no claim of any interest in such shares. The Abu Dhabi parties agree, however, to assign and transfer unconditionally what interest they have, if any, in any such shares to the Reserve Bank.

5. As soon as practicable, Board shall:

(a) cause Reserve Bank to surrender the CCAH stock transferred pursuant to paragraph (4)(c), supra, in return for a pro rata distribution of cash resulting from the sale or liquidation of CCAH's subsidiaries;

(b) cause Reserve Bank to establish an account to be owned by Board to be titled "Board of Governors Account A," which

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shall be funded with the cash proceeds derived from the CCAH stock referred to in paragraph (4)(c); and

(c) cause Reserve Bank to invest the balance in Board of Governors Account A in United States Treasury Securities and/or overnight repurchase agreements for so long as there is a balance in the Board of Governors Account A. The earnings from such investments shall be credited to the Board of Governors Account A.

6. The Board shall distribute the balance in Board of Governors Account A to FAC and Liquidating Authorities, with FAC being paid first, when funds become available, in the amount of $50 million less any amount received or to be received by FAC as a result of a distribution from B/G Settlement Account No. 1 created December 24, 1993, and the balance to the Liquidating Authorities when Board receives written notice from DOJ and DANY that the following events have occurred:

(a) a binding comprehensive agreement regarding the BCCI affair has been reached between the Abu Dhabi parties and the Liquidating Authorities; and

(b) the Liquidating Authorities have established, to the satisfaction of DOJ and DANY, reasonable procedures which are consistent with the laws of the countries governing distributions by the Liquidating Authorities and are designed to assure that the recipients of funds paid from Board of Governors Account A shall be limited to innocent depositors, creditors and other persons who suffered loss

1325015-000-9083

arising from the activities of BCCI, and who did not themselves participate in criminal, illegal, or wrongful behavior in connection with the affairs of BCCI.

In the event such written notice is not received by Board on or before January 1, 1995, the balance in Board of Governors Account A shall promptly be distributed to or for the benefit of the depositors and creditors of BCCI (other than the Abu Dhabi parties) on the instructions of DOJ, DANY and Board.

7. With respect to the balance in Board of Governors Account A, the Abu Dhabi parties waive their right to receive any pro rata distribution of funds paid out of Board of Governors Account A to which they would be entitled to as a result of the liquidation of BCCI, and agree to execute any document that is reasonably requested as evidence of the waiver, provided that nothing contained in this Agreement is intended by the Abu Dhabi parties as a waiver of any claim that any of the Abu Dhabi parties may otherwise have against any company or entity that is a part of BCCI, except as set forth in paragraph 10.

8. DOJ, DANY and Board agree that none of them will seek or pursue any prosecution of, or initiate any civil or administrative proceeding against, any of the Abu Dhabi parties arising from the facts and circumstances of the BCCI affair, unless this Agreement is breached by the Abu Dhabi parties. For the purposes of this paragraph, a breach giving rise to the loss of the assurances set forth herein shall be limited to the following specific circumstances:

1325015-000-9084

a) failure timely to deliver the Naqvi documents in accordance with the provisions of paragraph 3(a);

b) failure timely to provide access to those individuals in the custody of the United Arab Emirates authorities in accordance with paragraph 3(b);

c) failure timely to deliver Naqvi pursuant to paragraph 3(e);

d) failure to satisfy the provisions of paragraph (2); and

e) failure to satisfy the provisions of paragraph 4(a) through (c).

In order to insure that the Abu Dhabi parties will satisfy the provisions of paragraphs 3(c) and 3(d) of this Agreement, the Abu Dhabi parties covenant and agree that:

a) the Foreign Minister of the Government of the United Arab Emirates will provide formal assurances to the Government of the United States that the Abu Dhabi parties will honor and perform fully and completely their obligations under paragraphs 3(c) and 3(d);

b) if the Abu Dhabi parties, individually or collectively, commit an unintentional violation of any obligation imposed by paragraphs 3(c) or 3(d) requiring the production of documents, DOJ, DANY, or Board, as the case may be, will be entitled to the delivery in the United States, if requested, of any and all investigative information described in paragraphs 3(c) or 3(d), respectively, so long as the request of DOJ, DANY, or

Board is bona fide and is for specific documents and such violation continues for ten days after receipt by the Abu Dhabi parties of written notice from DOJ, DANY or Board;

c) if the Abu Dhabi parties, individually or collectively, commit a willful and intentional violation of any commitment imposed by virtue of paragraphs 3(c) or 3(d), the Abu Dhabi parties will be liable for a payment in the nature of liquidated damages in the sum of $5 million per violation, but in no event in excess of $100 million in the aggregate, and DOJ, DANY, or Board, may enforce this covenant and agreement by an action brought before the Supreme Court of the State of New York, New York County, if the enforcing party is DANY, or by an action in the United States District Court for the District of Columbia, if the enforcing party is DOJ or Board; provided that in such an action DOJ, DANY, or Board, as the case may be, shall be required to prove the violation by clear and convincing evidence and the parties agree that if a willful and intentional violation is proved, the court shall direct the payment to the Board of Governors Account A established under paragraph 5(b) of this Agreement.

9. The parties agree to a tolling of any applicable statute of limitations as of the effective date of this Agreement, to the extent that such is within their power, as to criminal and civil

1325015-000-9086

matters or actions that may be brought by any party in accordance with the terms of this Agreement.

10. Based on information currently available, DoJ, DANY, and the Board acknowledge and confirm the bona fides of the indebtedness to the Abu Dhabi parties referenced in paragraph 4(b) of this Agreement, and FAB, FAC, and the FAC Trustee, in furtherance of this Agreement, agree not to dispute same. In exchange for the agreements and commitments made by the Abu Dhabi parties in paragraph 4 hereof, FAC and FAB agree, as provided below, to settle the civil lawsuit filed by FAC and FAB in the United States Court for the District of Columbia with respect to all of the Abu Dhabi parties. FAC, FAB and the Abu Dhabi parties agree to negotiate in good faith and to enter into a separate settlement agreement that will provide for (1) the dismissal with prejudice and without costs of that lawsuit as to the Abu Dhabi parties, and (2) customary mutual general releases as to any and all claims by the parties to this Agreement against each other and corporate affiliates, officers, directors and agents to be defined in the settlement agreement, which settlement agreement will be filed with said Court within fourteen days after the effective date of this Agreement. In addition, FAC and FAB agree to cooperate reasonably in the

1325015-000-9087

efforts of the Abu Dhabi parties to relieve the DPA of its obligations pursuant to certain outstanding indemnity agreements (and related escrow agreement). Until such settlement agreement is executed and effective, nothing contained in this paragraph 10 shall be deemed a waiver of any claim or defense that FAC, FAB or any of the Abu Dhabi parties may have against each other.

11. To avoid raising issues regarding the sovereign rights of the Abu Dhabi parties, DOJ, DANY, and Board agree that notwithstanding any other provision of this Agreement no member of the Abu Dhabi Ruling Family (the Al-Nahyan Family) will be required by DOJ, DANY, and Board to appear personally in connection with this Agreement. In addition, with respect to personal appearances by representatives of the Abu Dhabi Ruling Family or officials of the Abu Dhabi Government and the United Arab Emirates Government in connection with this Agreement, DOJ, DANY and Board agree to take into account and give consideration to the responsibilities and official duties of such persons. The Abu Dhabi parties agree to pay the costs incurred with respect to any personal appearances by representatives of the Abu Dhabi Ruling Family or officials of the Abu Dhabi Government and the United Arab Emirates Government in connection with this Agreement.

12. Any of the terms or conditions of this Agreement may be waived only in writing by the party entitled to the benefit thereof, but no such waiver shall affect or impair the right of the waiving party or parties to require observance, compliance, performance or satisfaction of any other term or condition hereof.

1325015-000-9088

13. No amendments to this Agreement shall be effective unless made in writing and signed by all parties. No representations, either orally or in writing, except those contained expressly in this Agreement, were made to induce any of the parties to enter into this Agreement. All prior negotiations, oral and written, are merged in this Agreement. Absent a breach of this Agreement, neither this Agreement nor any provision thereof or any act taken or caused to be taken by any of the parties in performance of its obligations under this Agreement shall be used by or against any of the parties or be admissible as evidence of any wrongdoing or liability by or against any of the parties in any legal or regulatory proceeding.

14. This Agreement is by way of settlement only with no adjudication of or finding on any issue of fact or law, and no party, by executing this Agreement or carrying out its terms, admits any wrongdoing or liability with respect to any allegations or claims.

15. This Agreement shall be governed by and construed in accordance with the laws of the State of New York, United States of America, and any actions under this Agreement shall be brought in the United States.

16. This Agreement may be executed in one or more identical counterparts, whether transmitted by telecopier or otherwise, each of which such counterparts when executed and delivered shall be deemed to be an original for purposes of this Agreement, but all of

the counterparts together shall constitute one and the same instrument.

17. The effective date of this Agreement shall be January 8, 1994. This Agreement shall become binding irrespective of whether or not all of the Abu Dhabi parties have executed this Agreement, provided, however, that the benefits conferred and obligations imposed by this Agreement shall not inure in favor of or bind those Abu Dhabi parties who do not execute this Agreement on or before January 15, 1994.

18. All notices, communications and requests under this Agreement shall be made to:

(a) on behalf of DOJ:

[redacted] b6 b7C
for Financial Institution Fraud
U.S. Department of Justice
Washington, DC 20530

with a copy to:
Lee J. Radek
Director of Asset Forfeiture Office
Criminal Division
U.S. Department of Justice
Washington, DC 20530

(b) on behalf of DANY:
Robert M. Morgenthau
District Attorney
New York County
One Hogan Place
New York, New York 10013

1325015-000-9090

with a copy to:

[redacted]
Assistant District Attorney
New York County District Attorney
One Hogan Place
New York, New York 10013

b6
b7C

(c) on behalf of Board:
William W. Wiles
Secretary
Board of Governors of the Federal Reserve System
Washington, DC 20551

with a copy to:
J. Virgil Mattingly, Jr.
General Counsel
Board of Governors of the Federal Reserve System
Washington, DC 20551

(d) on behalf of FAC:

[redacted]
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20006

(e) on behalf of FAC Trustee:
Harry W. Albright, Jr.
Trustee, First American Corporation
1270 Avenue of the Americas
New York, NY 10020

with a copy to:

[redacted]
Corbin Silverman & Sanseverino
805 Third Ave.
New York, NY 10022

1325015-000-9091

(f) on behalf of FAB:

[redacted]
Jones, Day, Reavis & Pogue
1450 G Street, N.W.
Washington, D.C. 20006

b6
b7C

(g) on behalf of the Abu Dhabi parties:

[redacted]
c/o 5th Floor, Chamber of Commerce Building
Abu Dhabi, United Arab Emirates

with a copy to:

[redacted]
Patton, Boggs & Blow
2550 M Street, NW
Washington, DC 20037

and

[redacted]
Simmons & Simmons
14 Dominion Street
London EC2M2RJ

19. The parties hereto agree to consult with each other in advance of any publication of or relating to this Agreement or any of its terms as to the nature, form and timing of such publicity.

Dated:

b6
b7C

by [redacted]

1/8/94
Date

Special Counsel for Financial
Institution Fraud on behalf of the
United States Department of Justice

by [redacted]

1/8/94
Date

Assistant District Attorney
on behalf of the New York County
District Attorney

by William W. Wiles

1/7/94
Date

William W. Wiles
Secretary, Board of Governors
of the Federal Reserve System

1325015-000-9092

by _____ _____
Harry W. Albright, Jr. Date
FAC Trustee

by _____ _____
[redacted] Date
First American Corporation

by _____ _____
[redacted] Date
First American Bankshares, Inc.

by _____ _____
on behalf of Date
H.H. Sheikh Zayed bin Sultan Al-Nahyan

by _____ _____
on behalf of Date
H.H. Sheikh Sultan bin Zayed Al-Nahyan

by _____ _____
on behalf of Date
Department of Private Affairs of
H.H. Sheikh Zayed bin Sultan Al-Nahyan

by _____ _____
on behalf of Date
H.H. Sheikh Mohammed bin Zayed Al-Nahyan

by _____ _____
on behalf of the Date
Abu Dhabi Department of Finance

by _____ _____
on behalf of the Date
Abu Dhabi Investment Authority

by _____ _____
on behalf of Date
[redacted]

by _____
Date

by _____
Date

b6
b7C

1325015-000-9093

b6
b7C

by _____ Jan 8 1994
Harry W. Albright, Jr. Date
FAC Trustee

by [redacted] 8 January 1994
Date
First American Corporation

by [redacted] 8 January 1994
Date
First American Bankshares, Inc.

by _____
on behalf of
Sheikh Zayed bin Sultan Al-Nahyan Date

by _____
on behalf of
Sheikh Sultan bin Zayed Al-Nahyan Date

by _____
on behalf of
Department of Private Affairs of Date
Sheikh Zayed bin Sultan Al-Nahyan

by _____
on behalf of
Sheikh Mohammed bin Zayed Al-Nahyan Date

by _____
on behalf of the Date
Abu Dhabi Department of Finance

by _____
on behalf of the Date
Abu Dhabi Investment Authority

by _____
on behalf of
[redacted] Date

by _____
on behalf of
[redacted] Date

by [redacted]
Date

1325015-000-9094

by [redacted] Date

by [redacted] Date

by [redacted] Date

by [redacted] Date

by [redacted] Date 6/11/14

by [redacted] Date

b6
b7C

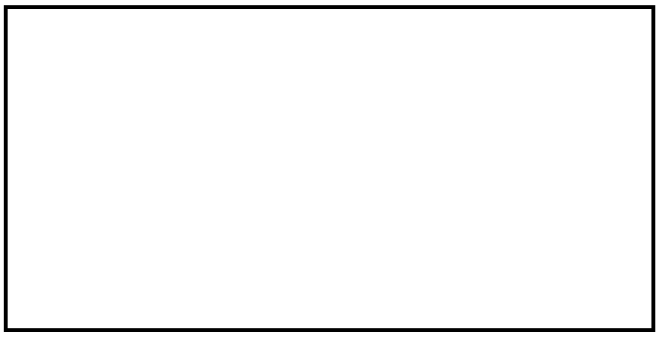
Exhibit A

Chairman H.H. Sheikh Khalifa bin Zayed Al-Nahyan
H.H. Sheikh Sultan bin Zayed Al-Nahyan
H.H. Sheikh Mohammed bin Zayed Al-Nahyan

[redacted]

b6
b7C

Exhibit B -- PART I



b6
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Exhibit B -- PART II

Exhibit C

1. Three Credit and Commerce American Holdings, N.V. ("CCAH") convertible debentures issued December 5, 1990, in the aggregate amount of $8,496,130.33.

2. Three promissory notes issued by CCAH, dated February 14, 1991, in the aggregate amount of $51,000,000.

3. Senior notes of First American Bankshares, Inc. ("FAB"), Series A-D, each dated as of December 1, 1986, as amended, in the aggregate principal amount of $81,500,000, issued pursuant to Senior Note Agreements, each dated December 1, 1986, to various purchasers.

4. Two promissory notes of First American Corporation ("FAC"), each dated as of June 26, 1991, in the aggregate principal amount of $39,150,000.

5. FAC's indebtedness under a loan agreement dated as of October 20, 1982, by and among FAC, Credit and Commerce American Investment, B.V., Banque Arabe et Internationale d'Investissement and certain other banking institutions pursuant to which a loan in the original principal amount of $50,000,000 was made to FAC.

Exhibit D

Registered Owner	Number of Shares
Abu Dhabi Investment Authority	19,141
Khalifa bin Zayed Al-Nahyan	28,741
Zayed bin Sultan Al-Nahyan	33,994

Exhibit E

b6
b7C

The [redacted] documents" referred to in paragraph 3(a) of the foregoing agreement shall mean those documents described in a letter dated November 15, 1993, from Patton, Boggs & Blow to DOJ, DANY, Board as indexed at 000073-000974.

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P)(C-5) Date 12/6/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On this date, DOJ Attorney/Advisor [redacted] b6 b7C reported he had been requested by Assistant General Counsel [redacted] b7E to provide the names and positions of anyone outside the [redacted] matters being examined by A/A [redacted] and myself. The reason for the request was that the [redacted] must give a security briefing to those individuals. The complexity of such a briefing would be determined by the level of specificity of the knowledge imparted to them.

I intend to provide A/A [redacted] with the following names b6 b7C and positions, and to inform him that (a) all briefings were very general in nature (issues were disclosed; no known sources or methods were disclosed or identified) and (b) all briefings were verbal (no documents were created).

Date Briefed	Name	Title
12/3/93	Thomas Kubic	WCC Section Chief
" " "	[redacted]	FIF Unit Chief
" " "		FIF Supervisory SA
12/6/93	Anthony Daniels	Asst. Director in Charge
" " "	John Navarrete	Sr. Asst. Special Agent in Charge
" " "	Donald Thompson	Asst. Special Agent in Charge

b6 b7C

(K)

1-WMFO

JNR:jnr
(1)

ADIC DANIELS
SASAC NAVARRETE
ASAC THOMPSON

29B-WF-171994-MAIN — 6/9

1325015-000-9101

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
March 14, 1994

[redacted] b6 b7C

Kostelanetz, Ritholz,
Tigue & Fink
80 Pine Street
New York, New York 10005

RE: [redacted] and your letter dated 2/10/94.

Dear [redacted]

Special Agent [redacted] of our office, has advised me b6 b7C
that the investigation of [redacted] is continuing.
Therefore, we are unable to comply with your request of February
10, 1994.

Sincerely,

Anthony E. Daniels
Assistant Director in Charge

By: [redacted] b6 b7C
Supervisory Special Agent

1-Addressee
1-29B-WF-171994 (Main)
1-29B-WF-171994 Sub W

620

29B-WF-171994 main

Searched
Serialized
Indexed
Filed

1325015-000-9102

Memorandum

To : ADIC, WMFO [redacted] Date 1/4/94

From : SA [redacted] (C-5) b6 b7C b7D

Subject: [redacted]

PURPOSE

[redacted] b7D

investigation captioned, "HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO: WMFO" (29B-WF-171994).

DETAILS

During the delineated period, [redacted] b7D

[redacted]

(1) [redacted] b7D

[redacted]

(2) With the concurrence of WMFO, FBIHQ and DOJ [redacted] b7D

[redacted]

1-WMFO [redacted] b7D

JNR:jnr
(1)

SSA [redacted] b6 b7C

ASAC THOMPSON

1325015-000-9103

[redacted] b7D

[redacted] b7D

[redacted] b7D
b7E

[redacted] b7D
b7E

DOJ Attorney/Advisor [redacted] b6
b7C
b7E

DWT (11/93)

___ ADIC DANIELS
___ AA [redacted]
___ ASAC NAVARRETE
___ SECRY [redacted]
___ ASAC DE SARNO

___ ASAC KELSO

___ ASAC WONG

___ ASAC LEWIS

___ A-4 SSA
___ A-5 SSA [redacted]
___ A-6 SSA
___ MEDIA OFFICE
___ TRAINING OFFICE

___ _____

___ C-2 ___ C-9
___ C-5 ___ C-14
___ C-7 ___ C-17
___ C-8 ___ C-20

DATE _____

___ OSM [redacted] b6
___ AOSM [redacted] b7C
___ SECRY [redacted]

___ See Me/Call Me
___ Initial & Return
___ Take Action/Handle
___ For Your Approval
___ For Your Information
___ For Your Comments
___ See Attached
___ As You requested
___ See Reverse Side
___ Advise Status

___ **DEADLINE** _____

[redacted] b7D

ATTENTION:

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

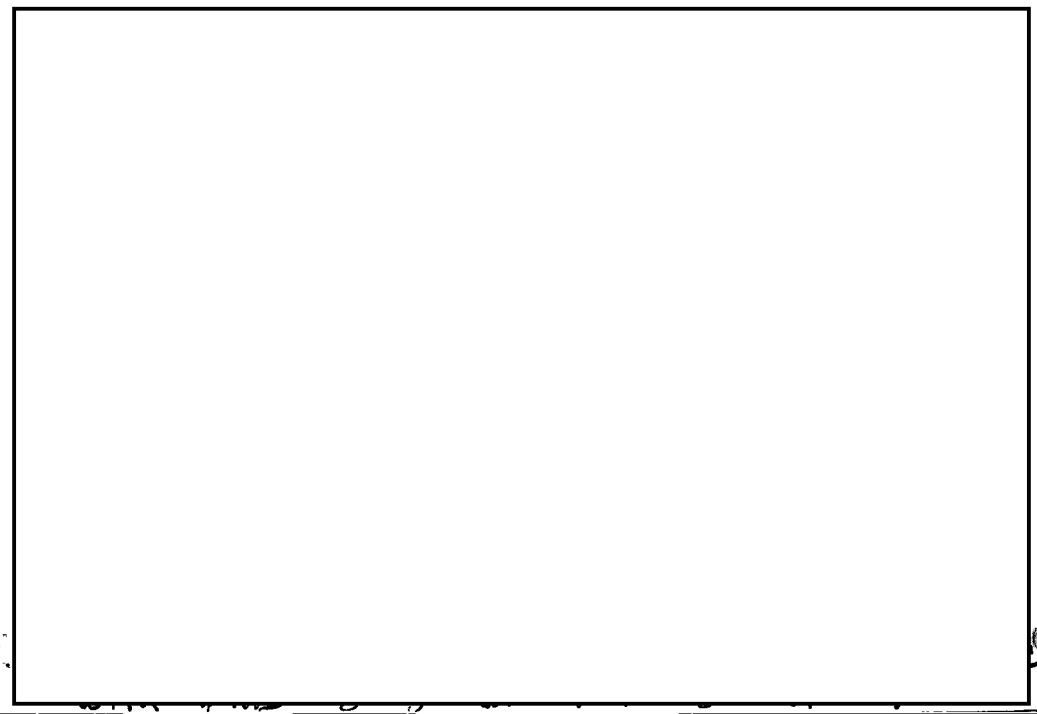
b6
b7C
b7D

[redacted] FIELD OFFICE

[redacted]

[redacted]

b6
b7C
b7D



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
May 10, 1994

Lt. Col. Charles W. Beadling, M.D.
BOQ 11, Room 275
8901 Wisconsin Avenue
Bethesda, MD 20889

Dear Dr. Beadling,

Enclosed is a "BCCI Squad" patch, which we hope you will accept both as a memento of your recent trip to Abu Dhabi with us and as a small token of our appreciation for the assistance you most ably and professionally rendered in our transporting of [redacted] to the U.S. Due in no small measure to the part you played, the trip came off without a hitch and we now have in custody and are able to prosecute one of the most integral participants in the largest bank fraud in history. b6 b7C

Thank you again for your help. Do not hesitate to call on us if there is some way in which we can reciprocate.

Very truly yours,

Anthony E. Daniels
Assistant Director in Charge

(K)

by: [redacted] b6 b7C
Supervisory Special Agent

1 - Addressee (Enc 1)
1 - WMFO

JNR:jo
(2)

29B-WF-171994 Main - 623

Searched
Serialized
Indexed
Filed

1325015-000-9107

Memorandum

To : ADIC, WMFO (72-WF-)(P)(C-5) Date 5/27/94

From : SA [redacted] b6 b7C

Subject: [redacted]

OO: WMFO

The following information came to my attention while in Abu Dhabi, U.A.E., between 4/28/94 and 5/7/94, conducting investigation on "HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO," (29B-WF-171994), i.e., the BCCI case.

[redacted] a New York City, NY, detective assigned to the BCCI investigation being conducted by the District Attorney of NY (DANY), telephone [redacted] reported that, while in the process of interviewing [redacted] BCCI, he learned that [redacted] b6 b7C

In furtherance of the ongoing effort to gather and review all BCCI records [redacted] associated disks were under the control of the law firm of SIMMONS & SIMMONS--a British firm representing the majority shareholders of BCCI--and specifically, [redacted] with S&S. When interviewed by [redacted] admitted the following:

1) [redacted] knew that, throughout the time that [redacted] spent in Abu Dhabi, [redacted] SHEIK ZAYED; [redacted] ABEDI would meet with ZAYED, and as ZAYED's personal banker when ZAYED would travel anywhere in the Middle East.

2) [redacted] knew that, after BCCI was closed and [redacted] was arrested, [redacted] had been inventoried as part of the collection of BCCI records and were maintained in the Shareholders' Committee Office flat ("the SCO Flat") in Abu Dhabi.

2-WMFO
1-29B-WF-171994 MAIN
1-72-WF-

JNR:jnr
(2)

29B-WF-171994 Main -624

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUN 1 1994
FBI — [redacted]

1325015-000-9108

3) [redacted] wanted to prevent potentially sensitive or embarrassing information about SIMMONS & SIMMONS' clients, i.e., SHEIK ZAYED, other members of the ruling family or members of the Majority Shareholders, including [redacted] ZAYED's Department of Private Affairs and the ABU DHABI INVESTMENT AUTHORITY (ADIA), from coming into the hands of the worldwide liquidators of BCCI. b6 b7C

4) In or about 2/92, [redacted] removed the computer disks from the file and took them (and possibly, the computer itself) to an ADIA chartered [redacted], supposedly to verify the contents of the disks. When they determined that the disks did contain the diaries, [redacted] instructed [redacted] to duplicate the disks and to "erase" the originals. [redacted] then returned the "erased" disks to the file so that the inventory would not be compromised. b6 b7C

When interviewed by [redacted] brought to him, but said he was unable to recall how he had done so, i.e., whether he had formatted the disks 5 times or had used Norton Utilities software. [redacted] further recalled mentioning to [redacted] the same information and there being some discussion about whether they should overwrite the hard disk. b6 b7C

I interviewed [redacted] with the WDC firm of PATTON BOGGS & BLOW (PB&B), representing the U.S. interests of the Majority Shareholders. [redacted] verified [redacted] admissions, both from statements [redacted] or in [redacted] presence. [redacted] and had attempted to access its hard drive; but learned it was password-protected. [redacted] arranged for me to see the computer, then in the custody of S&S. b6 b7C

Both PB&B and S&S refused to allow the computer and disks to be immediately taken by the FBI absent (1) authorization from their clients and (2) a determination that the hard disk does not contain classifiable information. PB&B and S&S were instructed to preserve the items in their present condition and to transport them to the Abu Dhabi Embassy, WDC, where an FBI computer expert would attempt to access the hard drive in their presence.

[redacted] provided the password on a piece of paper during an interview in Abu Dhabi; he also provided it to Det. [redacted] during an earlier interview. [redacted] a string of letters and numerals: [redacted] b6 b7C

1325015-000-9109

72-WF-

DOJ OIA Associate Director [redacted] has indicated she would seek prosecution of [redacted] for Obstruction of Justice. b6 b7C

I recommend this matter be opened and assigned.

1325015-000-9110

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
May 31, 1994

[redacted] b6 b7C

Office of International Affairs
Criminal Division
U.S. Department of Justice
P.O. Box 27330 Central Station
Washington, D.C. 20038-7330

Dear Sir:

Re: Swiss Customs Tax on Fuel
for Chartered Aircraft Used on
Official U.S. Government
Flight

On May 5, 1994 and again on May 7, 1994, [redacted] b6 b7C
chartered by the U.S. Government for the purpose of transporting an important federal fugitive, transited the Zurich, Switzerland international airport, where, on both occasions, it was refueled. The total fuel bill was USD $11,300.00. Our embassy in Bern, Switzerland, now informs us that Swiss Customs has imposed a total Customs Tax of USD $16,430.00 on the two purchases.

In that the flight was an official activity of the U.S. Government, we respectfully request that our State Department petition the Swiss Government to rescind the imposition of the above-mentioned Customs Tax.

Very truly yours,

Anthony E. Daniels
Assistant Director in Charge

By: [redacted] b6 b7C
Supervisory Special Agent

1 - Addressee
1 - WMFO

JWR: jr
(7)

SSA [redacted]

29B-WF-171994 Main - 625

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____

1325015-000-9111

29B-WF-171994
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case")

Case Agt: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, MLAT requests and letters rogatory; forfeiture investigation and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; Pleas from 6 corporations; apprehension of #2 subject, [redacted] b6 b7C forfeitures in excess of $800 million.

Status with DOJ:

Investigation actively continuing.

Investigative Activity for Next Two Weeks:

1) [redacted] b6 b7C b7D

2) Open spinoff OOJ matter relating to destruction or alteration of evidence;

3) Consider opening spinoff on financial fraud which occurred in relation to a highly classified matter at the [redacted] b7E

29B-WF-171994
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case")

Case Agt: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, MLAT requests and letters rogatory; forfeiture investigation and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; Pleas from 6 corporations; apprehension of #2 subject, [redacted] b6 b7C forfeitures in excess of $800 million.

Status with DOJ:

Investigation actively continuing.

Investigative Activity for Next Two Weeks:

1) 6/15-19/94: Travel to Spain to receive proffer from subject [redacted] b6 b7C b7E

2) 6/19-29/94: Travel to London, England to continue document review and conduct interviews;

3) Consider opening spinoff on financial fraud which occurred in relation to a highly classified matter at the [redacted]

29B-WF-171994 Main-626

INDEXED FILED
JUN 1 . 1994
FBI — WASH. METRO FIELD OFFICE

1325015-000-9113

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 7/13/94

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

On 7/12/94, DOJ Assistant Special Counsel for Financial Institution Fraud Matters [redacted] requested that I provide him with a list of Bureau personnel whom I believe should be recognized by DOJ for their contributions toward the reaching of a plea agreement with [redacted] Such a list should include: b6 b7C

WMFO

SA [redacted] (interviews and document review in Abu Dhabi; assisted in transporting [redacted] to the U.S. from Abu Dhabi). b6 b7C

SA [redacted] (interviews and document review in Abu Dhabi; processing of [redacted] in U.S.)

SAs [redacted] (interviews and document review in Abu Dhabi).

SA [redacted] (document review in Luxembourg and London).

SA [redacted] (document review in Luxembourg and London; processing of [redacted] in U.S.).

SSA [redacted] and ASAC DONALD W. THOMPSON, JR. (assisted in transporting [redacted] to U.S. from Abu Dhabi). (K)

ATLANTA

SA [redacted] (interviews and document review in Abu Dhabi; document review in London) b6 b7C

LOS ANGELES

SAs [redacted] and Financial Analysts [redacted] (review of [redacted] files" at Washington, D.C. during the last week of April and first week of May, 1994). b6 b7C

1-WMFO
1-[redacted]

JNR:jnr
(19)

29B-WF-171994 MAIN — 627

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 14 1994
FBI — WASH. FIELD OFFICE

1325015-000-9114

FBIHQ

SSA [redacted] (arrangements for charter flight to transport [redacted] to the U.S. from Abu Dhabi). b6 b7C

SSA [redacted] (document review and interviews in London).

SAs [redacted] (Bureau pilots who flew [redacted] to U.S. from Abu Dhabi).

1325015-000-9115

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 7/22/94

To: Special Counsel [redacted] DOJ, Washington, D.C. b6 b7C
(USA)

From: ADIC ANTHONY E. DANIELS, WMFO
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS; MAJOR CASE #38
(Name of Subject) Age Sex

You are hereby advised of action authorized by Asst. Special Counsel [redacted]
(Name of USA or AUSA)

on information submitted by Special Agent SA [redacted] 7/20/94
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18 USC, USC, Section(s) 1956; 371

Synopsis of case: Attached are copies of material developed as a result of the approach made to AGHA HASAN ABEDI in 12/93 (as you requested); and information to consider in deciding whether to supersede the DC RICO indictment to include [redacted] b6 b7C

1-Addressee
1-WMFO

JNR:jnr
(2)

29B-WF-171994 Main - 628

1325015-000-9116

29B-WF-171994
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 9/1/94)

Case Agt: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, MLAT requests and letters rogatory; forfeiture investigations and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; pleas from 6 corporations; plea from #2 subject, [redacted] forfeitures in excess of $800 million; [redacted] b6 b7C b7D

Status with DOJ:

Investigation actively continuing.

Investigative Activity for Next Two Weeks (9/1-9/16/94):

1) Continue investigation to open spinoff of financial fraud and OOJ matter a [redacted] b6 b7C b7E
2) Preparations for scheduled 9/18-10/1/94 travel to Luxembourg (pursuant to letters rogatory) and London, England (to continue document review and conduct interviews).
4) Present DOJ with evidence to support superseding existing WDC RICO indictment to include former BCCI officers [redacted]
5) Begin debriefing of [redacted] (assuming availability; [redacted] counsel has denied access pending outcome of negotiations with NY DA).

29B-WF-171994 - Main - 630

1325015-000-9158

29B-WF-171994
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 9/1/94)

Case Agt: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, MLAT requests and letters rogatory; forfeiture investigations and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; pleas from 6 corporations; plea from #2 subject, [redacted] forfeitures in excess of $800 million; [redacted] b6 b7C b7D

Status with DOJ:

Investigation actively continuing.

(K)

Investigative Activity for Next Two Weeks (9/1-9/16/94):

1) Continue investigation to open spinoff of financial fraud and OOJ matter at [redacted] b6 b7C b7E
2) Preparations for scheduled 9/18-10/1/94 travel to Luxembourg (pursuant to letters rogatory) and London, England (to continue document review and conduct interviews).
4) Present DOJ with evidence to support superseding existing WDC RICO indictment to include former BCCI officers [redacted]
5) Begin debriefing of [redacted] (assuming availability; [redacted] counsel has denied access pending outcome of negotiations with NY DA).

312

29B-WF-171994-Main Sec Sec

1325015-000-9159
Sec

29B-WF-171994
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 9/16/94)

Case Agt: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, MLAT requests and letters rogatory; forfeiture investigations and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; pleas from 6 corporations; plea from #2 subject, [redacted] forfeitures in excess of $800 million; [redacted] b6 b7C b7D

Status with DOJ:

Investigation actively continuing, under DOJ Special Counsel [redacted] and DOJ Fraud Section Chief Gerald McDowell. b6 b7C

Investigative Activity for Next Two Weeks (9/16-9/30/94):

1) Continue investigation to open spinoff of financial fraud and OOJ matter at [redacted] b6 b7C b7E
2) Preparations for scheduled 9/24-10/8/94 travel to London, England to continue document review and conduct interviews; to Luxembourg, pursuant to letters rogatory) to review and collect documents, and either to Frankfurt, Germany or Rome, Italy, to conduct an interview;
4) Continue efforts to support DOJ's intent to supersede existing WDC RICO indictment to include former BCCI officers [redacted]
5) Continue debriefing of [redacted]

29B-WF-171994 Main - 631

1325015-000-9160

29B-WF-171994
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 9/16/94)

Case Agt: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, MLAT requests and letters rogatory; forfeiture investigations and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; pleas from 6 corporations; plea from #2 subject, [redacted] forfeitures in excess of $800 million; [redacted] b6 b7C b7D

Status with DOJ:

Investigation actively continuing, under DOJ Special Counsel [redacted] and DOJ Fraud Section Chief Gerald McBoweII. b6 b7C

Investigative Activity for Next Two Weeks (9/16-9/30/94):

1) Continue investigation to open spinoff of financial fraud and OOJ matter at [redacted] b6 b7C
2) Preparations for scheduled 9/24-10/8/94 travel to London, England to continue document review and conduct interviews; to Luxembourg, pursuant to letters rogatory) to review and collect documents, and either to Frankfurt, Germany or Rome, Italy, to conduct an interview; b7E
4) Continue efforts to support DOJ's intent to supersede existing WDC RICO indictment to include former BCCI officers [redacted]
5) Continue debriefing of [redacted]

X

SW SW

29B-WF-171994 Main

1325015-000-9161

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P)(C-5) Date 10/14/94

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Due to the fact that, for the reasons indicated, no investigation remains to be done, it is recommended that the following subfiles be administratively closed:

Sub U [redacted] ET AL): DOJ deferred to the District Attorney of New York (DANY) in the prosecution of this matter. b6 b7C

Sub V [redacted] ET AL): No evidence of a money laundering violation found.

Sub Fug 2 [redacted] Apprehended and prosecuted.

Sub Fug 4 [redacted] Prosecuted in the Middle District of Florida.

Close subfiles 10-18-94

Sub U
Sub V
Sub Fug 2
Sub Fug 4

5-WMFO
1-29B-WF-171994 Main
1-29B-WF-171994-SUB_____

JNR:jnr
(5)

29B-WF-171994- Main - 632

[redacted]

1325015-000-9162

29B-WF-171994 (Squad C-5) 10/17/94
UNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 10/17/94)

Case Agent: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, provisional arrest warrants, MLAT requests and letters rogatory; forfeiture investigations and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; pleas from 6 corporations; plea from #2 subject, [redacted] forfeitures in excess of $800 million; preliminary agreements on two criminal pleas and two civil settlements; b6 b7C

Status with DOJ:

Investigation actively continuing, under DOJ Special Counsel [redacted] and DOJ Fraud Section Chief Gerald McDowell. b6 b7C

Investigative Activity for Next Two Weeks (10/17-10/31/94):

1) Continue investigation to open spinoff of financial fraud and OOJ matter at [redacted] b6 b7C b7E
2) Complete dictation of interviews done during recent travel;
3) Evaluate index of new cache of documents found in Luxembourg; meet with trustee overseeing GULF INTERNATIONAL HOLDINGS (i.e., the GOKAL brothers' company) bankruptcy liquidation;
4) Continue efforts to support DOJ's intent to supersede existing WDC RICO indictment to include former BCCI officers [redacted]
5) Report sentencing of [redacted] set for 10/19/94.

29B-WF-171994 Main — 633

1325015-000-9163

29B-WF-171994 (Squad C-5) 10/17/94
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 10/17/94)

Case Agent: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, provisional arrest warrants, MLAT requests and letters rogatory; forfeiture investigations and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; pleas from 6 corporations; plea from #2 subject, [redacted] forfeitures in excess of $800 million; preliminary agreements on two criminal pleas and two civil settlements; b6 b7C

Status with DOJ:

Investigation actively continuing, under DOJ Special Counsel [redacted] and DOJ Fraud Section Chief Gerald McDowell. b6 b7C

Investigative Activity for Next Two Weeks (10/17-10/31/94):

1) Continue investigation to open spinoff of financial fraud and OOJ matter at [redacted] b6
2) Complete dictation of interviews done during recent travel; b7C b7E
3) Evaluate index of new cache of documents found in Luxembourg; meet with trustee overseeing GULF INTERNATIONAL HOLDINGS (i.e., the GOKAL brothers' company) bankruptcy liquidation;
4) Continue efforts to support DOJ's intent to supersede existing WDC RICO indictment to include former BCCI officers [redacted]
5) Report sentencing of [redacted] set for 10/19/94.

633

29B-WF-171994 SEARCHED INDEXED SERIALIZED FILED

1325015-000-9164

FD-515 (Rev. 8-29-93)

Squad Supervisor approval (please initial)

Accomplishment Report

(Accomplishment must be reported and loaded into [redacted] within 30 days from date of accomplishment)

Date Prepared 10/19/94
Date Loaded _____
Data Loader's initials _____

Does Accomplishment Involve: (check all that apply)	
Drugs	☐
A Fugitive	☐
Bankruptcy Fraud	☐
Computer Fraud/Abuse	☐
Corruption of Public Officials	☐
Forfeiture Assets	☒

File Number
29B-WF-171994

RA	Squad
NVMRA	C-5

Task Force

Assisting Agents Soc. Sec. No. ×	
1.	– –
2.	– –

Serial No. of FD-515

Investigative Assistance or Technique Used

1 = Used, but did not help
2 = Helped, minimally
3 = Helped, substantially
4 = Absolutely essential

Rating	IAT	Rating	IAT	Rating	IAT
	Financ. Analyst Asst.		Informant Info.		Tech. Agnt.or Equip.
	Aircraft Assistance		Lab. Div. Exams		Telephone Toll Recs.
	Computer Assistance		Lab. Div. Field Supt.		UCO - Group I
	Consensual Monitor		Pen Registers		UCO - Group II
	ELSUR / FISC		Photograph Coverage		UCO - Other
	ELSUR / Title III		Polygraph Assistance		NCAVC / VI - CAP
	Eng. Sect. Field Supt.		Search Warrants Exec.		Visual Invest. Anal.
	Eng. Sect. Tape Exams		Show Money Usage		Crisis Neg. - Fed.
	Hypnosis Assistance		SOG Assistance		Crisis Neg. - Local
			Swat Team Action		ERT Assistance

b6
b7C
b7E

A. Complaint / Information / Indictment
Complaint Date _____
Check if Civil/ Rico Complaint ☐
Information Date _____
Indictment Date 1/15/93
Also Complete Section I

B. Arrest / Locate / Summons
Arrest Date _____
☐ Federal ☐ Local ♦
Subject Priority: ☐ A ☐ B ☐ C
☐ Subject Resisted
☐ Subject was Armed
Locate Date _____
Subject Priority: ☐ A ☐ B ☐ C
Summons Date _____
☐ Federal ☐ Local ♦

C. Hostage(s) Released Date _____
Released by: ☐ Terrorists ☐ Other
Number of Hostages: _____
Child Located Date _____

D. Recovery / Restitution / Potential Economic Loss Prevented (PELP) × ✦
Recovery Date _____
☐ Federal ☐ Local

Code •	Amount	Code •	Amount
01	$255,350,000		$
	$		$
	$		$

Restitution Date 10/19/94
☒ Court Ordered
☐ Pretrial Diversion
PELP Date _____

E. Civil / Rico Matters Date _____
Also Complete Section I
Judgment ____ ____ •
Judicial Outcome ____ ____ × •
Fines: $ _____
Suspension:

Years	Months

F. AFA Payment Date _____
Amount: $ _____

G. Administrative Sanctions Date _____
Type:
☐ Suspension
☐ Permanent
☐ Debarment
☐ Injunction

Length:

Years	Months

Subject Description Code ____ ____ •

H. Final Judicial Process Conviction
Also Complete Section I
Date of Conviction: 7/8/94
Date of Sentence: 10/19/94
Judicial State: DC District: DC
Sentence type: JS, __, __ •
Sentence Term:

In-Jail Years	In-Jail Months	Suspended Years	Suspended Months	Probation Years	Probation Months
11	03			3	0

Fines: $ _____

☒ Federal ☐ Local ♦
☒ Felony ☐ Misdemeanor
☒ Plea ☐ Trial

I. U.S. Code Violations

Title	Section	Counts
18	371	1
18	1343	1

Title	Section	Counts
18	1962(d)	1

Required for Sections A, E, and H (Conviction)
Optional for Section B (arrest) 29B-WF-171994-634

Acquittal / Dismissal / Pretrial Diversion
Acquittal Date _____
Dismissal Date _____
Pretrial Diversion Date _____

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____

b6
b7C
b7E

J. Subject Information (Required for Sections A, B, D (Restitution), E, F, G, and H)

Name	Date of Birth	Race •	Sex	Place of Birth (if available)	Social Security No. (if available)
		W	M	INDIA	N/A

☐ Subject Related to an LCN, Asian Organized Crime (AOC), or Italian Organized Crime (IOC) Group. (Submit form FD-515a for indictments and convictions only)

× Additional information may be added by attaching another form or a plain sheet of paper for additional entries.
♦ Requires that a written explanation on plain paper be attached. (Court Ordered Restitution does not require a written explanation)
• See codes on reverse side.

1326015-000-9165

For Further Instructions See: MAOP, Part [redacted] Sections 3-5 thru 3-5.3.

RACE CODES

A Asian/Pacific Islander
B Black
I Indian/American
U Unknown
W White
X Nonindividual

SENTENCE TYPES

CP Capital Punishment
JS Jail Sentence
LS Life Sentence
NS No Sentence (Subject is Fugitive, Insane, has Died, or is a Corporation)
PB Probation
SJ Suspension of Jail Sentence
YC Youth Correction Act

PELP CODES

22 Counterfeit Stocks/Bonds/Currency/ Negotiable Instruments
23 Counterfeit/Pirated Sound Recordings or Motion Pictures
24 Bank Theft Scheme Aborted
25 Ransom, Extortion or Bribe Demand Aborted
26 Theft From or Fraud Against Government Scheme Aborted
27 Commercial or Industrial Theft Scheme Aborted
30 All Other

PROPERTY CODES

01 Cash
02 Stocks, Bonds or Negotiable Instruments
03 General Retail Merchandise
04 Vehicles
05 Heavy Machinery & Equipment
06 Aircraft
07 Jewelry
08 Vessels
09 Art, Antiques or Rare Collections
11 Real Property
20 All Other

JOINT AGENCY CODES

ACIS Army Criminal Investigative Service
BATF Bureau of Alcohol, Tobacco & Firearms
DCAA Defense Contract Audit Agency
DCIS Defense Criminal Investigative Service
DEA Drug Enforcement Administration
DOI Dept. of Interior
FAA Federal Aviation Administration
FDA Food and Drug Administration
HHS Dept. of Health & Human Services
HUD Dept. of Housing & Urban Development
INS Immigration and Naturalization Service
IRS Internal Revenue Service
NASA Nat'l Aeronautics & Space Administration
NBIS Nat'l NARC Border Interdiction
NCIS Naval Criminal Investigative Service
[redacted]
SBA Small Business Administration
USBP U.S. Border Patrol
USCS U.S. Customs Service
USDS U.S. Department of State
USSS U.S. Secret Service
USTR U.S. Treasury
ST State
LOC Local
OTHR Other

JUDGMENT CODES

CJ Consent Judgment
CO Court Ordered Settlement
DF Default Judgment
DI Dismissal
JN Judgment Notwithstanding
MV Mixed Verdict
SJ Summary Judgment
VD Verdict for Defendant
VP Verdict for Plaintiff

JUDICIAL OUTCOME

AG Agreement
BR Barred/Removed
CC Civil Contempt
DC Disciplinary Charges
FI Fine
PI Preliminary Injunction
PR Temporary Restraining Order
RN Restitution
SP Suspension
VR Voluntary Resignation
OT Other

SUBJECT PRIORITY

A Subject wanted for crimes of violence (i.e., murder, manslaughter, forcible rape) against another individual or convicted of such a crime in the past five years

b7D

B Subject wanted for crimes involving loss or destruction of property valued in excess of $25,000 or convicted of such a crime in the past five years.

C All other subjects.

SUBJECT DESCRIPTION CODES

ORGANIZED CRIME SUBJECTS

1F Boss
1G Underboss
1H Consigliere
1J Acting Boss
1K Capodecina
1L Soldier

KNOWN CRIMINALS

2A Top Ten or I.O. Fugitive
2B Top Thief
2C Top Con Man

FOREIGN NATIONALS

3A Legal Alien
3B Illegal Alien
3C Foreign Official W/out Diplomatic Immunity
3D U.N. Employee W/out Diplomatic Immunity
3E Foreign Student
3F All Others

OTHERS

8A All Other Subjects
8B Company or Corporation

TERRORISTS

4A Known Member of a Terrorist Organization
4B Possible Terrorist Member or Sympathizer

UNION MEMBERS

5D President
5E Vice-President
5F Treasurer
5G Secretary/Treasurer
5H Executive Board Member
5I Business Agent
5J Representative
5K Organizer
5L Business Manager
5M Financial Secretary
5N Recording Secretary
5P Office Manager
5Q Clerk
5R Shop Steward
5S Member
5T Trustee
5U Other

GOVERMENT SUBJECTS

6A Presidential Appointee
6B U.S. Senator/Staff
6C U.S. Representative/Staff
6D Federal Judge/Magistrate
6E Federal Prosecutor
6F Federal Law Enforcement Officer
6G Federal Employee - GS 13 & Above
6H Federal Employee - GS 12 & Below
6J Governor
6K Lt. Governor
6L State Legislator
6M State Judge/Magistrate
6N State Prosecutor
6P State Law Enforcement Officer
6Q State - All Others
6R Mayor
6S Local Legislator
6T Local Judge/Magistrate
6U Local Prosecutor
6V Local Law Enforcement Officer
6W Local - All Others
6X County Commissioner
6Y City Councilman

BANK EMPLOYEES

7A Bank Officer
7B Bank Employee

10/20/94

********** CONVICTION **********

SENSITIVE / UNCLASSIFIED

Case Number: 029B WF0171994
Serial No.:

Stat Agent Name:
Stat Agent SOC.:

Report Date: 10/20/1994
Accom Date.: 10/19/1994

b6
b7C
b7D
b7E

Does Accomplishment Involve		Assisting Agents SOC	Subject Name
Drugs	: N		
A Fugitive.	: N		
Bankruptcy Fraud.	: N		
Computer Fraud/Abuse.	: N		
Corruption of Public Officials:	N		
Forfeiture Assets	: Y		

RA	Squad	Task Force
CRIM	C5	

Sub. Invest. Asst by Other FOs:

Investigative Assistance or Technique Used

FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	1 = Used, but did not help
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	2 = Helped, Minimally
CONSEN MONITR	PHOTO COVERGE	NCAVC/VI-CAP	3 = Helped, Substantially
ELSUR/FISC	POLYGRAPH	VISUAL INVEST	4 = Absolutely Essential
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	
ENG TAPE EXAM	SOG ASST	ERT ASST	
HYPNOSIS ASST	SWAT TEAM	BUTTE-ITC	
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
	TEL TOLL RECS		

Date of Conviction (MM/DD/YYYY) . . . . . .: 07/08/1994
Date of Sentencing (MM/DD/YYYY) . . . . . .: 10/19/1994

Federal or Local (F/L). . . . . .: F
Felony or Misdemeanor (F/M) . . . . . .: F

Plea or Trial (P/T) . . . . . .: P
Judicial State. . . . . .: DC
Judicial District . . . . . .:
Type of Sentence . . . : JS PB

	Year	Month
Time in Jail. .:	11	3
Time Suspended.:		
Probation Time.:	3	

Total Fines. . :$ 150

U.S. Code Violation

Title	Section	Counts
18	1343	1
18	1962D	1
18	371	1

Accomplishment Narrative

WAS SENTENCED BEFORE U.S. DISTRICT COURT JUDEGE JOYCE HENS GREEN FOR VIOLATIONS OF TITLE 18, U.S. CODE, SECTIONS 371 (CONSPIRACY - 1 COUNT), 1343 (FBW - 1 COUNT) AND 1962D (RICO CONSPIRACY) AND TO PAY A SPECIAL ASSESSMENT OF $50 EACH COUNT, AND ORDERED TO MAKE RESTITUTION OF $255,350,000. IS A CITIZEN OF PAKISTAN. JUDGE GREEN STATED SHE WOULD

CONSIDER SENTENCE REDUCTION IN RETURN FOR PRODUCTIVE COOPERATION.AND ORDERED
U.S. MARSHAL TO HAV [redacted] AVAILABLE FOR ARRAIGNMENT/TRIAL IN NEW YORK, BUT
[redacted] IS TO REMAIN IN FEDERAL CUSTODY

b6
b7C

SENSITIVE / UNCLASSIFIED

10/20/94

********** RESTITUTION **********

SENSITIVE / UNCLASSIFIED

Case Number: 029B WF0171994
Serial No.:

Stat Agent Name:
Stat Agent SOC.:

Report Date: 10/20/1994
Accom Date.: 10/19/1994

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Does Accomplishment Involve		Assisting Agents SOC	Subject Name
Drugs . . . . . : N			
A Fugitive. . . . . : N			
Bankruptcy Fraud. . . . . : N			
Computer Fraud/Abuse. . . . . : N			
Corruption of Public Officials: N			
Forfeiture Assets . . . . . : Y			

RA	Squad	Task Force
CRIM	C5	

Sub. Invest. Asst by Other FOs:

Investigative Assistance or Technique Used

FINAN ANALYST	LAB DIV EXAMS	UCO-GROUP I	
AIRCRAFT ASST	LAB FIELD SUP	UCO-GROUP II	1 = Used, but did not help
COMPUTER ASST	PEN REGISTERS	UCO-OTHER	2 = Helped, Minimally
CONSEN MONITR	PHOTO COVERGE	NCAVC/VI-CAP	3 = Helped, Substantially
ELSUR/FISC	POLYGRAPH	VISUAL INVEST	4 = Absolutely Essential
ELSUR/III	SRCH WAR EXEC	CRIS NEG-FED	
ENG FIELD SUP	SHOW MONEY	CRIS NEG-LOC	
ENG TAPE EXAM	SOG ASST	ERT ASST	
HYPNOSIS ASST	SWAT TEAM	BUTTE-ITC	
EVIDNCE PURCH	TECH AG/EQUIP	SAVANNAH-ITC	
	TEL TOLL RECS		

Restitution Court Ordered or by Pretrial Diversion (C/P). .: C

Restitution Property

CODE	AMOUNT	CODE	AMOUNT
01	$ 255350000		$

Accomplishment Narrative

WAS SENTENCED BEFORE U.S. DISTRICT COURT JUDEGE JOYCE HENS GREEN FOR VIOLATIONS OF TITLE 18, U.S. CODE, SECTIONS 371 (CONSPIRACY - 1 COUNT), 1343 (FBW - 1 COUNT) AND 1962D (RICO CONSPIRACY 1-COUNT) AND TO PAY A SPECIAL ASSESSMENT OF $50 EACH COUNT, AND ORDERED TO MAKE RESTITUTION.OF $255,350,000. IS A CITIZEN OF PAKISTAN. JUDGE GREEN STATED SHE WOULD CONSIDER SENTENCE REDUCTION IN RETURN FOR PRODUCTIVE COOPERATION; AND ORDERED U.S. MARSHAL TO MAKE AVAILABLE FOR ARRAIGNMENT/TRIAL IN NEW YORK, BUT S TO REMAIN IN FEDERAL CUSTODY

SENSITIVE / UNCLASSIFIED

1325015-000-9169

29B-WF-171994
JNR:jnr
1

BCCI CASE:
"HIDDEN INTERESTS"
INVESTIGATIVE STRUCTURE
(11/01/94-12/31/94)
(Revised 11/15/94)

SUPERVISOR: **SSA** [redacted] (C-5)

CASE AGENT: **SA** [redacted] (C-5)

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->Manpower assigned:
->Part time
->**SA** [redacted] (C-5)
->**SA** [redacted] C-5)

->Areas of Investigation:
->Support DOJ's prosecution of existing indictments and asset forfeiture efforts
->WMFO
->WDC RICO Conspiracy
->Document collection/review
->United Kingdom
->France
->Luxembourg
->Debriefing: [redacted]
->Negotiation with other nominees
[redacted]
->Superseding indictment
[redacted]
->Extortion
->CAPCOM and its nominees: FAG-
False Statements to CFTC
[redacted]
->Fugitive apprehension; negotiation
->AGHA HASAN ABEDI (Pakistan)
->GHAITH RACHAD PHARAON (Saudi Arabia)
->Jordan
->Pakistan
->Spain
->Witness identification; (re)interviews
->Pakistan
[redacted]

29B-WF-171994 Main - 635

SEARCHED INDEXED
SERIALIZED SW FILED SW

1325015-000-9170

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[redacted] (LA & DC Subject)
[redacted]

->Others [redacted]

->Asset forfeitures
->Defense against L-claims
->Leads to identify/forfeit additional assets
[redacted], NY, NY
->Review documents in FIRST AMERICAN BANK civil RICO suit

->Other DOJ and FBI divisions' BCCI-related indictments/-investigations (WMFO assist)
->LA (INDEPENDENCE BANK: FIF; Bribery)
->TP ("C-CHASE"; "C-CHASE II": Money Laundering)

->Miscellaneous Matters
[redacted]
->Spinoff OOJ investigation; joint with [redacted]
->Document review
->Interviews
[redacted] document review
->BANQUE DE COMMERCE ET DE PLACEMENTS (BCP)
->Identify role(s) in BCCI-related, U.S. crimes
->Luxembourg
->Document review
->Interviews
->INTERREDEC, INC.
->Assist Federal Reserve (if necessary) in forfeiture action
->"KERRY Committee" findings
->BCCI relationship to LINCOLN SAVINGS BANK; CHARLES KEATING; TRENDINVEST
[redacted] Bribery matter
->Interviews
[redacted]

->Administrative Matters
->Interview (FD-302) logs
->"Who's Who/ What's What"
->Case chronology
->Documents
->Control

29B-WF-171994
JNR:jnr
1

BCCI CASE:
"HIDDEN INTERESTS"
INVESTIGATIVE STRUCTURE
(11/01/94-12/31/94)
(Revised 11/15/94)

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b6
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[redacted]
->Superseding indictment
[redacted]
->Extortion
->CAPCOM and its nominees: FAG-False Statements to CFTC
[redacted]
->Fugitive apprehension; negotiation
[redacted]
->GHAITH RACHAD PHARAON (Saudi Arabia)
->Jordan
->Pakistan
->Spain
->Witness identification; (re)interviews
->Pakistan
[redacted]

29B-WF-171994 Main - 635

[redacted] (AT fugitive) b6 b7C b7E

[redacted]

[redacted] (LA & DC Subject)

[redacted]

->Others [redacted]

->Asset forfeitures
->Defense against L-claims
->Leads to identify/forfeit additional assets
->350 Park Ave., NY, NY
->Review documents in FIRST AMERICAN BANK civil RICO suit

->Other DOJ and FBI divisions' BCCI-related indictments/-investigations (WMFO assist)
->LA (INDEPENDENCE BANK: FIF; Bribery)
->TP ("C-CHASE"; "C-CHASE II": Money Laundering)

->Miscellaneous Matters

[redacted]

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->Document review
->Interviews

[redacted] document review

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->Identify role(s) in BCCI-related, U.S. crimes
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29B-WF-171994
JNR:jnr
1

As of 11/16/95

BCCI CASE:
"HIDDEN INTERESTS"
MAJOR CASE #38
BRIEFING POINTS

TYPE OF CASE

- o BCCI: international, multidimensional, financial schemes
  - --High-profile
    - --Relationships with well-known U.S. figures
      - --Jimmy Carter
      - --Orrin Hatch
      - --Clark Clifford
      - --Jesse Jackson
    - --Relationships with foreign officials/rulers
      - --Sheik Zayed bin Sultan al-Nahyan, et al
      - --Other U.A.E. rulers
      - --World figures (Gen. Manuel Noriega)
      - --British peers (Lord James Callaghan; Sir Shridath "Sonny" Ramphal)
  - --Document-intensive
    - --more than 300 branches operating in 70 countries
    - --in existence almost 20 years
    - --most records abroad (London; Abu Dhabi; Luxembourg; Cayman Islands); some in NY and FL
  - --Multifaceted corporate structure
    - --Ostensibly headquartered in Luxembourg, but directed from London until 4/90, then from Abu Dhabi until 7/91
    - --BCCI S.A.: operated branches
    - --BCCI Overseas: operation of branches in Central America, South America and the Caribbean; operation of representative offices in U.S. (WDC; NY; FL; CA; TX)
  - --Middle Eastern nominees holding shares
  - --Secret ownership/control of financial institutions
    - --U.S. (First American Bank; National Bank of Georgia; Independence Bank; CenTrust Savings)
      - --False Statements to U.S. and state regulators
    - --Foreign (e.g., Central and South America)
    - --Banks within banks
  - --False loans and accounting; i.e., Ponzi scheme
  - --Bribery of officials
  - --Extortions by employees
  - --Money laundering; flight-capital
  - --Foreign nationals as fugitives
    - --AGHA HASAN ABEDI (BCCI founder and chairman)
    - --GHAITH RACHAD PHARAON (leading nominee)
    - [redacted] (BCCI [redacted]

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29B-WF-171994 Main - 637

1325015-000-9178

[redacted] b6 b7C b7D
CAPCOM)
--Almost exclusively foreign witnesses
--Asset forfeitures
--[redacted]
--Parallel/competing investigations
--U.S.
--District Attorney of New York (DANY)
--Federal Reserve Board
--Congressional committees (Kerry; Gonzalez; Schumer)
--Foreign
[redacted]
--Gov't. of Abu Dhabi
--Argentina
--Hong Kong

CASE HISTORY, ACCOMPLISHMENTS, GOALS AND STATUS

o History
--Opened by WMFO 2/7/91, predicated on criminal referral from Federal Reserve Board of Governors
--USAO, WDC
--False Statements
--Bank Holding Company Act violations
--DOJ Criminal Division Fraud Section
--initially assist USAO, WDC
--Task force
--FED conducting own investigation
--Congressional committee hearings/investigations in progress
--1988 MDF convictions in "C-Chase"
--DOJ and DANY cooperate in some aspects and compete in others; bring indictments; FED brings "Statement of Charges"
--FED working with DANY over 1 year before referral to WMFO
--All investigating same subjects/facts
--DOJ acquiesces and allows DANY to proceed to try Clifford [redacted] first, with cross-designated DOJ trial attorney; Clifford dismissed; [redacted] DOJ dismissed as to both, without prejudice b6 b7C b7E
--Agencies: FBI (WMFO; LA; MM; AT); DOJ (Special Counsel FIF; Fraud Section; Asset Forfeiture; OIA); USAO, WDC; FED; [redacted] INS; and DANY

o Principal techniques:
--Document acquisition and review, and interviews of subjects/witnesses; primarily done in foreign countries

--International agreements; MLAT requests; letters rogatory
--forfeiture investigations and actions

- Accomplishments (WMFO)
  --Indictments against 3 individuals and 4 corporations: RICO Conspiracy; MF; FBW
  --Pleas from #2 subject [redacted] and 6 corporations
  --Forfeitures approaching $1 billion (almost half in cash); court-ordered restitution [redacted] $250,350,000

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[redacted]

- Goals
  --Successful prosecution of indicted subjects
  --Identification and prosecution of others involved in BCCI-related crimes in the U.S.
  --Understanding BCCI's plans for the U.S. and how those plans were implemented
  --Identification and forfeiture of all BCCI assets in the U.S.

- Status
  --DOJ
    --Investigation actively continuing under both Special Counsel for FIF and Fraud Section
  --WMFO
    --see accompanying insert ("Investigative Structure")
    --see accompanying, classified insert

29B-WF-171994
JNR:jnr
1

As of 11/16/95

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"HIDDEN INTERESTS"
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    - --GHAITH RACHAD PHARAON (leading nominee)
    - [redacted] (BCCI [redacted]

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29B-WF-171994 Main
SEARCHED SERIALIZED INDEXED FILED

1325015-000-9181

[redacted] b6 b7C b7D
CAPCOM)
--Almost exclusively foreign witnesses
--Asset forfeitures
[redacted]
--Parallel/competing investigations
--U.S.
--District Attorney of New York (DANY)
--Federal Reserve Board
--Congressional committees (Kerry; Gonzalez; Schumer)
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[redacted]

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29B-WF-171994 (Squad C-5) 11/21/94
JNR:jnr
1

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 11/21/94)

Case Agent: SA [redacted]

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

Violations: RICO; MF; FBW; Conspiracy

Principal Techniques:

Document acquisition and review, and interviews of subjects and witnesses, all primarily in foreign countries; international agreements, provisional arrest warrants, MLAT requests and letters rogatory; forfeiture investigations and actions.

Accomplishments to date (FBI WMFO only):

RICO Conspiracy indictments against 3 individuals and 4 corporations; convictions of 6 corporations; conviction #2 subject, [redacted] court-ordered restitution of $250,350,000.00; forfeitures in excess of $800 million; preliminary agreements on two criminal pleas and two civil settlements;

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Status with DOJ:

Investigation actively continuing, under DOJ Special Counsel [redacted] and DOJ Fraud Section Chief Mary C. Sparing.

Investigative Activity planned for 11/21-12/02/94:

1) Case agent on leave 11/21-11/25/94;
2) Brief Director Freeh;
3) Continue investigation to open spinoff of financial fraud and OOJ matter at [redacted]
4) Complete dictation of interviews done during recent travel;
5) Continue efforts to support DOJ's intent to supersede existing WDC RICO indictment to include former BCCI officers [redacted]
6) Work on screening project on names supplied by BCCI Liquidators and Counter Narcotics Center.

(K)

-638

29B-WF-171994 Main
SEARCHED INDEXED
SERIALIZED FILED

1325015-000-9184

29B-WF-171994 (Squad C-5) 11/21/94
JNR:jnr
1

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MC #38;
FIF; FAG;
OO: WMFO ("The BCCI Case" as of 11/21/94)

Case Agent: SA [redacted] b6 b7C

Agencies: FBI (WMFO; LA; MM; AT); DOJ Fraud Section, Asset Forfeiture Office and Office of International Affairs; Federal Reserve; District Attorney of NY

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6) Work on screening project on names supplied by BCCI Liquidators and Counter Narcotics Center.

29B-WF-171994 Main

1325015-000-9185

Memorandum

To : ADIC, WMFO
Attn: AOSM [redacted] NVMRA

Date 12/12/94

From : SSA [redacted]
SQUAD C-5

Subject: SECURITY VIOLATION
12/10/94

At or about 7:30 p.m. on 12/9/94, SA [redacted] (C-5; ext. 6408) completed drafting a secure teletype (classified ~~"Secret")~~ to FBIHQ and several offices in a case entitled "HIDDEN INTERESTS: MC #38; FIF; FAG; OO: WMFO," (29B-WF-171994). SA [redacted] then left the draft in the custody of the clerk (female; name unknown) at the NVMRA Communications Center with instructions to send it to WMFOHQ, via secure fax, to the night stenographer.

On arriving at his desk for duty on 12/12/94, SA [redacted] found the following in his chair:

1) a 12/10/94 fax of the cover sheet he had written to direct his teletype draft to WMFOHQ, bearing a stamp indicating the fax had been sent at 14:06 on 12/10/94 to "49197", i.e., the non-secure fax on Squad C-5 (324-9197), from an unidentified location;

2) a 12/10/94 fax of the cover sheet and teletype draft, bearing a stamp indicating the fax had been sent at 15:33 on 12/10/94 to "49197" from an unidentified location.

In the open mail in his mail slot SA [redacted] found the original cover sheet and draft of the teletype, with no markings on the cover sheet to indicate that any action had been taken.

On 12/12/94, SA [redacted] telephoned the WMFOHQ Word Processing Center and learned there was no record of his teletype there. He also called the WMFOHQ Communications Center and learned there was no record of the Center receiving or sending a secure fax relating to the above-mentioned file.

(K)

3-WMFO
1-AOSM [redacted] NVMRA
1-WMFO Security Officer
~~1~~-29B-WF-171994 MAIN

~~JNR~~:jnr
(2)

29B-WF-171994 Main - 641

[redacted]

1325015-000-9195

Memorandum

To : ADIC, WMFO (29-0) (P) Date 1/12/95

From : SA [redacted] b6 b7C

Subject: [redacted]

OO:WMFO

For information, on 1/11/95 SA [redacted] spoke with [redacted] b6 b7C Va. regarding his receipt of a fax from the above Nigerian subject. This fax was received by [redacted] on 11/26/94 from fax number [redacted] to a fax number used by him of [redacted]

The attached fax requests [redacted] bank account b6 b7C information so that 25 million dollars in Nigerian funds can be transferred to his account in the U.S. for which he will receive 25% as a fee. This fax is very similar to many letters and faxes turned over to the FBI in the past with the exception of the paragraph on page two concerning BCCI.

[redacted] advised that the fax was received at the office b6 b7C of THE WARRENTON WORD SHOP, (WWS) 54 East Lee Street, Suite 205, Warrenton, Va. 22186, [redacted] explained that it is very strange that a fax for him would go to her number inasmuch as he does not believe that the WWS number and his name are associated anywhere. [redacted] advised that he does receive faxes on the WWS fax machine, but only in his company name. [redacted] has his own fax machine at his office which is located in his home.

[redacted] EQUIDAIE, which is a horse magazine b6 b7C and has done so for the past three years. [redacted] stated that he has not received any other faxes from [redacted] nor has he received any telephone calls or letters from anyone in or from Nigeria.

[redacted] provided DOB of [redacted] and a telephone numbers b6 b7C [redacted]

A copy of this memo and attached fax are being provided to SA [redacted] C-5, for whatever action is deemed appropriate. b6 b7C

1- WMFO 29-0
1- SA [redacted] b6 b7C

29B-WF-171994 Main -643

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 12 1995
FBI — WASH. FIELD OFFICE

NSD-25015-000-9205

26-11-1994 18:12 [redacted] P.01

b6
b7C

ATTN: [redacted]

FROM: [redacted]
FAX: [redacted]

Dear Sir,

Your contact address is courtesy of your Home Embassy's Commercial section here in Nigeria, Though this my proposed project was not disclosed to them in the process of my enquiry.

I am [redacted] Nigerian National Security

Printing and Minting Co.

1:2005-000920

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b7C

these and genuine Dollar Bills deliberately defaced to avoid being detected from source of acquisition, Republic of Colombia. Moreso, owing to the fact that such volume of money is always regarded or seen as laundering of funds from drug trafficking or any other illicit transactions.

This deal was initiated during the world meeting in Seoul Korea, by [redacted] B.C.C.I [redacted] B.C.C.I [redacted] This money was to be used to buy shares in the Bank of Credit and Commerce International (B.C.C.I.), But unfortunately, [redacted] in the attempted case of money laundering and his recent conviction and detention in ABU DHABI marred the realization of this deal.

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Now, we wish to finalize this deal with a foreign partner in whose foreign account this fund would be lodged into for investments. But this bill need some development such as chemical reconversion and purification before being moved out to your Bank abroad.

Presently, This money is in from of bonded retractable negative, 267.03 mint stages and is almost ready for offer as a legal tender, with your assistance we will be able to reconvert them to grade A 135 neon proof mint state.

Consequently, we have agreed to offer you 25% of this money on reconversion, however, as seeing is believing, this cash will be universally tested scientifically and commercially after reconversion to clear doubt of its genuinety and qualities attributable to any legal tender, after which we will travel with you because we wish to acquire properties in your conutry. You be will required to visit Nigeria to enable us conclude the final part of this deal. Your coming to Nigeria will avail us the opportunity of knowing each other better.

Looking forward to your reply, but most importantly, we appeal for security and confidentiality of this matter to ensure success. You can reach me on the fax Number as indicated above. We will appreciate your effort to link us with somebody who is reliable in case your account cannot hold the above mentioned money, Please reply through the above Fax within 7days on receipt of this message.

My Sincere Regards.

[redacted]

b6
b7C

Looking forward to your reply, but most importantly, we appeal for security and confidentiality of this matter to ensure success. You can reach me on the fax Number as indicated above. We will appreciate your effort to link us with somebody who is reliable in case your account cannot hold the above mentioned money, Please reply through the above Fax within 7days on receipt of this message.

My Sincere Regards.

[redacted]

b6
b7C

[redacted]

26-11-1994 18:14 P.04

[redacted] b6 b7C

Dear Sir,

Your contact address is courtesy of your name from Embassy's Directory [redacted] b6 b7C

[redacted] b6 b7C

[redacted] b6 b7C

We are genuine Dollar bills [redacted] b6 b7C

[redacted] b6 b7C

This deal was initiated during the world meeting in Seoul Korea by [redacted] b6 b7C

[redacted]

[redacted] b6 b7C

1325015-000

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P)(C-5) Date 1/31/95

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

The purpose of this memorandum is to document a request by Assistant District Attorney [redacted] of the office of the District Attorney of New York (DANY), that ISA [redacted] travel to New York on 2/1/95, to testify before the NY State Grand Jury on matters relating to the examination of the computer which was used in relation to the captioned matter by the [redacted] BCCI [redacted] b6 b7C

ISA [redacted] will travel to NY and return to WDC on the same day. b6 b7C

3-WMFO
1-SSA [redacted] (A-5)
1-ISA
1-29B-WF-171994 SUB II

JNR:jnr
(3)

-644

b6 b7C

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 31 1995
FBI/DOJ
[redacted]

1325015-000-9210

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P)(C-5) Date 5/17/95

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On 5/16/95, DOJ Deputy Special Counsel [redacted] b6 b7C provided information as to the status of various aspects of the captioned matter.

1) Asset Forfeiture: To date, DOJ has been allocated approximately $28 million in discretionary funds from the BCCI forfeitures, and has requested another $36 million, the allocation of which is imminent. These funds are, in part, to be used to defray the costs of the BCCI investigation, including such disparate things as travel and rewards.

2) [redacted] b6 b7C FIRST AMERICAN trustee $3.5 million, as well as relinquish custody of his CCAH shares; pay a fine $1.5 million to the U.S. government; and pay $500,000 to the Fed to fund its BCCI computerized record system. As of this date, DOJ, the Fed and DANY had yet to sign off on the proposal, but "probably will" do so.

Negotiations with [redacted] b6 b7C "seem to be at a standstill," with the triumvirate of DOJ, DANY and the Fed looking (due to precedent) for an [redacted] type deal," i.e., get custody of any CCAH shares; get as much money as possible for DOJ, DANY, the Fed, the liquidators and the trustee; and prevent any claims.

DSC [redacted] b6 b7C is awaiting a response from Fed Special Counsel [redacted] on the state of any negotiations with [redacted] (Almost a year ago, SC [redacted] told me he had almost closed a deal with [redacted] in which [redacted] would relinquish all CCAH shares, notwithstanding the fact that [redacted] had disavowed ownership.)

1-WMFO

JNR:jnr
(1)

29B-WF-171994 MAIN- 652

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 17 1995
FBI — WASH. FIELD OFFICE

1825015-000-9231

3) GHAITH RACHAD PHARAON: The Resolution Trust Company, which had been trying to "pierce the corporate veil" of PHARAOH HOLDINGS LIMITED (PHL) to establish proof for an $8 million claim against ACCENT FILMS has led to RTC gaining a $2.7 million settlement involving ACCENT FILMS, GHAITH INTERNATIONAL, REDEC and another company, QUANDEEL (phonetic). DSC [redacted] will provide a copy of the complaint and settlement when he obtains them. b6 b7C

DOJ has "basically decided" to not go after a global restraining order on PHL: most of its known assets are overseas, which would present immense difficulties in controlling them. In addition, the U.S. District Court, WDC, has already ordered PHL to repatriate its overseas assets, but PHL has made no known attempt to comply. From another perspective, [redacted] in his testimony in the Cayman courts in regard to the liquidator's suit against PHARAON, did not disclose any assets in the U.S., even though he did admit that PHARAON and PHL were hiding, stripping, dissipating and otherwise manipulating assets to avoid attachment. In that [redacted] is due back in the Cayman court on 6/1/95 to deal with a contempt citation, DSC [redacted] and I agreed it would present an opportunity for the liquidator's counsel to question [redacted] under oath about (e.g.,) the identity of assets in the U.S., given the need for the liquidator (and us) to be able to verify that those assets were not used as part of PHL's manipulations. b6 b7C

Finally, DSC [redacted] said DOJ is considering requesting investigation of PHL bank accounts to allow them to be targeted and frozen on a "good" day, i.e., at a time when they contain large amounts of money. b6 b7C

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P)(C-5) Date 6/22/95

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Due to my retirement, the captioned matter should be reassigned. A topical summary of the continuing aspects of this investigation is attached.

(1)-WMFO (Att. 1)

29B-WF-171994 MAIN- 653

JNR:jnr
(1)

REASSIGN

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
[redacted] 1995
[redacted] OFFICE

b6 b7C

SW 6-26-95

1325015-000-9233

29B-WF-171994
JNR:jnr
1

BCCI CASE:
"HIDDEN INTERESTS"
INVESTIGATIVE STRUCTURE
(07/01/95-08/31/95)
(Revised 06/22/95)

SUPERVISOR: **SSA** [redacted] (C-5) b6 b7C

CASE AGENT: **SA** [redacted] (C-5)

->Manpower assigned:
->Part time
->**SA** [redacted] (C-5)

->Areas of Investigation:
->Support DOJ's prosecution of existing indictments and asset forfeiture efforts
->WMFO
->WDC RICO Conspiracy
->Document collection/review
->United Kingdom
->France
->Luxembourg
->FD302s
->Review
->Submit to DOJ
->Negotiation with other subjects
[redacted]
(DOJ)
->Fugitive apprehension; negotiation
->AGHA HASAN ABEDI (Pakistan)
->GHAITH RACHAD PHARAON (Saudi Arabia)
->France
->Spain
->Caribbean
->Antigua
->Cayman Islands
->Pakistan
->Witness identification; (re)interviews

->Pakistan
[redacted] b6 b7C b7E
->Others
[redacted]
->Dictation remaining on nine Abu Dhabi interviews
->Asset forfeitures
->Defense against L-claims
->Leads to identify/forfeit additional assets
->350 Park Ave., NY, NY
->Review documents in FIRST AMERICAN BANK civil RICO suit
->Other DOJ and FBI divisions' BCCI-related indictments/investigations (WMFO assist)
->AT (NATIONAL BANK OF GEORGIA: FIF; Bribery; Tax)
->Fugitives
[redacted]
->GHAITH RACHAD PHARAON
->LA (INDEPENDENCE BANK: FIF; Bribery)
-> indictment
[redacted]
->MM (CENTRUST SAVINGS BANK: FIF)
->Fugitive
->GHAITH RACHAD PHARAON
->TP ("C-CHASE"; "C-CHASE II": Money Laundering)

->Miscellaneous Matters
[redacted] b7E
->DOJ Fraud
->Preliminary OOJ investigation; joint with [redacted]
OIG
->Dictation of four interviews
->Report and assessment by DOJ/FBI
->FINCEN followup
->BANQUE DE COMMERCE ET DE PLACEMENTS (BCP)
->DOJ AFO
->Identify role(s) in BCCI-related, U.S. crimes

->Luxembourg
->Document review
->Interviews
->INTERREDEC, INC. and PHARAOH HOLDINGS, LTD.
->DOJ AFO
->Forfeiture action
[redacted] et al
->DOJ Fraud and AFO
->Interviews
[redacted] (London)
-Resulting
->Coordination
->GULF HOLDINGS liquidators (Luxembourg)
->BCCI liquidators (London)
->SITC responses
->SCREENING
->DOJ Fraud and AFO
->U.S. account holders
->Luxembourg
->Cayman Islands
->"KERRY Committee" findings
->DOJ Fraud
->BCCI relationship to LINCOLN SAVINGS BANK;
[redacted] TRENDINVEST
[redacted] Bribery matter
->DOJ Fraud
->Interviews
[redacted]
->Administrative Matters
->Scan to ZyIndex
->All FD-302s and inserts
->"Who's Who/ What's What"
->Case chronology
->Documents
->Consolidate collection
->DOJ, Fed to FBI
->Catalog/Control

b6
b7C

29B-WF-171994
JNR:jnr
1

BCCI CASE:
"HIDDEN INTERESTS"
INVESTIGATIVE STRUCTURE
(07/01/95-08/31/95)
(Revised 06/22/95)

SUPERVISOR: **SSA** [redacted] (C-5)

CASE AGENT: **SA** [redacted] (C-5)

b6
b7C

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->Part time
->**SA** [redacted] (C-5)

->Areas of Investigation:
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->WDC RICO Conspiracy
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[redacted]
(DOJ)
->Fugitive apprehension; negotiation
->AGHA HASAN ABEDI (Pakistan)
->GHAITH RACHAD PHARAON (Saudi Arabia)
->France
->Spain
->Caribbean
->Antigua
->Cayman Islands
->Pakistan
->Witness identification; (re)interviews

X

29B-WF-171994 Main

->Pakistan
[redacted] b6 b7C b7E
->Others
[redacted]
->Dictation remaining on nine Abu Dhabi interviews
->Asset forfeitures
->Defense against L-claims
->Leads to identify/forfeit additional assets
->350 Park Ave., NY, NY
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->Fugitives
[redacted]
->GHAITH RACHAD PHARAON
->LA (INDEPENDENCE BANK: FIF; Bribery)
-> indictment
[redacted]
->MM (CENTRUST SAVINGS BANK: FIF)
->Fugitive
->GHAITH RACHAD PHARAON
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[redacted] b7E
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->FINCEN followup
->BANQUE DE COMMERCE ET DE PLACEMENTS (BCP)
->DOJ AFO
->Identify role(s) in BCCI-related, U.S. crimes

->Luxembourg
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->Interviews
->INTERREDEC, INC. and PHARAOH HOLDINGS, LTD.
->DOJ AFO
->Forfeiture action
[redacted] et al
->DOJ Fraud and AFO
->Interviews
[redacted] (London)
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->Coordination
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[redacted] TRENDINVEST
[redacted] bribery matter
->DOJ Fraud
->Interviews
[redacted]
->Administrative Matters
->Scan to ZyIndex
->All FD-302s and inserts
->"Who's Who/ What's What"
->Case chronology
->Documents
->Consolidate collection
->DOJ, Fed to FBI
->Catalog/Control

b6
b7C

FD-448 Rev 6/1-91

FBI FACSIMILE COVERSHEET

PRECEDENCE
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION
- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☒ Unclassified

Time Transmitted: 2:10P
Sender's Initials: SUE
Number of Pages: 30
(Including Cover Page)

To: [redacted] Date: 7-31-95

b6
b7C

(Name of Office)

Facsimile Number: 202-514-6118

Attn: _____
(Name Room Telephone)

From: FBI TYSONS
(Name of Office)

Subject: Copies of FD302's
serials 170X1 + 184X2
29B-WF-171994 Sub D

Special Handling Instructions: _____

Originator's Name: [redacted] Telephone: [redacted]

Originator's Facsimile Number: [redacted]

Approved: _____

-654
29B-WF-171994 Main

SEARCHED _____ INDEXED _____
SERIALIZED SU FILED SU DOJ
JUL 3 1 1995
FBI — WASH. METRO FIELD OFFICE
PB

9240

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/01/1995

To: WMFO

From: WMFO
C-5/NVMRA
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

File Number(s): 29B-WF-171994 (Pending)

Title: "HIDDEN INTERESTS";
MC #38;
OO:WMFO

Synopsis: Request for Case Reassignment

Details: In that Case Agent SA [redacted] has been TDY'd to the [redacted] Independent Counsel Investigation, captioned case should be reassigned. b6 b7C

Investigative emphasis, as determined by DOJ, should be on locating and capturing fugitive GHAITH PHARAON. DOJ is considering the merits of attempting to build a case against PHARAON [redacted] in furtherance of locating and prosecuting PHARAON. b6 b7C

New case agent should contact DOJ Attorney [redacted] 202-514-0835, to coordinate investigative efforts. b6 b7C

(case) allfiles

1 - 29B-WF-171994 Main
1 - 29B-WF-171994 FUG 1
1 - 29B-WF-171994 FUG 3

SW 9-11-95

1 [redacted] b6 b7C

29B-WF-171994-655

SW SW

SW

1325015-000-9241

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/27/1995

To: SALT LAKE CITY **Attn:** BILLINGS RA, ATTN: SA [redacted] b6 b7C

From: WMFO
C-5, NVMRA
Contact: SA [redacted] (202) 324-6415

Approved By: [redacted]

Drafted By: [redacted] ch

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

Synopsis: Lead for Salt Lake City Division, Billings RA.

Reference: WMFO Teletype to Director FBI dated 6/5/95 and SU SA [redacted] telcall to WMFO SA [redacted] on 9/27/95. b6 b7C

Details: Above referenced Teletype set a lead to the Salt Lake City Division to obtain available information on the holder of [redacted] Bank of Bridger. [redacted] (W/M American, DPOB [redacted] 5'11", Brown Hair, Blue Eyes, SS# [redacted] [redacted] is believed to be the account holder and is believed [redacted] Montana area. Referenced Teletype supplied an incorrect Social Security Number of [redacted] b6 b7C

Additional information has been developed from the Savannah Information Technology Center (SITC) which has indicated that since March, 1993, [redacted] has maintained [redacted] [redacted] Montana. SITC also supplied information which indicates that [redacted] b6 b7C

2 - SALT LAKE CITY DIVISION
1 - WMFO (29B-WF-171994)
CH:ch
(3)

29B-WF-171994 Sub F, Fg. 3
-656 -309

SU

1325015-000-9242
main 656

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: SALT LAKE CITY From: WMFO
Re: 29B-WF-171994, 09/27/1995

b6
b7C

WMFO maintains that [redacted] can provide information to be used to apprehend fugitive GHAITH RACHAD PHARAON. [redacted] current location is unknown and it is unclear if [redacted] PHARAON's boat, "LE PHARAON".

1325015-000-9243

To: SALT LAKE CITY From: WMFO
Re: 29B-WF-171994, 09/27/1995

LEAD(s):

Set Lead 1:

SALT LAKE CITY DIVISION

[redacted] MONTANA

b6
b7C

Obtain subscriber information for [redacted] Montana and attempt to determine if and where [redacted] property in the area. It is requested that contact be made with the appropriate officials to obtain Driver's License photos of [redacted]

♦♦

04/16/96
07:08:31

View Document Attributes

ECFVA0M0

Orig. Office	: HK		Responses :
Document Type	: TELETYPE		Text . . :
Document Date	: 10/06/95		FIF . . . :
To	: FBI HEADQUARTERS *		
From	: HONG KONG		
Case ID . . .	: 29B-WF-171994	Serial :	657
Topic	: STATUS CHECK		
Author . . .	:		
Approver . .	:		
Ref. Case ID	:	Serial :	

Class Level	: SN	Authority :	Duration :	SCI :	
Rule 6(e) .	:	Caveats . :	FD-501 . :		

Command . . . > ..... +

F1=Help F3=Exit F4=Prompt F6=Multv F12=Cancel F14=List F15=PrevDoc F16=NextDoc

4BÜ # 08,02 T

29B-WF-171994 - 657

1225015-000-9245

04/16/96 View Document
07:08:17 ECFVA0MA To's

Orig. Office : HK
Document Type : TELETYPE
Document Date : 10/06/95
To . . . . . : FBI HEADQUARTERS *
From . . . . : HONG KONG
Case ID . . . : 29B-WF-171994
Topic . . . . : STATUS CHECK
Author . . . :
Approver . . :
Ref. Case ID :

Class Level : SN Authority :
Rule 6(e) . : Caveats . :

To
1 FBI HEADQUARTERS
2 WASHINGTON FIELD

Command . . . > .....
F1=Help F3=Exit F4=Prompt F6=Multv F12=Ca F1=Help F12=Cancel

4BÜ # 01,43 T

1325015-000-9246
-657

04/16/96
07:07:53

View Document Attributes

ECFVA0M0

Orig. Office	: MD		Responses :
Document Type	: FAX		Text . . :
Document Date	: 10/06/95		FIF . . . :
To	: MADRID		
From	: SNP BARCELONA		
Case ID . . .	: 29B-WF-171994	Serial : 660	
Topic	: FURNISHED CREW LIST		
Author . . .	:		
Approver . .	:		
Ref. Case ID	:	Serial :	

Class Level	: SN	Authority :	Duration :	SCI :	
Rule 6(e) .	:	Caveats . :	FD-501 . :		

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F15=PrevDoc F16=NextDoc

4BÜ # 22,18 T

1325015-000-9249

29B-WF-171991-660

04/16/96
07:09:03

View Document Attributes

ECFVA0M0

Orig. Office	: MD		Responses :
Document Type	: TELETYPE		Text . . :
Document Date	: 10/10/95		FIF . . . :
To	: BRIDGETOWN *		
From	: MADRID		
Case ID . . .	: 29B-WF-171994	Serial :	661
Topic	: FURNISHED LATEST INFO FROM BARCELONA		
Author . . .	:		
Approver . .	:		
Ref. Case ID	:	Serial :	

Class Level	: SN	Authority :	Duration :	SCI :	
Rule 6(e) .	:	Caveats . :	FD-501 . :		

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F6=Multv F12=Cancel F14=List F15=PrevDoc F16=NextDoc

4BÜ # 08,02 T

29B-WF-171994 EBF

1225015-000-9250

04/16/96
07:09:03

View Document

ECFVA0MA To's

Orig. Office : MD
Document Type : TELETYPE
Document Date : 10/10/95
To . . . . . : BRIDGETOWN *
From . . . . : MADRID
Case ID . . . : 29B-WF-171994
Topic . . . . : FURNISHED LATEST INFO F
Author . . . :
Approver . . :
Ref. Case ID :

Class Level : SN Authority :
Rule 6(e) . : Caveats . :

	To
1	BRIDGETOWN
2	FBI HEADQUARTERS
3	MANILA
4	ROME
5	WASHINGTON FIELD

Command . . . > .....
F1=Help F3=Exit F4=Prompt F6=Multv F12=Ca F1=Help F12=Cancel

4BÜ # 01,43 T

66b1
1323015-000-9251

04/16/96
07:01:58

View Document Attributes

ECFVA0M0

Orig. Office	: MD		Responses :
Document Type	: OTHER		Text . . :
Document Date	: 11/12/95		FIF . . . :
To	: MADRID		
From	: MADRID		
Case ID . . .	: 29B-WF-171994	Serial : 662	
Topic	: MAP OF AREA OF MEDITERRNEAN		
Author . . .	:		
Approver . .	:		
Ref. Case ID	:	Serial :	

Class Level	: SN	Authority :	Duration :	SCI :	
Rule 6(e) .	:	Caveats . :	FD-501 . :		

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F15=PrevDoc F16=NextDoc

4BÜ # 22,18 T

29B-WF-171994-662

C5

00 P12 FBIWMFO CAR

DE BRI #0001 3422029

ZNR JJJJJ

J 081400Z DEC 95

FM LEGAT BRIDGETOWN (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

LEGAT CARACAS/IMMEDIATE/

BT

UNCLAS

CITE: //5500:BRI321.342//

PASS: FBIHQ, ATTN: SSA [redacted] FIFU, WCCS, CID; SSA [redacted] IRU-1; SAs [redacted] WMFO; [redacted] INFORMANT UNIT, ROOM 4944, CID; [redacted] COMMERCIAL ACCOUNTS AND PAYMENT UNIT, ROOM 1993, DIVISION 12.

b6
b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; 00:
WMFO.

RE TELEPHONE CONVERSATION ON 12/7/95 BETWEEN ALAT [redacted] VOUCHER UNIT [redacted]

b6
b7C

Sub FAG 3 318

29B-WF-171994-663

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 1995
FBI — WASH. METRO FIELD OFFICE

main file

1328015-000-9253

AND WMFOTEL DATED 10/10/95.

THE BUREAU IS REQUESTED TO AUTHORIZE THE CONTINUED OPERATION OF LEGAT BRIDGETOWN CONFIDENTIAL SOURCE, [redacted] b7D

[redacted]

FOR INFORMATION OF THE BUREAU AND RECEIVING OFFICES, LEGAT'S CONFIDENTIAL SOURCE [redacted] b6 b7C b7D

[redacted]

ON 12/7/95 THE CONFIDENTIAL SOURCE [redacted] b6 b7C b7D

[redacted]

[redacted]

b6
b7C
b7D

ON 12/5/95 AND 12/6/95 THE SOURCE ADVISED [redacted]

b6
b7C
b7D

[redacted]

ON 11/28/95, THE SOURCE ADVISED [redacted]

b6
b7C
b7D

[redacted]

[redacted] b6 b7C b7D

ON 11/16/95, THE SOURCE ADVISED [redacted] b6 b7C b7D

[redacted]

ON 11/13/95, THE SOURCE ADVISED [redacted] b6 b7C b7D

[redacted]

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

AT THIS POINT, THE LEGAL ATTACHE OFFICE IS REQUESTING AUTHORIZATION TO CONTINUE TO MAINTAIN THE AFOREMENTIONED PERSON AS A CONFIDENTIAL SOURCE DUE TO HIS CONTINUED REPORTING OF POSITIVE INFORMATION ON CRIMINAL ACTIVITIES WITHIN LEGAT BRIDGETOWN TERRITORY.

BT

#0001

NNNN

CAR
305

0062 MRI 01292

PP LSG

DE CAR #0004 3452350

ZNR UUUUU

P 112321Z DEC 95

FM LEGAT CARACAS (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

LEGAT BRIDGETOWN/PRIORITY/

BT

UNCLAS

CITE: //5720:CAR292.345//

PASS: FBIHQ FOR SSA [redacted] FIFU, WCCS; IRU II ROOM 7458, IRB CID. b6 b7C

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; FIF; FAG; OO:WMFO.

RE BRIDGETOWN TELETYPE 12/8/95, LEGAT CARACAS TELEPHONE CALL TO SSA [redacted] WMFO, AND ALAT [redacted] LEGAT BRIDGETOWN, BOTH ON 12/11/95. b6 b7C

WMFO IS REQUESTED TO FURNISH BACKGROUND REGARDING CAPTIONED MATTER TO LEGAT CARACAS INCLUDING PERTINENT DETAILS

29B-WF-171994-664

REGARDING FUGITIVE AND THE YACHT HE MAY BE USING. WMFO IS ALSO REQUESTED TO FEDERAL EXPRESS PHOTOS OF THE SUBJECT. THE ADDRESS FOR LEGAT CARACAS IS: AMERICAN EMBASSY, ATTN: LEGAL ATTACHE; CALLE "F", COLINAS DE VALLE ARRIBA, CARACAS, VENEZUELA, 1061.

IF WMFO BELIEVES IT IS WARRANTED, LEGAT CARACAS MAY BE ABLE TO ARRANGE COVERAGE OF SOURCE MEETING [redacted] b7D

[redacted]

BT

#0004

NNNN

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☒ Teletype
☐ Facsimile
☐ AIRTEL

PRECEDENCE:
☐ Immediate
☒ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

Date 12/11/95

FM LEGAT CARACAS (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

LEGAT BRIDGETOWN/PRIORITY/

BT

UNCLAS

CITE: //5720:CAR292.345//

PASS: FBIHQ FOR SSA [redacted] FIFU, WCCS; IRU II ROOM 7458, IRB CID. b6 b7C

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; FIF; FAG; OO:WMFO.

RE BRIDGETOWN TELETYPE 12/8/95, LEGAT CARACAS TELEPHONE CALL TO SSA [redacted] WMFO, AND ALAT [redacted] LEGAT BRIDGETOWN, BOTH ON 12/11/95. b6 b7C

WMFO IS REQUESTED TO FURNISH BACKGROUND REGARDING CAPTIONED MATTER TO LEGAT CARACAS INCLUDING PERTINENT DETAILS REGARDING FUGITIVE AND THE YACHT HE MAY BE USING. WMFO IS

29B-WF-171994-664

TICKLER SET

LEAD ASSIGNED tones

RR

Approved: _____ Original filename: CAR292W.345

Time Received: _____ Telprep filename: CAR29250.345

MRI/JULIAN DATE: _____ ISN: _____

FOX DATE & TIME OF ACCEPTANCE: _____ ✓

1325015-000-9261

ALSO REQUESTED TO FEDERAL EXPRESS PHOTOS OF THE SUBJECT. THE ADDRESS FOR LEGAT CARACAS IS: AMERICAN EMBASSY, ATTN: LEGAL ATTACHE; CALLE "F", COLINAS DE VALLE ARRIBA, CARACAS, VENEZUELA, 1061.

IF WMFO BELIEVES IT IS WARRANTED, LEGAT CARACAS MAY BE ABLE TO ARRANGE COVERAGE OF SOURCE MEETING [redacted] b7D

[redacted]

BT

C-6

/READ 1292/345
0000 MRI 01292

PP RUCNFB FBIWMFO BRI

DE CAR #0004 3460315

ZNR UUUUU

P 112321Z DEC 95

FM LEGAT CARACAS (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

LEGAT BRIDGETOWN/PRIORITY/

BT

UNCLAS

CITE: //5720:CAR292.345//

PASS: FBIHQ FOR SSA [redacted] FIFU, WCCS; IRU II ROOM 7458, IRB CID. b6 b7C

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; FIF; FAG; OO:WMFO.

RE BRIDGETOWN TELETYPE 12/8/95, LEGAT CARACAS TELEPHONE CALL TO SSA [redacted] WMFO, AND ALAT [redacted] LEGAT BRIDGETOWN, BOTH ON 12/11/95. b6 b7C

WMFO IS REQUESTED TO FURNISH BACKGROUND REGARDING CAPTIONED MATTER TO LEGAT CARACAS INCLUDING PERTINENT DETAILS

-664

29B-WF-171994 FAG 3

-322

SEARCHED INDEXED
SERIALIZED FILED
DEC 95
FBI — WASH. METRO FIELD OFFICE

main -664

PAGE TWO CAR 0004 UNCLAS

REGARDING FUGITIVE AND THE YACHT HE MAY BE USING. WMFO IS ALSO REQUESTED TO FEDERAL EXPRESS PHOTOS OF THE SUBJECT. THE ADDRESS FOR LEGAT CARACAS IS: AMERICAN EMBASSY, ATTN: LEGAL ATTACHE; CALLE "F", COLINAS DE VALLE ARRIBA, CARACAS, VENEZUELA, 1061.

IF WMFO BELIEVES IT IS WARRANTED, LEGAT CARACAS MAY BE ABLE TO ARRANGE COVERAGE OF SOURCE MEETING [redacted] b7D

[redacted]

BT

#0004

NNNN

04/16/96
07:20:03

View Document Attributes

ECFVA0M0

Orig. Office	: WF		Responses :
Document Type	: OTHER		Text . . :
Document Date	: 12/11/95		FIF . . . :
To	: WASHINGTON FIELD		
From	: WASHINGTON FIELD		
Case ID . . .	: 29B-WF-171994	Serial :	665
Topic	: SEIZURE FORM		
Author . . .	:		
Approver . .	:		
Ref. Case ID	:	Serial :	

Class Level	: SN	Authority :	Duration :	SCI :	
Rule 6(e) .	:	Caveats . :	FD-501 . :		

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F16=NextDoc

4BÜ # 22,18 T

29B-WF-171994-605

1225015-000-92

Routing Slip
0-7 (Rev. 10-14-94)

(Copies to Offices Checked)

TO: SAC,

- ☐ Albany
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Boston
- ☐ Buffalo
- ☐ Charlotte
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Columbia
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Honolulu
- ☐ Houston
- ☐ Indianapolis
- ☐ Jackson
- ☐ Jacksonville
- ☐ Kansas City
- ☐ Knoxville
- ☐ Las Vegas
- ☐ Little Rock
- ☐ Los Angeles
- ☐ Louisville
- ☐ Memphis
- ☐ Miami
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Mobile
- ☐ Newark
- ☐ New Haven
- ☐ New Orleans
- ☐ New York City
- ☐ Norfolk
- ☐ ASAC, Brooklyn-Queens (MRA)
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Philadelphia
- ☐ Phoenix
- ☐ Pittsburgh
- ☐ Portland
- ☐ Richmond
- ☐ Sacramento
- ☐ St. Louis
- ☐ Salt Lake City
- ☐ San Antonio
- ☐ San Diego
- ☐ San Francisco
- ☐ San Juan
- ☐ Seattle
- ☐ Springfield
- ☐ Tampa
- ☒ Washington Metropolitan Field
- ☐ Quantico

TO: LEGAT,

- ☐ Athens
- ☐ Bangkok
- ☐ Bern
- ☐ Bogota
- ☐ Bonn
- ☐ Bridgetown
- ☐ Brussels
- ☐ Canberra
- ☐ Caracas
- ☐ Hong Kong
- ☐ London
- ☐ Madrid
- ☐ Manila
- ☐ Mexico City
- ☐ Montevideo
- ☐ Moscow
- ☐ Ottawa
- ☐ Panama City
- ☐ Paris
- ☐ Rome
- ☐ Santiago
- ☐ Tokyo
- ☐ Vienna

RE: 29B-WF-171994

12/20/95
Date

☐ For information ☐ Retention optional ☐ For appropriate action ☐ Surep,by _____

☐ The enclosed is for your information. If used in a future report, ☐ conceal all sources ☐ paraphrase contents.

☐ Enclosed are corrected pages from report of SA _____ dated _____.

Remarks:

Documents submitted for your file.

29B-WF-171994

Enc.
Bufile
Urfile

1325015-000-9267

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 12/13/95

[redacted] was observed deplaning from NORTHWEST flight #1043 at approximately 10:25 p.m., at the Billings Logan International Airport. He met with two younger females and an approximately one-year-old child. He was followed down to the baggage area and confronted by SA [redacted]

[redacted] was advised of the identity of the agent and also advised that he was being contacted concerning the whereabouts of GHAITH RACHAD PHARAON. [redacted] was then advised by SA [redacted] that PHARAON was currently a fugitive from justice and that if he, [redacted] knowingly concealed the whereabouts of PHARAON, he, [redacted] could be charged for harboring a fugitive.

[redacted] advised that he last saw PHARAON on the 19th of November when he departed Damascus. [redacted] explained that he had [redacted] PHARAON [redacted]

When asked where GHAITH RACHAD PHARAON was currently located, [redacted] stated that he can always either be found in Jetta or Syria and because of his current status, he did not believe PHARAON would leave the Arab states.

[redacted] identified the company owning the yacht as the LATH TREATING AND CONTRACTING COMPANY.

[redacted] also advised that [redacted]

[redacted] further stated that [redacted] Montana, [redacted] Montana. His telephone number is [redacted]

Investigation on 11/20/95 at Billings, Montana File # 29B-WF-171994-668

by SA [redacted] mlf Date dictated 12/11/95

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-9269

(03/31/95)

C-5

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/22/1995

To: WMFO **Attn:** SAC

From: SALT LAKE CITY
Billings, Montana, RA
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mlf

File Number(s): 29B-WF-171994 (Referred Upon Completion)

Title: HIDDEN INTEREST;
MC #38;
FIF; FAG;

Synopsis: [redacted] was interviewed on 11/20/1995, concerning captioned matter. b6 b7C

Reference: WMFO EC dated 9/27/1995.

Enclosures: Enclosed for WMFO are the original and two copies of the FD-302 regarding the interview of [redacted] conducted on 11/20/1995. b6 b7C

Details: See enclosed FD-302.

♦♦

1325015-000-9270

29B-WF-171994-669

 b6 b7C

[redacted] also stated that he does have some allegiance to PHARAON as PHARAON has been his, [redacted] b6 b7C

[redacted] also stated that he was not aware if any of the charges pending against PHARAON were true. b6 b7C

[redacted] also stated that if he had to supply information concerning PHARAON, he would. b6 b7C

The following is a description taken from observation and questioning of [redacted] b6 b7C

Race:	White
Sex:	Male
Height:	Approximately 6' tall
Date of Birth:	[redacted]
Hair:	Thinning, brown
Eyes:	Blue
Weight:	Approximately 210 pounds

DECLASSIFIED BY [redacted]
ON 05-01-2018

b6
b7C

04/16/96 View Document Attributes ECFVA0M0
07:05:25 ~~SECRET~~

Orig. Office : PA Responses :
Document Type : EC Text . . : Y
Document Date : 11/06/95 FIF . . . :
To . . . . . : CID *
From . . . . : LEGAT PARIS
Case ID . . . : 29B-WF-171994 Serial : 670
Topic . . . . : STATUS REPORT ON VARIOUS ISSUES ASSOCIATED WITH
Author . . . : [redacted]
Approver . . : [redacted]
Ref. Case ID : Serial :

b6
b7C

Class Level : ~~S~~ Authority : ~~S~~ ~~Duration : X-1~~ SCI :
Rule 6(e) . : Caveats . : ~~FD-501 . :~~

~~SECRET~~

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F6=Multv F12=Cancel F13=Text F14=List F15=PrevDoc
F16=NextDoc
4BÜ # 08,02 T

1325015-000-9272

29B-WF-171994 - 670

DECLASSIFIED BY [redacted]
ON 05-01-2018

b6
b7C

04/16/96 View Document
07:05:25 ~~SECRE~~ ECFVA0MA To's

Orig. Office	: PA		To
Document Type	: EC	1	CID
Document Date	: 11/06/95	2	WMFO
To	: CID *		
From	: LEGAT PARIS		
Case ID . . .	: 29B-WF-171994		
Topic	: STATUS REPORT ON VARIOU		
Author . . .	: [redacted]		
Approver . .	:		
Ref. Case ID	:		

b6
b7C

Class Level : ~~S~~ Authority : ~~S~~
Rule 6(e) . : Caveats . :

~~SECRE~~

Command . . . > .....
F1=Help F3=Exit F4=Prompt F6=Multv F12=Ca F1=Help F12=Cancel
F16=NextDoc
4BÜ # 01,43 T

U.S. Department of Justice

Federal Bureau of Investigation

Office of the Legal Attaché

C-5

Legal Attaché

The American Embassy
PSC 801, Box 02
FPO AE 09498-4002

3/4/96

TO: FBI, WMFO

Re: 298-WF-171994

Originals of Serials 672 and 673 forwarded for your file.

Legat London

1325015-000-9285

CR

219

0122 MRI 01718

RR LSG

DE CAR #0002 0652313

ZNR UUUUU

R 052242Z MAR 96

FM LEGAT CARACAS (29B-WF-171994) (RUC)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //5720:CAR066.065//

PASS: FBIHQ FOR IRU II, ROOM 7458.

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; FIF; FAG; OO:WMFO.

SINCE NO FURTHER INVESTIGATION IS WARRANTED IN CARACAS, LEGAT CONSIDERS THIS MATTER CLOSED IN CARACAS.

BT

#0002

29B WF-171994-674

NNNN

RUC 6 3/6/96

Lead covered 3/6/96

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
[X] Teletype
[ ] Facsimile
[ ] AIRTEL

PRECEDENCE:
[ ] Immediate
[ ] Priority
[X] Routine

CLASSIFICATION:
[ ] TOP SECRET
[ ] SECRET
[ ] CONFIDENTIAL
[ ] UNCLAS E F T O
[X] UNCLAS

Date 3/5/96

FM LEGAT CARACAS (29B-WF-171994) (RUC)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //5720:CAR066.065//

PASS: FBIHQ FOR IRU II, ROOM 7458.

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; FIF; FAG; OO:WMFO.

SINCE NO FURTHER INVESTIGATION IS WARRANTED IN CARACAS, LEGAT CONSIDERS THIS MATTER CLOSED IN CARACAS.

BT

RUC 6 8 12 March 96

Approved: Rat/R Original filename: CAR066W.065

Time Received: _____ Telprep filename: CAR06650-065

MRI/JULIAN DATE: _____ ISN: _____

FOX DATE & TIME OF ACCEPTANCE: _____

1325015-000-9294

Case ID . : 29B-WF-171994 Serial : 674
Responses :

3/5/96

X

X

FM LEGAT CARACAS (29B-WF-171994) (RUC)

TO DIRECTOR FBI/ROUTINE/

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F8=Fwd F12=Cancel F13=Attrib F14=List F16=NextDoc

4BÜ # 22,18 T

1325015-000-9295
29B-WF-171994 - 674

29B-WF-171994
DCR/dcr

The following investigation was conducted by SA [redacted] in Falls Church, Virginia: b6 b7C

Pursuant to the receipt of a memo from [redacted] dated 10/13/95, (memo attached), SA [redacted] telephonically contacted [redacted] for additional information. [redacted] advised that all information he has is contained in his memo dated 10/13/95, and that [redacted] In summary, the information contained in the [redacted] memo is that there was a scheduled closing on a PHARAON Hotel in Orlando, Fla., in October 1995 where there were checks written directly to GHAITH PHARAON.

On 1/16/96, SA [redacted] contacted [redacted] regarding his knowledge of the above events. [redacted] stated that the information which he provided to [redacted] came from [redacted] b6 b7C b7D

On 1/19/96, SA [redacted] telephonically contacted [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

605

1325015-000-9296

29B-WF-171994 Main

29B-WF-171994
DCR/dcr

The following investigation was conducted by SA [redacted] in Falls Church, Virginia: b6 b7C

Pursuant to the receipt of a memo from [redacted] dated 10/13/95, (memo attached), SA [redacted] telephonically contacted [redacted] for additional information. [redacted] advised that all information he has is contained in his memo dated 10/13/95, and that [redacted]

In summary, the information contained in the [redacted] memo is that there was a scheduled closing on a PHARAON Hotel in Orlando, Fla., in October 1995 where there were checks written directly to GHAITH PHARAON.

On 1/16/96, SA [redacted] contacted [redacted] regarding his knowledge of the above events. [redacted] stated that the information which he provided to [redacted] came from [redacted] b6 b7C b7D

On 1/19/96, SA [redacted] telephonically contacted [redacted] b6 b7C b7D

[redacted]

-675

b6 b7C b7D

1325015-00 97

Date: Friday, October 13, 1995 6:54 pm
From: [redacted] b6 b7C
Subject: Pharaon/InterRedec

[redacted] b6 b7C b7D

Got a call today from Trustee in the BCCI case [redacted]

[redacted]

Whatever you do with the letter you were going to send to [redacted] you should not agree to any refinancings. [redacted] could one of you please pass this information along to the FBI to check out ? [redacted] In addition, [redacted] should know that [redacted]

[redacted] b6 b7C

04/16/96
07:38:23

View Document Attributes

ECFVA0M0

Orig. Office : D4
Document Type : AIRTEL
Document Date : 09/08/95
To . . . . . : FBI HEADQUARTERS
From . . . . : BANGKOK
Case ID . . . : 29B-WF-171994 Serial : 676
Topic . . . . : LETTER FROM AGHA KHAN HOSPITAL
Author . . . :
Approver . . :
Ref. Case ID : Serial :

Responses :
Text . . :
FIF . . . :

Class Level : SN Authority : Duration : SCI :
Rule 6(e) . : Caveats . : FD-501 . :

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F16=NextDoc

4BÜ # 22,18 T

1325015-000-9299
29B-WF-171994-676

C-5

/read 931/080
0000 MRI 00931

RR RJCNFB FBIWMFO HQN

DE BRU #0001 0810526

ZNY EEEEE

R 201536Z MAR 96

FM LEGAT BRUSSELS (29B-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

INFO LEGAT HONG KONG/ROUTINE/

BT

UNCLAS E F T O

CITE: //5220:BL322.080 20 MAR 96//

PASS: FBIHQ: FIFU, FCS, IRJ1, IRO5B; WMFO: ATTN: SA [redacted] b6 b7C

[redacted] SQUAD-C5.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE # 38; FIF; OO: WMFO.

REFERENCE BRUSSELS TELEPHONE CALL OF ALAT [redacted] b6 b7C

[redacted] ON MARCH 18, 1996.

[redacted] b7D

29B-WF-171994 -677

SEARCHED INDEXED
SERIALIZED FILED
MAR 21 1996
FBI — WASH. METRO FIELD OFFICE

UNCLAS E F T O

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

SOURCE ADVISED [redacted]

[redacted]

BRUSSELS' QUERY OF UNIVERSAL INDEX (UNI) DISCLOSED NO INDEXING OF [redacted] b6 b7C b7D

SOURCE ADVISED [redacted]

[redacted]

LEADS:

WMFO AT WASHINGTON, D.C.:

ADVISE IF [redacted] b6 b7C b7D

[redacted] ADVISE IF ADDITIONAL INFORMATION REGARDIN [redacted] AND HIS CURRENT WHEREABOUTS AND ACTIVITY WOULD BE HELPFUL TO CAPTIONED MATTER.

LEGAT BRUSSELS AT BRUSSELS, BELGIUM:

AWAIT RESULTS OF WMFO LEAD.

BT

#0001

NNNN

04/16/96 View Document Attributes ECFVA0M0
07:41:59

Orig. Office : D4 Responses :
Document Type : TELETYPE Text . . :
Document Date : 10/20/95 FIF . . . :
To . . . . . : FBI HEADQUARTERS
From . . . . : WASHINGTON FIELD
Case ID . . . : 29B-WF-171994 Serial : 678
Topic . . . . : RE TELETYPE FROM LEGAT HONG KONG TO DIRECTOR DATED 10/5/95
Author . . . :
Approver . . :
Ref. Case ID : Serial :

Class Level : U Authority : Duration : SCI :
Rule 6(e) . : Caveats . : FD-501 . :

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F16=NextDoc

4BÜ # 22,18 T

1325015-000-9303

29B-WF-171994- 678

04/16/96
07:44:23

View Document Attributes

ECFVA0M0

Orig. Office : D4
Document Type : TELETYPE
Document Date : 11/29/95
To . . . . . : FBI HEADQUARTERS
From . . . . . : STATE
Case ID . . . : 29B-WF-171994
Topic . . . . : PHARON, GHAITH - EXTRADITION
Author . . . :
Approver . . :
Ref. Case ID :

Responses :
Text . . :
FIF . . . :

Serial : 679

Serial :

Class Level : U
Rule 6(e) . :

Authority :
Caveats . :

Duration :
FD-501 . :

SCI :

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F12=Cancel F14=List F16=NextDoc

4BÜ

22,18 T

29B-WF-171994-679

1220150009304

U.S. Department of Justice

Federal Bureau of Investigation

Office of the Legal Attaché

C-5

Legal Attaché

The American Embassy
PSC 801, Box 02
FPO AE 09498-4002

3/27/96

To: FBI, WMFO

Re: 29B-WF-171994

Original of Serial 680 attached for your file.

Leget, London

1325015-000-9305

Routing Slip
0-7 (Rev. 10-14-94)

(Copies to Offices Checked)

TO: SAC,

- ☐ Albany
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Boston
- ☐ Buffalo
- ☐ Charlotte
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Columbia
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Honolulu
- ☐ Houston
- ☐ Indianapolis
- ☐ Jackson
- ☐ Jacksonville
- ☐ Kansas City
- ☐ Knoxville
- ☐ Las Vegas
- ☐ Little Rock
- ☐ Los Angeles
- ☐ Louisville
- ☐ Memphis
- ☐ Miami
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Mobile
- ☐ Newark
- ☐ New Haven
- ☐ New Orleans
- ☐ New York City
- ☐ Norfolk
- ☐ ASAC, Brooklyn-Queens (MRA)
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Philadelphia
- ☐ Phoenix
- ☐ Pittsburgh
- ☐ Portland
- ☐ Richmond
- ☐ Sacramento
- ☐ St. Louis
- ☐ Salt Lake City
- ☐ San Antonio
- ☐ San Diego
- ☐ San Francisco
- ☐ San Juan
- ☐ Seattle
- ☐ Springfield
- ☐ Tampa
- ☒ Washington Metropolitan Field
- ☐ Quantico

TO: LEGAT,

- ☐ Athens
- ☐ Bangkok
- ☐ Bern
- ☐ Bogota
- ☐ Bonn
- ☐ Bridgetown
- ☐ Brussels
- ☐ Canberra
- ☐ Caracas
- ☐ Hong Kong
- ☐ London
- ☐ Madrid
- ☐ Manila
- ☐ Mexico City
- ☐ Montevideo
- ☐ Moscow
- ☐ Ottawa
- ☐ Panama City
- ☐ Paris
- ☐ Rome
- ☐ Santiago
- ☐ Tokyo
- ☐ Vienna

RE: 29B-WF-171994

4/1/96
Date

☐ For information ☐ Retention optional ☐ For appropriate action ☐ Surep,by _____

☐ The enclosed is for your information. If used in a future report, ☐ conceal all sources ☐ paraphrase contents.

☐ Enclosed are corrected pages from report of SA _____ dated _____.

Remarks:

Copy of Serial 683 attached for your file.

29B-WF-171994
Legat London - 684

SEARCHED SW INDEXED
SERIALIZED SW FILED SW
APR 8 1996
TRO FIELD OFFICE

Enc.
Bufile
Urfile

b6
b7C

132-HQ-1085410 Serial 684

PB

DECLASSIFIED BY: [redacted]
ON 05-01-2018

b6
b7C

(06/01/1995)

~~SECRET~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 04/05/1996

To: CID **Attn:** SSA [redacted] b6 b7C
IRU#1, IRB

WMFO

From: Rome
Contact: ALAT [redacted]

Approved By: [redacted]

Drafted By: [redacted]:jgh

Case ID #: 29B-WF-171994 (Closed)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG; OO: WF

ARMED AND DANGEROUS

Synopsis: Since no leads remain outstanding and this matter is considered RUC'd at Legat Rome.

Details: Reference WMFO's teletype to the Director, Legat Rome and other Legats. Legat Rome has conducted a review of its file regarding captioned matter and no leads remain outstanding. As such, this matter is being placed in an RUC status. Advise is you should desire any additional assistance in this matter. Legat Rome has [redacted] b7D and these could be further explored. Additionally, TDY special agents from WMFO are in Riyadh addressing a bombing matter on a rotational basis and could be in a position to assist.

~~**Classified by:** 7982~~
~~**Reason:** 1.5 (c)~~
~~**Declassify on:** X1~~

~~SECRET~~

29B-WF-171994 - 685

1325015-000-9312

To: CID From: Rome
Re: 29B-WF-171994, 04/05/1996

LEAD(s):

Set Lead 1:

WASHINGTON FIELD

AT WASHINGTON, D.C.

This lead being set only so that ACS flags the fact there is new information in the file. You can close this lead once you have read this serial.

ARMED AND DANGEROUS

♦♦

1325015-000-9313

DECLASSIFIED BY: [redacted]
ON 05-01-2018

b6
b7C

(05/01/1995)

~~SECRET~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 04/05/1996

To: CID **Attn:** SSA [redacted] b6 b7C
IRU#1, IRB

WMFO

From: Rome
Contact: ALAT [redacted]

Approved By: [redacted]

Drafted By: [redacted] jgh

Case ID #: 29B-WF-171994 (Closed)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG; OO: WF

ARMED AND DANGEROUS

Synopsis: Since no leads remain outstanding and this matter is considered RUC'd at Legat Rome.

Details: Reference WMFO's teletype to the Director, Legat Rome and other Legats. Legat Rome has conducted a review of its file regarding captioned matter and no leads remain outstanding. As such, this matter is being placed in an RUC status. Advise is you should desire any additional assistance in this matter. Legat Rome has [redacted] b7D Additionally, TDY special agents from WMFO are in Riyadh addressing a bombing matter on a rotational basis and could be in a position to assist.

~~**Classified by:** 7982~~
~~**Reason:** 1.5 (c)~~
~~**Declassify on:** X1~~

~~SECRET~~

1325015-000-9314

To: CID From: Rome
Re: 29B-WF-171994, 04/05/1996

LEAD(s):

Set Lead 1:

WASHINGTON FIELD

AT WASHINGTON, D.C.

This lead being set only so that ACS flags the fact there is new information in the file. You can close this lead once you have read this serial.

ARMED AND DANGEROUS

♦♦

DECLASSIFIED BY: [redacted]
ON 05-01-2018

b6
b7C

04/16/96 View Document Text ECFVT0M0
07:49:06 ~~SECRET~~ More : +

Case ID . : 29B-WF-171994 Serial : 685
Responses :

Precedence: PRIORITY Date: 04/05/1996

To: CID Attn: SSA [redacted] b6 b7C
IRU#1, IRB

WMFO

From: Rome
Contact: ALAT [redacted]

Approved By: [redacted]

Drafted By: [redacted] jgh

~~SECRET~~

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F8=Fwd F12=Cancel F13=Attrib F14=List F16=NextDoc

4BÜ # 22,18 T

1325015-000-9316

29B-WF-171994 — 685

04/16/96 View Document Text ECFVT0M0
07:49:18 ~~SECRET~~ More : - +

Case ID . : 29B-WF-171994 Serial : 685
Responses :

Case ID #: 29B-WF-171994 (Closed)

Title: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG; OO: WF

ARMED AND DANGEROUS

Synopsis: Since no leads remain outstanding and this matter is considered RUC'd at Legat Rome.

Details: Reference WMFO's teletype to the Director, Legat Rome and other Legats. Legat Rome has conducted a review of its file

~~SECRET~~

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F7=Bkwd F8=Fwd F12=Cancel F13=Attrib F14=List
F16=NextDoc
4BÜ # 22,18 T

1325015-000-9317

04/16/96 View Document Text ECFVT0M0
07:49:27 ~~SECRET~~ More : - +

Case ID . : 29B-WF-171994 Serial : 685
Responses :

---

regarding captioned matter and no leads remain outstanding. As such, this matter is being placed in an RUC status. Advise is you should desire any additional assistance in this matter.

Legat Rome has [redacted] b7D

Additionally, TDY special agents from WMFO are in Riyadh addressing a bombing matter on a rotational basis and could be in a position to assist.

LEAD(s):

~~SECRET~~

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F7=Bkwd F8=Fwd F12=Cancel F13=Attrib F14=List
F16=NextDoc
4BÜ # 22,18 T

04/16/96 View Document Text ECFVT0M0
07:49:38 ~~SECRET~~ More : - +

Case ID . : 29B-WF-171994 Serial : 685
Responses :

Set Lead 1:

WASHINGTON FIELD

AT WASHINGTON, D.C.

This lead being set only so that ACS flags the fact
there is new information in the file. You can close this lead
once you have read this serial.

~~SECRET~~

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F7=Bkwd F8=Fwd F12=Cancel F13=Attrib F14=List
F16=NextDoc
4BÜ # 22,18 T

Bottom of document.
04/16/96 View Document Text ECFVT0M0
07:50:23 ~~SECRET~~ More : -

Case ID . : 29B-WF-171994 Serial : 685
Responses :

ARMED AND DANGEROUS

~~SECRET~~

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F7=Bkwd F12=Cancel F13=Attrib F14=List F16=NextDoc

4BÜ # 22,18 T

Routing Slip
0-7 (Rev. 10-14-94)

(Copies to Offices Checked)

C-5

TO: SAC,

- ☐ Albany
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Boston
- ☐ Buffalo
- ☐ Charlotte
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Columbia
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Honolulu
- ☐ Houston
- ☐ Indianapolis
- ☐ Jackson
- ☐ Jacksonville
- ☐ Kansas City
- ☐ Knoxville
- ☐ Las Vegas
- ☐ Little Rock
- ☐ Los Angeles
- ☐ Louisville
- ☐ Memphis
- ☐ Miami
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Mobile
- ☐ Newark
- ☐ New Haven
- ☐ New Orleans
- ☐ New York City
- ☐ Norfolk
- ☐ ASAC, Brooklyn-Queens (MRA)
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Philadelphia
- ☐ Phoenix
- ☐ Pittsburgh
- ☐ Portland
- ☐ Richmond
- ☐ Sacramento
- ☐ St. Louis
- ☐ Salt Lake City
- ☐ San Antonio
- ☐ San Diego
- ☐ San Francisco
- ☐ San Juan
- ☐ Seattle
- ☐ Springfield
- ☐ Tampa
- ☒ Washington Metropolitan Field
- ☐ Quantico

TO: LEGAT,

- ☐ Athens
- ☐ Bangkok
- ☐ Bern
- ☐ Bogota
- ☐ Bonn
- ☐ Bridgetown
- ☐ Brussels
- ☐ Canberra
- ☐ Caracas
- ☐ Hong Kong
- ☐ London
- ☐ Madrid
- ☐ Manila
- ☐ Mexico City
- ☐ Montevideo
- ☐ Moscow
- ☐ Ottawa
- ☐ Panama City
- ☐ Paris
- ☐ Rome
- ☐ Santiago
- ☐ Tokyo
- ☐ Vienna

RE: ✓
29B-WF-171994

4/11/96
Date

☐ For information ☐ Retention optional ☐ For appropriate action ☐ Surep,by _____

☐ The enclosed is for your information. If used in a future report, ☐ conceal all sources ☐ paraphrase contents.

☐ Enclosed are corrected pages from report of SA _____ dated _____.

Remarks:

Original of Serial 686 provided for your file.
29B-WF-171994

SEARCHED 9E INDEXED _____
SERIALIZED _____ FILED _____
APR 18 1996
FBI — WASHINGTON

Legat, London

Enc.
Bufile
Urfile

1325015-000-8321

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-01-2018 BY [redacted]

(03/31/95)

b6
b7C

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/15/1996

To: Legat Paris **Attn:** WCCS, FIFU SSA [redacted]

b6
b7C

From: ADIC, WMFO
C-5
Contact: SA [redacted]

Approved By: [redacted] PGB/DED

Drafted By: [redacted]

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTEREST, MAJOR CASE # 38
FIF;FAG;
OO:WMFO

Synopsis: Response to Paris lead to WMFO dated 3/25/96, regarding an Extradition Extension request.

Details: For information Legat Paris, on 4/15/96 SA [redacted] contacted DOJ Attorney [redacted] regarding their request for an Extradition Extension request pertaining to [redacted]

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[redacted] advised that she would contact Legat Paris, directly concerning the necessity of the Extradition Extension.

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If there are any additional questions concerning this matter, contact should be made with SA [redacted] at telephone (202) 324-6414.

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♦♦

29B-WF-171994-689

SEARCHED INDEXED
SERIALIZED FILED

FBI/DOJ

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-01-2018 BY [redacted]

b6
b7C

SSA [redacted] ROUTING SLIP DATE 9/19

ASAC MACK

SSA [redacted]	SA [redacted]
SSA	SA
SSA	SA
SSA	SA
SSA	SA
SSA	SA
SSA	SA
SSA (1) ✓	SA
	SA
FA [redacted]	SA
(2) IMA [redacted] ✓	SA
	SA

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b7C

____See Me
____FYI
____Initial
____Other

COMMENTS:

[redacted] — These are the two BCCI leads that are assigned to you. If all work has been completed, please forward to [redacted] and have her mark leads as "covered"

b

1325015-000-9325

DECLASSIFIED BY [redacted]
ON 05-01-2018

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09/18/97 View Lead ICMLMO06
16:48:36 ~~SECRET~~ Page 1 of 2

View Lead, then press Enter

Case ID . . . . . : 29B-WF-171994 Serial . . . : 677
Status . . . . . : ASSIGNED Lead Number. : 2
Precedence. . . . . : ROUTINE
Office . . . . . : WASHINGTON FIELD Squad. . . . : C5
At . . . . . : WASHINGTON, DC
Assigned To . . . . : CRIMINAL 5 Date : 04/30/1996
Previously Assigned : * Date :
Set By . . . . . : [redacted]
Set Date . . . . . : 03/20/1996 Time : 11:12AM
Deadline Date . . . : 05/19/1996 Time : 05:00PM

ADVISE IF [redacted] IS SOUGHT EITHER AS A FUGITIVE OR AS A SUSPECT FOR 1
INTERVIEW. ADVISE IF ADDITIONAL INFORMAITON REGARDING [redacted] AND HIS 2
CURRENT WHEREABOUTS AND ACTIVITY WOULD BE HELPFUL TO CAPTIONED MATTER 3
4
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~~SECRET~~

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Command . . > .....
F1=Help F2=Text F3=Exit F4=Prompt F6=Multv F7=Bkwd F8=Fwd F11=NextPg F12=Cancel
F21=Case

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☒ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☐ AIRTEL	☒ Routine	☐ CONFIDENTIAL
		☒ UNCLAS E F T O
		☐ UNCLAS

Date 4/19/96

FM FBI WMFO (29B-171994) (P) (C-5)

TO DIRECTOR FBI/ROUTINE/

LEGAT BRUSSELS/ROUTINE/

BT

UNCLAS E F T O

CITE: //3920//

PASS: FBIHQ: FIFU, FCS, IRU1. IROSB; ALAT [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; OO: WMFO.

FOR INFORMATION LEGAT BRUSSELS, SA [redacted] TELEPHONICALLY CONTACTED [redacted] b6 b7C

[redacted] NEW YORK BANKING COMMISSION, WHO WAS ASSIGNED TO THE BCCI INVESTIGATION. [redacted] ADVISED THAT HE IS FAMILIAR WITH [redacted] NEW YORK DISTRICT ATTORNEY'S OFFICE (DANY) INVESTIGATION REGARDING [redacted] [redacted] PROVIDED THAT ADDITIONAL INFORMATION IS AVAILABLE FROM [redacted] DANY, TELEPHONE

LGTBRSS.114-688

C-5 [redacted]

SEARCHED [redacted] INDEXED [redacted] SERIALIZED [redacted] FILED [redacted] JB

Approved: [redacted] Original filename: LRROOTW.110

Time Received: TOPIC Telprep filename: WMR001S0.110 b6 b7C

MRI/JULIAN DATE: 8761110 ISN: 008

FOX DATE & TIME OF ACCEPTANCE: 4/19/96 940A

132-150000-9327

[redacted] b6 b7C

SA [redacted] SUBSEQUENTLY CONTACTED [redacted] WHO CONFIRMED b6 b7C THAT [redacted] BUT THERE WAS NEVER SUFFICIENT EVIDENCE COMPILED TO CHARGE HIM WITH A CRIME. [redacted] FURTHER PROVIDED THAT THERE IS NO OUTSTANDING WARRANT FOR [redacted] AND THEY NEVER ATTEMPTED TO CONTACT HIM FOR AN INTERVIEW. IN ADDITION, [redacted] APPEARED TO BE AWARE OF ALL INFORMATION PROVIDED IN REFERENCED TELETYPE CONCERNING [redacted] INCLUDING HIS CURRENT EMPLOYMENT.

WMFO INDICES NEGATIVE CONCERNING [redacted] AND THERE IS b6 b7C NO CURRENT INVESTIGATION REGARDING [redacted] BY WMFO.

IN VIEW OF THE ABOVE, THIS LEAD IS CONSIDERED CLOSED. IF THERE ARE ANY QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO SA [redacted] TELEPHONE NUMBER (202)324-6414. b6 b7C

BT

/READ 876/110
0000 MRI 00876

RR RUCNFB BRU

DE FBIWMFO #0008 1101354

ZNY EEEEE

R 191340Z APR 96

FM FBI WMFO (29B-171994) (P) (C-5)

TO DIRECTOR FBI/ROUTINE/

LEGAT BRUSSELS/ROUTINE/

BT

UNCLAS E F T O

CITE: //3920//

PASS: FBIHQ: FIFU, FCS, IRU1. IROSB; ALAT [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; OO: WMFO.

FOR INFORMATION LEGAT BRUSSELS, SA [redacted] TELEPHONICALLY CONTACTED [redacted] b6 b7C

[redacted] NEW YORK BANKING COMMISSION, WHO WAS ASSIGNED TO THE BCCI INVESTIGATION. [redacted] ADVISED THAT HE IS FAMILIAR WITH [redacted] NEW YORK DISTRICT ATTORNEY'S OFFICE (DANY) INVESTIGATION REGARDING [redacted] PROVIDED THAT ADDITIONAL

[redacted]

1325015-000-9329

29B-WF-171994 -688

PAGE TWO DE FBIWMFO 0008 UNCLAS E F T O

INFORMATION IS AVAILABLE FROM [redacted] DANY, [redacted] b6 b7C

[redacted]

SA [redacted] SUBSEQUENTLY CONTACTED [redacted] WHO CONFIRMED b6 b7C

THAT [redacted] BUT

THERE WAS NEVER SUFFICIENT EVIDENCE COMPILED TO CHARGE HIM

WITH A CRIME. [redacted] FURTHER PROVIDED THAT THERE IS NO

OUTSTANDING WARRANT FOR [redacted] AND THEY NEVER ATTEMPTED TO

CONTACT HIM FOR AN INTERVIEW. IN ADDITION, [redacted] APPEARED

TO BE AWARE OF ALL INFORMATION PROVIDED IN REFERENCED TELETYPE

CONCERNING [redacted] INCLUDING HIS CURRENT EMPLOYMENT.

WMFO INDICES NEGATIVE CONCERNING [redacted] AND THERE IS b6 b7C

NO CURRENT INVESTIGATION REGARDING [redacted] BY WMFO.

IN VIEW OF THE ABOVE, THIS LEAD IS CONSIDERED CLOSED. IF

THERE ARE ANY QUESTIONS REGARDING THIS MATTER SHOULD BE

DIRECTED TO SA [redacted] TELEPHONE NUMBER (202)324-6414. b6 b7C

BT

#0008

NNNN

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-01-2018 BY

b6
b7C

AFFIDAVIT OF

b6
b7C

BEFORE ME, the undersigned authority, on this day personally appeared, being by me duly sworn upon her oath, deposed as follows:

"My name is I am over the age of eighteen (18), have never been convicted of a felony, and am fully competent to testify to and have personal knowledge of the matters stated herein, all of which are true and correct.

I have been a Special Agent with the Federal Bureau of Investigation (FBI) for approximately sixteen years and am currently assigned to the Houston, Texas Division.

I have conducted the following official investigation:

1. On October 20, 1995 I obtained a copy of the Trans Union Credit report of

b6
b7C

Trans Union, Houston Division, 12941 Interstate 45 North, Suite 609, Houston, Texas. (See Exhibit A, FBI FD-302 report with attached Trans Union credit report.)

2. On October 23, 1995 I telephonically interviewed American Express, 602 Sawyer, Suite 440, Houston, Texas. advised that there has been no activity on American Express card since July, 1995 and is currently paying off the balance of his account. advised that the billing address for Texas. further advised that payment on the American Express account of was made by check and the last check was signed by advised

SEARCHED INDEXED
SERIALIZED FILED

1325015-000-9331

29B-WF-171994-670

that [redacted] has an American Express Gold Card, but she used it only once recently on September 29, 1995 to purchase fuel in Houston, Texas. (See Exhibit B, FBI insert regarding [redacted] information.) b6 b7C

3. On November 14, 1995 I obtained from [redacted] of American Express, photocopies of check numbers 2700, 2730 and 2743, drawn on an account styled [redacted] Tanglewood Bank, Houston, Texas. (See Exhibit C, FBI FD-302 report with checks attached). b6 b7C

4. On February 7, 1996 I telephonically interviewed [redacted] b6 b7C

[redacted] Hidalgo, Banfill, Zlotnik & Kermali, 3555 Timmons, Suite 460, Houston, Texas, telephone number [redacted] advised that [redacted] left Houston, Texas in September, 1995 and [redacted] is in Karachi, Pakistan. [redacted] advised that he does not have an address or telephone number for [redacted] in Pakistan. [redacted] advised that the only address for [redacted] that he has is [redacted] Texas. [redacted] advised that [redacted] provided him with money to pay [redacted] bills before he left for Pakistan. [redacted] also receives [redacted] mail, which is mostly junk mail that he throws away. [redacted] advised that [redacted] calls him about once a month. [redacted] advised that [redacted] is in Pakistan because his mother is very elderly and has been very sick the last few months. (See Exhibit D, FBI insert regarding [redacted] information.)

DECLASSIFIED BY: [redacted]
ON 05-01-2018

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b7C

09/18/97 View Lead ICMLM006
16:47:42 ~~SECRET~~ Page 1 of 2

View Lead, then press Enter

Case ID . . . . . : 29B-WF-171994 Serial . . . : 677
Status . . . . . : ASSIGNED Lead Number. : 2
Precedence. . . . . : ROUTINE
Office . . . . . : WASHINGTON FIELD Squad. . . . : C5
At . . . . . : WASHINGTON, DC
Assigned To . . . . : CRIMINAL 5 Date : 04/30/1996
Previously Assigned : * Date :
Set By . . . . . : [redacted]
Set Date . . . . . : 03/20/1996 Time : 11:12AM
Deadline Date . . . . : 05/19/1996 Time : 05:00PM

ADVISE I[redacted] IS SOUGHT EITHER AS A FUGITIVE OR AS A SUSPECT FOR 1
INTERVIEW. ADVISE IF ADDITIONAL INFORMAITON REGARDING[redacted] AND HIS 2
CURRENT WHEREABOUTS AND ACTIVITY WOULD BE HELPFUL TO CAPTIONED MATTER 3
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~~SECRET~~

+

Command . . > .....
F1=Help F2=Text F3=Exit F4=Prompt F6=Multv F7=Bkwd F8=Fwd F11=NextPg F12=Cancel
F21=Case

b6
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[redacted] - Serial 688 states that Serial (lead) is Covered - It was Covered by SA [redacted]
Please mark lead as Covered
[redacted]

1325015-000-9333

DECLASSIFIED BY: [redacted]
ON 05-01-2018

b6
b7C

09/18/97 View Lead ICMLMO06
16:48:36 ~~SECRET~~ Page 1 of 2

View Lead, then press Enter

Case ID . . . . . : 29B-WF-171994 Serial . . . : 677
Status . . . . . : ASSIGNED Lead Number. : 2
Precedence. . . . . : ROUTINE
Office . . . . . : WASHINGTON FIELD Squad. . . . : C5
At . . . . . : WASHINGTON, DC
Assigned To . . . . : CRIMINAL 5 Date : 04/30/1996
Previously Assigned : * Date :
Set By . . . . . : [redacted]
Set Date . . . . . : 03/20/1996 Time : 11:12AM
Deadline Date . . . : 05/19/1996 Time : 05:00PM

ADVISE IF [redacted] IS SOUGHT EITHER AS A FUGITIVE OR AS A SUSPECT FOR 1
INTERVIEW. ADVISE IF ADDITIONAL INFORMAITON REGARDING [redacted] AND HIS 2
CURRENT WHEREABOUTS AND ACTIVITY WOULD BE HELPFUL TO CAPTIONED MATTER 3
4
5

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Command . . > .....
F1=Help F2=Text F3=Exit F4=Prompt F6=Multv F7=Bkwd F8=Fwd F11=NextPg F12=Cancel
F21=Case

5. On October 27, 1995 I obtained fro[redacted] an [redacted] CSC Houston, 652 North Belt East, Suite 133, Houston, Texas, a copy of the CSC credit report of [redacted] (See Exhibit E, FBI FD-302 report with attached CSC credit report of [redacted] b6 b7C

6. On October 23, 1995 I received from [redacted] Assistant United States Attorney, United States Attorney's Office, Southern District of Texas, 910 Travis Street, Suite 1500 Houston, Texas, telephone toll records for telephone numbers [redacted] received from Southwestern Bell Telephone Company, One Bell Plaza, Dallas, Texas. (See Exhibit E, FBI FD-302, regarding receipt of these documents, and Exhibit G, telephone toll records.) b6 b7C

7. On October 10, 1995 I conducted physical surveillance and observed a white female depart the residence of [redacted] Texas, and drive away in [redacted] (See Exhibit H, FBI insert regarding aforementioned surveillance.) b6 b7C

8. On October 16, 17, 30, and 31, 1995, I conducted further physical surveillances at various times in the vicinity of [redacted] Texas. I observed no one arriving or departing the garage at [redacted] (See Exhibit I, J, K and L, FBI inserts regarding aforementioned surveillance.) b6 b7C

1325015-000-9335

9. On November 1, 1995 I conducted further physical surveillance and observed a white female departing the garage of [redacted] b6 b7C [redacted] Texas, driving a [redacted] [redacted] I requested a National Crime Information Center (NCIC) check on [redacted] which revealed that the owner of the vehicle registered to [redacted] See Exhibit M, FBI insert regarding aforementioned surveillance.)

10. On January 29, 1996 I interviewed residents of [redacted] b6 b7C [redacted] Texas and they advised that they have not observed anyone at [redacted] since around Christmas, 1995. (See Exhibit N, FBI insert regarding interview of neighbors of [redacted]

11. On January 29, 1996 I interviewed [redacted] b6 b7C at Zenith Real Estate Services, Inc., 2900 Wilcrest Drive, Suite 205, Houston, Texas. [redacted] advised that [redacted] left Houston for Pakistan in September, 1995 with his elderly mother. [redacted] further advised that he does not know exactly where [redacted] is located, but that [redacted] is currently traveling in Pakistan. [redacted] also advised that he does not have an address or telephone fo[redacted] in Pakistan [redacted] then stated that he was a [redacted] Zenith Real Estate Services, Inc. [redacted] [redacted] Zenith. [redacted] finally

1325015-000-9336

advised that [redacted] Zenith because [redacted] b6 b7C

[redacted] (See Exhibit O, FBI FD-302 report regarding interview of [redacted]

12. On January 29, 1996 I interviewed [redacted] b6 b7C

[redacted] Texas. [redacted] advised that [redacted] was not currently in the United States and stated that he did not know where to locate [redacted] (See Exhibit P, FBI FD-302 report regarding interview of [redacted]

Further Affiant sayeth not."

[redacted] b6 b7C

February 9, 1996

SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

SUBSCRIBED AND SWORN TO before me on this 9th day of February 1996.

THE STATE OF TEXAS
COUNTY OF HARRIS

CARMEL BOLDUC NOTARY PUBLIC STATE OF TEXAS MY COMMISSION EXPIRES 04-01-99

Carmel Bolduc

NOTARY PUBLIC
IN AND FOR THE STATE OF TEXAS
My commission expires: 4/1/99.

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent [redacted] Federal Bureau of Investigation (FBI), Houston, Texas on February 7, 1996: b6 b7C

[redacted] HIDALGO, BANFILL, ZLOTNIK & KERMALI, Certified Public Accountant, 3555 Timmons, Suite 460, Houston, Texas, telephone number [redacted] advised that [redacted] left for Karachi, Pakistan in September, 1995. [redacted] left him with money to pay [redacted] bills. [redacted] also receives [redacted] mail which is mostly junk mail that he throws away. [redacted] about once a month to ask him how things are going. [redacted] advised that the only address that he has for [redacted] advised that he does not have an address or telephone number for [redacted] in Pakistan. [redacted] advised that [redacted] stated that if he learns where [redacted] can be located, then he will provided the information to the FBI.

SEARCHED ____ INDEXED ____
SERIALIZED HO FILED Su

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent (SA) [redacted] Federal Bureau of Investigation (FBI), Houston, Texas, [redacted] Texas on January 29, 1996: b6 b7C

SA [redacted] rang the door bell on the exterior gate of the [redacted] Texas several times and no one responded to the door bell. Special Agent [redacted] observed a video camera installed above the door of [redacted]

An unidentified white male resident of [redacted] advised that an [redacted] but he does not know their name. He further advised that he has not observed any lights on or any activity at [redacted] since around Christmas, 1995. b6 b7C

An unidentified white female resident of [redacted] advised that she and her husband moved into the condominium in December, 1995. Since they moved into the condominium in December, she had not observed anyone [redacted] While the condominium was being remodeled in late October and November, she occasionally saw or heard a car leaving the garage which is located next to their garage. The white female advised that she cannot see the front door of [redacted] The white female advised that she would check with her husband to determine if he has observed anyone at [redacted] The white female advised that she would contact SA [redacted] if she finds out any additional information from her husband. b6 b7C

An unidentified white male resident of [redacted] advised that the resident of [redacted] since around Christmas time, 1995. Before December, 1995 he occasionally observed a female [redacted] The white male also advised that no one has taken care of the outside plants and the plants have all died from the cold weather. b6 b7C

SEARCHED ____ INDEXED ____
SERIALIZED HO FILED Su

FBI 1325015-000-9339

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent [redacted] Federal Bureau of Investigation (FBI), Houston, Texas on November 1, 1995: b6 b7C

Surveillance was conducted in the vicinity of the alley behind the enclosed garage of [redacted] Texas from approximately 7 a.m. until 10 a.m. No vehicles were observed departing the garage of [redacted] No vehicles were observed parked in front of [redacted]

A spot check for any vehicle known to be registered to [redacted] was conducted at [redacted] No vehicle identifiable with [redacted] was observed. b6 b7C

Spot checks at [redacted] Texas were made and no vehicle registered to [redacted] was observed. b6 b7C

Surveillance was conducted in the vicinity of the alley behind the garage of [redacted] Texas from approximately 2 p.m. to 6:30 p.m. At approximately 5 p.m. the [redacted] departs the garage of [redacted] driven by a white female [redacted] NCIC check reveals that Texas [redacted] American Honda Finance and [redacted] Texas [redacted] No further activity was observed at [redacted] b6 b7C

SEARCHED ____ INDEXED ____
SERIALIZED HO FILED SU

1325015-000-9340

030SF08

29B-WF-171994-693

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent [redacted] Federal Bureau of Investigation (FBI), Houston, Texas on October 31, 1995: b6 b7C

Surveillance was conducted in the vicinity of the alley behind the enclosed garage of [redacted] Texas from approximately 7:30 a.m. until 12:30 p. m. No vehicles were observed departing the garage of [redacted] No vehicles were observed parked in front of [redacted]

A spot check for any vehicle known to be registered to [redacted] was conducted at [redacted] No vehicle identifiable with [redacted] was observed. b6 b7C

Spot checks at [redacted] Texas were made and no vehicle registered to [redacted] was observed. b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

1325015-000-9341

030SF07

29B-WF171994-694

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent [redacted] Federal Bureau of Investigation (FBI), Houston, Texas on October 30, 1995: b6 b7C

Surveillance was conducted in the vicinity of the alley behind the enclosed garage of [redacted] Texas from approximately 1:30 p.m. until 5:30 p. m. No vehicles were observed departing the garage of [redacted] No vehicles were observed parked in front of [redacted]

A spot check for any vehicle known to be registered to [redacted] was conducted at [redacted] No vehicle identifiable with [redacted] was observed. b6 b7C

Spot checks at [redacted] Texas were made and no vehicle registered to [redacted] was observed. [redacted] Vehicles with [redacted]

NCIC check provided the following information:

(1) [redacted] b6 b7C

[redacted] Texas [redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent [redacted] Federal Bureau of Investigation (FBI), Houston, Texas on October 17, 1995: b6 b7C

Surveillance was conducted in the vicinity of the alley behind the enclosed garage of [redacted] Texas from approximately 8:30 a.m. until 10:30 a. m. No vehicles were observed departing the garage of [redacted] Between 8:45 a.m. and 9:45 a.m. [redacted] Occupants of [redacted] were not observed entering [redacted] A check with NCIC revealed that [redacted] Texas.

No vehicles were observed parked at [redacted] b6 b7C exas.

A spot check for any vehicle known to be registered to [redacted] was conducted at [redacted] No vehicle identifiable with [redacted] was observed. b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

1325015-000-9343

030SF05

29B-WF-171994-696

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent [redacted] Federal Bureau of Investigation (FBI), Houston, Texas on October 16, 1995: b6 b7C

Surveillance was conducted in the vicinity of the alley behind the enclosed garage of [redacted] Texas from approximately 7:30 a.m. until 11:00 a. m. No vehicles were observed departing the garage of [redacted] No vehicles observed parked in front of [redacted]

No vehicles were observed parked at [redacted] b6 b7C
[redacted] Texas. Vehicles bearing [redacted]

Spot check for any vehicle known to be registered to [redacted] was conducted at [redacted] No vehicle identifiable with [redacted] as observed. b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

1325015-000-9344

0305E04

29B-WF-171994-697

The following investigation was conducted by Special Agent (SA) [redacted] Federal Bureau of Investigation (FBI), Houston, Texas. b6 b7C

On October 23, 1995 [redacted] American Express, 602 Sawyer, Suite 440, Houston, Texas, telephone number [redacted] advised that there has been no activity on [redacted] American Express Optima card since July, 1995 and [redacted] is currently paying off the balance of his account. The billing for [redacted] Texas. [redacted] further advised that payment on [redacted] American Express account was paid by check and the last check was signed by [redacted] advised that she would request photocopies of the checks received by American Express as payment on the account and would mail them to the FBI [redacted] has an American Express Gold Card, and she used it only once recently on September 29, 1995 to purchase fuel in Houston.

On October 25, 1995 SA [redacted] visited 3555 Timmons and observed that Suite 460 is the office of HIDALGO, BANFILL, ZLOTNIK & KERMALI, Certified Public Accountant. A review of the Southwestern Bell Telephone Company's Greater Houston Business White Pages had listings for [redacted] Texas [redacted] Texas [redacted] b6 b7C

SEARCHED____INDEXED
SERIALIZED 40 FILED SU

1325015-000-9345

29B-WF-171994
SF/sf

1

The following investigation was conducted by Special Agent [redacted] Federal Bureau of Investigation (FBI), Houston, Texas on October 10, 1995: b6 b7C

[redacted] was observed parked in the driveway at [redacted] Texas. Several other vehicles were observed parked in the area of [redacted] A white female is observed entering the [redacted]

No vehicles were observed parked at [redacted] b6 b7C
[redacted] Texas and [redacted] Texas.

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

1325015-000-9346

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/30/96

[redacted] was contacted at his residence at [redacted] Texas. [redacted] was advised of the identity of the interviewing agent and the nature of the interview. [redacted] thereafter voluntarily provided the following information: b6 b7C

[redacted] stated that he has lived at [redacted] for approximately one year. [redacted] stated that he did not [redacted] would not provide any information about the [redacted] After being asked again who [redacted] advised that he knows [redacted] further advised that he does not know where [redacted] is not in the United States. [redacted] advised that [redacted] b6 b7C

[redacted] was given a copy of a letter addressed to [redacted] dated January 19, 1996, from [redacted] After reading the letter [redacted] returned the letter and stated that he did not know where [redacted] was located. [redacted] stated that the letter should be taken to Zenith Real Estate Services at 2900 Wilcrest, Houston. [redacted] advised that he is [redacted] Zenith Real Estate Services, Inc. [redacted] b6 b7C b7D

Investigation on 1/29/96 at Houston, Texas File # 29B-WF-171994 -700

by SA [redacted] sf Date dictated 1/30/96 SEARCHED [redacted] INDEXED [redacted] FILED [redacted] b6 b7C

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1325015-000-9347

030SF01

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/30/96

[redacted] Zenith Real Estate Services, Inc. (hereafter referred to as Zenith), 2900 Wilcrest Drive, Suite 205, Houston, Texas, was advised of the identity of the interviewing agent and the nature of the interview. [redacted] thereafter voluntarily provided the following information: b6 b7C

[redacted] advised that [redacted] Zenith but [redacted] stated that [redacted] Zenith. [redacted] did not provide an answer as to [redacted] Zenith [redacted] b6 b7C

[redacted] hoped that [redacted] left the United States in approximately September or October, 1995 [redacted] decided [redacted] b6 b7C

[redacted] may come back to the United States in February or March, 1996. [redacted] said that [redacted] and [redacted] Pakistan and he does not know where they are. [redacted] was given a copy of a letter addressed to [redacted] dated January 19, 1996, from [redacted] After reading the letter, [redacted] and the FBI should contact him. [redacted] advised that [redacted] and his office is located at 1100 Louisiana, Suite 1700, Houston, Texas. b6 b7C b7D

Investigation on 1/29/96 at Houston, Texas File # 29B-WF-171994 - 701

by SA [redacted] /sf Date dictated 1/30/96 b6 b7C

SEARCHED INDEXED SERIALIZED HO FILED 54

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1325015-000-9348

030 5F02

b6
b7C

[redacted] advised that the Zenith location at 4702 West FM 1960, Houston, Texas is empty and there is no one working there.

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10-23-95

[redacted] Assistant United States Attorney, United States Attorney's Office, Southern District of Texas, 910 Travis Street, Suite 1500, Houston, Texas, made available to the Federal Bureau of Investigation (FBI) telephone toll records that [redacted] received from Southwestern Bell Telephone Company pursuant to a United States District Court subpoena in a civil case date October 10, 1995. The aforementioned records will be maintained in a FD-340 (1A envelope). b6 b7C

A review of the aforementioned records revealed that numerous long distance calls were made from telephone number [redacted] Texas [redacted] Photocopies of pertinent parts of the telephone toll records for telephone number [redacted] are attached and made part of this document. b6 b7C

Investigation on 10-23-95 at Houston, Texas File # 29B-WF-171994 -702

by SA [redacted] / sf Date dictated 10-23-95 SEARCHED [redacted] INDEXED [redacted] SERIALIZED [redacted] FILED [redacted] b6 b7C

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1525015-000-9350

296 SF02

[redacted] b6 b7C

AT&T INVOICE CHARGES FOR PERIOD ENDING JUN 30, 1995

MONTHLY SERVICE FOR AT&T ----------

1 AT&T TRUEWORLD (SM) SAVINGS
JUN 30 THRU JUL 29 3.00

TOTAL MONTHLY SERVICE FOR AT&T 3.00

ITEMIZED CALLS FOR AT&T ----------

ADJ	NO	DATE	TIME	PLACE CALLED	AREA NUMBER	*	MIN.	AMOUNT	
	2	6 4	1208AM	PAKISTAN	[redacted]	N	8.0	6.92	W
	3	6 6	1251AM	PAKISTAN		N	2.0	2.77	W
	4	6 7	1255AM	PAKISTAN		N	1.0	1.38	W
	5	6 10	1133AM	PAKISTAN		N	6.0	5.19	W
	6	6 10	1140AM	PAKISTAN		N	4.0	3.46	W
	7	6 12	1244AM	PAKISTAN		N	1.0	1.38	W
	8	6 12	1248AM	PAKISTAN		N	18.0	24.91	W
	9	6 13	1124PM	PAKISTAN		N	1.0	1.38	W

ADJ	NO	DATE	TIME	PLACE CALLED	AREA NUMBER	*	MIN	AMOUNT	
	10	6 14	954AM	NEWROCHLLE NY	[redacted]	D	4.0	1.08	&
	11	6 14	1108PM	PAKISTAN		N	1.0	1.38	W
	12	6 14	1114PM	PAKISTAN		N	1.0	1.38	W
	13	6 17	1221AM	PAKISTAN		N	16.0	13.84	W
	14	6 17	1132PM	PAKISTAN		N	1.0	.87	W
	15	6 18	1036AM	PAKISTAN		N	5.0	4.33	W
	16	6 21	210PM	UK		D	6.0	4.99	W
	17	6 21	938PM	THORNHILL ON		N	10.0	1.92	W
	18	6 22	1214AM	PAKISTAN		N	1.0	1.38	W
	19	6 22	1241AM	PAKISTAN		N	1.0	1.38	W
	20	6 22	713AM	PAKISTAN		N	8.0	11.07	W
	21	6 22	304PM	FAIRFAX VA		D	15.0	4.05	&
	22	6 25	1052PM	PAKISTAN		N	1.0	.87	W
	23	6 25	1107PM	PAKISTAN		N	1.0	.87	W
	24	6 25	1114PM	PAKISTAN		N	8.0	6.92	W
	25	6 26	909PM	GORMLEY ON		N	4.0	.76	W
	26	6 28	1254PM	NEWROCHLLE NY		D	8.0	2.16	&
	27	6 28	351PM	UK		N	1.0	.54	W
	28	6 29	808PM	IRAN		N	1.0	1.19	W

[redacted]

AT&T INVOICE CHARGES FOR PERIOD ENDING JUL 30, 1995

MONTHLY SERVICE FOR AT&T ----------

1 AT&T TRUEWORLD (SM) SAVINGS
JUL 30 THRU AUG 29 3.00

TOTAL MONTHLY SERVICE FOR AT&T 3.00

ITEMIZED CALLS FOR AT&T ----------

ADJ	NO	DATE	TIME	PLACE CALLED		AREA NUMBER	*	MIN	AMOUNT	
	2	7 1	947AM	PAKISTAN		[redacted]	N	6.0	5.19	W
	3	7 1	1158AM	PAKISTAN			N	4.0	3.46	W
	4	7 2	704PM	GORMLEY	ON		N	2.0	.24	W
	5	7 5	913PM	PAKISTAN			N	1.0	1.38	W
	6	7 6	920AM	FAIRFAX	VA		D	2.0	.54	&
	7	7 6	159PM	TORONTO	ON		D	4.0	1.88	W
	8	7 6	805PM	WVANCOUVER	BC		N	7.0	1.34	W
	9	7 7	847AM	PAKISTAN			D	10.0	26.40	W

[redacted]

ADJ	NO	DATE	TIME	PLACE CALLED		AREA NUMBER	*	MIN	AMOUNT	
	10	7 7	428PM	WALTHAM	MA	[redacted]	D	1.0	.27	&
	11	7 7	431PM	WALTHAM	MA		D	1.0	.27	&
	12	7 7	431PM	WALTHAM	MA		D	1.0	.27	&
	13	7 7	436PM	WALTHAM	MA		D	1.0	.27	&
	14	7 7	437PM	WALTHAM	MA		D	1.0	.27	&
	15	7 7	438PM	THORNHILL	ON		D	1.0	.47	W
	16	7 7	1004PM	THORNHILL	ON		N	2.0	.38	W
	17	7 8	1210AM	PAKISTAN			N	1.0	.87	W
	18	7 8	327PM	FAIRFAX	VA		N	2.0	.28	&
	19	7 8	335PM	FAIRFAX	VA		N	9.0	1.26	&
	20	7 9	732PM	PAKISTAN			N	2.0	1.73	W
	21	7 11	100AM	PAKISTAN			N	7.0	9.69	W
	22	7 11	113PM	NEWROCHLLE	NY		D	8.0	2.16	&
	23	7 11	238PM	UK			D	7.0	5.82	W
	24	7 12	829AM	SWITZERLND			D	2.0	2.30	W
	25	7 12	922AM	SWITZERLND			D	1.0	1.15	W
	26	7 12	931AM	SWITZERLND			D	1.0	1.15	W
	27	7 12	617PM	ALLENTOWN	PA		E	5.0	.85	&
	28	7 13	650AM	IRAN			N	5.0	5.96	W

ADJ	NO	DATE	TIME	PLACE CALLED	AREA NUMBER	*	MIN	AMOUNT		
	29	7 13	417PM	NEWROCHLLE NY		D	8.0	2.16	&	b6
	30	7 19	648AM	SWITZERLND		N	1.0	.62	W	b7C
	31	7 19	931AM	SWITZERLND		D	3.0	3.46	W	
	32	7 21	841PM	PAKISTAN		N	1.0	1.38	W	
	33	7 21	843PM	PAKISTAN		N	1.0	1.38	W	
	34	7 21	946PM	PAKISTAN		N	1.0	1.38	W	
	35	7 21	947PM	PAKISTAN		N	1.0	1.38	W	
	36	7 22	950AM	PAKISTAN		N	5.0	4.33	W	
	37	7 22	1102PM	PAKISTAN		N	1.0	.87	W	
	38	7 22	1151PM	PAKISTAN		N	1.0	.87	W	
	39	7 22	1153PM	PAKISTAN		N	7.0	6.06	W	
	40	7 23	247PM	UK		N	8.0	2.72	W	
	41	7 25	1033PM	PAKISTAN		N	3.0	4.15	W	
	42	7 28	1255AM	PAKISTAN		N	1.0	1.38	W	
	43	7 28	402PM	FAIRFAX VA		D	8.0	2.16	&	
	44	7 28	412PM	NEWROCHLLE NY		D	1.0	.27	&	
	45	7 28	413PM	NEWROCHLLE NY		D	3.0	.81	&	
	46	7 28	1157PM	PAKISTAN		N	3.0	4.15	W	
	47	7 29	1202AM	PAKISTAN		N	8.0	6.92	W	

1 AT&T TRUEWORLD (SM) SAVINGS
AUG 30 THRU SEP 29 3.00

TOTAL MONTHLY SERVICE FOR AT&T 3.00

ITEMIZED CALLS FOR AT&T ----------

ADJ	NO	DATE	TIME	PLACE CALLED	AREA NUMBER	*	MIN	AMOUNT	
	2	7 30	114PM	NEWROCHLLE NY		N	1.0	.14	&
	3	7 30	133PM	THORNHILL ON		N	9.0	1.08	W
	4	7 31	212PM	FAIRFAX VA		D	2.0	.54	&
	5	7 31	606PM	PAKISTAN		N	1.0	1.38	W
	6	8 2	907PM	PAKISTAN		N	1.0	1.38	W
	7	8 3	626PM	FAIRFAX VA		E	2.0	.34	&
	8	8 5	1206AM	PAKISTAN		N	1.0	1.38	W
	9	8 5	1206AM	PAKISTAN		N	1.0	1.38	W

b6
b7C

SEP 07 95 *BILL 0000288M00 PAGE 7 N
FOR YOUR INFORMATION 1FW AG 3 HOU

ADJ	NO	DATE	TIME	PLACE CALLED	AREA NUMBER	*	MIN	AMOUNT	
	10	8 5	1207AM	PAKISTAN		N	1.0	1.38	W
	11	8 5	1208AM	PAKISTAN		N	1.0	1.38	W
	12	8 5	1209AM	PAKISTAN		N	1.0	1.38	W
	13	8 5	1211AM	PAKISTAN		N	1.0	1.38	W
	14	8 5	1212AM	PAKISTAN		N	2.0	2.77	W
	15	8 5	118PM	PAKISTAN		N	13.0	17.99	W
	16	8 5	138PM	IRAN		N	3.0	3.58	W
	17	8 5	322PM	PAKISTAN		N	1.0	1.38	W
	18	8 6	1115AM	NEWROCHLLE NY		N	6.0	.84	&
	19	8 6	1237PM	NEWROCHLLE NY		N	7.0	.98	&
	20	8 6	153PM	NEWROCHLLE NY		N	1.0	.14	&
	21	8 6	154PM	YONKERS NY		N	10.0	1.40	&
	22	8 6	507PM	YONKERS NY		E	1.0	.17	&
	23	8 8	701PM	FAIRFAX VA		E	7.0	1.19	&
	24	8 10	929AM	SWITZERLND		D	1.0	1.15	W
	25	8 11	354PM	NEWROCHLLE NY		D	4.0	1.08	&
	26	8 13	943AM	NEWROCHLLE NY		N	5.0	.70	&
	27	8 13	1018AM	PAKISTAN		N	3.0	4.15	W
	28	8 13	1111AM	PAKISTAN		N	5.0	6.92	W

SEP 07 95 *BILL 0000288M00 PAGE 8 N
FOR YOUR INFORMATION 1FW AG 3 HOU

ADJ	NO	DATE	TIME	PLACE CALLED	AREA NUMBER	*	MIN	AMOUNT	
	29	8 13	1151PM	PAKISTAN		N	5.0	6.92	W
	30	8 15	1252AM	PAKISTAN		N	1.0	1.38	W
	31	8 15	1106PM	PAKISTAN		N	1.0	1.38	W
	32	8 15	1108PM	PAKISTAN		N	1.0	1.38	W
	33	8 15	1136PM	PAKISTAN		N	4.0	5.54	W
	34	8 15	1140PM	PAKISTAN		N	7.0	9.69	W
	35	8 15	1147PM	PAKISTAN		N	12.0	16.61	W
	36	8 16	1208AM	PAKISTAN		N	2.0	2.77	W
	37	8 16	1212AM	PAKISTAN		N	1.0	1.38	W
	38	8 17	1141PM	PAKISTAN		N	1.0	1.38	W
	39	8 18	102AM	PAKISTAN		N	4.0	5.54	W
	40	8 18	709AM	SWITZERLND		N	1.0	.62	W
	41	8 18	850AM	SWITZERLND		D	5.0	5.76	W
	42	8 18	319PM	NEWROCHLLE NY		D	1.0	.27	&
	43	8 18	612PM	MOUNTKISCO NY		E	1.0	.17	&
	44	8 18	614PM	NEWROCHLLE NY		E	5.0	.85	&
	45	8 19	104AM	PAKISTAN		N	5.0	6.92	W
	46	8 20	1045AM	PAKISTAN		N	3.0	4.15	W
	47	8 20	1048AM	PAKISTAN		N	2.0	2.77	W

[redacted]

b6
b7C

SEP 07 95 *BILL 0000288M00 PAGE 9
FOR YOUR INFORMATION 1FW AG 3 HOU

ADJ	NO	DATE	TIME	PLACE CALLED		AREA NUMBER	*	MIN	AMOUNT	
	48	8 21	1235AM	PAKISTAN		[redacted]	N	1.0	1.38	W
	49	8 21	823AM	SWITZERLND			D	3.0	3.46	W
	50	8 21	750PM	FAIRFAX	VA		E	1.0	.17	&
	51	8 23	1240AM	PAKISTAN			N	3.0	4.15	W
	52	8 23	1244AM	PAKISTAN			N	1.0	1.38	W
	53	8 23	535PM	NEWROCHLLE	NY		E	3.0	.51	&
	54	8 26	713PM	ALLENTOWN	PA		N	3.0	.42	&
	55	8 27	146PM	PAKISTAN			N	4.0	5.54	W
	56	8 29	438PM	FAIRFAX	VA		D	8.0	2.16	&

ADJ	NO	DATE	TIME	PLACE CALLED		AREA NUMBER	*	MIN	AMOUNT	
	2	9 2	1222AM	PAKISTAN		[redacted]	N	9.0	12.46	W
	3	9 2	1231AM	PAKISTAN			N	1.0	1.38	W
	4	9 2	1233AM	PAKISTAN			N	8.0	11.07	W
	5	9 8	1136PM	PAKISTAN			N	14.0	19.38	W
	6	9 12	1254PM	NEW YORK	NY		D	1.0	.27	P
	7	9 14	111PM	NEW YORK	NY		D	3.0	.81	P
	8	9 16	1245AM	PAKISTAN			N	1.0	1.38	W
	9	9 16	1247AM	IRAN			N	10.0	11.92	W

[redacted]

OCT 07 95 *BILL 0000288M00
FOR YOUR INFORMATION 1FW AG 3 HOU

N

ADJ	NO	DATE	TIME	PLACE CALLED		AREA NUMBER	*	MIN	AMOUNT	
	10	9 16	144PM	PAKISTAN		[redacted]	N	15.0	20.76	W
	11	9 17	1214AM	PAKISTAN			N	4.0	5.54	W
	12	9 17	1054PM	IRAN			N	3.0	3.58	W
	13	9 22	1131PM	PAKISTAN			N	17.0	23.53	W
	14	9 23	435PM	FAIRFAX	VA		N	4.0	.56	P
	15	9 23	442PM	THORNHILL	ON		N	13.0	2.49	W
	16	9 24	757PM	THORNHILL	ON		N	19.0	3.64	W

INCLUDED IN SUBTOTAL 117.13

W AT&T TRUEWORLD (SM) CALLS
P CALLS ELIGIBLE FOR AT&T TRUE USA (SM) SAVINGS.

AT&T TRUEWORLD (SM) SAVINGS SUMMARY

TOTAL CHARGES FOR AT&T TRUEWORLD (SM) SAVINGS 0.00

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10-27-95

Pursuant to an exparte order issued by United States District Court, Southern District of Texas, Houston, Texas on September 25, 1995, [redacted] CSC Houston, 652 North Belt East, Suite 133, Box 674402, Houston, Texas 77267, telephone number [redacted] made available a copy of the CSC credit report of [redacted] The aforementioned credit report is attached and made part of this document. b6 b7C

Investigation on 10-27-95 at Houston, Texas File # 29B-W F-171994 - 703

by SA [redacted] sf Date dictated 10-27-95 SEARCHED [redacted] INDEXED [redacted] SERIALIZED [redacted] FILED [redacted] b6 b7C

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124-HQ-5015-000-9356

300SFO)

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 11/15/95

Pursuant to an exparte order issued by United States District Court, Southern District of Texas, Houston, Texas on September 25, 1995, [redacted] American Express, 602 Sawyer, Suite 440, Houston, Texas, telephone number [redacted] made available photocopies of check numbers [redacted] Tanglewood Bank. The aforementioned check is attached and made part of this document. b6 b7C

Investigation on 11/14/95 at Houston, Texas File # 29B-WF-171994 -704

by SA [redacted] sf Date dictated 11/15/95 SEARCHED ___ INDEXED ___ FILED ___ b6 b7C

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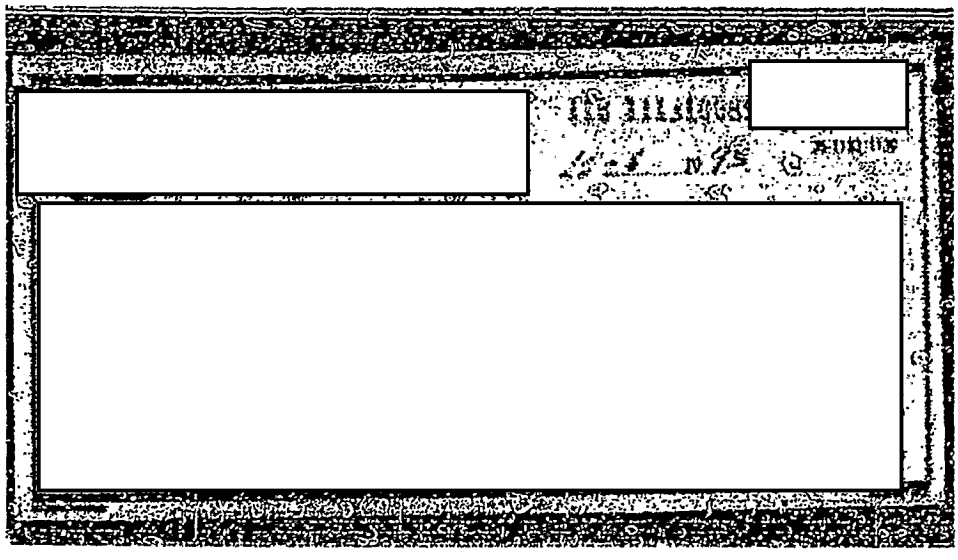
1325015-000-9361

319SF01

Best Copy-FLM IS BLURRY



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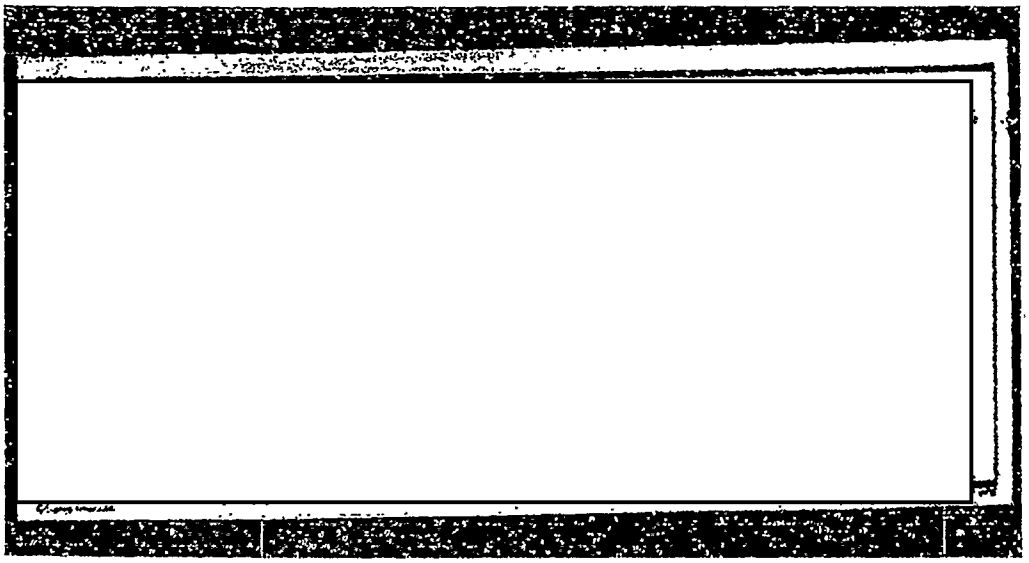
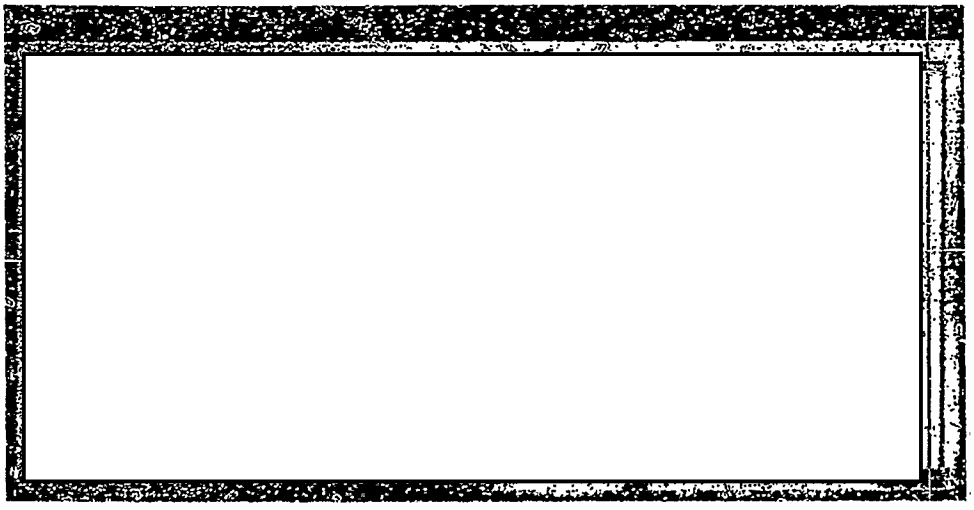
b7C
E-LEG2-07 11/05 CAS[redacted]RS FILM [redacted]
IMAGES 1 TO [redacted]
Scanned on SCANNER3 by [redacted] on Monday, November 06, 1995 at 01:05:01 PM



E-LEG2-07 11/05 CAS[redacted]RS FILM [redacted] [redacted] b6 b7C
IMAGES 1 TO 1 of 1 - PAGE 1
Scanned on SCANNER3 by [redacted] on Monday, November 06, 1995 at 01:57:02 PM



FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10-20-95

Pursuant to an exparte order issued by United States District Court, Southern District of Texas, Houston, Texas on September 25, 1995, [redacted] Trans Union, Houston Division, 12941 I-45 North, Suite 609, Houston, Texas 77060, telephone number [redacted] made available a copy of the Trans Union credit report of [redacted] The aforementioned credit report is attached and made part of this document. b6 b7C

Investigation on 10-20-95 at Houston, Texas File # 29B-WF-171994 - 705

by SA [redacted] / sf Date dictated 10-20-95 SEARCHED [redacted] INDEXED [redacted] SERIALIZED [redacted] FILED SU b6 b7C

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293SF02

1325015-000-9365

TRANS UNION

OPER NO	BATCH NO.	DPT	RPT TYPE	DATE MAILED

TRADE CLEARED	EMPLOYMENT VERIFIED	INCOME VERIFIED

(I) ZH05250 *15 HO 6/84 10/19/95 16:46CT

[redacted] [redacted] BIRTH DATE b6
2/34 b7C

CURRENT ADDRESS [redacted] NY. [redacted] DATE REPORTED 9/95R

FORMER ADDRESS [redacted] TX. [redacted] 8/95R

[redacted] TX. [redacted]

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORTED
AMERICAN EXPORT			10/87F
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	HIGH CREDIT	DATE VERIFIED	PRESENT STATUS: BALANCE OWING	PRESENT STATUS: AMOUNT PAST DUE	PAYMENT PATTERN: 1-12 MONTHS	TYPE ACCOUNT & MOP
ACCOUNT NUMBER	TERMS		CREDIT LIMIT	DATE UPDATED	MAXIMUM DELINQUENCY: DATE	AMOUNT	MOP	13-24 MONTHS
ECOA	COLLATERAL		REMARKS		TYPE LOAN			HISTORICAL STATUS: NO OF MONTHS / 30-59 / 60-89 / 90+

TRD=47 NEG=0 PUB=0 COL=0 INQS=0 BAL=$25.8K HC-CL=$194K-104K

TRADES

MWCC/WARDS D 235005T 9/90 $1230 10/95A $0 $0 155555555543 R01
[redacted] $0 10/95P 1/95 05 X1111111111 b6
I BRCP3C DL0363 61V 1 1 10 b7C

MBGA/EXXON Q 235046B 8/87 $210 9/95A $0 $0 111111111111 R01
[redacted] $500 9/95P 11
I BRCG7A DL3115 14 0 0 0

AMER HONDA Q 3946018 5/95 $7181 9/95A $5684 $0 1111 I01
[redacted] 24M299
I /LEASE 4 0 0 0

SEARS D 6256411 3/95 $7881 9/95A $3503 $0 1111111 R01
6595706 M73 $3800
I /CHARGE ACCOUNT 7 0 0 0

MBNA AMERICA B 1597029 2/89 $8885 9/95A $5720 $0 111111111111 R01
[redacted] MIN82 $14.1K 111111111111
I /CREDIT CARD 48 0 0 0

CITIBK GOLD B 64DB001 6/88 $0 9/95A $3520 $0 111111111111 R01
[redacted] MIN73 $7800 111111111111
I /CREDIT CARD 48 0 0 0

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1325015-000-9366

TRANS UNION

BATCH NO	OPT	RPT TYPE	DATE MAILED
EMPLOYMENT VERIFIED			POST DATED

(I) ZH05250 * 6/84 10/19/95 16:46C

[redacted] b6 b7C

[redacted] NY. [redacted]

DATE REPORTED 9/95R

SPOUSE'S NAME/SSN

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORTED
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	HIGH CREDIT		PRESENT STATUS: BALANCE / AMOUNT PAST DUE	PAYMENT PATTERN: 1-2 MONTHS	TYPE ACCOUNT & MOP
ACCOUNT NUMBER	TERMS		CREDIT LIMIT	DATE CLOSED	WORST DELINQUENCY: DATE / AMOUNT / MOP	3-24 MONTHS	
ECOA	COLLATERAL		TERMS			HISTORICAL STATUS: NO OF MONTHS / 30-59 / 60-89 / 90+	

SEARS [redacted] I	D	6256367	8/87 M10	$235 $2700	9/95A 9/95P	$0 /CHARGE ACCOUNT	$0	X11111XXXXXX 1XXX11XXXX1 48 0 0 0	R01 b6 b7C
CITIBK GOLD [redacted] I	B	64DB001	12/90 MIN91	$0 $5000	9/95A	$4388 /CREDIT CARD	$0	111111111111 1111111XXXX1 48 0 0 0	R01
DILLARDS [redacted] I	D	4456015	1/91 MIN20	$243 $2000	9/95A	$0 /CREDIT CARD	$0	111111111111 111111111111 48 0 0 0	R01
CENTURIONS&T [redacted] I	N	656N002	9/91	$2117 $3000	9/95A	$2117 /CREDIT CARD	$0	111X111111X 1X111X1 48 0 0 0	R01
RNB/MERVYN'S [redacted] C	D	1249003	8/93 MIN15	$75 $500	10/95A 8/95P	$0 /CHARGE ACCOUNT	$0	111111111111 111111111111 24V 0 0 0	R01
CHEMICAL BK [redacted] C	B	382D033	1/93 MIN19	 $8500	8/95A	$892 /CREDIT CARD	$0	111111111111 111111111111 32 0 0 0	R01

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1325015-000-9367

TRANS UNION

OPER NO	BATCH NO	DPT	RPT TYPE	DATE MAILED

TRADE CLEARED	EMPLOYMENT VERIFIED	INCOME VERIFIED

(I) ZH05250 * 6/84 10/19/95 16:46C

[redacted] NY. [redacted]

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DATE REPORTED 9/95R

SPOUSE'S NAME/SSN

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORTED
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	HIGH CREDIT	DATE VERIFIED	PRESENT STATUS: BALANCE OWING	PRESENT STATUS: AMOUNT PAST DUE	PAYMENT PATTERN: 1-12 MONTHS	TYPE ACCOUNT & MOP
ACCOUNT NUMBER	TERMS		CREDIT LIMIT	DATE CLOSED	MAXIMUM DELINQUENCY: DATE	AMOUNT	MOP	PAYMENT PATTERN: 13-24 MONTHS
ECOA	COLLATERAL			TYPE LOAN	HISTORICAL STATUS: NO. OF MONTHS	30-59	60-89	90+

GCCC/MACYS D 235003P 11/87 $1490 8/95A $0 $0 111111111111 R01
[redacted] $2900 8/95P 111111111111 b6
48 0 0 0 b7C

FOLEYS DEPT D 144N003 6/81 $976 9/95A $0 $0 11XXXXXXXXXX R01
[redacted] MIN15 $2100 8/95P XX1111111111
C 48 0 0 0

CITIBANK MC R 64DB002 4/88 $0 7/95A $0 $0 11111XXXXXX1 R01
[redacted] MIN20 $3300 7/95P 111111111111
I /CREDIT CARD 48 0 0 0

RNB-TARGET D 6476004 10/92 $600 9/95A $0 $0 111111111 R01
[redacted] MIN20 $600 6/95P
I 42 0 0 0

JC PENNEY D 1972032 6/81 $341 5/95A $0 $0 11XXXXXXXX11 R01
[redacted] MIN10 5/95P 111111111111
C 12V 0 0 0

AMERICAN EXP N 656N001 12/81 $0 7/95A $0 $0 11XXX1XXX1X1 001
[redacted] 1/95P 11X11111X111
I /CREDIT CARD 45 0 0 0

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TRANS UNION

OPER NO	BATCH NO	DPT	RPT TYPE	DATE MAILED

TRADE CONFIRMED | EMPLOYMENT VERIFIED | INCOME VERIFIED

(I) ZH05250 * 6/84 10/19/95 16:46C

[redacted] NY. [redacted]

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FORMER ADDRESS

DATE REPORTED 9/95R

SPOUSE'S NAME/SSN

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORTED
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	HIGH CREDIT	DATE VERIFIED	PRESENT STATUS: BALANCE OWING	PRESENT STATUS: AMOUNT PAST DUE	PAYMENT PATTERN: 1-12 MONTHS	TYPE ACCOUN & MOP
ACCOUNT NUMBER	TERMS		CREDIT LIMIT	DATE CLOSED	MAXIMUM DELINQUENCY: DATE	AMOUNT	MOP	13-24 MONTHS
ECOA	COLLATERAL			REMARKS	TYPE LOAN			HISTORICAL STATUS: NO. OF MONTHS / 30-59 / 60-89 / 90+

DIAMOND SHAM D 992J001 1/93 $75 9/95A $Ø $Ø XXXXXXXXXXXX RØ1
[redacted] 7/94P XXX1 b6
I 24V Ø Ø Ø b7C

CHASE-MNHTN B 402D038 2/93 $30.5K 4/94A $Ø $Ø XiXiXiiiiiii IØi
[redacted] M494 4/94C 1
I /SECURED 14 Ø Ø Ø

FST FID BK B 971P006 2/87 4/94A $Ø 111111111111 RØ1
[redacted] MIN5 $7000 111111111111
I *CLOSED /CREDIT CARD 48 Ø Ø Ø

LORD&TAYLOR D 1643002 1/90 $162 9/95A $Ø $Ø 1XXXXXiiXXii RØ1
[redacted] MIN20 $1500 4/94P 11XXX11XXXX1
C 48 Ø Ø Ø

MCDUFF/HSB D 640D006 9/90 $1316 3/95A $Ø $Ø 111111111111 RØ1
[redacted] MIN40 $3100 3/94P 111111111111
I *ACCOUNT CLOSED BY CONSUMER 43 Ø Ø Ø

ITT FINCSRV F 95LV001 8/91 $4831 8/93A $Ø $Ø X1X1111X1111 IØ1
[redacted] 36M 1111X11111X1
I *TRANSFER /SECURED 26 Ø Ø Ø

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1325015-000-9369

TRANS UNION

OPER NO	BATCH NO	DPT	RPT TYPE	DATE MAILED

TRANS [illegible]	EMPLOYMENT VERIFIED	INCOME VERIFIED

FOR

(I) ZH05250 * 6/84 10/19/95 16:46C

[redacted] NY. [redacted]

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DATE REPORTED	SPOUSE'S NAME/SSN
9/95R	

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORTE
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	HIGH [illegible]	[illegible]	PRESENT STATUS: BALANCE OWING	PRESENT STATUS: AMOUNT PAST DUE	PAYMENT PATTERN: 1-12 MONTHS	TYP ACCOU & MC
ACCOUNT NUMBER	TERMS		CREDIT LIMIT	[illegible] CLOSED	MAXIMUM DELINQUENCY: DATE	AMOUNT	MOP	13-24 MONTHS
ECOA	[illegible]				TYPE LOAN			HISTORICAL STATUS: NO OF MONTHS, 30-59, 60-89, 90+

TOYOTA MTR C 4176029 6/92 $43.0K 5/93A $0 $0 X1111X11 I0
[redacted] 2/93P b6 b7C
/AUTOMOBILE 10V 0 0 0

CHEMICAL BK B 382D024 7/87 $8500 2/95A $0 $0 111111111111 R0
[redacted] $8500 1/93C 111111111111
C *CLOSED /CREDIT CARD 37 0 0 0

PALAIS ROYAL D 1934003 8/81 $141 11/93A $0 $0 XXXXXXXXXXX R0:
[redacted] $1300 12/92P XXXXXXX1X111
P 38 0 0 0

AM CENTURION B 8216001 11/88 1/94A $0 $0 C0:
[redacted] $10.0K 11/92C
I *CLOSED /LINE OF CREDIT 28 0 0 0

AMERICAN EXP N 656N001 11/81 $0 10/92A $0 $0 XXXXXXXXXXX 00:
[redacted] 10/92P XXXXXXXXXX11
I *ACCOUNT CLOSED BY CONSUMER 34 0 0 0

TANGLEWD BK B 5021001 12/91 $21.1K 8/92A $0 $0 X111 I0:
[redacted] 36M 6/92C
I /AUTOMOBILE 7 0 0 0

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1325015-000-9370

TRANS UNION

BATCH NO	DPT	RPT TYPE	DATE MAILED

(I) ZH05250 * 6/84 10/19/95 16:46 b6 b7C

[redacted] NY. [redacted]

9/95R

SPOUSE'S NAME/SSN

CURRENT EMPLOYER AND ADDRESS — POSITION/INCOME — EMPL. DATE — DATE REPORTED

FORMER EMPLOYER AND ADDRESS

SPOUSE'S EMPLOYER AND ADDRESS

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	HIGH CREDIT	DATE VERIFIED	PRESENT STATUS: BALANCE OWING	PRESENT STATUS: AMOUNT PAST DUE	PAYMENT PATTERN	TYPE ACCOUN & MOP
ACCOUNT NUMBER	TERMS	CREDIT LIMIT	DATE CLOSED		MAXIMUM DELINQUENCY: DATE	AMOUNT	MOP	1-12 MONTHS
ECOA: COLLATERAL				TYPE LOAN				13-24 MONTHS
								HISTORICAL STATUS: NO. OF MONTHS / 30-59 / 60-89 / 90+

NEIMAN MARCU D 2016001 [redacted] 7/91 $113 10/95A 1/92P $0 $0 111111 R0 b6 b7C
I
6 0 0 0

HFC E 2351666 [redacted] 1/88 X45 $2042 $0 12/92A 7/91P $0 $0 1XXXXXXXXXXX XXXX111 R01
I
19 0 0 0

GECAP/QVCNET Q 235010X [redacted] 4/88 $0 1/91A $0 $0 1111111111 R01
I BRC13C DL1033
13 0 0 0

FOLEYS DEPT D 144N003 [redacted] 4/94 10M $0 9/95A 7/90C $0 $0 111 I01
C
4 0 0 0

MARSHALL FLD D 1169002 [redacted] 12/89 $425 4/90A 1111 R01
A
4 0 0 0

CHEMICAL BK B 382D029 [redacted] 7/87 M50 $8500 1/90A $0 1 R01
1 0 0 0

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TRANS UNION

OPR	BATCH NO	DPT	RPT TYPE	DATE MAILED

TRADE CLEARED	EMPLOYMENT VERIFIED	INCOME VERIFIED

(I) ZH05250 * 6/84 10/19/95 16:46C

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b7C

NY.

DATE REPORTED
9/95R

SPOUSE'S NAME SSN

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORTE
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	HIGH CREDIT	DATE UPDATED	PRESENT STATUS: BALANCE OWING	PRESENT STATUS: AMOUNT PAST DUE	PAYMENT PATTERN	TYP ACCO & MA
ACCOUNT NUMBER	TERMS		CREDIT LIMIT	DATE LAST ACTIVITY	MAXIMUM DELINQUENCY: DATE	MAXIMUM DELINQUENCY: AMOUNT	MOP	24 MONTHS
ECOA	COLLATERAL		REMARKS		TYPE LOAN			HISTORICAL STATUS: NO OF MONTHS / 30-59 / 60-89 / 90+

DINERS CLUB N 4447004 9/81 $0 2/94A $0 $0 1 C00
10/89P
I *ACCOUNT CLOSED BY CONSUMER 1 0 0 0

STERNS D 9120001 6/87 $295 10/95A $0 $0 1 R0
$300 5/89P
I 1 0 0 0

RNB-FIELD'S D 1169007 12/89 $2400 8/95A $0 $0 R0
MIN16 $2400 8/94P
I 31 0 0 0

AM CENTURION B 8246001 12/90 10/93A $0 $0 R0
$2000 10/93C
I *TRANSFER /CREDIT CARD 35 0 0 0

FFB MC B 4397004 2/87 $5490 12/89A $0 R0
MIN33 $7000
I

AMERICAN EXP N 656N001 6/81 $0 12/89A $0 $0 00
12/89P
I *ACCOUNT CLOSED BY CONSUMER

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TRANS UNION

(I) ZH05250 * 6/84 10/19/95 16:46C

[redacted] b6 b7C

NY. [redacted]

DATE REPORTED 9/95R

TELEPHONE

SPOUSE'S NAME/SSN

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORTE
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED		PRESENT STATUS: BALANCE OWING	AMOUNT PAST DUE	PAYMENT PATTERN: 1-12 MONTHS	TYPE ACCOU & MO
ACCOUNT NUMBER	TERMS			DATE OF LAST ACTIVITY	AMOUNT / MOP	13-24 MONTHS	
ECOA	COLLATERAL					HISTORICAL STATUS: NO OF MONTHS / 30-59 / 60-89 / 90+	

MBNA AMERICA B 1597029 2/89 $3289 12/89A $0 R01
[redacted] b6
I 10V 0 0 0 b7C

MBNA AMERICA B 1597029 10/87 $5117 8/94A $0 $0 R01
[redacted] $5000 3/89P
I /CREDIT CARD

JC PENNEY D 1972032 6/81 $184 4/95A $0 $0 I00
[redacted] 4/95C
D 12V 0 0 0

HOUSEHOLD FN F 235167T 8/91 $4831 4/94A $0 $0 X111 IUR
[redacted] 36M134 3/94C
*CLOSED /SECURED 4 0 0 0

FST COMM CU 0 43UK001 2/93 $21.1K 4/94A $0 $0 X1 IUR
[redacted] M425 3/93C
I *CLOSED /AUTOMOBILE 2 0 0 0

END OF CREDIT REPORT

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TRANS UNION

OPER NO	BATCH NO.	DPT	RPT TYPE	DATE MAILED

TRADE CLEARED	EMPLOYMENT VER.	INCOME VERIFIED

(I) ZH05250 * 6/84 10/19/95 16:46(

[redacted]

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[redacted] NY. [redacted]

DATE REPORTED 9/95R

SPOUSE'S NAME /SSN

CURRENT EMPLOYER AND ADDRESS	POSITION/INCOME	EMPL DATE	DATE REPORT
FORMER EMPLOYER AND ADDRESS			
SPOUSE'S EMPLOYER AND ADDRESS			

SUBSCRIBER NAME	SUBSCRIBER CODE	DATE OPENED	[illegible]	[illegible]	PRESENT STATUS: BALANCE OWING	PRESENT STATUS: AMOUNT PAST DUE	PAYMENT PATTERN: 1 MONTHS	TYPE ACCOUNT & MORE
ACCOUNT NUMBER	TERMS	CREDIT LIMIT	[illegible]		MAXIMUM DELINQUENCY: DATE	AMOUNT	MOP	2-24 MONTHS
ECOA	COLLATERAL		[illegible]	TYPE LOAN				HISTORICAL STATUS: NO. OF MOS. 30-59 60-89 90+

REPORT SERVICED BY:
TRANS UNION CORPORATION
760 W. SPROUL ROAD, PO BOX 390
SPRINGFIELD, PA 19064-0390
713-874-0169

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CRIMINAL CRIMINAL

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/17/1996

To: WMFO

From: Houston
WC-2

Approved By: [redacted] b6 b7C

Drafted By: [redacted] :sf

File Number(s): 29B-WF-171994 (Referred Upon Completion)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF;
FAG;

Synopsis: Houston Division has completed [redacted] b7D
[redacted]
Attorney's Office, Southern District of Texas, Houston, Texas.

Enclosures:

Enclosed for WMFO are photocopies of the following documents:

(1) a FD-302 concerning the serving of an exparte order to [redacted] Trans Union, Houston, Texas; b6 b7C
(2) a FD-302 concerning the serving of an exparte order to [redacted] American Express, Houston, Texas;
(3) a FD-302 concerning the serving of an exparte order to [redacted] CSC Credit Service, Inc., Houston, Texas.
(4) a FD-302 concerning obtaining telephone toll records for [redacted]
(5) a FD-302 of an interview of [redacted]
(6) a FD-302 of an interview of
(7) an insert dated 10/10/95;
(8) an insert dated 10/23/95;

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MAY 02 1996
JB DFB
AH
DR

1325015-000-9376

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29B-WF171994-706

(9) an insert dated 10/16/95;
(10) an insert dated 10/17/95;
(11) an insert dated 10/30/95;
(12) an insert dated 10/31/95;
(13) an insert dated 11/1/95;
(14) an insert dated 1/29/96;
(15) an insert dated 2/7/96;
(16) an affidavit of [redacted] dated 2/9/96; b6 b7C
(17) FD-340 containing photocopies of telephone toll records for [redacted]

Details: For information of WMFO this matter was reopened to [redacted] b3 b6 b7C b7D locating [redacted] in January, 1996. On 9/26/95 Assistant United States Attorney [redacted] Southern District of Texas, Houston, Texas, advised that a U. S. subpoena had been issued for [redacted]

Inasmuch as all logical investigation has been completed by the Houston Division, this matter is being closed by Houston Division.

♦♦

1325015-000-9377

Memorandum

To : 29B-WF-171994 Date 5/2/96

From : [redacted]
Legat Paris

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On 4/24/96, I received a call from [redacted] of [redacted] said that he had no new information about the [redacted]

[redacted] is still in regular contact with [redacted]

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29B-WF-171994-707
SEARCHED
INDEXED
SERIALIZED

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123RJBO1.memo

FEDERAL BUREAU OF INVESTIGATION

INTELLIGENT WORKSTATION

SYSTEM MONITOR

PRNT--00. Has Completed Printing

F1 - FBINET
F2 - WordPerfect Menu
F3 - Diskette Utility Menu
F4 - Backup/Restore Menu
F5 - 10-Net Menu
F6 - RBASE Menu
F7 - Excel For Windows
F8 - Miscellaneous Software Menu
F9 - WordPerfect Office
F10 - EXIT

NODE ID: P95867

IWSMENU Rev. 3.00 °Baseline Software Level: 9.1TR° Mon Jun 24 7:33:23 AM

06/24/96 View Document Text ECFVT0M0
09:50:00 More : - +

Case ID . : 29B-WF-171994 Serial : 707
Responses :

[redacted] b6 b7C b7D

er
y of

[redacted] said that he had no new information about the [redacted] b6 b7C b7D

[redacted] is still in regular contact with [redacted] b6 b7C b7D

Command . . . > .....
F1=Help F3=Exit F4=Prompt F7=Bkwd F8=Fwd F12=Cancel F13=Attrib F14=List
F15=PrevDoc F16=NextDoc
4BÜ Aa B0--W9586702 R 22 C 18 7:35 6/24/96

1325015-000-9379

Bottom of document.
06/24/96 View Document Text ECFVT0M0
09:50:08 More : -

Case ID . : 29B-WF-171994 Serial : 707
Responses :

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b7D

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F7=Bkwd F12=Cancel F13=Attrib F14=List F15=PrevDoc
F16=NextDoc
4BÜ Aa B0--W9586702 R 22 C 18 7:35 6/24/96

ABN·AMRO

fax-bericht / fax-message

Aan / to: [redacted] b6 b7C
Bedrijf / Company: US Embassy Brussels
Afdeling / Department: Legal Attache
Fax: [redacted]

Van / From: [redacted]
Bedrijf / Company: ABN AMRO Bank N.V.
Afdeling / Department: Corporate Security Department
Tel: [redacted]
Fax: [redacted]

Datum / Date: 14-05-96

Aantal pagina's incl. voorbl./ nbr. of pages incl. frontpage: 1

This message is intended only for the use of the individual or entity named above and may contain information that is confidential and privileged. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and destroy the original message. Thank you.

Ref.nr.

Opmerkingen / Remarks:

Dear [redacted] b6 b7C

In my fax dated 26 April 1996 I stated that I would inform you accordingly when new information from our legal department in New York would be received by me.

[redacted] 29B-WF-171994

They informed me one week ago that they received no further information regarding to [redacted] The federal prosecutor who had initially led them to expect additional information ultimately declined to provide that.

Best regards,

Bert

29B-WF-171994-708
SEARCHED [ ] INDEXED [ ]
SERIALIZED [ ] FILED [ ]
JUN - 1996
FBI — WASH. METRO FIELD OFFICE

1325015-000-9381

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/24/1996

To: Director, FBI **Attn:** SSA [redacted] IRU/2
SSA [redacted] FIFU
FBI WMFO **Attn:** SSA [redacted], NVRA

b6
b7C

From: Legat Bridgetown
Legat Bridgetown
Contact: [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 (Pending)

Title: Hidden Interest;
Major Case #38;
FIF; FAG;
OO: WMFO

Synopsis: A review of the captioned file has determined that all investigative leads have been covered and reported.

Details: At this time, there are no outstanding leads in regards to the captioned matter. Therefore, this matter is being closed within Legat Bridgetown's territory.

♦♦

pls make Leads covered.

OSM
CLOSE ON THIS
5/29/96
4 5 6

709

29B-WF-171994 main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUN 1 0 1996
FBI — WASH. METRO FIELD OFFICE
[redacted]

b6
b7C

WF994145.EC

1325015-000-9382

06/24/96
13:41:55

View Document Attributes

ECFVA0M0

Orig. Office	: D4		Responses :
Document Type	: TELETYPE		Text . . :
Document Date	: 05/24/95		FIF . . . :
To	: BRIDGETOWN *		
From	: WASHINGTON FIELD		
Case ID . . .	: 29B-WF-171994	Serial : 710	
Topic	: WFO EFFORTS TO LOCATE FUGITIVES CONTINUES		
Author . . .	:		
Approver . .	:		
Ref. Case ID	:	Serial :	

Class Level : U	Authority :	Duration :	SCI :	
Rule 6(e) . :	Caveats . :	FD-501 . :		

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F6=Multv F12=Cancel F14=List F16=NextDoc

4BÜ Aa B0--W9586702 R 8 C 2 11:27 6/24/96

29B-WF-171994-710

1325015-000-9383

1992 SEP 18 PM 3:05

0019 MRI 01232

PP RUCNFB FBIDN FBITP

DE FBIWMFO #0017 2621829

ZNR UUUUU

P 181710Z SEP 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

FBI DENVER (INFO)/PRIORITY/

FBI TAMPA (INFO)/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

REQUEST OF FBIHQ:

AUTHORIZATION IS REQUESTED FOR THE TRAVEL OF SA [redacted] [redacted] TO PARIS, FRANCE, ON SEPTEMBER 25, 1992, TO CONDUCT AN INTERVIEW OF [redacted]

UNITED STATES DEPARTMENT OF JUSTICE (DOJ), OFFICE OF INTERNATIONAL AFFAIRS (OIA), HAS SUBMITTED A REQUEST TO PARIS AUTHORITIES TO ALLOW THE INTERVIEW OF [redacted] A KEY

Was in long file - just place in front of C -711

29B-WF-171994

SEP 18

AUTOMATED INDEX SEARCH [redacted]

MANUAL SEARCH [redacted]

C/A [redacted]

1325015-000-9384

SUBJECT OF THE BCCI AND CAPCOM INVESTIGATIONS, CURRENTLY INCARCERATED IN PARIS. [redacted] BCCI [redacted] CAPCOM. OIA HAS ADVISED THAT THE ANTICIPATED INTERVIEW DATE IS SEPTEMBER 28, 1992. SA [redacted] WILL BE TRAVELLING TO PARIS ON SEPTEMBER 25, 1992, ARRIVING ON SEPTEMBER 26, 1992, ON UNITED AIRLINES FLIGHT 914. THE DURATION OF THE STAY HAS NOT YET BEEN DETERMINED AND IS DEPENDANT UPON THE ACTUAL DATE OF THE INTERVIEW, LENGTH OF THE INTERVIEW, AND THE DATE OF SEARCHES BY THE FRENCH, WHICH HAVE BEEN REQUESTED TO BE CONDUCTED WITH THE PRESENCE OF BUREAU AGENTS. IT IS EXPECTED THAT THESE SEARCHES WILL TAKE PLACE AT THREE LOCATIONS IN FRANCE. THE LOCATIONS ARE THOSE ASSOCIATED WITH GHAITH PHARAON, AN INDICTED BCCI SUBJECT WHO REMAINS A FUGITIVE. ONCE THE SEARCHES ARE AUTHORIZED, SA [redacted] WILL BE JOINED BY SAS [redacted] AND SSAS [redacted]

b6
b7C

TAMPA AND DENVER ARE ADVISED OF INTERVIEW IN THAT IT IS HOPED INFORMATION OF ASSISTANCE TO INVESTIGATIONS IN THESE DIVISIONS WILL BE SOLICITED FROM [redacted]

b6
b7C

BT

#0017

NNNN

DATE: 6-18-96

TO: WMFO FGBIPF3

FILE NO. 29B-WF-171994
SERIAL #

FROM: TAMPA

ATTACHED DOCUMENTS HAVE BEEN SERIALIZED BY **TAMPA** AND FORWARDED TO YOU FOR INCLUSION IN YOUR OO: FILE.

29B-WF-171994-712

SEARCHED SAT INDEXED SAT
SERIALIZED SAT FILED SAT
JUN 2 1996
FBI — WASH. METRO FIELD OFFICE

OO

1325015-000-9387

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/11/1996

To: ADIC, WMFO **Attn:** EVIDENCE TECHNICIAN [redacted] b6 b7C

From: WMFO
C-5/NVMRA
Contact: SA [redacted] 324-6415

Approved By: [redacted]

Drafted By: [redacted] :ch

File Number(s): 29B-WF-171994 (Pending)

Title: EVIDENCE DESTRUCTION

Synopsis: Destruction of evidence in 29B-WF-171994.

Reference: 5/22/96 meeting between ET [redacted] b6 b7C

Details: Per referenced meeting where SAs [redacted] reviewed boxes of evidence, it has been decided that the following items should be destroyed: (1) 29B-WF-171994 1B39, Bar Code E0573489, pink sheet and (2) 29B-WF-171994 SubH 1B8, Bar Code E0574441, boxes 1 through 15.

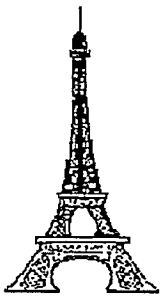
It has also been decided to retain the following items: (1) 29B-WF-171994 1B39, eight boxes and (2) 29B-WF-171994 1C1 & 1C2, two folders.

(1) - 29B-WF-171994
1 - ET [redacted] b6 b7C
◆◆

29B-WF-171994-713

SEARCHED SU INDEXED SU
SERIALIZED SU FILED SU
JUN 1 1996
FBI — WASH. METRO FIELD OFFICE
PB

1325015-000-9388



Office of the Legal Attache
American Embassy
Paris, France

FAX: 33/1/45.63.79.61
TELEPHONE: 33/1/43.12.7310

FROM: Legal Attache, Paris
ALAT [redacted]

Date: July 15, 1996

TO: DOJ, FBI

ATTN: [redacted] b6 b7C

Total # pages including this page: 1

Sara

The telephone number for [redacted] b6 b7C

This is to [redacted]

The fax number is [redacted] to the attention of [redacted]
Call first so he will know there is a fax coming.

[redacted]

29B-WF-171994 715

JUL 15 1996

1825015-000-9393

********** -ACCUSE RE[redacted]TION- ********** DATE 15-0[redacted]996 ***** HEURE 09:54 *** P.01

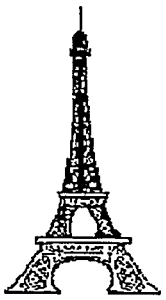
MODE = EMISSION DEPART=15-07 09:54 FIN=15-07 09:54

NO.	CODE	ABR./RESEAU	DESTINATAIRE/ NO. DE FAX	PAGES	NO.PROG	NOM DU PROGR
001	OK	☎	1912025140080	001		

-LEGAT PARIS -

********** - - ***** -011 33 1 45 63 79 61- *********

1325015-000-9394



Office of the Legal Attache
American Embassy
Paris, France

FAX: 33/1/45.63.79.61
TELEPHONE: 33/1/43.12.7310

FROM: Legal Attache, Paris **Date:** 7/22/96

TO: OIA

ATTN: [redacted]

b6
b7C

Total # pages including this page: 4

correspondence from French MOJ

to [redacted]

Per tel call

[redacted]

29B-WF-171994-719

JUL 23 1996

1325015-000-9409

Date: Wednesday, July 31, 1996 11:38 am
From: [redacted] b6
Subject: [redacted] b7C

[redacted] remains in custody; British High Court remands proceedings

Today, former BCCI [redacted] petition for habeas corpus was denied, but the British court directed the magistrate to redo the warrant committing [redacted] into custody based upon his waiver of extradition in March 1996.

In a victory for the Home Office, the judicial panel conceded that the Bowe Street Magistrate has authority, where an extraditee has waived, to surrender an extraditee directly to a foreign country without a surrender warrant from the Secretary of State. However, that authority applies only where the extraditee has clearly waived all rights under British law.

[redacted] will now appear before the magistrate to clarify the terms of his waiver of extradition. It is anticipated that he will only waive rights to further challenges in the extradition proceedings. If so, he can seek to discharge the committal warrant unless the Secretary of State executes a warrant surrendering him to the United States in two months. b6 b7C

The High Court also said that comity requires that France consent to re-extradition of [redacted] before he is released to US authorities. In related developments, the Home Office is seeking to meet with French MOJ August 5-6th. b6 b7C

To: AUSA [redacted]
Legat Paris
9-011-331-45.63.79.61 b6 b7C

From: [redacted]

[redacted] The latest from the U.K. on this.

29B-WF-171994-722

JUL 31

31-07-1996 17:53 202 305 4667 95% P.01

1325015-000-94

b6
b7C

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
NEW YORK, N.Y. 10013
(212) 335-9000

ROBERT M. MORGENTHAU
District Attorney

FAX DOCUMENT COVER SHEET

Date: 8/20/96

To: [redacted]

Fax #: 011-331-456 37961

Location: DOJ

From: [redacted]

Fax #: [redacted]

b6
b7C

[redacted] 8/2

jmc 8/2/96

Number of Pages including this cover: 3

COMMENT:

29B-WF-171994-723

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 20 1996
LEGAT PARIS

1325015-000-9418

b6
b7C

b6
b7C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

----------x

THE PEOPLE OF THE STATE OF NEW YORK :

-against - :

[redacted] : b6 b7C

Defendant. :

----------x

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuse the defendant of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law Section 155.42 committed as follows: the defendant in the County of New York and elsewhere during the period from on or about July 1, 1988 through on or about August 12, 1988, stole property to wit, money, with a value in excess of $1,000,000 from the Bank of Credit and Commerce International by extortion.

SECOND COUNT

AND THE GRAND JURY AFORESAID, further accuse the defendant of the crime of **GRAND LARCENY IN THE FOURTH DEGREE**, in violation of Penal Law Section 155.30(6) committed as follows: the defendant in the County of New York and elsewhere during the period from on or about July 1, 1988 to on or about August 12, 1988, stole property to wit, money, from the Bank of Credit and Commerce International by extortion.

ROBERT M. MORGENTHAU
District Attorney
County of New York

Filed: CCI 95N069125

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

[redacted]

Defendant.

INDICTMENT

GRAND LARCENY IN THE FIRST DEGREE, P.L. §155.42
GRAND LARCENY IN THE FOURTH DEGREE, P.L. §155.30(6)

ROBERT M. MORGENTHAU
District Attorney

ADA [redacted]
Investigation Division Central

A True Bill

Foreman

SENT BY:NEW YORK COUNTY ; 8-20-96 ; 9:32AM ; 33 1 45 63 79 61;# 3
20-08-1996 15:38 2123359807 91% P.03
b6 b7C
1325015-000-9420

Memorandum

D

J

Subject
8/23/96 [redacted] Meeting, London, England

Date
August 25, 1996

b6
b7C

To
File

From
[redacted]

b6
b7C
b7D

This memorandum summarizes [redacted]

[redacted]

b6
b7C
b7D

A [redacted]

unknown [redacted] male

[redacted] representing U.S. Department of Justice

b6
b7C

[redacted], representing U.S. Department of Justice

29B-WF-171994-726

[redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

[redacted] 1994

[redacted] AT PARIS

[redacted]

1825015-000-9439

Routing Slip
FD-4 (Rev. 8-8-89)

Date 9/12/96

To: ☐ Director
Att.: _____

FILE # 29B-WF-171994

☐ SAC _____
☐ ASAC _____
☑ Supv. Squad C-5, WFO
☐ Agent _____
☐ OSM _____
☐ Rotor # _____
☐ Steno _____
☐ Typist _____
☐ M _____
Room _____

Title _____

RE: _____

☐ Acknowledge	☑ For Information	☐ Return assignment card
☐ Assign ☐ Reassign	☐ Handle	☐ Return file ☐ serial
☐ Bring file	☐ Initial & return	☐ _____
☐ Call me	☐ Leads need attention	☐ Return with action taken
☐ Correct	☐ Mark for indexing	☐ Return with explanation
☐ Deadline _____	☐ Open case	☐ Search and return
☐ Delinquent	☐ Prepare lead cards	☐ See me
☐ Discontinue	☐ Prepare tickler	☐ Type
☐ Expedite	☐ Recharge file ☐ serial	
☑ File	☐ _____	
	☐ Send to _____	

SAC _____

_____ See reverse side

Office Legat London

☆U.S. GPO: 1994—387-153/02470

1325015-000-9445

Precedence: PRIORITY Date: 09/12/1996

To: CID Attn: Financial Institution Fraud Unit;
[redacted] b6 b7C b7E

Miami Attn: SSA [redacted]

From: London
Contact: Ala[redacted]

Approved By: [redacted]

Drafted By: [redacted] jds

Case ID #: 29B-WF-171994 (Pending)

Title: BCCI; MAJOR CASE #38;
FINANCIAL INSTITUTION FRAUD; FRAUD AGAINST THE GOVERNMENT

Synopsis: To request assistance for the [redacted] b6 b7C b7D

Details: Reference is made to the phone call from Alat [redacted] on 9/11/96. b6 b7C

For the information of Miami, [redacted] is scheduled to commence trial in a BCCI related matter at the Central Criminal Court on Wednesday, 9/11/96. [redacted] DOB [redacted] BCCI [redacted] trial. Recent attempts to contact [redacted] at his last known address were unsuccessful. However, he has acknowledged correspondence from the court in the past and has agreed in the past to testify on behalf of the prosecution. b6 b7C

The last known address for [redacted] was given as [redacted] Florida [redacted] telephone number [redacted] b6 b7C

LEAD(s):

Set Lead 1:

MM

AT MIAMI, FLORIDA

Will attempt to make contact with [redacted] b6 b7C

CASE ID: 29B-WF-171994 SERIAL: 728

[redacted] Florida, telephone number [redacted] b6 b7C b7D
[redacted] to ascertain if he is at that premises and would be willing to provide testimony at the trial of above captioned subject. If the witness is not at the address, but can be contacted elsewhere, obtain the new contact telephone number and address and request that he make direct contact with [redacted] at the law clerks' office for the [redacted] on telephone [redacted] Inasmuch as trial starts on 9/11/96, it is requested that this matter be given priority handling.

03/07/97
09:20:16

View Document Attributes

ECFVA0M0

Orig. Office : MM
Document Type : EC
Document Date : 10/04/96
To . . . . . : CRIMINAL INVESTIGATIVE *
From . . . . : MIAMI
Case ID . . . : 29B-WF-171994
Topic . . . . : LEAD TO LOCATE AND MAKE CONTACT WITH [redacted]
Author . . . : [redacted]
Approver . . : [redacted]
Ref. Case ID :

Responses :
Text . . : Y
FIF . . . :

Serial : 729

Serial :

b6
b7C

Class Level : SN Authority : Duration : SCI :
Rule 6(e) . : Caveats . : FD-501 . :

Command . . . > ..... +
F1=Help F3=Exit F4=Prompt F6=Multv F12=Cancel F13=Text F14=List F15=PrevDoc
F16=NextDoc

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/29/1996

To: Atlanta

From: Atlanta
Squad 5
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994

Title: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;

Synopsis: Closing the Atlanta portion of this case.

Details: A file review was conducted by SSA [redacted] on 10/4/96. b6 b7C b7E
It was determined that the Atlanta investigation regarding BCCI and NBG should be closed. Previously, Atlanta provided the [redacted] To date, no indictments have been returned based upon the [redacted] Atlanta remains available to assist the [redacted] upon request.

♦♦

Uploaded and Indexed to Investigative Data
AT 10/29/96 mrk
Initials

close 4
10/29/96
8 1

29B-WF-171994-730

Lead covered

mrk 10/30/96

1325015-000-9450

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 03-05-2019 BY: [redacted]

b6
b7C

Memorandum

~~SECRET~~

To : ADIC, WMFO (29B-WF-171994)(P) Date 12/05/94

From : SA [redacted] (C-5)

b6
b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

This communication is classified ~~"Secret"~~ except as designated.

The purpose of this memorandum is to summarize both the status and the need for further investigation in the captioned matter. (U)

[redacted]

b6
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DOJ Fraud Section Trial Attorney [redacted] has been tasked with drafting an information or indictment to which [redacted] CAPCOM; is currently incarcerated in the U.K.; and faces two indictments in the Middle District of Florida) will plead. At present, the choices are to have him

b5
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[redacted]

(U)

b5

[redacted]

1-WMFO

29B-WF-171994 MAIN- 639

JNR:jnr
(1)

~~Classified by: 9850~~
~~Declassify: OADR~~
~~SECRET~~

~~SECRET~~

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FBI — [redacted]

1325015-000-9186

b6
b7C

Basically, the facts are: wrote in 1988, asking him to come to WDC to testify before the Kerry Committee; 2) came to WDC, met with then called and threatened to tell and the subcommittee the things they wanted to know about BCCI unless BCCI paid him $15 million; 3) to WDC to mollify 4) met again with in New York; 5) a $15 million "loan" was made to CAPCOM by BCCI; and 6) did not testify before the subcommittee. (U)

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As can be seen, testimony could be pivotal in a possible prosecution of However, since the beginning of this case, DOJ has steadfastly discouraged any contact with apparently due to some perceived harm to DOJ in remarks publicly made about DOJ's supposedly-less-than-aggressive approach to the BCCI investigation. TA and I maintain tha should be interviewed and have again sought authorization to do so. (U)

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b7C

TA has asked that I reinterview about the $15 million payment to in 1988. I have arranged to do so on 11/30/94. TA and I also have a long-standing plan to interview which we hope to accomplish during a trip to Pakistan (more on this below). (U)

b3

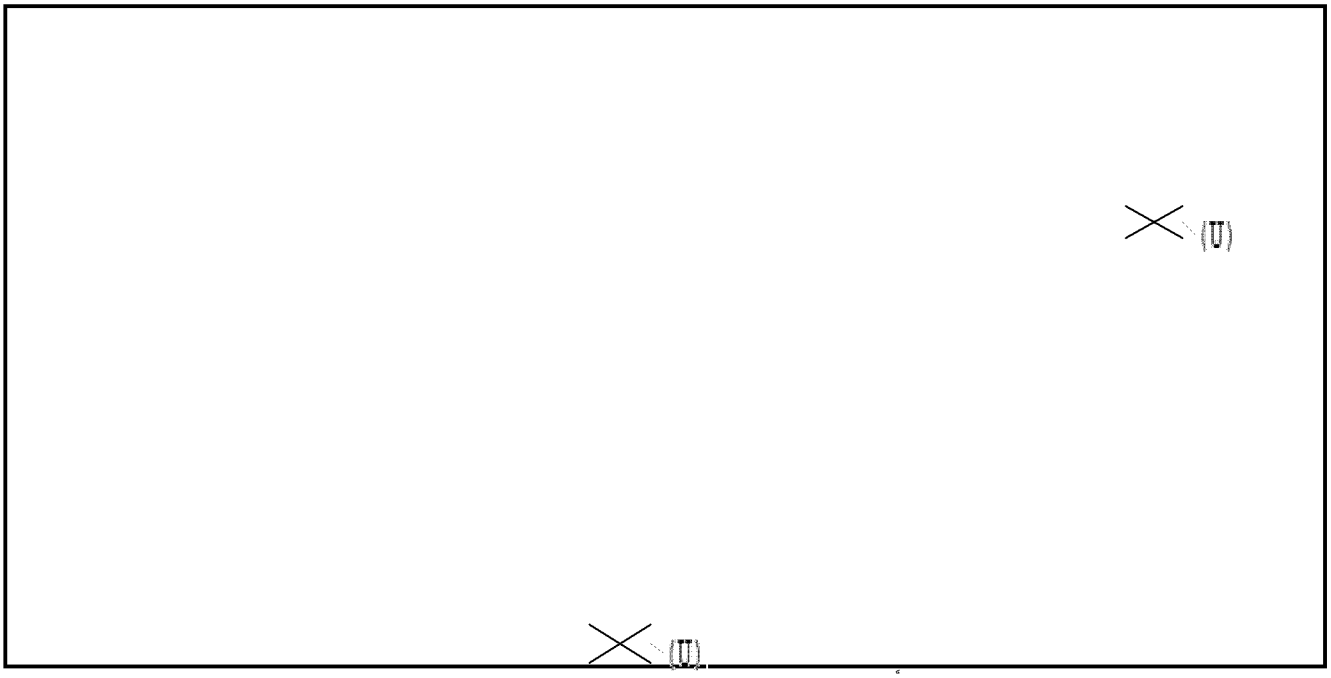
(U)

(U)

(U)

1325015-000-9187

b3



(U)

(U)

ANTICIPATED OVERSEAS ACTIVITIES AND INTERVIEWS:

GHAITH R. PHARAON: Efforts continue, in coordination with the Office of Naval Intelligence, to maintain a watch on PHARAON's yacht, "Le Pharaon," which remains in a boat yard in Barcelona, Spain, undergoing maintenance. ONI has a corporate source who will report the yacht's exact itinerary, thereby enabling us to track the vessel's movements and, hopefully, to be in a position to locate and apprehend PHARAON. (U)

Recently, DOJ--specifically, Special Counsel [redacted] Deputy SC [redacted] and OIA Assistant Director Linda Candler--has been strongly suggesting that an application be made to the Spanish government [redacted] I learned 11/28/94 that DOJ had unilaterally even begun to draft an affidavit to accompany such an MLAT request. I contacted both AD Candler and SC [redacted] and told them I was opposed to such a plan for several reasons: 1) the existence of the source who can and will provide us with the boat's itinerary; 2) the likelihood that, given the history of our failed attempts to confidentially gain the assistance of foreign governments in apprehending PHARAON, such an approach to the Spanish government would immediately be conveyed to him, thereby negating any assumption by PHARAON that the boat is a safe haven; 3) [redacted] 4) the likelihood that, if we and DOJ designate PHARAON

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b7C

1325015-000-9188

~~SECRET~~

[redacted] of MOHAMMED M. HAMMOUD.(U) b6 b7C b7D

[redacted], who, with his [redacted] GULF INTERNATIONAL HOLDINGS, a shipping company whose non-performing loans from BCCI caused almost a billion dollars in losses (some of which probably was funneled into or through the U.S.). With regard to [redacted] has reported that [redacted] will be extradited from Germany to the U.K. on 12/8/94, and will appear in court there on 12/9. The [redacted] advised that any interview of [redacted] should take place within 70 days of his arrival in the U.K. in order not to conflict with likely trial scheduling. Therefore, it is suggested that travel to the U.K. occur in or about January, 1995. (U)

1325015-000-9192

[redacted] b6 b7C
both AGHA ABEDI [redacted] BCCI's U.K. region until 1988 and knew about BCCI's use of nominees, such as MOHAMMED M. HAMMOUD, who was used to "buy" CLIFFORD and [redacted] CCAH shares. (U)

[redacted] a BCCI loan officer who was intimately b6 b7C
familiar with the roles BCCI, [redacted] GHAITH PHARAON played in the acquisition and operation of INDEPENDENCE BANK. (U)

(In London):

[redacted] b6 b7C
BCCI nominee MOHAMMED M. HAMMOUD, who, along with his father, provided almost $300,000.00 to Senator ORRIN HATCH's [redacted] (U)

[redacted] MOHAMMED M. HAMMOUD. (U)

[redacted] who, with his [redacted] b6 b7C b7D
[redacted] GULF INTERNATIONAL HOLDINGS, a shipping company whose non-performing loans from BCCI caused almost a billion dollars in losses (some of which we believe was funneled into or through the U.S.). With regard to [redacted] has reported learning from the [redacted] that [redacted] will be extradited from Germany to the U.K. on 12/8/94, and will appear in court there on 12/9. The [redacted] to request to interview [redacted] within 70 days of his arrival in the U.K. in order not to conflict with likely trial scheduling. Therefore, TA [redacted] and I are tentatively planning to travel to the U.K. in or about January, 1995. (U)

1325015-000-9190

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 03-05-2019

[redacted]

b6
b7C

~~SECRET~~

29B-WF-171994 12/7/94
JNR:jnr
1

This document is classified ~~Secret~~ in its entirety, unless otherwise designated.

OVERSEAS INTERVIEWS: Travel to Pakistan (at least to Karachi and possibly to Islamabad) and the United Kingdom will be necessary to conduct interviews which will further both the BCCI- and [redacted] investigations. Those interviews would include (in Pakistan): ~~(S)~~ (U)

b3

[redacted]

b3
b6
b7C

~~(U)~~

AGHA HASAN ABEDI, the fugitive founder and chairman of BCCI. (U)

[redacted] BCCI officer who has struck a plea and cooperation agreement with the Middle District of Florida, and who could be a pivotal witness in any prosecution of other BCCI players, particularly, [redacted] GHAITH PHARAON. (U)

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[redacted] (Northern District of Georgia) BCCI official who helped BCCI control the NATIONAL BANK OF GEORGIA, and who could testify against others, e.g., PHARAON, and would very likely know about criminality of U.S. citizens. (U)

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[redacted] AGHA ABEDI [redacted] BCCI's U.K. region until 1988 and knew about BCCI's use of nominees, such as MOHAMMED M. HAMMOUD, who was used to "buy" CLIFFORD and [redacted] CCAH shares. (U)

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[redacted] a BCCI loan officer who was intimately familiar with the roles BCCI, [redacted] GHAITH PHARAON played in the acquisition and operation of INDEPENDENCE BANK. (U)

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b7C

(In London):

[redacted] BCCI nominee MOHAMMED M. HAMMOUD, [redacted] provided almost $300,000.00 to Senator ORRIN HATCH's [redacted] (U)

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b7C

~~Classified by: 9850~~
~~Declassify: OADR~~

~~SECRET~~ 29B-WF-171994 Main — 640

~~SECRET~~

[redacted] b3 (U)

On 12/5/94, I contacted [redacted] ONI, to determine whether [redacted] I accepted [redacted] offer to draft it (she will also query the ONI's corporate source for an [redacted] b3 b6 b7C (U)

[redacted] b3 (U) (U)

AGHA HASAN ABEDI, the fugitive founder and chairman of BCCI. (U)

[redacted] BCCI officer who has struck a plea and cooperation agreement with the Middle District of Florida, and who could be a pivotal witness in any prosecution of other BCCI players, particularly, [redacted] GHAITH PHARAON. (U) b6 b7C

[redacted] (Northern District of Georgia) BCCI official who helped BCCI control the NATIONAL BANK OF GEORGIA, and who could testify against others, e.g., PHARAON, and would very likely know about criminality of U.S. citizens. (U)

FEDERAL BUREAU OF INVESTIGATION
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REASON: 1.4 (C)
DECLASSIFY ON: 12-31-2020
DATE: 02-25-2019

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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE

U.S. Department of Justice

~~SECRET~~

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
February 17, 1995

Mr. Gerald Stern
Special Counsel for Financial Institution
and Health Care Fraud Matters
-and-
Mr. Robert Litt
Deputy Assistant Attorney General
Criminal Division

U. S. Department of Justice
10th Street & Constitution Ave., NW,
Washington, D. C. 20530

Dear Sirs:

Re: The BCCI Case: Remaining Investigative Matters (U)

This communication is classified ~~"Secret"~~ except as otherwise designated.

As you may be aware, February 7, 1995, marked the fourth anniversary of the beginning of the investigation of the BCCI case by our office, in concert with members of your staff and others in the DoJ, and the Office of the U. S. Attorney for the District of Columbia. The passing of this milestone alone would seem to be an appropriate moment to list and discuss items which, in our view, constitute the major remaining investigative matters in the BCCI case; matters which we believe to be no less important despite the passage of so much time. However, you should also be aware that some exigency in pursuing these matters now exists due to the fact that our case agent, Special Agent [redacted] will no longer be in this office, and possibly, the FBI, after July 1, 1995. (U)

b6
b7C

In order to ensure an orderly, seamless progression of the BCCI investigation, we are ready and able, at your earliest opportunity, to discuss the matters presented below, using as a guide either the agenda we have included in this letter, or one you may have. At a minimum, we are committed to bringing each of the these matters to a successful, acceptable conclusion. (U)

Classified by: G-3
Declassify: OADR

645

29B-WF-171994 Main

1-Each addressee
3-WMFO (1)-main
1-SAC Meggy
1-ASAC Shubert
TNR:jr.
(4)

~~SECRET~~

1325015-000-9211

1. The ongoing and anticipated prosecution of the existing RICO indictment in the District of Columbia. (U)

This category includes:

(a) the completion of the collection and review of records from Abu Dhabi (particularly, the so-called [redacted] files"), England, France and Luxembourg, for relevant evidence and leads. b6 b7C

(b) the apprehension of fugitives AGHA HASAN ABEDI, GHAITH RACHAD PHARAON and TARIQ JAMIL.

(c) witness identification and interviews (in some cases, reinterviews). Some witnesses are abroad in (e.g.) England or Pakistan (see below at "Overseas interviews"). (U)

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

1325015-000-9212

[redacted] (S) b1 b3

(b) Certain BCCI nominees, each of whom played a role in BCCI's illegal ownership and control of CREDIT AND COMMERCE AMERICAN HOLDINGS (CCAH), the company which owned FIRST AMERICAN CORPORATION. It is our understanding that each was negotiating a plea and/or settlement with the DoJ's Fraud Section, Asset Forfeiture Office (AFO) or the Board of Governors of the Federal Reserve System (BGFRS), and the District Attorney of New York (DANY). Those involved in this category include: [redacted] b6 b7C

1325015-000-9213

--INTERREDEC, INC.
(b) Responsibility within DoJ.
(c) Investigation needed. (U)

4. CAPCOM:
(a) Interest in pursuing.
(b) Responsibility within the DoJ.
(c) Investigation needed. (U)

[redacted] b3

6. Overseas interviews:
(a) Authorization.
(b) Funding. (U)

7. Screening:
(a) Dedication to participation/completion.
(b) Responsibility within the DoJ.
(c) Assistance.
(d) Dissemination of results:
--Responsibility.
--Format. (U)

In closing, we reiterate our desire to meet with you at your earliest convenience to discuss and evaluate the status of, and plans for, this important, complicated and sensitive investigation. Arrangements may be made through Supervisory Special Agent [redacted] or Assistant Special Agent in Charge [redacted] (U) b6 b7C

Very truly yours,

William Megary
Acting Assistant Director in Charge

cc: Ms. Mary Spearing
Chief
Fraud Section
U.S. Department of Justice

1325015-000-9220

Colorado, apparently as a tax case. The ultimate disposition of that referral remains unclear, but is our understanding that prosecution was declined. (U)

In examining BCCI records relating to CAPCOM, we have seen documents which strongly indicate that one or more of the directors of CAPCOM, ROBERT MAGNESS, LARRY ROMRELL and/or KERRY FOX, all of whom we believe were subjects of the Colorado inquiry, were enriched by the forgiveness of a BCCI loan to one of their corporations, WINTERWOOD ASSOCIATES. Further, we are told that the DANY has corroborative documentary evidence showing that one or more of these subjects asked for the return of, and received, the original loan documents when the loan was forgiven. (U)

[redacted] b6 b7C b7D

Recent stories and editorials in the media in the U.K. and elsewhere have decried the fact that CAPCOM continues to operate in the U.K. when it is supposedly so infamous as a suspected money-laundering enterprise. Even the [redacted] management professes not to understand why CAPCOM has not been "wound up." The same media stories report that U.S. Senator KERRY is sufficiently outraged by the lack of any overt action against CAPCOM, either here or abroad, that he is moving to reopen subcommittee hearings. (U) b7D

[redacted] b1 (S) b3

1325015-000-9215

[redacted] (S) b1 b3

We would like to take this opportunity to recognize and commend TA [redacted] both for his work on the BCCI case, in general, and in particular, for his work on this complicated and important aspect of the investigation: ascertaining the nature and scope of the relationship between BCCI and the U.S. intelligence community. Were it not for TA [redacted] tenacity, his diplomacy and his investigative skills, much of what has now come to light would have remained hidden--to our eventual detriment. (U) b6 b7C

6. Overseas interviews. (U)

We believe certain interviews of, or proffers from, persons now overseas would advance both the BCCI-[redacted] investigations. Those interviews would include: (U) (S) b1 b3

(In Pakistan): (U)

(a) AGHA HASAN ABEDI, the fugitive founder and chairman of BCCI. In 12/93, we contacted ABEDI through informants. At that time, he indicated his supposed willingness to cooperate with the U.S.' inquiries. It was and is our belief that our earlier efforts should be rekindled, and should include an attempt by TA [redacted] and SA [redacted] to contact him in person. (U) b6 b7C

[redacted] (S) b1 b3

(c) [redacted] a longtime, high-level BCCI b6 b7C

1325015-000-9217

officer, who has struck a plea and cooperation agreement with the USAO, Middle District of Florida, and who could be a pivotal witness in any prosecution of other BCCI figures, particularly, [redacted] GHAITH PHARAON. (U) b6 b7C

(d) [redacted] a fugitive (Northern District of Georgia) BCCI official, who helped BCCI control the NATIONAL BANK OF GEORGIA, and who could testify against others, e.g., PHARAON, and would very likely know about criminality of U.S. citizens. (U)

(e) [redacted] b6 b7C
both AGHA HASAN ABEDI [redacted] BCCI's U.K. region until 1988 and knew about BCCI's use of nominees, such as the (allegedly) late MOHAMMED M. HAMMOUD, whom BCCI used as a nominee to "buy" CLARK CLIFFORD's [redacted] CCAH shares. (U)

(f) [redacted] a BCCI loan officer who was intimately familiar with the roles which BCCI, [redacted] and GHAITH PHARAON played in the acquisition and operation of INDEPENDENCE BANK in Encino, California. (U) b6 b7C

(In London): (U)

(g) [redacted] BCCI nominee MOHAMMED M. HAMMOUD, [redacted] provided almost $300,000.00 to Senator ORRIN HATCH [redacted] (U) b6 b7C

(h) [redacted] MOHAMMED M. HAMMOUD.(U)

(i) [redacted] b6 b7C b7D
[redacted] GULF INTERNATIONAL HOLDINGS (GIH), a Luxembourg-based shipping company whose non-performing loans from BCCI caused almost a billion dollars in losses (some of which probably was funneled into or through one or more of several companies GIH owned or controlled in the U.S.). [redacted] you will recall, was arrested in 12/94 by German police on a U.K. warrant, while he was en route to the U.S. to be interviewed by SA [redacted] and TA [redacted] and representatives from the DANY. It is our understanding that, since that time, TA [redacted] has been communicating with [redacted] U.K. attorney and the [redacted] to arrange another opportunity to interview [redacted] (U)

(j) [redacted] was identified in a recently-obtained, BCCI liquidators' document as an "important witness." [redacted] ABU DHABI INVESTMENT AUTHORITY, a quasi-governmental organization. Prior to that position, [redacted] LAZARD b6 b7C

1325015-000-9218

FRERES, working with [redacted] U.S. Energy Secretary. In 1990, looking for assistance for BCCI, [redacted] was sent by the government of Abu Dhabi to meet with [redacted] and SA [redacted] also plan to interview [redacted] (U) b6 b7C

(k) [redacted] to advance the discussions of a plea agreement. (U)

7. Screening BCCI account holders and claimants: (U)

At various times through almost the entire investigation, we have been tasked with screening the names of account holders seeking the return of their deposits from BCCI's liquidators. It has become apparent to us that many of these accounts have been used to launder money or to evade U.S. taxation. In Luxembourg, for example, information which TA [redacted] were able to provide enabled the liquidator to freeze over $80 million in laundered drug proceeds; funds which will be used to compensate the legitimate victims of the BCCI debacle. We are currently reviewing our records for similar information on hundreds more names from Luxembourg and from BCCI's branch in the Cayman Islands. While recognizing the inherent difficulties in suspecting criminality by the mere existence of funds in a BCCI account, and the fact we are constrained from providing the liquidator with any information on a subject other than that which is public, it is our belief this effort should continue and that any U.S. subject(s) should be aggressively pursued and prosecuted. (U) b6 b7C

AGENDA: (U)

1. The D.C. RICO case:
   (a) Dedication to prosecution.
   (b) Who is responsible for prosecution?
   (c) What investigation is needed? (U)

2. The negotiation of pleas and cooperation agreements:
   (a) Status of efforts:
   [redacted] b6 b7C
   (b) Dedication to completion.
   (c) Responsibility within the DoJ.
   (d) What investigation is needed? (U)

3. Additional targets in the D.C. RICO case:
   (a) Dedication to prosecution:
   [redacted]

1325015-000-9219

[redacted] (a Kuwait citizen, from whom SA [redacted] ALI MOHAMMED AL-SHORAFA (the director of the royal court of SHEIK ZAYED BIN SULTAN AL-NAYHAN, the ruler of Abu Dhabi and president of the United Arab Emirates [U.A.E.]; SA [redacted] HUMAID BIN RASHID AL-NAOMI (the crown prince and deputy ruler of Ajman, one of the U.A.E.; and HAMAD BIN MOHAMMED AL-SHARQI (the ruler of Fujaira, another of the U.A.E.). (U) b6 b7C b7D

3. Additional targets in the District of Columbia RICO case: (U)

We include in this category: (U)

(a) KEMAL SHOAIB, formerly a high-level BCCI official who ostensibly left his BCCI position to become the chairman and CEO of INDEPENDENCE BANK (IB) in Encino, California. Largely due to the work of FBI SAs [redacted] in Los Angeles, who investigated the IB failure matter, we believe we can show that SHOAIB was a co-conspirator in BCCI's scheme to illegally acquire IB. We also have evidence that SHOAIB extorted funds from BCCI in return for his silence. It is our understanding that DoJ Fraud Section TA [redacted] who is presently working with SAs [redacted] on an indictment of SHOAIB in California on Bank Bribery charges stemming from the IB failure, is favorably disposed to proceeding against SHOAIB in the District of Columbia, and that she is joined in that opinion by DoJ Deputy Special Counsel [redacted] (U) b6 b7C

(b) INTERREDEC, INCORPORATED, which is a corporation owned or controlled by GHAITH RACHAD PHARAON in Richmond Hill, Georgia. Again largely due to the work of LA SAs [redacted] added to that done earlier by WMFO SA [redacted] we believe we can prove that INTERREDEC, INC., played a conspiratorial role in BCCI's acquisition, ownership and control of the NATIONAL BANK OF GEORGIA and INDEPENDENCE BANK. As they did in regard to SHOAIB, TA [redacted] have expressed favorable opinions with regard to charging INTERREDEC, INC., in the District of Columbia. (U) b6 b7C

LA SAs [redacted] plan to travel to Washington, D.C., within the next two weeks, in part to discuss the above matters with the DoJ Fraud Section. (U) b6 b7C

4. CAPCOM:

As you will recall, the portion of the BCCI investigation relating to CAPCOM was referred in 1992 to the District of

1325015-000-9214

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Memorandum

To : SAC, WMFO 29B-WF-171994 Date 11/4/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 62 - STATUS REPORT
IDENTIFY ASSETS OF BCCI SHAREHOLDERS & "FRONT-MEN"

To date a Bureau wide airtel has been sent to index and search indices on major BCCI shareholders and "front-men". The FBI, Butte Information Technology Center (BITC) has been requested to search their files for information concerning the major BCCI shareholders and "front-men", along with companies associated with the individuals.

The writer will follow up the results from Butte when received. The writer is also awaiting the KERRY REPORT documents, in order to review any information contained in the report which might assist in locating assets held in the United States.

29B-WF-171994 -5

2 - WMFO
(1 - 29B-WF-171994)
(1 - 29B-WF-171994 SUB FS)

RHM:rhm
(2)

1325015-000-7746

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 11/4/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Re: Conference with IIC [redacted] **on 10/28/92** b6 b7C

Lead # 60 - [redacted] **: BCCI &** [redacted]

Pursuant to referenced conference, the following is submitted regarding the status of lead #60:

Background

Lead requires a determination as to BCCI involvement with [redacted] (CENTRUST) in identifying affiliated entities that may have laundered funds for [redacted] to offshore locations. The Subcommittee found numerous connections amount [redacted] and BCCI related persons/entities. b6 b7C

Status

On 11/4/92, SA [redacted] telephonically contacted SSA [redacted] FBI-Phoenix, regarding the [redacted] investigation. SSA [redacted] advised that a Task Force was established that included approximately 40 investigators including 6 FBI SAs in both Phoenix and Los Angeles, 3 OFFICE OF THRIFT SUPERVISION (OTS) examiners, state banking officials and several FBI Financial Analysts. At the present time, the case is in the second day of trial and includes two defendants. Only 2-3 SAs are currently working on the investigation. Eight plea agreements were made and all defendants were interviewed, which included questions regarding BCCI and the [redacted] -related entities. SSA [redacted] advised that the Task Force was aware of b6 b7C

2 - WMFO (1 - 29B-WF-171994-Main)
(1 - IIC [redacted])
CWS
(2)

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1325015-000-7748

the BCCI transactions, but no additional information was developed to justify additional investigation into those matters. Many of the defendants knew of [redacted] transactions with BCCI, but there was no information indicating any wrongdoing. b6 b7C

Recommendation

Based on the foregoing, it is recommended that Lead #60 be considered "Covered."

1325015-000-7749

Memorandum

To : SAC, WMFO (29B-WF-171994) (BCCI) (P) Date 11/5/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On Nov. 5, 1992, SA [redacted] contacted [redacted] b6 b7C b7D
Associate Director of DOJ/OIA, [redacted]

[redacted] advised that the request was still pending as [redacted] b6 b7C b7D

[redacted] stated that Tampa U.S. Attorney [redacted] had [redacted] b6 b7C b7D

(1) - WMFO (29B-WF-171994)
1 - SSA [redacted] b6 b7C

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FBI — WASH. FIELD OFFICE

1325015-000-7750

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 11/12/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 41 - SCREENING OF CLAIMANT NAMES
MEMO DATED 10/22/92 SETTING UP SUB BB

The purpose of this memo is to spell out the criteria used in identifying claimants to the Bank of Credit and Commerce International (BCCI), which will be globally searched through WMFO indices.

Since the objective of the search is only to determine those individuals or companies which may have derived money form illegal activities, it was decided that after the global searches are completed WMFO would only review searches resulting in positive hits, of either individuals or companies, which are from a main file less than seven years old. Also, WMFO would not review files of individuals or companies which were previously known to WMFO.

2 - WMFO
(1)- 29B-WF-171994)
(1 - 29B-WF-171994 SUB BB)

RHM:rhm
(2)

29B-WF-171994-515
Main
Sub Sub

1325015-000-7751

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 11/12/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 41 - SCREENING OF CLAIMANT NAMES
MEMO DATED 10/22/92 SETTING UP SUB BB

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2 - WMFO
(1 - 29B-WF-171994)
(1 - 29B-WF-171994 SUB BB)

RHM:rhm
(2)

29B-WF-171994-516
Main
See See

1325015-000-7752

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
NEW YORK, N.Y. 10013
(212) 335-9000

ROBERT M. MORGENTHAU
DISTRICT ATTORNEY

November 13, 1992

[redacted] b6 b7C
Special Agent
Federal Bureau of Investigations
7799 Leesburg Pike
Falls Church, Virginia 22043

Re: People v. Clark M. Clifford
People v. [redacted] b6
N.Y. Co. Ind. No. 6994/92 b7C

Dear [redacted] b6 b7C

This Office has conducted a criminal investigation into the affairs of the Bank of Credit and Commerce International (BCCI) and its relationship with First American Bankshares (FAB), a multi-state bank holding company, and with officers, directors, and shareholders, and other principals of FAB, its parents, and its subsidiaries. That investigation resulted in an indictment against a number of persons, including Clark M. Clifford and [redacted] b6 b7C A trial of the charges contained in that indictment is scheduled to begin on February 15, 1993, in the Supreme Court of the State of New York, New York County.

We understand that your agency may have conducted an inquiry into matters related to the subject matter of the accompanying indictment, or may have otherwise spoken to a number of persons on connected matters. We ask you to search your files and provide us with a copy of anything that constitutes a "statement" of any of the persons in the attached list. We ask that you do so before December 15, 1992.

Under New York State law, a criminal defendant is entitled to

> [a]ny written or recorded statement [in the possession of the prosecution]... made by a person whom the prosecutor intends to call as a witness ... which relates to the subject

-517
288-WF-176994 Main
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SERIALIZED [redacted] FILED [redacted] b6 b7C
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[redacted]

RECYCLED PAPER

1325015-000-7753

matter of the witness's testimony

New York CPL section 240.45 (1)(a). New York courts have taken a broad view of what constitutes such a statement. For example, under New York law, the statement by one person of what a third person said would be a statement of that third person. In addition, New York law considers not only a final summary memorandum of an interview to be a statement of a witness, but any draft notes of an interview to be such a statement. Thus, informal notes can be a statement as well as such obvious things as a deposition, transcript of testimony, or a written, signed, tape recorded, or other recorded statement by the witness himself or herself.

We realize that this request will exact some burdens upon your organization. We appreciate the efforts that you make to provide this Office with possession of the indicated statements, and thank you in advance for your anticipated courtesy and promptness in carrying out our request. If you have any questions, please call me at (212) 335-9892. In any event, we would be grateful for a written response to our request from your agency.

Sincerely,

[redacted]

Attorney

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b7C

Enc.
JWM:mvc

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 11/18/92

b6
b7C

TO : DIRECTOR, FBI
ATTN: ASSISTANT DIRECTOR POTTS
CRIMINAL INVESTIGATIVE DIVISION

Susp. BCCI

FROM : SAC, WMFO (29B-171994)

SUBJECT : HIDDEN INTERESTS
MAJOR CASE #38

Investigation in captioned matter is nearing completion and major case status will be sustained until mid-December, 1992. Special Agent resources are being reallocated and the Financial Analysts who were assigned TDY have been released to their respective divisions. All remaining investigation in support of the Federal RICO indictments and the upcoming trial of [redacted] and CLARK CLIFFORD in New York can be addressed on a squad level at WMFO.

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A brief chronology of the prosecutive stages of this investigation is being provided for background information:

In July, 1991, the District Attorney's Office, New York (DANY), brought indictments against BCCI executives and nominees:

AGHA ABEDI
[redacted]
GAITH PHARAON
[redacted]

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b7C

[redacted]

2-Bureau
2-WMFO
LMT: lth
(3)

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29B-WF-171994 Main

-519

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-7757

These individuals were charged with operating a criminal enterprise (BCCI). DANY also indicated [redacted] charging them with "Scheme to Defraud in the First Degree." b6 b7C

In September, 1991, the United States Attorney (USA), Middle District of Florida, brought RICO charges (operating BCCI as a racketeering enterprise), against the following:

[redacted] b6 b7C

CAPCOM FINANCIAL SERVICES

[redacted]

In November, 1991, the U.S. DEPARTMENT OF JUSTICE (DOJ) brought RICO charges against: ABEDI; [redacted] PHARAON; BCCI holdings; BCCI SA; BCCI Overseas; and ICIC. b6 b7C

In December, 1991, DOJ brought a superseding indictment against: BCCI holdings; BCCI SA; BCCI Overseas; and ICIC, charging them with RICO and aiding and abetting.

In July, 1992, DOJ brought indictments against CLARK CLIFFORD and [redacted] charging them with conspiracy and concealing material facts. b6 b7C

In July, 1992, DANY brought indictments against CLIFFORD and [redacted] charging them with accepting bribes and defrauding United States bank regulators. b6 b7C

In September, 1992, the USA, Northern District of Georgia brought indictments against: PHARAON; [redacted] charging them with conspiracy, bribery, false entry, money laundering and tax violations. b6 b7C

In January, 1992, the liquidators representing BCCI entered a guilty plea to Federal RICO charges and New York Larceny and Fraud charges. BCCI agreed to forfeit $550 million to the Federal Government and pay $10 million in fines to New York State. BCCI also agreed to cooperate with DOJ and DANY in all ongoing investigations of BCCI.

1325015-000-7758

In July, 1992, [redacted] pleaded guilty in New York County to criminal conduct involving BCCI, (misdemeanors), and a agreed to cooperate with DOJ and DANY. They also paid $105 million in fines, reimbursements and compensation. b6 b7C

On July 31, 1992, U.S. District Judge JOYCE HANS GREEN set a Federal trial date of October 26, 1992, for CLIFFORD and [redacted] On August 14, 1992, [redacted] requested that Judge GREEN allow New York's trial of CLIFFORD and [redacted] to proceed on October 22, 1992. b6 b7C

On August 18, 1992, Judge GREEN held a status meeting to address the issue of trial dates and at this time DOJ requested a continuance in order to allow DANY to proceed on October 22, 1992, prior to the Federal case. DOJ expressed the opinion that a Federal trial would jeopardize DANY's case on the grounds of double jeopardy.

On September 10, 1992, Judge GREEN honored the request for a continuance by DOJ and agreed to allow DANY to try CLIFFORD and [redacted] in New York on January 4, 1993. The trial has since been postponed to February, 1993. b6 b7C

In March, 1991, DOJ focused its prosecutive efforts on CLIFFORD and [redacted] and FBI investigative resources were directed to support this strategy. As a result, other aspects of the case were placed in pending inactive status. In July, 1992, additional Special Agents and Financial Analysts were assigned and by late October the investigations pertaining to other subjects were updated to the extent that they could be presented to DOJ for prosecutive opinion. b6 b7C

On October 29, 1992, Deputy Assistant Attorney General (DAAG) [redacted] advised that DOJ would not consider prosecution of the PRICE WATERHOUSE auditors [redacted] b6 b7C b7D

[redacted]

DAAG [redacted] advised that DOJ would seek no additional prosecution in the REDEC, CAPCOM and CENTRUST matters as these cases are being addressed in current and anticipated indictments by DOJ and other Federal Districts. b6 b7C

1325015-000-7759

On November 6, 1992, a meeting was held at the FEDERAL RESERVE in New York in order to discuss the prosecutive and investigative strategy of this case. Present were: DAAG [redacted] DOJ; [redacted] b6 District Attorney, New York and his deputy [redacted] b7C [redacted] FEDERAL RESERVE; Inspector [redacted] [redacted] and SSAs [redacted] and [redacted] FBI.

The prosecutive potential of the following was discussed:

1. The nominees of BCCI as a RICO conspiracy
2. INTERREDEC
3. [redacted] b6
4. [redacted] b7C

It was agreed that precedent had been set by DANY b6 in their acceptance of pleas by [redacted] but that b7C this would not preclude DANY from proceeding against the other nominees. In view of the progress DANY has made and since they have established contact with at least one other nominee, it was agreed that any additional effort by Federal authorities would be duplicative. DOJ and FBI agreed to assist DANY by furnishing results of any related investigation relevant to the nominees.

The criminal aspect of the INTERREDEC investigation focuses on GAITH PHARAON who is under indictment on various charges in three different jurisdictions. It was agreed that additional efforts against PHARAON would be duplicative and the forfeiture proceedings against INTERREDEC can best be addressed by attaching them to the FEDERAL RESERVE civil case. The results of this action, the forfeiture of approximately $20 million to the U.S. Government, would be the same in either case.

The feasibility of a Federal case against [redacted] b6 [redacted] was discussed and it was decided that since DANY b7C has already indicted [redacted] and a Federal investigation has not yet begun, DANY is in the strongest position to proceed and DOJ deferred to them.

[redacted] is the subject of investigations by b6 both DANY and the FBI. DANY is investigating several multi- b7C million dollar fraud violations in New York which were perpetrated by [redacted] through his use of BCCI. DANY expects to have indictments returned by a New York Grand Jury in the very near future. In view of this as well as the fact that the FBI investigation consists of an SBA fraud which is in the initial stage, DOJ agreed to defer prosecution to DANY.

1325015-000-7760

It should be noted that DOJ has assigned a Federal prosecutor to DANY to assist in the joint prosecution of CLIFFORD and [redacted]. It was agreed that FBI agents would be made available to assist DANY in trial preparation. The details of this project are currently being arranged. b6 b7C

Currently there are enough investigative leads pending to fully occupy six agents for a period of 60 days. An additional two agents will be required to assist in trial preparation during the next 60 days.

It should be noted that the bribery allegations against Senator ORRIN HATCH have been thoroughly investigated and no culpability on the part of the Senator was found. Several leads remain which would determine if an acquaintance of Senator HATCH's has violated Federal Election laws.

WMFO intends to reassign agents who are currently assigned to Major Case #38 as soon as their work is completed.

Inspector [redacted] will be available for reassignment, December 14, 1992. b6 b7C

1325015-000-7761

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 11/18/92

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

[redacted] Attached, photocopied, 3/20/92, letter from DOJ AAG [redacted] b6 b7C
to U.S. Rep. Charles E. Schumer was provided by DOJ TA [redacted]

1-WMFO (Att. 1)

JNR:jnr
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[redacted] SZD b6 b7C
(WW/WW; Chronology)

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FBI — WASH. FIELD OFFICE

1325015-000-7811

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 11-19-92

Requested by:

To: Office Services Manager

Ext. 9325 | Squad: B&C1 | File No. 29B-WF-171994

b6
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Subject

Social Security Account #

Alias

Address | Birth Date | Birth Place | Race | Sex ☒ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☐ **General Indices:** ☑ NEG ☐ POS	GC	11-23	☐ **ISIS:** ☐ NEG ☐ POS
☐ **Confidential Indices:** ☐ NEG ☐ POS			☐ **OCIS:** ☐ NEG ☐ POS
☐ **ELSUR Indices:** ☐ NEG ☐ POS			☐ **IIS:** ☐ NEG ☐ POS
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Searched by / Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
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Central
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- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
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- ☐ Omaha
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- ☐ Springfield
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Western
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- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

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29B-WF-171994

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

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~~SENSITIVE~~

[redacted]

NO: 001 b6 b7C
REC-NO: 001

DDN:
TRUE:
FO: WF CASE NO: [redacted] CLASS: 029B
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 111692
MODIFIED:
VIOLATION: FIF SPECIAL:
SERIALS: 331

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:
MISCELLANEOUS: RESIDENT [redacted] b6 b7C

CLASSIFICATION LEVEL: SN CLASSIFIED BY: DECLASSIFY ON:
<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS
F1 -REQUERY F8 -DELETE F10 -INDEX
SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS
4β NUM ↑ — 33

Memorandum

To : IIC [redacted] (29B-WF-171994) (P) Date 11/19/92

From : SA [redacted]

Subject: HIDDEN INTEREST
MAJOR CASE #38
FIF;FAG;
OO:WMFO

Reference our meeting on 10/23/92.

Per your request, the following information is being provided regarding leads #21 and #67 which involve BCCI's ownership of NBG.

SA [redacted] reviewed all relevant portions of the Kerry report and determined that it contained no information that was not already known to the BCCI Task Force. A review of the related "Kerry report material" will be conducted upon it's receipt by the Task Force.

On 10/4/92, SA [redacted] contacted SA [redacted] Atlanta Division, who is the case agent of the Atlanta corruption investigation. SA [redacted] advised that their investigation regarding the allegations concerning the payment of bribes to Georgia officials failed to uncover any payments to Georgia officials to ensure passage of the Georgia law which enabled FAB to purchase NBG. SA [redacted] further advised that the statute of limitations has expired pertaining to any violation concerning the passing of the law , which occurred in 1987, and therefore it is anticipated that their case will be closed. SA [redacted] provided that any additional investigations into public corruption in Atlanta will not involve the passage of the Georgia law affecting the FAB acquisiton of NBG.

On 11/18/92, SA [redacted] contacted TA [redacted] who is the lead DOJ prosecutor concerning the NBG investigation. TA [redacted] stated that she is in the process of preparing a prosecutive memo re NBG and she is recommending that the information developed be incorporated in the existing RICO indictment.

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29B-WF-171994 Main

3-WMFO (1-29B-WF-171994)
(1-IIC [redacted]
(1-SSA [redacted]

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1325015-000-7814

TA [redacted] agreed that the investigation is essentially complete and that the information would be used as additional evidence against those indicted, including Pharaon. TA [redacted] stated that she has already been provided all of the pertinent documents and information relating to the NBG investigation and there is no need for a prosecutive report by the FBI. TA [redacted] stated that it is her opinion that the investigation determined that there was no prosecutable criminal activity conducted in regards to Riveredge, but that some of the information developed during the investigation would be used in the RICO case. TA [redacted] advised that she will also address Riveredge in her prosecutive memo, and will provide a copy of the memo to writer when it is complete. TA [redacted] advised that she is currently preparing for the [redacted] trial in Georgia, and will address the NBG matter as time allows.

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1325015-000-7815

Memorandum

To : IIC [redacted] (29B-WF-171994) (P) Date 11/19/92

From : SA [redacted]

Subject: HIDDEN INTEREST
MAJOR CASE #38
FIF;FAG;
OO:WMFO

Reference our meeting on 10/23/92.

Per your request, the following information is being provided regarding lead # 1 which involves the nominee investigation.

On 11/19/92, SA [redacted] telephonically contacted DOJ attorney [redacted] regarding captioned lead. [redacted] advised that the DANY prosecution team has already been provided all of the pertinent documentation and information from the BCCI Task Force. [redacted] further advised that there is no need for the Task Force to provide DANY with any additional documentation or information at this time.

On 11/16/92, SSA [redacted] advised writer that [redacted] is currently drafting a memo which in part confirms DAAG [redacted]'s declination regarding the nominee investigaton, and therefore SA [redacted] does not need to confirm DAAG [redacted]'s prosecutive opinion.

Based upon the above information, lead #1 should be considered covered.

- 522

3-WMFO (1-29B-WF-171994)
(1-IIC [redacted]
(1-SSA [redacted]

29B-WF-171994 Main

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FBI — WASH. FIELD OFFICE

1325015-000-7816

Memorandum

To : SAC, WMFO (29B-WF-171994) (BCCI) Date 11/20/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

RE lead #36.

PURPOSE: To determine if there is any connection between INSLAW and BCCI or between BCCI and the death of DANIEL CASOLARO.

RECOMMENDATION: No further investigation should be conducted on this matter as no evidence was obtained that connected INSLAW with BCCI or CASOLARO's death to BCCI.

DETAILS: DANIEL CASOLARO was a free lance investigative reporter who was investigating the allegations that the Dept. of Justice (DOJ) had forced INSLAW, a computer software company, to go bankrupt so the U.S. government could seize a software program called "PROMIS" from INSLAW.

In August of 1991, DANIEL CASOLARO was found dead in a Martinsburg, West Virginia, hotel. The initial verdict by the Martinsburg, W. Va., Police Dept. (MPD) was that CASOLARO had committed suicide. However, CASOLARO's family and members of the media questioned the findings of the police and went as far as to state that CASOLARO had been murdered because of his current investigations. The MPD reopened the investigation, but again found nothing to support any theory of CASOLARO being murdered.

During the BCCI investigation several newspaper/magazine articles were published that questioned the death of CASOLARO and made inference to a BCCI/INSLAW connection. FBIHQ requested that the BCCI Squad look into CASOLARO's death for any connection to BCCI and for any connection between BCCI and INSLAW.

(2) - WMFO (29B-WF-171994)
1 - IIC
1 - SSA [redacted] b6 b7C

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Prior to conducting any interviews on this matter SA [redacted] met with SA [redacted] at the NVRA. SA [redacted] had information re CASOLARO and his investigations. SA [redacted] did advise that CASOLARO had been investigating the INSLAW affair at the time of his death, but SA [redacted] did not know of any connection between BCCI and INSLAW. SA [redacted] did not believe the MPD findings that CASOLARO committed suicide, but believed CASOLARO was murdered. However, SA [redacted] had no evidence that would support this belief of murder. SA [redacted] did suggest that SA [redacted] interview several other people during this investigation. Among these people were the [redacted]; [redacted], a reporter that supposably had information on CASOLARO's death and of the connection between BCCI and INSLAW; [redacted] DANIEL CASOLARO [redacted]; and a confidential source of [redacted]'s [redacted]

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[redacted] had been interviewed by SAs [redacted] and [redacted] on Oct. 17, 1991. During this interview [redacted] stated that he had no knowledge of [redacted] investigation into BCCI and/or INSLAW. [redacted] also advised that he had turned over all of DANIEL CASOLARO's documents in [redacted]'s possession to ABC's Nightline television show.

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On Sept. 15, 1992, SAs [redacted] met with the [redacted]s re BCCI/INSLAW and CASOLARO. For two hours the [redacted]s gave a detailed background on their company and their allegations against the DOJ. Not once during this time did the [redacted]s mention a connection between INSLAW and BCCI. When specifically questioned about any connection between INSLAW and BCCI the [redacted]s stated that [redacted] a reporter for CNBC, Washington, D.C. , told them that CASOLARO had advised her that the First American Bank in McLean, Va., may have filtered PROMIS money through it. The [redacted]s also advised that CASOLARO told them that he had uncovered documents which tied BCCI, IRAN-CONTRA, the "October Surprise", and INSLAW together. However, before CASOLARO could explain further he died which made the [redacted]s suspicious of his death. The [redacted]s had no knowledge as to where CASOLARO may have stored his research and/or documents and had no knowledge of where or from whom CASOLARO received his information.

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On Sept. 15, 1992, SA [redacted] contacted MICHAEL BINSTEIN, a syndicated columnist for numerous publications, including the Washington Post. The Washington Post had published an editorial by BINSTEIN titled "Suspicious Death Hangs Over Inslaw Case". In

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1325015-000-7821

this editorial BINSTEIN wrote of the death of CASOLARO and made mention that CASOLARO had stumbled across evidence that CASOLARO believed linked INSLAW to deeper intrigues, including the Iran-Contra scandal, the BCCI affair, and the pre-Persian Gulf War arming of Iraq.

In this article BINSTEIN also made mention that Special Agent Tom Gates of the FBI LA Division was suspicious of CASOLARO's death as CASOLARO was in contact with an individual SA GATES believes has connections to Organized Crime. SA GATES believes this individual is CASOLARO's primary source on the INSLAW investigation being conducted by CASOLARO. BINSTEIN advised that he had received all the information for the article from the Sept. 12, 1992 Full House Judiciary Subcommittee Investigative Report on "The Inslaw Affair".

On Sept. 14, 1992, SA [redacted] had advised SA [redacted] that he had worked with CASOLARO on an investigation of organized crime activity within the Hollywood, Ca. entertainment industry. SA [redacted] had no evidence but believed CASOLARO's death was a result of his involvement in this investigation. SA [redacted] was not aware of any investigation CASOLARO was conducting on BCCI and/or INSLAW and knew of no connection between the two. b6 b7C

A copy of SA [redacted] testimony to the Subcommittee was obtained in Oct. of 1992 and reviewed. SA [redacted] testified that he had only spoken to CASOLARO two or three times by phone and that during one of these conversations CASOLARO stated that he had been threatened by [redacted] whom SA [redacted] believes is connected to organized crime. CASOLARO told SA [redacted] that [redacted] had contacted him as a result of his investigation into the INSLAW affair. SA [redacted] testified that he knew nothing further of CASOLARO's death or of his investigation into BCCI/INSLAW. b6 b7C

On Sept. 21, 1992, SA [redacted] contacted [redacted] in regards her association with CASOLARO. [redacted] stated she had known CASOLARO professionally and personally since 1980. CASOLARO had advised [redacted] that he believed INSLAW's computer software was being used by BCCI to keep track of secret documents. CASOLARO had also advised [redacted] that he believed BNL and BCCI were connected, however, due to their competitive news relationship he never disclosed how or where he obtained information to substantiate these allegations. [redacted] advised that CASOLARO never used a computer and that he carried his documents with him. Therefore, [redacted] could not provide any b6 b7C

1325015-000-7822

additional information as to where proof to these allegations could be stored. [redacted] advised that she believes that CASOLARO probably did commit suicide. b6 b7C

[redacted] did provide a copy of CASOLARO's outline of his book, "The Octopus", which was to be a catch-all book to tie in all the political scandals of the 1980s and some as far back as the 1950s. CASOLARO claims that eight men make up "The Octopus" and have been responsible for the failure of an initiative into Albania in the fifties, the failure of the Bay of Pigs invasion, Watergate, and the present day BCCI scandal. CASOLARO includes a list of people involved in his book. This list has approximately fifty names which include HOWARD HUNT, KIM PHILBY, [redacted] SENATOR ROBERT BYRD, PRESCOTT BUSH, [redacted] ROBERT VESCO, Chinese Triad Leaders, Japanese Yakuza Leaders, and associated OC leaders in the United States.

On Sept. 29, 1992, SAs [redacted] b6 b7C interviewed [redacted] CASOLARO. [redacted] stated that CASOLARO had started an investigation into the INSLAW affair in early 1990. Not until July or August of 1991 did CASOLARO begin looking into the BCCI scandal. At this time [redacted] does not believe CASOLARO had found any connection between INSLAW and BCCI. [redacted] believes CASOLARO started to look into BCCI because [redacted]s ad agency, GOLDBERG, MARCHESANO, and KOLHMAN, was doing ads for FIRST AMERICAN BANK, which is involved in the BCCI scandal. [redacted] was told by CASOLARO that INSLAW and BCCI were connected through the OCTOBER SURPRISE affair, but was never given any details on this connection.

[redacted] states that CASOLARO kept telling her that he b6 b7C was getting closer and closer to unraveling the mystery that included the INSLAW/BCCI connection. CASOLARO had a theory that a group of powerful men in Washington, D.C. were responsible not only for the INSLAW affair and the BCCI scandal, but also for the IRAN-CONTRA affair, the OCTOBER SURPRISE, and the failure of the Savings and Loans. CASOLARO called this group of men and his theory, "OCTOPUS". CASOLARO made claims that he had obtained numerous secret documents that supported his theory, but never revealed where these documents came from. [redacted] stated that she did not believe in this theory and never read the supporting documents. [redacted] does not know where these documents could now be located.

[redacted] does not believe that CASOLARO committed b6 b7C suicide. However, [redacted] does not have any information that would assist in identifying a possible suspect in CASOLARO's death.

1325015-000-7823

[redacted] did give SAs [redacted] several documents still in her possession that had belonged to CASOLARO at the time of his death. A review of these documents resulted in no positive information. b6 b7C

On Sept. 30, 1992, [redacted] was contacted by SA [redacted] was writing an article for Spy Magazine on CASOLARO's death, but had uncovered no information that would lead [redacted] to connect CASOLARO's death to BCCI or INSLAW. [redacted] also advised that he has no information to substantiate CASOLARO's claim that there was a connection between BCCI and INSLAW. b6 b7C

On Oct. 23, 1992, [redacted] provided documents to SAs [redacted] that had previously belonged to DANIEL CASOLARO. These were the same documents that [redacted] had given to ABC's Nightline. A review of these documents disclosed no relation between BCCI and INSLAW. It was noted that the copy of the autopsy report disclosed that the cause of death was suicide. It was also noted that the test results showed trace amounts of tricyclic antidepressants. His blood and urine also showed trace amounts of opiates. b6 b7C

All attempts to interview SA [redacted]'s source have met with negative results. Eventhough the source acts concerned about CASOLARO's death and wants the FBI to investigate, the source refuses to meet with anyone without SA [redacted] being present. As SA [redacted] is involved with an undercover operation and has limited free time from his UC duties, a meeting between SA [redacted] SA [redacted] and his source has never materialized. SA [redacted] has conversed with the source by telephone, but has received no information during these conversations as the source has stated that his telephone is bugged and believes it is in connection with CASOLARO's investigation. The source is extremely paranoid and wishes to proceed cautiously before he reveals any information re CASOLARO's death and/or the connection between BCCI and INSLAW. However, during SA [redacted]'s initial meeting with SA [redacted] it was revealed that the source had not advised SA [redacted] of any connection between BCCI and INSLAW eventhough SA [redacted] had an interest in the matter. It is the opinion of the writer that the source has no positive information that would have a bearing on this matter. SA [redacted] has advised the source that he will be leaving the BCCI Squad in the near future and would not be able to investigate this matter further, but this has had no effect in hastening a meeting with the source. b6 b7C

1325015-000-7824

A teletype was sent to LA Division requesting a copy of SA [redacted]' testimony before the Subcommittee investigating the INSLAW Affair. Upon receipt of this testimony from LA an airtel was sent to Pittsburgh Division (Martinsburg RA, location of CASOLARO's death) re SA [redacted] belief on who may have been responsible for CASOLARO's death. b6 b7C

At this time no further investigation will be conducted re BCCI/INSLAW or CASOLARO's death.

1325015-000-7825

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 11/20/92

To: [redacted] Principal Deputy Chief, DOJ Fraud Section b6 b7C
(Name and Address of USA)

From: SAC ROBERT M. BRYANT
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS; [redacted] ETAL
(Name of Subject) Age Sex

You are hereby advised of action authorized by DAAG [redacted] TA [redacted]
(Name of USA or AUSA)

on information submitted by Special Agent SA [redacted] on 11/16/92
(Name) (Date)

(Check One)

- [ ] Request further investigation
- [X] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 2; 371; 1001; 1341; 1343; 2314

Synopsis of case:

Pursuant to the pending investigation of the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI), the FBI received allegations of fraud involving [redacted], [redacted] b6 b7C companies P.S. INVESTMENT COMPANY and ZURICH CORPORATION). [redacted] obtained loans in excess of $34 million from BCCI-New York in what appears to be a series of fraudulent representations, diversions of assets and possible corruption and bribery

1 - Addressee
1 - WMFO
CWS
(2)

29B-WF-171994 Main
-526

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#7

of BCCI officials. Further, the FBI has determined that FALCON CORPORATION, [redacted] Small Business Investment Company, may have been used to defraud the U.S. SMALL BUSINESS ADMINISTRATION (SBA) of loans in excess of $1 million. b6 b7C

Pursuant to meeting on 10/29/92 between FBI-BCCI Squad Managers, [redacted] and officials from the office of the DISTRICT ATTORNEY OF NEW YORK (DANY), DAAG [redacted] declined federal prosecution in this matter in deference to DANY's parallel investigation. b6 b7C

On 11/16/92, TA [redacted] confirmed the aforementioned declination due to the fact that DANY is nearer to completion of its investigation and willing to proceed with prosecution. b6 b7C

TA [redacted] also requested that the FBI provide DANY with the results of its investigation that has been conducted to date. b6 b7C

1325015-000-7827

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 11/22/92
Attn: BCCI Squad

From : SA [redacted] TSS

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Re Airtel, WMFO to FBIHQ, captioned as above, and dated 11/18/92.

Referenced airtel requested subscriber information regarding certain telephone numbers in the 202, 201, and 441 area codes. This communication will address inquiries made at the Chesapeake and Potomac Telephone Company regarding 202-[redacted]

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According to the Security Office at the telephone company, exchange "237" is operational in the metropolitan calling area in Virginia only. Specifically, there is no "237" exchange telephone number active in Washington, DC (the 202 area code). A check of [redacted] shows that the number is in service for an individual in the Falls Church, Virginia area. The number is non-published, and the telephone company will not provide subscriber information without a subpoena.

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b7C

Subscriber information for this number may be secured by providing the subpoena directly to C & P Officials at their Cockeysville, Maryland address.

No further information is available in this matter, and the above is for information only.

-527

29B-WF-171994 Main
SW Sec

BCCI

3 - WMFO
2 - BCCI Squad
1 - TSS, CMP

1325015-000-7828

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 11/23/92
(ATTN: SSA [redacted]) b6 b7C

From : SA [redacted] (C-2)

Subject: HIDDEN INTEREST;
MAJOR CASE #38;
FIF - FAG;
OO: WMFO

RE: LEAD #79/[redacted] - U.C. OPERATION b6 b7C

The purpose of this memo is to report the results of a global indices search on [redacted] and to explain his involvement with Bank of Credit and Commerce International (BCCI). b6 b7C

A global indices search on [redacted] was conducted by the writer on 11/9/92, with negative results. b6 b7C

As a result of a review of a memorandum dated 8/8/91 from [redacted] AUSA Criminal Division, Northern District of Dallas to [redacted] Deputy Chief, Fraud Section, Criminal Division; a United States (U.S.) District Court Northern District of Texas Dallas Division indictment filed 10/8/89; and a U.S. District Court Northern District of Texas Judgement filed 7/31/90 the writer determined the following: b6 b7C

In the summer of 1987, the Customs's Service and the IRS began an undercover sting operation in the Northern District of Texas concerning a money laundering operations. The U.S. Attorney's Office for the Northern District of Texas, and the Fraud Section, Criminal Division , Department of Justice assisted in the investigation. [redacted] was one of the individuals implemented in money laundering proceeds of illegal drug sales. During this investigation [redacted] bragged that he knew the heads of BCCI's Canadian operations, but there was no evidence that any of the money that [redacted] laundered through Canada had any connection with BCCI. b6 b7C

1 - 29B-WF-171994
1 - IIC [redacted]
1 - SSA [redacted]
1 - SA [redacted]
SEB:seb
(4)

29B-WF-171994-528 Main b6 b7C

SEARCHED See INDEXED See
SERIALIZED See FILED See
NOV 24 1992
FBI — WASH. FIELD OFFICE

1325015-000-7829

During the investigation [redacted] was observed transporting drug proceeds from the U.S. to Nassau, Bahamas. Undercover bank accounts revealed that currency had been deposited into BCCI, Nassau by [redacted] and wire transferred back to the U.S. b6 b7C

Later in the investigation [redacted] bragged that he could arrange bogus offshore loan through his contacts at BCCI, Miami. [redacted] gave the name [redacted] as his contact at BCCI, Miami. Attempts were made during this investigation to setup a meeting with [redacted], but the meeting never materialized. The investigation produced no evidence that [redacted] or BCCI, Miami was ever involved in the transfer of money for [redacted] other than acting as the corresponding bank in the U.S. for the wire transfer. b6 b7C

On 6/16/89, [redacted] and two co-defendants were indicted for money laundering. In March of 1990, [redacted]s case was tried by a jury and was convicted on 17 counts. [redacted] was sentenced to 142 months at Johnson County Jail, Osbourne, Texas. Before the trial, the government contacted the BCCI investigation in Tampa to obtain copies of records of the deposits and wire transfers believed to be seized from BCCI. [redacted] attorney for BCCI, Miami and Bahamas provided documents that indicated that currency was being deposited into BCCI, Bahamas and wire transferred to undercover accounts. In conclusion of the investigation, the investigating party determined that the acceptance of currency by BCCI, Nassau and wire transferring the funds to U.S. accounts is not a violation of U.S. or Bahamian Law. b6 b7C

In conclusion, the writer considers this lead covered, since there are no additional investigative avenues.

1325015-000-7830

Memorandum

To : DIRECTOR FBIHQ
ATTN: SSA [redacted] (White Collar Crimes Section, Financial Institute Fraud Unit)
From : SAC, WMFO (29B-WF-171994) (P)

Date 11/23 /92

Subject: HIDDEN INTERESTS
MAJOR CASE #38
FIF;FAG
OO:WMFO

b6
b7C

Reference telephone conversation between SSA [redacted] FBHIQ and SA [redacted], WMFO on October 6, 1992.

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SSA [redacted] advised during referenced telephone conversation that SSA [redacted] Houston Division had reported that the quote, [redacted] SSA [redacted] believed that this quote came directly from a Houston FD-302 summarizing an interview of Houston's source [redacted] As a result, SSA [redacted] requested an investigation as to whether or not these FD-302s could have been disseminated to the New York District Attorney's Office.

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b7D

[redacted], Supervising Investigator, New York District Attorney's Office advised that he had never seen the NewsWeek article. [redacted] questioned [redacted] District of New York Attorneys who also advised that they were unaware of such an article. [redacted] did state that the Public Integrity Office of the New York District Attorney's Office advised that they had received the same question from [redacted] a reporter in Washington, D.C. Upon asking District of New York Attorney, [redacted] had advised that he did not make the statement, but that one of the article's co-writers, [redacted] of Washington, D.C. had asked for his comments on the quote.

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-529

3-FBIHQ
(1-SSA [redacted]
(2)-WMFO

DBS:dml
(2)

29B-WF-171994 Main

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b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 2 3 1992
FBI — WASH. FIELD OFFICE

1325015-000-7831

SSA [redacted] was telephonically advised as to the above facts along with SA [redacted]s belief that Houston's source most likely spoke directly with [redacted] or some other reporter. SSA [redacted] requested no further investigation be conducted at this time. b6 b7C

As such, WMFO will not conduct any further investigation into the source of the quote.

1325015-000-7832

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 12/9/92

TO : Director, FBI
ATTN: [redacted] AUTOMOTIVE MANAGEMENT UNIT
ASD, ROOM 6863

b6
b7C

FROM : SAC, Washington Field Office (197-New)

SUBJECT : DAMAGES FOR AUTO ACCIDENTS INVOLVING BUREAU RENTAL VEHICLES 99-6563 and 99-6563.
ADMINISTRATIVE MATTER;
CIVIL SUITS AND CLAIMS (FBI PROGRAMS).

RE 12/7/92 conversation between WMFO SA [redacted] [redacted] Auto Management Unit.

b6
b7C

Enclosed for the WMFO PLA and The Bureau are two copies each of the rental agreements and related claims for damages resulting from two Bureau automobile accidents as summarized below. The PLA and AMU are requested to process the attached claims for payment.

Incident # 1 concerns a claim of $588.56 by ACTION AUTO RENTAL, 31500 Solon Road, Solon, Ohio, 44139, (216) 349-4440, for damages to a 1992 Pontiac Sunbird operating as Bucar #99-6562 under Purchase Order R209045. The accident occurred on 6/23/92 when the operator of the vehicle, WMFO SA [redacted] attempted to change lanes while traveling eastbound on Franklin Street in Alexandria, VA, and struck a vehicle operated by [redacted] Alexandria, VA. [redacted] suffered no injuries and damage to his vehicle were estimated at $1,000. Further details are contained in pending Bureau accident investigation 66A-WF-181285 (reported in error as involving Bucar #99-6563).

b7C
b7C

2 - WMFO Acting PLA [redacted] (Encl. 4)
1 - 29B-WF-171994 (Encl. 2)
2 - BUREAU (Encl.4)
MTU:mtu
(5)

b6
b7C

29B-WF-171994 - 531

Searched
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Indexed
Filed

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-7838

Incident #2 concerns a claim of $816.91 by THRIFTY RENT A CAR, 330 Hooffs Run Drive, Alexandria, VA, 22314, (703) 684-6056, for damages to a 1993 Dodge Spirit operating as Bucar #99-6563 under Purchase Order R300792. The accident occurred on 10/6/92 when the operator of the vehicle, FA [redacted] attempted to make a U-Turn on First Street, NW , Washington, DC, and struck a vehicle operated by [redacted] MD. [redacted] suffered no injuries and damage to his vehicle were estimated at $1300. Further details are contained in pending Bureau accident investigation 66A-WF-183125. b6 b7C

Both accidents occurred while the vehicles were being operated on official business re MAJOR CASE #38, "HIDDEN INTERESTS", 29B-WF-171994.

LEADS

PLA at WMFO

Review and coordinate with FBIHQ AMU [redacted] X4925) payment of attached claims. b6 b7C

1325015-000-7839

Thrifty Car Rental

RSL-1006-34

Welcome Corporation
Licensee
P. O. Box 11252
Alexandria, VA 22312
703 941 9520

Out of Town Reservations:
1-800-FOR-CARS℠

Invoice Date 10/8/92

For Service At

Charge to Company FBI -

Renter

Address 7799 LEESBURG PIKE - SUITE 200 SOUTH

City FALLS CHURCH State VA Zip Code 22043

Credit Card No.

Type Credit Card

R.A. Number(s)

Damage $ 744.91

Loss of Use (4 days @ $18/day) 72.00

Additional Info

Total $816.91

Payment for this invoice is due upon receipt. Please attach blue copy to your check to insure proper credit to your account.

TA0015 © 1987 Thrifty Rent-A-Car System, Inc.
1091M60

Thrifty features quality products of the Chrysler Corporation and other fine cars.

For worldwide reservations contact your travel consultant or call 1-800-FOR-CARS℠ (1-800-367-2277).

Invoice

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b7C

1325015-000-7840

SPRINGMALL AUTO BODY LTD.

7708 G Backlick Road
SPRINGFIELD, VIRGINIA 22150
Body Shop Direct Line
(703) 569-1710
FAIRFAX OFFICE - 703-352-4035

Dodge | FORD | PONTIAC

AUTO DAMAGE ESTIMATE

DATE: 10-6-92

NAME: THRIFTY CAR RENTAL			ADDRESS: UNIT # 330086		
MAKE: DODGE	YEAR: 93	MODEL: SPIRIT	LICENSE NO.: 270547	SPEEDOMETER: 1457	PHONE NO.: 684-6057
SERIAL NO.: 3B3XA46K9PT517601			COLOR: RED	ADJUSTOR:	INSURANCE CO.:

REPL	STR.	DETAILS OF REPAIRS AND REPLACEMENTS	LABOR HOURS	REFIN HOURS	PARTS		SUBLET	
	✓	LH. FENDER	8.0	2.4				
✓		" " SPLASH SHIELD & RETAINERS (3)	0.3	✓	26	00		
✓		" " FT. MLDG.	0.3	✓	18	50		
	✓	FT. BUMPER COVER	2.0	2.2				
✓		" " " LH. MLDG.	0.6	✓	16	50		
✓		LH. FT. WHEEL COVER	0.2	✓	58	00		
	✓	LH RADIATOR SUPT.	1.0	0.5				
		Add For Painted Stripe (2 colors)	✓	1.5				
		Add For Clear Coat	✓	1.5				
		TOTALS	12.4	8.1	149	00		

The above is an estimate based on our inspection and does not cover any additional parts or labor which may be required after the work has been opened up. Occasionally after the work has started damaged or broken parts are discovered which are not evident on the first inspection. Estimate Prices Subject to Change After 30 Days. Not responsible for any delays caused by unavailability of parts or delays in parts shipments by supplier or transporter.

NO PERSONAL CHECKS ACCEPTED

ESTIMATOR:

20.5 HRS. @ $ 24.00		$ 492.00
PARTS LESS %	OR $	$ 149.00
SUBLET	PAINT MATERIAL 97.20	$ 97.20
TAX ✓		$ 6.71
TOWING OR STORAGE		$
	GRAND TOTAL	$ 744.91

b6
b7C

SRS-02278 NOP.OK OKLAHOMA CITY

1325015-000-7841

WELCOME CORPORATION
A THRIFTY RENT A CAR
336 HOOFS RUN DRIVE
ALEXANDRIA , VA 22314
(703)684-6056

CUSTOMER NUMBER: 1153 UNIT NUMBER : U33WRA AGENCY CODE IAF

[redacted] b6
RM 6863-[redacted] b7C
10TH AND PA. AVE N.W.
WASHINGTON, DC 20535

93 DODGE SPIRIT
4 DOOR SEDAN RED

LEASE VEHICLE RETURN RECEIPT

Vehicle Start Date 09/30/92 Vehicle Return Date 10/06/92

Vehicle Mileage at Pickup 1204 Monthly Mileage Allowance 2500

Vehicle Fuel at Inception FULL Number of Days In Use 6

Vehicle Mileage at Return 1446 Total Lease Miles 242

Vehicle Fuel at Return

1. Vehicles must be returned with same amount of fuel as stated above.
2. Customer is responsible for all parking tickets.
3. Customer is responsible for damages (if any) noted on return. A Repair Estimate will be forwarded to Customer.

VEHICLE RETURNED BY : X [redacted] b6 b7C TELEPHONE X202-324-4300

SIGNATURE: X [redacted] DRIVERS LICENSE NUMBER _____

*** NOTICE THIS DOCUMENT SHALL SERVE AS CUSTOMERS PROOF OF RETURN OF THE ABOVE REFERENCED VEHICLE. PLEASE KEEP A COPY OF THIS DOCUMENT FOR YOUR RECORDS. THANK YOU FOR YOUR BUSINESS. ***

1325015-000-7842

3-512 (Rev. 5-9-91)

FBI

U.S. Department of Justice
Federal Bureau of Investigation

Purchase Order for Supplies or Services

IMPORTANT: Mark all packages and papers with contract and/or order numbers

1. Date of Order	2. Order No.	3. Mod. No.	4. Mod. Date	5. Page No.
11/04/92	R300792			1

6. To Contractor *(Name, Address and Zip Code):*
THRIFTY CAR RENTAL
P.O. BOX 11252

ALEXANDRIA, VA
22312

7. Ship to *(Consignee and address, ZIP Code):*
FEDERAL BUREAU OF INVESTIGATION
1900 HALF STREET, SW
WASHINGTON, DC
20535

8. Issuing Office *(Adress correspondence to):*
FEDERAL BUREAU OF INVESTIGATION
PROPERTY PROCUREMENT & MGMNT.
POST OFFICE BOX 50670
WASHINGTON, D. C.
20091-0670

9. Send Invoice to:
FEDERAL BUREAU OF INVESTIGATION
1900 HALF STREET, SW
WASHINGTON, DC
20535

10. Business Classification	11. F.O.B. Point	12. Discount Terms
LARGE BUSINESS	DESTINATION	NET 30 DAYS

13. Schedule

Line No. (A)	Supplies or Services (B)	Quantity Ordered (C)	Unit (D)	Unit Price (E)	Amount (F)
	CONTRACT #:*-OPEN MARKET DUE DATE 10/01/92				
0001	W023-00-FBI-0001	1	EA	15363.000	15363.00
	RENTAL OF NINE(9) MIDSIZE VEHICLES FOR 99 DAYS				
	RATE: 569.00/PER CAR-MNTH				
	RENTAL PERIOD: 10/01/92 - 12/31/92				
	P.O.C. [redacted]				
	*****THIS IS A CONFIRMING ORDER				
	DO NOT DUPLICATE*******				
	THIS PURCHASE IS NEGOTIATED UNDER THE AUTHORITY OF:				
	TLE 41, USC 253(C)				
	**********FOR FBI INFO ONLY**********				
	REQ#635202 CC-3920 SUBOBJECT CLASS:522120				

14. Type of Order

☐ **A. Purchase** - Please furnish the following under the terms, and Conditions specified on both sides of this order, the above quotation number if indicated, and the attached sheets, if any, including delivery as indicated. This purchase is negotiated under the authority of:
CONTRACTOR NUMBER THR2231200

☐ **B. Delivery** - This delivery order is subject to instructions contained on this side only of this form and is issued subject to the terms and conditions of the above-numbered contract.

15. Grand Total ➡ 15,363.00

See Instructions on Reverse

Point of Contact - Purchase Order Information:
[redacted]
202-324-2966

Point of Contact - *Invoice Payment Information:*
Voucher Payroll Section - (202) 324-5614

16. United States of Ame
By *(Signature)*
[redacted]

17. Name *(Typed)*

Title: Contracting Offic

b6
b7C

b6
b7C

A - REQUISITIONER

1325015-000-7843

ACTION® AUTO RENTAL

November 3, 1992

[redacted] b6 b7C
7799 Leesburg Pike, #200
Falls Church VA 22043

RE: OUR CLAIM NO.: F54369-103
DATE OF LOSS : 9/17/92
DAMAGES : $558.56 Repairs
$ 30.00 Loss of Use ($15.00/day x 2 days)
$588.56 AMOUNT DUE

Dear [redacted] b6 b7C

Attached is an estimate of damages which occurred to our vehicle while it was on rent to you.

Please contact your insurance company as they may handle this loss for you. Be sure that your insurance company has all of the necessary information to handle our claim.

If for any reason they do not handle the balance of the damages, you will be personally responsible for the entire amount.

If we do not receive contact from either yourself or your insurance company within 10 days from the date of this letter, we will be forced to take further action against you. Please forward a certified check or money order to the [redacted] clear your account. b6 b7C

[redacted] cipated cooperation and prompt attention.

[redacted]
Subrogation Department

KJB/wnd 05J

Enclosure(s)

1325015-000-7844

ACTION AUTO RENTAL

F-54364-103

9/11/92

RENTAL AGREEMENT

Rental Type: F-01 PO. R70685

Date IN:

ORIGINAL VEHICLE

Color: WHITE | License No: ROZ 985 | State: VA

Make: Oldsmobile | Unit #: 13554

Out	2:59 PM
In	1403
Fuel	

	Out	In
R.F. DR/FDR		OK
R.R. DR/FDR		OK
L.F. DR/FDR		dmg.
L.R. DR/FDR		OK
HOOD/GLASS	Scratch	
TRUNK/SPARE		
WHL COVERS	Tire/Rim	
INTERIOR		
Fuel	E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F	
Fuel	E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F	

REPLACEMENT VEHICLE

Date Out: 9-17-92

Color: RED | License No: [redacted] | State: MD

Make: SB | Unit #: 127809

Out	4:32
In	
Fuel	

	Out	In
R.F. DR/FDR	✓	
R.R. DR/FDR	CAS CAP	SCRATCH
L.F. DR/FDR	DENT	
L.R. DR/FDR	✓	
HOOD/GLASS	BUMPER	SCUFFED
TRUNK/SPARE	✓	
WHL COVERS	RT F DENT	
INTERIOR	✓	
Fuel	E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F	
Fuel	E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F	

Notice: This contract offers, for an additional charge, a collision damage waiver to cover your responsibility for damage to the rental vehicle. Before deciding whether to purchase the collision damage waiver, you may wish to determine whether your own automobile insurance affords you coverage for damage to the rental vehicle and the amount of the deductible under your own insurance coverage, which may still be your personal responsibility. The purchase of this collision damage waiver is not mandatory and may be declined.

Rental Charges & Different

Date IN:

Rental Type: F-01 PO. R70685

Address: 7799 Leesburg Pike #200

City: Falls Church | State: VA | Zip Code: 22043 | Work Phone:

Local Address: MAIL

Insurance Co: U.S. GOVT | Policy #:

Driver's License: | State: VA | Expires: 1.31.95

Date of Birth: | Height: 6-0 | Weight: 175 | Eyes: | Hair:

Employer: F.B.I.

Renter requests Sale/Rental daily fee shown in adjoining column. See reverse. This is not insurance.
X Renter

Renter requests personal accident insurance (PAI) at daily fee shown in adjoining column, and has read the PAI brochure
X Renter

REQUEST FOR PERMISSION FOR PERSON OTHER THAN RENTER TO DRIVE
Not valid unless approved by Action Auto Rental. I request Action Auto Rental's permission to allow
Name: LICENSED, AUTHORIZED | Age:
License No: EMPLOYEES OF F.B.I. | State: | Expires:
To drive the motor vehicle described above, and for no one else, in the conduct of my business.

☐ YES ☒ NO States: NOT VA

Authorized for Action Auto Rental

Date: 8/11/92

Date: 8/11/92

Rate Code/Qty	Rate	Amount	Out #	Fuel Pd	Free Min	Time
	ORIG DEP.					
EXT. TO	ADDT DEP.					
EXT. TO	ADDT DEP					
EXT TO	ADDL DEP.					
EXT TO	ADDL DEP					

Vehicle is due back by _____ or at the end of 30 days, or upon demand by the office, whichever occurs first.

SRP REVISION: - Acceptance of SRP provides coverage limited to customer's own deductible

- 24 HOUR NOTICE REQUIRED FOR PICK UP
- NO SATURDAY PICK-UPS
- CALENDAR DAY BILLING

CREDIT CARD IMPRINT

Off Rent No: 103 | Agreement Number: 2497966

b6 b7C

Out: 9:31 AM

Chargeable Miles	Mileage Rate	
Days	Daily Rate	18.00
Subtotal		
Miscellaneous Charge		
Subtotal		
SR		
PAI		
Subtotal		
Applicable Sales Taxes		8.00%
Fuel Charges		
TOTAL CHARGES		
LESS DEPOSITS		
Bill to Company		
☐ Due From Renter		
☐ Due To Renter		
☐ Transfer Refund To #		
AMOUNT DUE		

CLAIM INFORMATION

Policy/Claim #

Insured

Date of Loss ☐ Theft ☐ Accident

Phone Name

Repair Shop

Type Car | Color

R: 7.50

Company Name | Customer #

Attn: | Phone | Ext:

BILL TO:

Address

City | State | Zip Code

50A-GEN-5/92

INVOICE COPY - PLEASE PAY PROMPTLY NO OTHER BILLING WILL BE SENT

1325015-000-7845

RENTAL AGREEMENT: TERMS AND CONDITIONS

[redacted]ES BY HIS/HER SIGNATURE ON THE F[redacted]EREOF THAT HE/SHE HAS READ AND [redacted]OF THE FOLLOWING TERMS AND CONDITI[redacted]CONCERNING THE USE OF THE [redacted]E AND ACCEPTS FULL RESPONSIBILITY HEREIN. This contract is the entire agreement [redacted]een Renter and Owner. The terms and conditions of this contact supercede all terms and conditions contained in prior contractual agreements, letters, oral agreements, promotional or advertising materials. It is agreed that these terms are contractual and cannot be altered by another document, unless specified herein. Owner makes no warranties, express or implied. Renters authorizes Owner to verify through credit agencies or other sources, personal and credit information provided by Renter. As used herein "vehicle" means automobile, van or truck, "Owner" means Owner or Owner's representative.

1. OWNERSHIP, CONDITION OF VEHICLE, TERMS OF CONTRACT, USE OF OR OPERATION OF VEHICLE: Renter acknowledges vehicle is the property of Owner, although registered title may be in a third party, and acknowledges he received vehicle in good physical and mechanical condition. Renter further acknowledges that Renter is not an agent, employee or otherwise acting on Owners behalf, in any manner whatsoever.

2. Renter agrees to return vehicle to Owner in same condition as received, on return date stated on front of contract or immediately upon demand of Owner, written or oral, ordinary wear and tear accepted.

3. Renter agrees not to use vehicle for transportation of persons or property for hire or carry passengers nor use vehicle in violation of any law ordinance or regulation governing the use or return thereof, nor remove it from the state of rental without written consent of Owner.

4. RENTER EXPRESSLY AGREES TO PAY TO OWNER ON DEMAND:

(a) The mileage charge computed at rate specified on the front of contract for miles traveled by vehicle during the period of rental if applicable.

(b) Service and time charges at rate specified on front of contract plus other charges if applicable, even if a billing or statement is sent to any other individual, or insurance organization. All charges incurred during the period of rental, and while the vehicle is in possession of Renter, are the sole responsibility of Renter. Billing to parties other than Renter is done as a courtesy for the renter only. Service charges may include a surcharge, which represents a portion of expenses Owner incurs in the rental of each car, and will be paid upon demand.

(c) The value of tires, tools, parts or accessories lost or stolen from vehicle.

(d) One Hundred Dollars ($100.00) or One Dollar ($1.00) per each hour, whichever is greater, in addition to all other charges, the vehicle is in possession of Renter if the odometer is disconnected or tampered with.

(e) Any fine or legal violation against the vehicle, driver or Owner during this contract, except for Owner's fault. Renter gives owner express authority to process a credit card voucher to pay for parking tickets and violations and for all damages incurred while vehicle is in possession of Renter.

(f) A One and One-Half Percent (1 1/2%) per month carrying charge on all charges not paid within thirty (30) days after the end of the rental.

(g) One Hundred Dollars ($100.00) or Fifty Cents ($.50) per mile, whichever is greater, if the vehicle is not returned to the original rental office without the written consent of Owner.

(h) All expenses incurred by Owner in the collection of monies due Owner per this agreement, or in regaining possession of vehicle enforcing any term or condition of the agreement, including attorney's fees and cost.

(i) Damage to rented vehicle if SafeRent™ is not purchased or does not apply or if Renters insurance company does not pay for damages to vehicle for any reason.

5. DAMAGE TO RENTED CARS: Renter is responsible for and agrees to pay to Owner the retail value of replacing and/or repairing all losses and damages to the rented car including "loss of use" and administrative charges during the period it is unavailable for rental use as measured by reasonable rental value of renting a replacement vehicle, regardless of fault or negligence of the Renter or any person. If Owner offers and Renter agrees to pay an additional fee for SafeRent and driver is between 25 and 70 years old, Renter is relieved of responsibility for physical damage. If Owner offers and Renter agrees to pay additional fee for SafeRent and driver is between 21 and 25 years old or over 70 years old, Renter is relieved of any deductible on Renters policy, plus an additional amount the total of Renters deductible and the additional amount will not exceed $1,000.00. Renter remains responsible and is obligated to Owner for all damage and costs in excess of $1,000.00 Renter agrees to present a claim to his/her insurance company for all losses, damage and cost not covered by SafeRent and understands that if for any reason Renter's insurance company does not pay for damages to the vehicle, Renter is solely responsible. A violation of any provision or condition of the agreement invalidates SafeRent.

6. BODILY INJURY/PROPERTY DAMAGE RESPONSIBILITY TO THIRD PARTIES: RENTER'S INSURANCE IS PRIMARY AND Renter represent and warrants that he/she has and will maintain, during the entire length of this rental, liability and property damage liability insurance or coverage for the Renter, other operators, users, passengers, and third parties, equal to or greater than the financial responsibility limits required by the applicable Financial Responsibility Laws in the applicable jurisdiction. In addition, Renter agrees to indemnify Owner and hold Owner harmless from any Renters use, operation or possession of the vehicle. Owner relying on Renters maintenance of said liability and property damage insurance does not provide any coverage whatsoever unless required to do so by the Financial Responsibility Laws in the applicable jurisdiction, or by specific waiver signed by Owner. If Primary Liability Coverage is provided because of applicable jurisdiction statute or specific waiver, coverage is limited to the minimum financial responsibility liability limits as required by the applicable jurisdiction.

7. PERSONAL INJURY PROTECTION (PIP) NO FAULT COVERAGE: PIP/no fault coverage are neither provided nor considered and Renter expressly agrees to waive any right to claim PIP/no fault protection from Owner, and relies on the coverage provided in his/her own personal insurance policy. If Owner is required to provide said coverage by Financial Responsibility Law of the applicable jurisdiction, coverage is limited to the minimum financial responsibility requirements of said applicable jurisdiction.

8. UNINSURED AND [redacted]RINSURED MOTORIST PROTECTION: Uninsured and underinsured Motorist Protection is neither contemplated, nor provided as part of this agreement. Renter expressly agrees to waive any right to claim uninsured and/or underinsured motorist protection from Owner unless said coverage is required to be provided by the Financial Responsibility Laws in the applicable jurisdiction.

9. PERSONAL ACCIDENT INSURANCE (PAI): PAI does not cover third parties for damage or injury. Coverage is limited to reimbursing Renter, driver, or passenger for expenses incurred because of hospitalization and/or for loss of life because of accident; is applicable only if Renter requests coverage by initialing applicable block on face of this agreement; Renter pays for such coverage, and is subject to terms and conditions in the actual P.A.I. policy and rental agreement.

10. OWNER'S FINANCIAL RESPONSIBILITY. UNLESS LAW REQUIRES, DOES NOT EXTEND TO:

(a) Injuries to the Renter, driver, or passengers while riding in, alighting from, entering into or on the vehicle.

(b) Liability imposed upon or assumed by anyone under any worker's compensation act, plan, or contract.

(c) Bodily injury or property damage occurring while the vehicle is used as a commercial vehicle or for a commercial purpose.

(d) Any injuries or losses arising from the operation of vehicle in violation of any provision or condition of this agreement.

11. Accidents must be immediately reported in writing to the office where the vehicle was rented and in any event within 24 hours after an accident. The Renter, driver or any passenger shall cooperate fully with Owner in all manners connected with any claim or suit. Any suit papers, process or pleading must be delivered to the office from which the vehicle was rented. NONCOMPLIANCE CONSTITUTES A VIOLATION OF THE CONTRACT AND VOIDS ALL COVERAGES PROVIDED HEREIN.

12. If there is evidence of violation of any provision of this agreement, Renter agrees to indemnify Owner for all losses, damage, costs, expenses paid or incurred by the Owner resulting from the use or operation of the vehicle and renter will present a claim to his/her insurance carrier for such losses, damages, costs, and expense. If Renter has no insurance to cover said loss, Renter agrees to pay Owner for all such losses. Any and all disputes arising from the rental of this vehicle must be resolved by a court of competent jurisdiction.

13. Any coverage or protection referred to in this agreement are null and void in Mexico or Canada. The vehicle cannot be taken or driven out of the Continental United States for any reason.

14. VIOLATIONS OF THE CONTRACT: A violation of the contract shall exist if the vehicle is used or driven

(a) In violation of any term or condition of this agreement.

(b) By any person under the age of 21 without Owner's written permission, or by anyone who has given a fictitious name or false age, address, or any information whatsoever.

(c) For any illegal purpose, in a race, speed contest, to tow a vehicle or trailer.

(d) By any person if there is reasonable evidence they were under the influence of narcotics, intoxicants, or drugs.

(e) By any person other than Renter without written consent of Owner.

(f) Outside the state of rental without written consent of Owner.

(g) By anyone presenting or using a license which has been revoked or suspended or using a license which is not his/her own or is not fully valid.

(h) If Renter or driver leaves the vehicle unlocked or fails to secure the keys.

(i) On other than a public highway, private road or driveway.

(j) In a reckless or imprudent manner or if the vehicle is deliberately damaged.

(k) Or if Renter misrepresents facts to Owner pertaining to rental, use, or operation of the vehicle.

15. Upon termination of Renter's right to operate said vehicle by reason of violation of any condition herein stated, or by Owners demand, Renter agrees to cease using said vehicle, to notify Owner, and pay all expenses incurred by Owner in returning vehicle to place of rental. Renter agrees that any continued operation of vehicle after a violation, is an operation without the knowledge, consent or permission of Owner and Owner may notify police that said car has been stolen and Renter releases and discharges Owner from any liability and all claims of any nature arising therefrom. Owner has right to seize, without legal process or notice to Renter, said vehicle at any time or place and Renter waives all claims for damages connected with such seizure.

16. RENTER'S INDEMNITY PROVISION: Renter shall defend, indemnify, and hold Owner harmless from all losses, liabilities, damages, injuries, claims, demands, costs and expense connected with the possession or use of the rental vehicle including claims of or liabilities to third parties due to abandonment, conversion, concealment, or unauthorized sale of the vehicle or confiscation of the vehicle by governmental authority, for any unlawful or improper use.

17. ALL CHARGES ARE SUBJECT TO FINAL AUDIT.

18. RENTER AUTHORIZES OWNER TO SUBMIT FOR PAYMENT CREDIT CARD VOUCHERS CREDIT CARD HAS BEEN PRESENTED AS A MEANS OF DEPOSIT OR SECURITY AT THE T[redacted] CAR WAS RENTED, INCLUDING, IF ANY THIRD PARTY, TO WHOM A BILLING WAS DIRECTE[redacted] REFUSES TO MAKE PAYMENT. Credit card vouchers may also be used to pay any unpaid traffic parking violations or damages incurred to the vehicle during Renter's possession of the vehicle.

19. POWER OF ATTORNEY: Renter hereby grants and appoints to Owner a Limited Power of A[redacted] to present Insurance claims, either third party liability or physical damage, to Renter's Insurance c[redacted] and to endorse Renter's name on insurance payments for charges or damages resulting from the possession of Owner's vehicle.

20. If any provision of this rental agreement is unlawful, contrary to public policy, void or unenforceable, remaining provisions shall continue in full force and effect.

[redacted]

This provision is made part of the Rental Agreement and supersedes paragraph 6 of the Rental Agreement only when signed by the Renter and owner's authorized representative. This provision, properly executed, provides primary liability coverage equal to but not exceeding the minimum state liability coverages as dictated by the financial responsibility requirements of the applicable jurisdiction. Any violation of the Rental Agreement of which this provision is a part voids any coverages provided herein.

X *Renter's Signature*_____

X *Owner's Representative*_____ 1325015-000-7846

DAMAGE REPORT
10/06/92 at 10:36

AUTO RENTAL
D.R. 10862-0000098
Est: Not On File.

AUTO BODY CENTER, INC.

HAVE A NICE DAY!!
5272 PORT ROYAL RD.
SPRINGFIELD, VA 22151-
(703) 978-1400

CAR UNIT # 136554

Parts (Subject to Invoice)			101.95
Parts Discount (15.0%)			-15.29
Labor	10.5 hrs	$ 22.00/hr	231.00
Paint	7.3 hrs	$ 22.00/hr	160.60
Paint/Materials	7.3 hrs	$ 11.00/hr	80.30
SUBTOTAL		$	558.56
GRAND TOTAL		$	558.56

Temporary Repairs	$	0.00
Prior/Unrelated Damage	$	0.00
INSURANCE PAYS	$	558.56

THIS ESTIMATE IS BASED ON OUR INSPECTION AND EXCLUDES ADDITIONAL PARTS OR LABOR THAT MAY BE REQUIRED AFTER THE WORK HAS BEEN STARTE D.WORN OR DAMAGED PARTS NOT EVIDENT ON FIRST INSPECTION MAY BE DISCOVERED.PARTS,MATERIALS,WORKMANSHIP IS GUARANTED,EXPECT RUST REPAI RS.WARRANTY IS VOID ON NORMAL WEAR AND AFTER DELIVERY DAMAGE.

Estimate based on MOTOR CRASH ESTIMATING GUIDE. Non-asterisk(*) items are derived from the Guide DR1FK88. Database Date 8/92
EZEst - A product of CCC Information Services Inc.

OCT 1 2 1992

1325015-000-7847

DAMAGE REPORT
10/06/92 at 10:36

AUTO RENTAL
D.R. 10862-0000098
Est: Not On File.

AUTO BODY CENTER, INC.

HAVE A NICE DAY!!
5272 PORT ROYAL RD.
SPRINGFIELD, VA 22151-
(703) 978-1400

Owner: ACTION AUTO RENTAL
ADDRESS: 5272 PORT ROYAL RD
SPRINGFIELD VA 22151

Day Phone: ( ) - -
Other Ph: ( ) - -
Deductible: $ N/A

Insurance Co.:
Claim No.:F54369-103

Phone:
Adj.:

92 PONT SUNBIRD LE 2D WHITE 4-2.0L-FI
Vin: 1G2JC14H2N7582171 License: RUZ 985 VA Prod Date: 5/92 Odometer: 3062

Clear coat paint

NO.	RPR/REF REPLACE	DESCRIPTION OF DAMAGE	QTY	PARTS COST	LBR HRS	PAINT HRS	MISC
1		FENDER & LAMPS					
2*	Repair	LT Fender all models	1		5.0	2.5	
3		Add for Clear Coat	1			1.0	
4		FRONT BUMPER & LAMPS					
5		WHEELS & FRONT SUSPENSION					
6	Replace	LT/Front Cover 14x6	1	80.25			
7		O/H Front Bumper	1		2.5		
8	Replace	O/H Front Bumper	1		Incl		
9*	Repair	Front fascia	1		3.0	2.7	
10		Add for Clear Coat	1			1.1	
11	Replace	Moulding red	1	21.70	Incl		
		Subtotals ===>		101.95	10.5	7.3	0.0

OCT 12 1992

1325015-000-7848

2668

AUTO BODY CENTER, INC.

*WE ACCEPT INSURANCE CHECKS *PERSONAL
CHECKS UP TO $100 FOR DEDUCTIBLE ONLY
*PAINTING ON RUBBER BUMPERS OR FLEXIBLE
PARTS NOT GUARANTEED FOR CRACKING\PEEL

5272 PORT ROYAL RD.
SPRINGFIELD VA 22151
1(703)978-1400 Fax: 1(703)321-7286

REPAIR ORDER # 2668 by [redacted] b6 b7C

Date	10-08-1992	Time	17:59	In	10-03-1992
Out	10-08-1992	from EST	#2831		
ACTION AUTO RENTAL		Prod Date	05/92	Ins. Co.	
5272 PORT ROYAL RD		Model #		Adjuster	
SPRINGFIELD VA 22151		license	RUZ 985	Worker	[redacted]
Home		Ser #	1G2JC14H2N7582171	Claimant	
Work		Deposit		Insured	
92 PONTIAC SUNBIRD LE 2DR		in/out mi	3062	Policy #	
Style	Pt.	Deductibl	$0.00	Claim #	136554

#	DESCRIPTION	EST PRICE	INVOICE	EST LAB	ACT LAB	$$ DIF
1	REPAIR AS ABC EST -S		558.56			558.56

Labor REPAIR ORDER	SUMMARY	ESTIMATE	ACTUAL
PAINT	0.0 @ 24.00	0.00	0.00
BODY	0.0 @ 24.00	0.00	0.00
MECH	0.0 @ 55.00	0.00	0.00
FRAME	0.0 @ 35.00	0.00	0.00
	0.0 @ 0.00	0.00	0.00
DETAIL	0.0 @ 24.00	0.00	0.00
FORIEGN	0.0 @ 24.00	0.00	0.00
RESTORATI	0.0 @ 60.00	0.00	0.00
RUSTPROOF	0.0 @ 15.00	0.00	0.00
ENG.STM.C	0.0 @ 0.00	0.00	0.00
	0.0 Labor hrs.		

Descriptive Items	ESTIMATE	ACTUAL
PARTS	0.00	0.00
PAINT MAT.	0.00	0.00
BODY MAT.	0.00	0.00
HAZARD WST	0.00	0.00
TOWING	0.00	0.00
AFTER MARK	0.00	0.00
GLASS	0.00	0.00
STORAGE	0.00	0.00
UNIBODY	0.00	0.00
SUBLET	0.00	558.56

Items	558.56
Labor	0.00
Subtotal	558.56
Tax @ .04500	0.00
Grand Total	$558.56
Orig Estimate	0.00
SUPPLEMENT DUE	$558.56

ENTERED OCT 2 1992

********** Part Prices Subject to Invoice **********

AUTHORIZED AND ACCEPTED: You are hereby authorized to make the above specified repairs. I understand that payment in full will be due upon release of vehicle, including additional supplemental damage charges, and hereby grant you and/or your employees, permission to operate the car, truck or vehicle herein described on street, highways or elsewhere for the purpose of testing and/or inspection. An express mechanic's lien is hereby acknowledged on above car, truck or vehicle to secure the amount of repairs thereto. You will not be held responsible for loss or damage to vehicle or articles left in vehicle in case or fire, theft, accident or any other cause beyond your control.OLD PARTS REMOVED WILL BE JUNKED UNLESS OTHER WISE INSTRUCTED. NOT RESPONSIBLE FOR ANY PERSONAL ITEMS LEFT IN VEHICLE.Storage will be charged 48 hours after completion.

REPAIR ORDER authorized by [redacted] date 10/9/92 b6 b7C

TERMS ARE STRICTLY CASH UNLESS PRIOR ARRANGEMENTS ARE MADE (SEE ABOVE)

OCT 1 2 1992

1325015-000-7849

LUSTINE'S

Discount AutoPlus

A DIVISION OF LUSTINE GM PARTS DISTRIBUTORS

4510 LONGFELLOW STREET • HYATTSVILLE, MARYLAND 20781

100% Colombian Coffee | *Top Quality Exhaust* | *Coffee Pots & Supplies*

Acura Audi BMW Chrysler Dodge Fiat Ford GM Honda Hyundai Isuzu Jaguar Jeep/Eagle Lincoln Mazda Mercedes Mercury Mitsubishi Nissan Peugeot Plymouth Porsche Renault Saab Subaru Suzuki Toyota Volkswagon Volvo Yugo

1-800-638-0514 TOLL FREE NATIONWIDE | 301-927-4455 METRO | 1-800-382-7278 24 HOUR FAX ORDERS

NO REFUNDS WITHOUT THIS INVOICE. RECEIVED BY:

NO REFUNDS AFTER 10 DAYS. ELECTRICAL PARTS NOT RETURNABLE. SPECIAL ORDER OR FACTORY ORDERED ITEMS NOT RETURNABLE. 15% HANDLING CHARGE ON ALL MERCHANDISE RETURNED FOR CREDIT.

SOLD TO:

AUTO BODY CENTER INC (B) ATT: REF# 276271
5272 PORT ROYAL RD SHIP: UPS DEL. 10:30-11:30 CASH 00 10/06/92
SPRINGFIELD PHONE:(703) 978-1400 ACCT 053894 12:18:14
VIRGINIA 22151 M04 14 PO# 2668 MP 04/033
ROUTE SEQ TAX# 024 021

022549100	COVER-WH WW503	1	80.25	56.18	56.18
022569929	MOLDING KK09	1	21.70	15.19	15.19

M.S

71.37
TAX .00
INVOICE TOTAL 71.37

TOTAL LINES 2
REMAN. POWER STEERING PUMPS IN STOCK
PAGE 001 OF 001 YOUR ORDER WAS FILLED BY [redacted] EXT 674

b6
b7C

DISCLAIMER OF WARRANTIES

THE SELLER, LUSTINE CHEVROLET, INC., HEREBY EXPRESSLY DISCLAIMS ALL WARRANTIES EITHER EXPRESS OR IMPLIED, INCLUDING ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND LUSTINE CHEVROLET, INC., NEITHER ASSUMES NOR AUTHORIZES ANY OTHER PERSON TO ASSUME FOR IT ANY LIABILITY IN CONNECTION WITH THE SALE OF THE PRODUCTS.

OCT 12 1992

PICKED BY: LOC SHIPPED BY:

1325015-000-7850

ACTION AUTO RENTAL

RENTAL AGREEMENT

Office No. 103 | Agreement Number 2497966

Date OUT: 8/11/92
Start Charges if Different
Date IN:

Rental Type | Source # | Customer #

Pick ups and returns require notice on prior business day or additional rental charges will be incurred.
OFFICE HOURS: MON & FRI 8 - 6; TUES - THURS 8-5 SAT 9 - 12
PLEASE CALL: 431-3493

b6 b7C

ORIGINAL VEHICLE

Color	License No.	State
White	ROZ 985	Va

Make	Unit #
Dod.	136554

Ren
Add 1764 Lee Hwy, Rte #200
City Falls Church State VA Zip Code 22043 Work Phone
Local Address None
Insurance Co. U.S. GOVT Policy #
Driv State VA Expires 7-31-95
Height 6-0 Weight 175 Eyes Hair
Employer FBI

MILEAGE

IN	
OUT	14037
DRIVEN	

CONDITION	OUT	IN
R.F. DR/FDR		OK
R.R. DR/FDR		OK
L.F. DR/FDR		dmg.
L.R. DR/FDR		OK
HOOD/GLASS		/
TRUNK/SPARE		/
WHL COVERS		/
INTERIOR		/

FUEL OUT E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F
FUEL IN E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F

Rente X Renter — Renter requests SafeRent℠ at daily fee shown in adjoining column. See reverse, this is not insurance. X Renter
Rente X Renter — Renter requests personal accident insurance (PAI) at daily fee shown in adjoining column, and has read the PAI brochure X Renter

REQUEST FOR PERMISSION FOR PERSON OTHER THAN RENTER TO DRIVE
Not valid unless approved by Action Auto Rental. I request Action Auto Rental's permission to allow
Name LICENSED AUTHORIZED Age D
License No. EMPLOYEES OF F.B.I. State Expires
To drive th responsible that he/she complete f
X Renter
PERMISSION GRANTED FOR VEHICLE TO LEAVE THE STATE.
☐ YES ☒ NO States: NO VA TN X Authorized by Action Auto Rental

REPLACEMENT VEHICLE

Date Out
Color | License No. | State
Make | Unit #

MILEAGE

IN	
OUT	
DRIVEN	

CONDITION	OUT	IN
R.F. DR/FDR		
R.R. DR/FDR		
L.F. DR/FDR		
L.R. DR/FDR		
HOOD/GLASS		
TRUNK/SPARE		
WHL COVERS		
INTERIOR		

FUEL OUT E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F
FUEL IN E 1/8 1/4 3/8 1/2 5/8 3/4 7/8 F

NO GASOLINE REFUND

I have read and agree to the terms and conditions on both sides of this agreement. My signature below is considered to have been made on any applicable credit card voucher and I authorize Action Auto Rental to process such voucher for advance deposits and charges incurred. See reverse for liability restrictions.

X
X Date 8/11/92
X Date 8/11/92

Date Car Will Return:			Amount	Auth. #	Paid By	Date Paid	Initial
		ORIG DEP.					
EXT. TO		ADD'L DEP.					
EXT. TO		ADD'L DEP.					
EXT. TO		ADD'L DEP.					
EXT. TO		ADD'L DEP.					

Office No. / Agreement Number	103 / 2497966
Chargeable Miles	
Mileage Rate	
Days	
Daily Rate	19.00
Subtotal	
Miscellaneous Charge	
Subtotal	
SR	
PAI	
Subtotal	
cable Sales Taxes	4.00 %
Charges	
TOTAL CHARGES	
LESS DEPOSITS	
Bill to Company	
☐ Due From Renter ☐ Due To Renter ☐ Transfer Refund To #	
AMOUNT DUE	

CLAIMS INFORMATION

Policy/Claim #
Insured
Date of Loss ☐ Theft ☐ Accident
Phone Name
Repair Shop
Type Car | Color

CREDIT CARD IMPRINT

RENTAL TERMINATION

Vehicle is due back by _____ or at the end of 30 days, or upon demand by the office, whichever occurs first.

SUPPLEMENTAL INFORMATION

SRP REVISION: Acceptance of SRP provides coverage limited to customer's own deductible BUCKLE UP

- 24 HOUR NOTICE REQUIRED FOR PICK-UP
- NO SATURDAY PICK-UPS
- CALENDAR DAY BILLING

Notice: This contract offers, for an additional charge, a collision damage waiver to cover your responsibility for damage to the rental vehicle. Before deciding whether to purchase the collision damage waiver, you may wish to determine whether your own automobile insurance affords you coverage for damage to the rental vehicle and the amount of the deductible under your own insurance coverage, which may still be your personal responsibility. The purchase of this collision damage waiver is not mandatory and may be declined.

Company Name Customer #
Attn: Phone Ext:
BILL TO: Address
City
State Zip Code

50A-GEN-5/92

CUSTOMER COPY

1325015-000-7851

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 11/30/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: Status Reports for Outstanding Leads.

Lead #27 - InterRedec as a RICO conspirator.

On 11/6/92, writer and SSA [redacted] and DOJ Trial Attorney (TA) [redacted] met with Federal Reserve representatives [redacted] in New York, to discuss the possibility of the Federal Reserve increasing their outstanding civil lien against GHAITH PHARAON, based on evidence supporting PHARAON's illegal activity in the purchase of CenTrust subordinated debentures and stock and in the acquisition and sale of the National Bank of Georgia. The increase in fines and penalties would be satisfied through additional liens against InterRedec, Inc. [redacted] agreed that this would be acceptable and that they would review the necessary procedures with their people and contact the FBI in the near future. b6 b7C

Lead #27 is pending, awaiting direction from the Federal Reserve.

Lead #38 - Classified Documents

Lead was reassigned to the writer on 11/17/92. Writer has met with TA [redacted] and upon [redacted] receiving the appropriate clearances, the specific classified documents will be reviewed. Writer also requested [redacted] to query appropriate DOJ personnel concerning the results of a letter sent to [redacted] dated 2/25/92. b6 b7C

Lead #38 is pending, awaiting [redacted] clearances and subsequent review of documents. b6 b7C

-532

1-WMFO
(1 - 29B-WF-171994)

MRM:mm
(1)

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 8 1992
FBI — WASH. FIELD OFFICE

1325015-000-7852

Lead #56 - Review material related to [redacted] and [redacted] and interview [redacted] b6 b7C

Lead was reassigned to the writer on 11/17/92. Per prior lead SA, all leads have been covered except the interview of [redacted] by the Miami Division. b6 b7C

Lead #56 is pending, awaiting results of Miami Division's interview and if appropriate, evaluation of U.S. Attorney records concerning the prosecution of [redacted] b6 b7C

Lead #88 - Interview [redacted] re: PHARAON. b6 b7C

Lead #88 is pending, awaiting contact by [redacted] for rescheduling of interview.

Lead #90 - Interview of [redacted] re: BCCI. b6 b7C

Global indices sent on 11/19/92. On 11/16/92, San Francisco Division set lead for Sacramento Division to interview [redacted]

Lead #90 is pending, awaiting results of global indices search and interview of [redacted] by Sacramento Division. b6 b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 12/8/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

RE: LEAD # 84 Modern Healthcare Services, Inc.

Referenced lead set forth information that DOJ Fraud Section Principal Deputy Chief [redacted] reported being called by [redacted] Atlanta. [redacted] said he was told by [redacted] that they were about to serve summonses on several BCCI-related entities, including Modern Healthcare Services, Inc., and wanted to know if such service would disrupt the BCCI investigation. b6 b7C b7E

After repeated exchanges of telephone messages, writer spoke with [redacted] on 11/25/92. [redacted] explained that he was [redacted] b6 b7C b7E

[redacted] said he had previously phoned [redacted] with his questions, but [redacted] had no information for him. [redacted] explained that he wanted to insure that the FBI had no ongoing investigation of the hospital entities. b6 b7C

Writer informed [redacted] that there was no such ongoing investigation by the Agents assigned to the BCCI matter. [redacted] was asked to refer to the appropriate agencies, anything his investigation uncovers of a criminal nature. [redacted] said he was aware of the jurisdiction and interest investigative agencies would have in such evidence, and said he has made such referrals in the past. Writer provided [redacted] with the main phone number to the BCCI squad and the name of SSA [redacted] should he have additional questions or need to make a referral. b6 b7C

534

In light of the above, this lead is considered **COVERED**.

2-29B-WF-171994
1-IIC [redacted]
1-SSA
DEV/dev

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 8 1992
FBI — WASH. FIELD OFFICE

b6 b7C

FBI/DOJ 225015-000-7855

7-227 (8-4-92)

FBI LABORATORY

C-5 C5 Q Quinn

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

YOUR FILE NO.
FBI FILE NO. 29B-WF-171994 (P)
LATENT CASE NO. L-1054

12/14/92

TO: SAC, WMFO

RE: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG

REFERENCE: Airtel 11/20/92
EXAMINATION REQUESTED BY: WMFO
SPECIMENS: Three-page telex
Fingerprints of [redacted] b6 b7C
and [redacted]

This report confirms and supplements information furnished telephonically on 12/8/92.

The requested latent print examination was conducted, but no latent prints of value were detected.

The specimens are enclosed.

-537

Enc. (4)

29B-WF-171994

DEC 1 0 1992

[redacted] b6 b7C

[redacted]

THIS REPORT IS FURNISHED FOR OFFICIAL USE ONLY

1325015-000-7860

7-227 (8-4-92)

FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

YOUR FILE NO.
FBI FILE NO. 29B-WF-171994 (P)
LATENT CASE NO. L-1054

12/14/92

TO: SAC, WMFO

RE: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG

REFERENCE: Airtel 11/20/92
EXAMINATION REQUESTED BY: WMFO
SPECIMENS: Three-page telex
Fingerprints of [redacted] b6 b7C
and [redacted]

This report confirms and supplements information furnished telephonically on 12/8/92.

The requested latent print examination was conducted, but no latent prints of value were detected.

The specimens are enclosed.

Enc. (4)

-537

THIS REPORT IS FURNISHED FOR OFFICIAL USE ONLY

29B-WF-171994 Filed in
1325015-000-7861

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 12/15/92

From SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MAJOR CASE #38
FIF; FAG
OO:WMFO

RE: Lead #2: Illegal Guns and Arms Dealings

This lead deals with the identification of Arms Dealers and determining if they had accounts with BCCI.

The writer spent a total of four weeks in London at the BCCI overseas headquarters from July until October, 1992. During this time an extensive records review operation was set up under the writer's supervision. During this operation several million pages of records were reviewed and numerous meetings were held with the liquidators of BCCI and the British authorities investigating this matter.

A few important facts are set out here regarding BCCI record keeping practices with regard to account holders:

1) An account holder did not have a unique account number. The number may have been previously used by another unrelated person or entity.

2) Account numbers were maintained separately in each to branch. There was no central record of account numbers. The same account number will exist in two or three branches belonging to two or three different account holders.

(1) 29B-WF-171994

1-IIC
1-SSA
1-SA
1-SSA

[redacted] b6 b7C

ABL:dml
(4)

29B-WF-171994 Main

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW
DEC 15 1992
FBI — WASH. FIELD OFFICE

1325015-000-7862

3) Very little and many times no identification or personal data was needed to open an account. The writer observed on a number of accounts that simply a letter or memo stating a name and post office box in some country was all of the identifying data in that account.

4) Records archival procedures were non-existent at BCCI. Old records were simply carried to a warehouse and deposited without any particular order. In attempting to locate account folders on occasions the writer could give the full name, alleged account number and SSAN yet the liquidators would be unable to find the account information. The same situation existed with closed accounts.

The above information is set forth to point out the impossibility of determining account information with having specific information. Even with specific information, the search will often prove to be fruitless.

1325015-000-7863

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 12/15/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: Status Reports for Outstanding Leads.

Lead #27 - InterRedec as a RICO conspirator.

On 12/9/92, DOJ Trial Attorney (TA) [redacted] advised that he had not heard from Federal Reserve representative [redacted] concerning their decision to go forward with the Federal Reserve increasing their outstanding civil lien against GHAITH PHARAON, based on evidence supporting PHARAON's illegal activity in the purchase of CenTrust subordinated debentures and stock and in the acquisition and sale of the National Bank of Georgia. TA [redacted] expected to hear from [redacted] soon, and would keep writer apprised. b6 b7C

Lead #27 is pending, awaiting direction from the Federal Reserve.

Lead #38 - Classified Documents

On 12/9/92, writer met with TA [redacted] and SSA [redacted] to review the specific classified documents in the possession of SSA [redacted] It was determined that the only viable lead was to try to further identify the "possible U.S. person" referred to in the documents. On 12/11/92, name search requests were submitted to FBIHQ for dissemination to [redacted] On 12/14/92, writer requested SA [redacted] to query source for any information relating to the "possible U.S. person". TA [redacted] had requested that the FBI requery [redacted] for any additional information concerning this matter; however, a review of the original query of [redacted] (by the FBI), indicated that such a request had already been made. On 12/14/92, writer requested that SSA [redacted] contact SSA [redacted], FBIHQ liaison with [redacted] for an opinion as to the necessity of requerying [redacted] b6 b7C b7E

1-WMFO
(1 - 29B-WF-171994)

MRM:mm
(1)

29B-WF-171994 Main -539

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
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FBI — WASH. FIELD OFFICE

HIDDEN INTERESTS (29B-WF-171994)

Lead #38 is pending, awaiting [redacted] name search requests and confidential source tasking. b7E

Lead #56 - Review material related to [redacted] and [redacted] and interview [redacted]. b6 b7C

Lead #56 is pending, awaiting results of Miami Division's interview and if appropriate, evaluation of U.S. Attorney records concerning the prosecution of [redacted] Due to the complexities of arranging an interview with [redacted] a status teletype will be sent to Miami within 60 days, rather than 30 days, of original lead request of 10/28/92.

Lead #88 - Interview [redacted] re: PHARAON. b6 b7C

On 12/9/92, a teletype was sent to Legat Montevideo advising them that [redacted] had not been interviewed and requested the Legat to determine his status and if possible, what information he wants to share with the FBI.

Lead #88 is pending, awaiting outstanding lead to Legat Montevideo.

Lead #90 - Interview of [redacted] re: BCCI. b6 b7C

Lead #90 is pending, awaiting results of global indices search and interview of [redacted] by Sacramento Division. A lead status request will be sent to Sacramento on 12/16/92.

1325015-000-7865

To: SSA [redacted] b6 b7C

From: [redacted]

Re: [redacted]

Date: December 15, 1992

In response to a written enquiry from me, [redacted] b6 b7C b7D, Special Counsel to the Attorney General for the INSLAW investigation, sent me the attached reply, identifying [redacted] as a possible source of information about BCCI. I called [redacted] today for more details, and he referred me to AUSA [redacted] (Chicago, 312-886-1390). [redacted] brought the subject to Chicago [redacted] in order to testify on the INSLAW matter before a grand jury. However, the subject was uncooperative and offered no testimony on any matter. [redacted] recalls that the subject has made some allegations [redacted]

The d.o.b. for [redacted] is [redacted]

His [redacted] b6 b7C b7D

29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 15 1992
FBI — WASH. FIELD OFFICE

540

132501S-000-7866

DATE: 11/30/92

ROUTING & TRANSMITTAL SLIP

TO:	INITIALS	DATE
1.SPECIAL AGENT [redacted]	[redacted]	12/14/92
2.FBI TASK FORCE		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

PER OUR CONVERSATION, HERE IS THE REQUEST FOR ASSISTANCE FROM SURINAME, WHICH WAS FORWARDED TO [redacted] ON OCTOBER 15.

b6
b7C

FROM:	Room No.-Bldg.
[redacted] ASSOCIATE DIRECTOR INTERNATIONAL AFFAIRS CRIMINAL DIVISION	5100, BOND
	Phone No. 514-0015

[redacted]

4

b6
b7C

-541

296-WF-171994 Main

b6
b7C

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SERIALIZED SU FILED SU

DEC 15 1992

FBI — WASH. FIELD OFFICE

1325015-000-7867

COPY FOR YOUR INFORMATION

DATE: 10/15/92

ROUTING & TRANSMITTAL SLIP

TO:		INITIALS	DATE
1.	FRAUD		
2.	FRAUD		
3.			
4.			
5.			

b6
b7C

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate	X	For Your Information		See Me
	Comment		Investigate	X	Signature
	Coordination		Justify		

REMARKS

PLEASE ADVISE WHETHER YOU WILL BE ABLE TO PROVIDE RECORDS OF THESE TRANSACTIONS TO THE SURINAME AUTHORITIES.

FROM:	Room No.-Bldg. 5100, BOND
Associate Director	Phone No. 514-0015

b6
b7C

2

DATE: 12/02/92

ROUTING & TRANSMITTAL SLIP

TO:	INITIALS	DATE
1. SPECIAL AGENT [redacted]	[redacted]	12/14/92
2. FBI TASK FORCE		
3.		
4.		
5.		

☐	Action	☐	File	☐	Note and Return
☐	Approval	☐	For Clearance	☐	Per Conversation
☐	As Requested	☐	For Correction	☐	Prepare Reply
☐	Circulate	☐	For Your Information	☐	See Me
☐	Comment	☐	Investigate	☐	Signature
☐	Coordination	☐	Justify	☐	

REMARKS

FOR YOUR INFORMATION, HERE IS AN INQUIRY RE GHANA WHICH WAS FORWARDED TO THE FRAUD SECTION LAST JANUARY

(X)

FROM:	Room No.-Bldg.
[redacted] ASSOCIATE DIRECTOR INTERNATIONAL AFFAIRS CRIMINAL DIVISION	5100, BOND
	Phone No. 514-0015

b6 b7C

29A-WF-171994 Main 542

[redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

FEB 16 1992

FBI — WASH. FIELD OFFICE

b6 b7C

1325015-000-7872

DATE: 01/13/92

ROUTING & TRANSMITTAL SLIP

TO:	INITIALS	DATE
1. [redacted]		
2.		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate	X	For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

SEE ATTACHED CABLE RE BCCI ACTIVITIES IN GHANA -- POSSIBLE BRIBES TO GOVERNMENT OFFICIALS IN 1983.

FROM:	Room No.-Bldg. 5100, BOND
[redacted]	Phone No. 514-0015

b6
b7C

b6
b7C

SHADYAC & SHADYAC, P.C.
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW

RICHARD C. SHADYAC, JR.*
MARCIA L. FISCHER+

OF COUNSEL
RICHARD C. SHADYAC

* MEMBER VIRGINIA AND D.C. BARS
+ MEMBER VIRGINIA BAR

3421 HAINES WAY
SUITE 102
FALLS CHURCH, VIRGINIA 22041
TELEPHONE: (703) 671-5800
TELEFAX: (703) 671-5808

7400 GAINESVILLE VILLAGE SQUARE
GAINESVILLE, VIRGINIA 22065
TELEPHONE: (703) 754-1616
TELEFAX: (703) 754-7070

DIRECT ALL CORRESPONDENCE TO
FALLS CHURCH OFFICE

COPY

November 19, 1992

Special Agent [redacted] b6 b7C
Federal Bureau of Investigation
Washington, D.C.

Dear Special Agent [redacted]

As you know, I have been retained to represent the interests of [redacted] in connection with an investigation being conducted by the F.B.I. You have asked that [redacted] voluntarily produce certain documents which are currently in his possession. As I am sure you realize, [redacted] was not an officer, or director of Investrade Development of Virginia, Inc. b6 b7C

As his counsel, I am concerned about his ability to produce certain documents and we have sought permission from the appropriate individuals. Unfortunately, to date, we have not received a response.

Moreover, I am concerned that certain information contained in the files may be protected by the attorney-client privilege and possibly other privileges.

In light of the foregoing, we would respectfully request that the Government subpoena the requested documents from [redacted] A court order would serve to protect [redacted] and certainly serve the interests of justice. I want you to know that [redacted] desires to cooperate in this investigation and wants to demonstrate his good faith to the United States Government. Moreoever he does not believe he has done anything wrong. b6 b7C

29B-WF-171994 Main
543

SEARCHED SERIALIZED FILED
SEP JR

1325015-000-7877

b6
b7C

Please contact me upon receipt of this letter so that we can discuss the appropriate procedures to meet both the Government's interests and [redacted]s needs.

b6
b7C

Sincerely yours,

[redacted]

b6
b7C

[redacted]/ad
cc: [redacted]

b6
b7C

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

Washington Metropolitan Field Office
1900 Half Street
Washington D. C. 20535

December 9, 1992

[redacted] b6 b7C
Principal Deputy Chief
U.S. Department of Justice
Criminal Division
1400 New York Avenue, 4th Floor
Washington, D.C. 20530

Dear [redacted]

Enclosed is a copy of a letter from [redacted] b6 b7C attorney for [redacted] to Special Agent (SA) [redacted] of our office. [redacted] is requesting that the Federal Government issue a Federal Grand Jury (FGJ) subpoena to his client for any records in his custody.

As such, the FBI cannot conduct any further investigation into the content of these records without such a subpoena. It is therefore requested that a FGJ subpoena be issued to [redacted], both as [redacted] b3 b6 b7C Documents to be subpoenaed should include, but not be limited to, [redacted]

Also enclosed is a copy of a [redacted] b3 b6 b7C Should you desire further documentation, it is recommended that a FGJ subpoena be issued to [redacted] for a copy of [redacted]

2-Addressee
1-WMFO 29B-WF-171994
DBS:dml
(3)

29B-WF-171994 Main

Searched
Indexed
Filed

1325015-000-7881

For your information, meetings were scheduled with [redacted] b6 b7C in London, England during the weekend of December 5, 1992. [redacted] failed to appear at these meetings. As such, the FBI will not attempt to contact her any further.

Again, it is the FBI's position that [redacted] b3 b6 be served a FGJ subpoena to testify, if the motive of the case is truly to determine bribes made to politicians. Should [redacted] b7C assert his 5th Amendment rights, [redacted] Either [redacted] will tell the truth and a successful investigation can be conducted, or he could lie, which would lead to his prosecution at a later date. Either way, the government would take an aggressive position in this investigation.

Any questions should be directed to Special Agent [redacted] b6 b7C at telephone number (202) 324-9302.

Sincerely yours,

[redacted] b6 b7C
Special Agent in Charge

By: [redacted]
Supervisory Special Agent

1325015-000-7882

29B-WF-171994 Main -545

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SERIALIZED SW FILED SW

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FBI — WASH. FIELD OFFICE

Discussed at DANY
12/18/92

1325015-000-7883

Memorandum

To : SAC WMFO (29B-WF-171994)(P)(BCCI) Date 12/15/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 92 - "ROSS COSMETICS & [redacted] b6 b7C

The writer conducted searches for the above names in the "Who's Who/What's What" and "Aspen". There where no references to ROSS COSMETICS or [redacted] A GLOBAL search on indices provided information that New York has a case on ROSS COSMETICS with references to [redacted] b6 b7C

A teletype was sent to New York requesting details about the case. When the information is received by the writer, the writer will provide the information to [redacted] Trial Attorney, Department of Justice. b6 b7C

1 - WMFO (29B-WF-171994)

RHM:rhm

29B-WF-171994 Mem - 5th

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 2 1992
FBI — WASH. FIELD OFFICE

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 12/22/92

To: [redacted], Principal Deputy Chief, DOJ Fraud b6 b7C
(Name and Address of USA)

From: [redacted]
(Name of Official in Charge and Field Division)

[redacted]
(Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by _____
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] 12/22/92 b6 b7C
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached is a copy of the 12/22/92 BCCI Interview Report and the following FD-302's:

INTERVIEWEE	DATE
[redacted]	.....9/18/92
	.....7/14/92
	.....11/11-15/92
	.....5/11-12/92, 5/22,6/2/92
	.....11/10/92

b6 b7C

29B-WF-171994 Main

1- Addressee
(1) WMFO
SRP
(L)

Serialized SU 2 SUF

SU

1325015-000-7890

#7

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 12/23/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Lead # 88 - [redacted] **Argentina** b6 b7C

Status

On 12/18/92, [redacted] personally appeared at the BCCI Squad Offsite located at 500 First Street N.W., Washington, D.C. and was interviewed by SA [redacted] and SA [redacted] pursuant to referenced lead.

(See FD-302 for details of the interview)

Recommendation

Inasmuch as the information obtained from [redacted] b6 b7C disclosed that he had met GHAITH PHARAON on one occasion regarding a proposed acquisition of an Argentina bank, as well as other apparent fraudulent activities by other individuals which are unrelated to captioned investigation, it is recommended that this lead be considered "covered" and no additional investigative resources be utilized regarding this matter.

-548

4 - WMFO (1 - 29B-WF-171994-Main)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted]

CWS
(4)

29B-WF-171994 Main b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

DEC 2 5 1992

FBI — WASH. FIELD OFFICE

1325015-000-7891

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 12/29/92

From : SA [redacted] (BCCI) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference lead #42 [redacted] b6 b7C

WMFO case 58C-WF-182413, entitled "Orrin G. Hatch, U.S. Senator; CFPO-Legislative Branch; Bribery; OO: WMFO", has been closed due to lack of prosecutive merit.

WMFO case 196B-WF-182892, entitled [redacted] b6 b7C Daiwa Bank of Chicago-Victim; FBW; OO: WMFO; has also been closed to lack of prosecutive merit, but will be forwarded to the Chicago Division for possible prosecution of an associate of [redacted]s.

Attempts to interview [redacted] in both France and England have been unsuccessful due to [redacted] failing to appear. As such , there will be no further attempts to interview [redacted] b6 b7C

As all investigation is complete, it is requested that this lead be closed.

(1) WMFO
1- [redacted]
1-
1-
(4)

Lead #42 - "Covered"

29B-WF-171994 main
-549

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 30 1992
FBI — WASH. FIELD OFFICE

1325015-000-7892

DECLASSIFIED BY: NSICG
ON 04-27-2018

b6
b7C

Memorandum

~~SECRET~~

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 1/4/93

From : SA

b6
b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

This communication is classified ~~"SECRET"~~ in its entirety.

RE: **Lead #38 - Classified Documents**

On 12/21/92, SA contacted the writer concerning information his source had provided about the

b6
b7C
b7D

Source advised that

b6
b7C
b7D

~~Classified by: 3971~~
~~Declassify on: OADR~~

1-WMFO
(1 - 29B-WF-171994)

MRM:mm
(1)

-550

29B-WF-171994 Main

SEARCHED SERIALIZED INDEXED FILED
JAN 4 1993
FBI — WASH. FIELD OFFICE

~~SECRET~~

DECLASSIFIED BY: NSICG W43J99B18
ON 04-27-2018

Memorandum

~~SECRET~~

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 1/7/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

This communication is ~~classified~~ ~~"SECRET"~~ in its entirety.

RE: **Lead #38 - ~~Classified~~ Documents**

On 1/6/93, writer telephonically contacted former [redacted] and attorney [redacted] concerning the whereabouts of [redacted] and the possibility of the FBI speaking with him concerning BCCI. [redacted] advised that he did not recall the name but would check around for any information. b6 b7C

[redacted] advised that [redacted] was a client of his and that he would attempt to locate [redacted] and request an interview. [redacted] felt comfortable with his client speaking with the FBI, but not prosecutors. He stated that he would contact the writer when he locates [redacted], as he is out of the country. b6 b7C

~~Classified by: 3971~~
~~Declassify on: OADR~~

1-WMFO
(1 - 29B-WF-171994)

MRM:mm
(1)

-552

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 7 1993
FBI — WASH. FIELD OFFICE

1325015-000-7904

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 1/7/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: Lead #90 - Interview of [redacted] b6 b7C

Status

On 12/29/92, [redacted] was interviewed at the [redacted] concerning his knowledge of BCCI. b6 b7C

(See Sacramento teletype, dated 1/4/93, for details of the interview)

Recommendation

Inasmuch as the information obtained from the interview disclosed that [redacted] did not have direct knowledge of BCCI operations [redacted] it is recommended that this lead be considered "covered" and no additional investigative resources be utilized regarding this matter. b6 b7C

4 - WMFO (1 - 29B-WF-171994-Main)
(1 - IIC [redacted]) b6 b7C
(1 - SSA [redacted])
(1 - SA [redacted])

29B-WF-171994 Main - 55

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW
JAN 7 1993
FBI — WASH. FIELD OFFICE

MRM:mm
(4)

1325015-000-7905

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/13/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Lead # 93 - [redacted] **: Identify Madison Loan** b6 b7C

Status

The "Madison loan" referred to on page 10 of a memorandum to the "BCC File", dated 25 June 1990, has been identified as a loan for the property located at 330 Madison Avenue, New York, New York. Per [redacted] this property has already been identified and seized. b6 b7C

Recommendation

Inasmuch as the loan has been identified and the property seized, it is recommended that this lead be considered "covered" and no additional investigative resources be utilized regarding this matter.

4 - WMFO (~~1~~ - 29B-WF-171994-Main)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted]

MRM:mm
(4)

b6 b7C

29B-WF-171994 Main - 555

SEARCHED SERIALIZED INDEXED FILED
JAN 15 1993
FBI — [illegible]

1325015-000-7911

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 12/31/92

Requested by: [redacted] b6 b7C

To: Office Services Manager

Ext. 9315 | Squad: BCCI | File No. 29B-WF-171884

Subject [redacted] | Social Security Account # [redacted]

~~Aliases~~ [redacted]

Address [redacted] | Birth Date [redacted] | Birth Place | Race | Sex ☑ Male ☐ Female

☒ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **ISIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **OCIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **IIS:** ☐ NEG ☐ POS	Searched by / Date
☒ **FOIMS:** ☑ NEG ☐ POS	Searched by SW / Date 1-5-93	☐ **MICRO:** ☐ NEG ☐ POS	Searched by / Date
☐ **GLOBAL:** ☐ NEG ☐ POS	Searched by / Date	☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by / Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
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- ☐ Charlotte
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- ☐ Quantico
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- ☐ Savannah
- ☐ Tampa
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Central
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- ☐ San Antonio
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- ☐ Albuquerque
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- ☐ Portland
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- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-556

29B-WF-171884

Consolidated by [redacted] Date

Reviewed by [redacted] Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW
FEB 4 - 1993
FBI - WASH. METRO FIELD OFFICE

1325015-000-7912

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 12/31/92

Requested by: [redacted] b6 b7C

To: Office Services Manager

Ext. 9315 | Squad: BCCI | File No. 29B-WF-171954

Subject [redacted]

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☑ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by	Date	
☑ **FOIMS:** ☐ NEG ☐ POS	Searched by SU	Date 1-5-93	
☐ **GLOBAL:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ISIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **OCIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **IIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **MICRO:** ☐ NEG ☐ POS	Searched by	Date	
☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by	Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
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- ☐ Mobile
- ☐ New Orleans
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- ☐ San Juan
- ☐ Savannah
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Central
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- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

557
29B-WF-171954

Consolidated by Date

Reviewed by Date

File Review Symbols
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FBI - WASH. METRO FIELD OFFICE
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1325015-000-7913

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 12/31/92

To: Office Services Manager

Requested by:

Ext. 9315 | Squad: BCCI | File No. 29B-WF-171954

~~Subject~~

Social Security Account #

~~Aliases~~ Bus.- Ross Goldman & Associates

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☒ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
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☐ Confidential Indices: ☐ NEG ☐ POS	Searched by	Date	
☐ OCIS: ☐ NEG ☐ POS	Searched by	Date	
☐ ELSUR Indices: ☐ NEG ☐ POS	Searched by	Date	
☐ IIS: ☐ NEG ☐ POS	Searched by	Date	
☒ FOIMS: ☐ NEG ☐ POS	Searched by SW	Date 1-5-93	
☐ MICRO: ☐ NEG ☐ POS	Searched by	Date	
☐ GLOBAL: ☐ NEG ☐ POS	Searched by	Date	
☐ REGIONAL: ☐ NEG ☐ POS	Searched by	Date	

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- ☐ San Diego
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File & Serial Number	Remarks	File & Serial Number	Remarks

558

29B-WF-171954

Consolidated by Date

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1325015-0007914

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 12/31/92

Requested by:

b6
b7C

To: Office Services Manager

Ext. 9315 | Squad: BCCI | File No. 29B-WF-171954

Subject: International Insurance Services Gulf, Ltd.

Social Security Account #

~~Aliases~~

Address | Birth Date | Birth Place | Race | Sex ☐ Male ☐ Female

☒ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
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☐ ELSUR Indices: ☐ NEG ☐ POS	Searched by / Date	☐ IIS: ☐ NEG ☐ POS	Searched by / Date
☒ FOIMS: ☒ NEG ☐ POS	Searched by SW / Date 1-4-93	☐ MICRO: ☐ NEG ☐ POS	Searched by / Date
☐ GLOBAL: ☐ NEG ☐ POS	Searched by / Date	☐ REGIONAL: ☐ NEG ☐ POS	Searched by / Date

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- ☐ San Juan
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- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-559
29B-WF-171954

Consolidated by / Date

Reviewed by / Date

File Review Symbols
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SEARCHED SW INDEXED
SERIALIZED SW FILED SW
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FBI - WASH. METRO FIELD OFFICE
SW SR

1325015-000-7915

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 12/31/92

Requested by:

b6
b7C

To: Office Services Manager

Ext. 9315 | Squad: BCCI | File No. 29B-WF-171994

Subject

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☒ Male ☐ Female

- ☒ Exact Spelling
- ☐ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☐ Criminal References Only
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- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

☐ General Indices: ☐ NEG ☐ POS	Searched by	Date	
☐ ISIS: ☐ NEG ☐ POS	Searched by	Date	
☐ Confidential Indices: ☐ NEG ☐ POS	Searched by	Date	
☐ OCIS: ☐ NEG ☐ POS	Searched by	Date	
☐ ELSUR Indices: ☐ NEG ☐ POS	Searched by	Date	
☐ IIS: ☐ NEG ☐ POS	Searched by	Date	
☒ FOIMS: ☒ NEG ☐ POS	SM	1-4-93	
☐ MICRO: ☐ NEG ☐ POS	Searched by	Date	
☐ GLOBAL: ☐ NEG ☐ POS	Searched by	Date	
☐ REGIONAL: ☐ NEG ☐ POS	Searched by	Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
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- ☐ New Orleans
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- ☐ Quantico
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- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
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- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
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- ☐ Detroit
- ☐ El Paso
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- ☐ Pittsburgh
- ☐ San Antonio
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- ☐ Salt Lake City
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- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-560
29B-WF-171994

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED SM INDEXED
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FEB 4 - 1993
FBI WASH. METRO FIELD OFFICE
SM TR

1325015-000-7916

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 12/3/92

To: Office Services Manager

Requested by:

Ext. 9315 | Squad: BCCI | File No. 29B-WF-171994

~~Subject~~ Subject - Marine Life and Casualty ~~Co~~ Insurance Co.

Social Security Account #

~~Aliases~~

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female
11310 North Freeway, Ste 191 Houston, TX				

☒ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
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☐ General Indices: ☐ NEG ☐ POS	Searched by		Date
☐ ISIS: ☐ NEG ☐ POS	Searched by		Date
☐ Confidential Indices: ☐ NEG ☐ POS	Searched by		Date
☐ OCIS: ☐ NEG ☐ POS	Searched by		Date
☐ ELSUR Indices: ☐ NEG ☐ POS	Searched by		Date
☐ IIS: ☐ NEG ☐ POS	Searched by		Date
☒ FOIMS: ☒ NEG ☐ POS	Searched by SW		Date 1-5-93
☐ MICRO: ☐ NEG ☐ POS	Searched by		Date
☐ GLOBAL: ☐ NEG ☐ POS	Searched by		Date
☐ REGIONAL: ☐ NEG ☐ POS	Searched by		Date

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- ☐ New Orleans
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- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
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- ☐ Anchorage
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- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
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- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

561
29B-WF-171994

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
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SEARCHED ___ INDEXED ___
SERIALIZED SW FILED SW
FEB 2 - 1993
FBI - WASH. METRO FIELD OFFICE
SW

1325015-000-7917

b6
b7C

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 12/31/92

To: Office Services Manager

Requested by [redacted] b6 b7C

Ext. 9315 | Squad: BCCI | File No. 29B-WF-171994

Subject [redacted]

Aliases [redacted]

Social Security Account # [redacted]

Address | Birth Date | Birth Place | Race | Sex ☑ Male ☐ Female

[redacted]

- ☒ Exact Spelling
- ☐ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
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☐ General Indices: ☐ NEG ☐ POS	Searched by	Date	
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☐ OCIS: ☐ NEG ☐ POS	Searched by	Date	
☐ ELSUR Indices: ☐ NEG ☐ POS	Searched by	Date	
☐ IIS: ☐ NEG ☐ POS	Searched by	Date	
☒ FOIMS: ☐ NEG ☑ POS	SW	1-5-93	
☐ MICRO: ☐ NEG ☐ POS	Searched by	Date	
☐ GLOBAL: ☐ NEG ☐ POS	Searched by	Date	
☐ REGIONAL: ☐ NEG ☐ POS	Searched by	Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
196B-2067 (M)	DBA Federated International Groups of Companies		
C-5 [redacted]			
closed - March 89			
WF-			
			562
			29B-WF-171994

Consolidated by [redacted] Date

Reviewed by [redacted] Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

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SERIALIZED SW FILED SW
FEB 2 - 1993
1325015-000-7918
FBI - WASH. METRO FIELD OFFICE
SW IR

Date: Friday, January 8, 1993 12:05 pm
From: CRM03 ([redacted]) b6 b7C
Subject: BCCI -Reply

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

The letters rogatory to Luxembourg is ready for signature. We forwarded an advance copy to [redacted], he was in Luxembourg this week and discussed this with [redacted] the Luxembourg liquidator. [redacted] recommend we include additional details about the persons for whom we are requesting records. They want us to link each individual to a particular case and specify whether an individual is a defendant, target or witness. I will discuss this with [redacted] on Monday. The prosecutors had concerns about identifying witnesses and targets. b6 b7C

[redacted] b6 b7C

Rec'd from T/A
1/11/93

[redacted]

[redacted]

29B-WF-171994-563

SEARCHED SW INDEXED
SERIALIZED SW FILED SW

JAN 1 . 1993

FBI — WASH. FIELD OFFICE

[redacted]

1325015-000-7919

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/14/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MAJOR CASE #38
FIF; FAG;
OO:WMFO

RE: Lead #39 regarding interview of WALL STREET JOURNAL reporter, [redacted] b6 b7C

SSA [redacted] is attempting to contact [redacted] to schedule this interview. SSA [redacted] will advise SA [redacted] accordingly. b6 b7C

2 - WMFO
(1 - 29B-WF-171994)
(1 - SSA [redacted]) b6 b7C

29B-WF-171994 Main -564

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 14 1993
FBI — WASH. FIELD OFFICE

1325015-000-7920

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 1/14/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 62 - ASSETS OF BCCI SHAREHOLDERS AND "FRONT-MEN"
STATUS REPORT

The writer sent a Bureau wide airtel (11/3/92) requesting that the field offices search indices for the major BCCI shareholders and "front-men". As of this date over half of the offices have responded, none have indicated that assets of the shareholders/"front-men" exists.

There are assets in the U.S. which belong to GHAITH PHARAON and [redacted] These assets are being looked at by both the DOJ-AFO and the Federal Reserve. DOJ-AFO has and will consider going [redacted] after some of the assets of CLARK CLIFFORD and but only after the trial has taken place. b6 b7C

To date the writer has not reviewed any 'Kerry Report' documents, which may lead to additional assets held by other shareholders/front-men.

The writer requested that the FBI, Butte Information Technology Center (BITC) conduct searches on the shareholders/front-men and related companies to the shareholders/front-men. BITC responded and as of this date there is no indication that other assets exists.

RECOMMENDATION

The writer recommends that LEAD 62 be placed under LEAD 30 (asset forfeiture).

29B-WF-171994 Main - 565

SEARCHED SW INDEXED
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JAN 14 1993
FBI — WASH. FIELD OFFICE

1 - WMFO (29B-WF-171994)

RHM:rhm
(1)

1325015-000-7921

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 1/15/93

Lead # 55 - [redacted] **: FOREIGN COMMODITIES/SECURITIES** b6 b7C

In the **KERRY REPORT**, the authors reported that they had received information that **BCCI** participated in the manipulation of security markets (specifically penney-stock) in Canada and the Netherlands. In conjunction with other requests for documents from **U.S. SENATE SUBCOMMITTEE (SENATOR JOHN KERRY)** regarding BCCI, SA [redacted] requested documentation from [redacted] to corroborate the allegations and request for further investigation. b6 b7C

On 1/5/93, [redacted] was interviewed pursuant to the written request for documents by **DOJ ATTORNEY** [redacted] regarding 20 items that were being addressed by the FBI. In regard to captioned lead, [redacted] advised that the information contained in the KERRY REPORT was derived from similar sources that were used by authors **LARRY GURWIN** and **JOHN TRUELL**, who recently published a book about BCCI entitled "**False Profits.**" The write-up from the book was, in [redacted]s opinion, the best documentary explanation for the basis of including the allegation in the Subcommittee report. Therefore, [redacted] furnished photocopies of selected pages from "False Profits" and recommended that the FBI interview GURWIN. A review of those pages disclosed that the allegation was based on other subjects who ran "boilerroom operations" with fictitious penney-stock investments and those operations used BCCI as its bank. There was no information indicating that anyone at BCCI was involved in the schemes. b6 b7C

566

4 - WMFO (1 - 29B-WF-171994)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted]

CWS
(4)

29B-WF-171994 Mari b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

1 [illegible]

FBI — [illegible]

1325015-000-7922

[redacted] admitted that Senate investigators are not held to the same high degree of standards as the FBI when conducting its investigation and subsequent reporting of results. [redacted] also admitted that much of the information contained in the Subcommittee report was obtained from media sources and other journalists and contains speculation and conclusions drawn by the investigators as well as their sources. [redacted] made frequent references to author LARRY GURWIN's work ("False Profits") during the interview. b6 b7C

[redacted] had no knowledge regarding any new developments involving BCCI and is no longer involved in any matters relating to the investigation of BCCI. b6 b7C

At the request of DOJ Attorney [redacted] was contacted by SA [redacted] and an interview will be conducted after [redacted] returns from his vacation on 1/25/93, in an effort to determine if [redacted] has any corroborative evidence to support the allegations of stock manipulation by BCCI and to determine if there is a federal violation to investigate. b6 b7C

1325015-000-7923

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 1/15/93

Lead # 45 - [redacted] **: POLITICAL PAYOFFS/CORRUPTION** b6 b7C

Per discussion with **SA** [redacted] on 12/16/92, [redacted] is an international fugitive and is currently under indictment in Peru. [redacted] was arrested in another Latin American country (San Salvador) but was released on bond before he could be extadicted to Peru. SA [redacted] believes that [redacted] would be considered a unreliable witness. b6 b7C

Transcripts for the tapes containing interviews of [redacted] have been completed. One box of transcripts has been reviewed by **SA** [redacted] as of 12/21/92. No meaningful information was obtained from the transcripts reviewed that indicated any public corruption activities. One other box remains to be reviewed by SA [redacted] b6 b7C

Per previous discussions with [redacted] **NEW YORK STATE DEPARTMENT OF BANKING**, they have not determined any meaning as to the list of politicians that was found in the records seized at the hotel located at the LaGuardia Airport (owned by [redacted]. b6 b7C

-567

4 - WMFO (1 - 29B-WF-171994)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted]

CWS
(4)

29B-WF-171994 Main

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b6 b7C

1325015-000-7924

On 12/17/92, **IIC** [redacted] advised that in November 1992, **DEPARTMENT OF JUSTICE (DOJ) ATTORNEY** [redacted] had been in contact with [redacted]s attorneys in order to arrange for an interview of [redacted]. DOJ will advise FBI if and when the interview is being scheduled. Therefore, efforts to locate and interview [redacted] will be held in abeyance pending notification from DOJ. b6 b7C

Lead:

1. Will, review remaining transcripts of interview tapes as set forth in captioned lead.

2. Inasmuch as [redacted] appears to be an unreliable witness that could be easily be discredited due to the charges pending against him in South American countries, this lead should be considered "handled" and in the event DOJ arranges for an interview of [redacted] a new lead could be set forth at that time. b6 b7C

1325015-000-7925

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 1/15/93

Lead # 54 - [redacted] : [redacted] **aka** [redacted] b6 b7C

As of 12/16/92, **SA** [redacted] sent a lead to **SA** [redacted] to interview [redacted], a reporter for Time Magazine, regarding [redacted] inasmuch as SA [redacted] had previously interviewed [redacted] on other matters. SA [redacted] advised that [redacted] is an unreliable witness and has not returned calls from SA [redacted] during October 1992 because he [redacted] was having a book published about BCCI. b6 b7C

SA [redacted] also advised that **FBI LEGAT-BERN** has reported that [redacted] was interviewed and admitted that she had typed letters on BCCI letterhead for [redacted] purportedly written by [redacted] and back-dated them several years. SA [redacted] noted that subject [redacted]'s name was even spelled incorrectly on the fraudulent documents. [redacted] was allegedly trying to get the U.S. government or others (eg; [redacted], to pay him money for the evidence that he was apparently manufacturing. Based on the foregoing, SA [redacted] considers [redacted] very unreliable. b6 b7C

Per meeting with IIC [redacted] on 12/17/92 regarding the above, SA [redacted] was instructed not to interview [redacted] inasmuch as previously conducted interviews have been b6 b7C

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4 - WMFO (1 - 29B-WF-171994)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted]

CWS
(4)

29B-WF-171994 Main

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FBI — U.S. DEPARTMENT OF JUSTICE

b6 b7C

1325015-000-7926

unproductive. SA [redacted] was also instructed not to interview [redacted] inasmuch as Legat-Bern has reported that [redacted]'s representations have been discredited and he has attempted to sell false information to TIME MAGAZINE reporter [redacted] as well as criminal investigators. b6 b7C

Based on the foregoing, this lead should be considered "handled."

1325015-000-7927

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 12/30/92

Lead # 36 - [redacted] b6 b7C

On 1/15/93, a lead was set to have [redacted] b6 b7C interviewed. SA [redacted] was contacted telephonically and advised that the lead was being sent to his attention. [redacted] will conduct the interview between 1/25/93 and 1/30/93. Upon completion of the interview a recommendation will be made as to any further action.

4 - WMFO (1) - 29B-WF-171994)
(1 - IIC [redacted] b6 b7C
(1 - SSA [redacted]
(1 - SA [redacted]

JPF
(4)

-569

29B-WF-171994 Main

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FBI — WASH. FIELD OFFICE

1325015-000-7928

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 1/15/93

To: [redacted], Principal Deputy Chief, DOJ Fraud b6 b7C
(Name and Address of USA)

From: [redacted]
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] on 1/15/93 b6 b7C
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached is a copy of the 1/15/93 BCCI Interview Report and the following FD-302's.

INTERVIEWEE	DATE
[redacted]	.....11/10/92
	.....12/18/92
	.....12/2/92

b6 b7C

29B-WF-171994-5

Main

Searched
Serialized SW
Indexed
Filed SW

1 - WMFO (29B-WF-171994) (P)
1 - [redacted] (Enc. 4)
JNR;srd
(2)

1325015-000-7929

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 12/30/92

Lead # 33 - [redacted] **: FUGITIVE INVESTIGATIONS** b6 b7C

No further information has been obtained regarding the fugitive investigations since the previous update.

4 - WMFO (1 - 29B-WF-171994)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted] b6 b7C

JPF
(4)

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JAN 2 1 1993
FBI — WASH. FIELD OFFICE

1325015-000-7930

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 1/15/93

Lead # 91 - [redacted] **: THE** [redacted] **BOXES (Index Review)** b6 b7C

The above referenced lead has not been addressed as of this writing. Time permitting, SA [redacted] anticipates reviewing the index during the next few weeks. b6 b7C

- 592

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

FBI — [redacted] b6 b7C

4 - WMFO (1 - 29B-WF-171994)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted]

CWS
(4)

1325015-000-7931

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 1/15/93

Lead # 82 - [redacted] **: TOKYO MONEY LAUNDERING** b6 b7C

Pursuant to WMFO airtel to FBIHQ (cc: NY) dated 12/22/92, this matter was referred to New York Division.

Based on the foregoing, this lead should be considered "handled."

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29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
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JAN 1 1993
FBI — U.S. FIELD OFFICE

4 - WMFO
(1 - 29B-WF-171994)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted] b6 b7C

CWS
(4)

1325015-000-7932

C5

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

MEMORANDUM January 16, 1993

TO: SAC, WMFO (29B-WF-171994)(BCCI) (P)

FROM: SAC, NEW HAVEN

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG
GHAITH PHARAON - Fugitive:
OO: WMFO

- ARMED & DANGEROUS -

Re WMFO airtel to NH dated 11/17/92.

This date, SA [redacted] contacted [redacted] at his residence telephone [redacted] advised that he has not heard from [redacted] and they are not particularly close since they argued two years ago. [redacted], a maker of consumer electronics, advised that [redacted] is a [redacted] and he does not know how to get in touch with him. He advised that it if he hears from [redacted], he will give him the FBI's message to contact SA [redacted] at (202) 324-9358. b6 b7C

Delay is due to [redacted]'s recently being in Europe over the holidays, as learned from [redacted] at telephone number given in reairtel. She stated that she understood [redacted] had "just seen [redacted] down in some island" but [redacted], when queried about this remark, stated that [redacted] was incorrect. b6 b7C

If WMFO wishes toll records checked, a subpoena will be required.

This matters is considered RUC'd in New Haven.

594

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2 - 29B-WF-171994
SA SA

(2) - WMFO (29B-WF-171994)
1 - NH
(3)
ML:ml

JAN 2 5 1993

SW/JR

1325015-000-7933

Memorandum

To : SAC WMFO (29B-WF-171994)(P)(BCCI) Date 1/21/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 41 - SCREENING

2

By prior agreement with the Department of Justice (DOJ) in the person of [redacted] Principal Deputy Chief, Fraud Section and the liquidators for the Bank of Credit and Commerce International (BCCI), Touche Ross, Incorporated in the person of [redacted] it was decided that the liquidators would furnish available information on those persons making claims against BCCI to the DOJ. DOJ would in turn determine to the extent feasible if the money claimed was derived from illegal activities. b6 b7C

The FBI conducted Global searches on the names which were provided. However, DOJ should be advised that the FBI can not disclose to third parties the contents of its files or, in some cases, even the existence of such files; further, that any investigation by the FBI to determine whether certain funds are ill-gotten gains may only be initiated when facts or circumstances reasonably indicate that, in relation to such funds, a federal crime has been, is being or will be committed. In the matter of determining the validity of claims filed by individuals and companies against funds held by BCCI's liquidators, it is incumbent on the liquidators to provide sufficient cause for the FBI to initiate an inquiry.

Since the objective of the search was only to determine those individuals or companies which may have derived money form illegal activities, it was decided that after the Global searches were completed WMFO would only review searches resulting in positive hits, of either individuals or companies, which were from a main file less than seven years old. Also, WMFO would not review files of individuals or companies which were previously known to WMFO.

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-575

2 - WMFO
(1 - 29B-WF-171994)
(1 - 29B-WF-171994 SUB BB)

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(2)

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JAN 2 1 1993
FBI — WASH. FIELD OFFICE

1325015-000-7934

The following claimants should already be known to the liquidators:

1. BCCI (Nigeria) Limited
2. Bank of Credit and Commerce International Staff Pension Staff Scheme
3. BCC Ghana 'Auction Cover'
4. ICIC Foundation London (UK)
5. CCL Assurance Ltd (Credit and Commerce Life Assurance Ltd)
6. Cromwell Hospital (Has ties to BCCI)
7. Attock Oil International Ltd (Has ties to ICIC and GHAITH PHARAON)
8. Arabian Trading and Development Co. (Has possible ties to GHAITH PHARAON)
9. Banco Nazionale Del Lavoro (BNL)

The following claimants were positive hits which dealt with ongoing FBI cases. However, due to the nature of the cases the FBI will not, at this time, release any further information.

1. China State Construction Engineering Corporation
2. China North Industries Corporation

The following claimant was a reference in a case which the field office was in the process of closing. The claimant was not a subject of the case and the field office did not indicate any reason to prevent the claimant from receiving any funds.

1. [redacted] b6 b7C

The screening process, with regards to the FBI Global searches, has been completed and the only remaining process is whether the DEA will conduct NADDIS checks on the claimant names. [redacted] Attorney, DOJ and the writer are planning on contacting the DEA to see what the status is regarding the NADDIS checks. b6 b7C

1325015-000-7935

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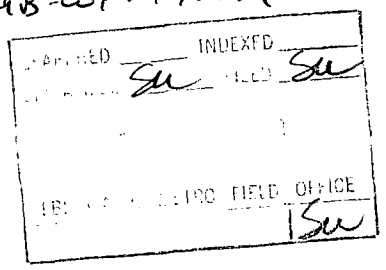
29B-WF-171994 - Main



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Grand Jury Sworn in on January 16, 1991

Holding a Criminal Term

UNITED STATES OF AMERICA	:	
- v -	:	Crim No. 91-0655(JHG)
AGHA HASAN ABEDI SWALEH NAQVI, and GHAITH R. PHARAON	:	Violations: 18 USC §371 (Conspiracy); 18 USC §1343 (Wire Fraud); 18 USC §1962(d) (Racketeering Conspiracy); 18 USC §2 (Aiding and Abetting).
Defendants.	:	

JOYCE HENS GREEN, J.

SUPERSEDING INDICTMENT

B

FILED IN OPEN COURT

JAN 15 1993

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

THE GRAND JURY CHARGES:

COUNT ONE

Introduction

AT ALL TIMES MATERIAL TO THIS INDICTMENT:

1. The Federal Reserve System ("FRS") was an agency of the United States. The Board of Governors of the FRS ("the Board") had primary responsibility for supervising and regulating activities of bank holding companies and had residual responsibility for United States offices of foreign banks.

2. The Federal Deposit Insurance Corporation ("FDIC") was an agency of the United States. The FDIC supervised FDIC-insured, state-chartered savings banks which were not members of the FRS. The FDIC examined and supervised those banks under its purview, approved or denied applications for structural or corporate changes, and ruled on applications for insurance. The

SUPERSEDING

1325015-000-7937

FDIC insured deposits in amounts up to $100,000 per account in banks which it insured.

3. The Federal Home Loan Bank Board ("FHLBB") was an agency of the United States established to regulate and supervise savings and loan associations and savings banks insured by the Federal Savings and Loan Insurance Corporation ("FSLIC"). As part of its duties, the FHLBB governed the FSLIC. The FHLBB examined insured institutions to ensure they were operated in a safe and sound manner and in conformity with applicable laws and regulations.

4. The FSLIC was an agency of the United States established to protect depositors by insuring deposits in savings and loan associations and in certain savings banks in amounts up to $100,000 per account.

5. The Office of the Comptroller of the Currency ("OCC") was an agency of the United States. The OCC regulated, examined and supervised nationally-chartered banks to ensure they were operated in a safe and sound manner and in conformity with applicable laws and regulations.

6. Independence Bank ("Independence"), Encino, California, was chartered, regulated and supervised by the State of California and had deposits insured by the FDIC.

7. The National Bank of Georgia (sometimes referred to as "NBG"), Atlanta, Georgia, was regulated and supervised by the OCC and had deposits insured by the FDIC.

8. GRP, Inc. was a corporation organized and existing

under the laws of the State of Georgia, and was owed by GHAITH R. PHARAON. GRP, Inc., at times, was the holding company for NBG.

9. NBG Financial Corporation was a corporation organized and existing under the laws of the State of Georgia. NBG Financial Corporation, from 1983 onward, was the holding company of NBG.

10. Interedec (Georgia), Ltd. was a foreign company organized under the laws of the Bahamas, and was the sole owner of NBG Financial Corporation.

11. Interedec (Georgia), N.V. was a foreign corporation organized under the laws of the Netherlands Antilles, and was owned by GHAITH R. PHARAON. Interedec (Georgia) N.V. was the sole owner of Interedec (Georgia) Ltd.

12. Financial General Bankshares was a bank holding company authorized under the Bank Holding Company Act. Financial General Bankshares had numerous subsidiary banks with state and federal charters. The subsidiary banks were insured by the Federal Deposit Insurance Corporation (FDIC).

13. Credit and Commerce American Holdings (CCAH), and its wholly owned subsidiary, Credit and Commerce American Investment (CCAI), were corporations formed in 1978 to acquire control and ownership of Financial General Bankshares. CCAH and CCAI were bank holding companies under the Bank Holding Company Act. CCAH and CCAI owned several subsidiary banks doing business under the name "First American Bank." The various First American Banks had national bank charters and were insured by the FDIC.

14. As of August 9, 1989, the Office of Thrift Supervision ("OTS") succeeded to the interests of the FHLBB and the FSLIC with respect to the regulation and supervision of savings and loan associations and certain savings banks, and the FDIC succeeded the FSLIC as the insurer.

15. CenTrust Savings Bank, a State Savings Bank ("CenTrust"), was located in Miami, Florida, and was chartered by the State of Florida. CenTrust was regulated and supervised by the FHLBB and had deposits insured by the FSLIC until August 9, 1989. CenTrust was also subject to regulation and supervision by the Florida Department of Banking and Finance.

16. As of August 9, 1989, the insurance of the deposits of CenTrust was transferred to the FDIC and the OTS began its role as regulator and supervisor of CenTrust.

17. CenTrust Trust, formerly the Westport Company, was a wholly-owned subsidiary of CenTrust.

18. BCCI Holdings (Luxembourg), S.A. ("BCCI Holdings") was a foreign bank holding company established under the laws of Luxembourg.

19. BCCI Holdings owned and controlled Bank of Credit and Commerce International S.A. ("BCCI S.A."), a foreign bank established under the laws of Luxembourg. BCCI S.A. operated agencies in Los Angeles, California and New York, New York.

20. BCCI Holdings also owned and controlled Bank of Credit and Commerce International (Overseas) Limited ("BCCI Overseas"), a foreign bank established under the laws of the Cayman Islands.

BCCI Overseas operated agencies in Miami, Tampa and Boca Raton, Florida.

21. The term "BCCI Group," as used in this Superseding Indictment, means the combination of BCCI Holdings, BCCI S.A. and BCCI Overseas.

22. International Credit and Investment Company (Overseas) Limited ("ICIC Overseas") was a foreign bank established under the laws of the Cayman Islands.

23. Defendant AGHA HASAN ABEDI was a principal of BCCI Holdings, BCCI (Overseas), BCCI S.A. and ICIC Overseas.

24. Defendant SWALEH NAQVI was a principal of BCCI Holdings, BCCI (Overseas), BCCI S.A. and ICIC Overseas.

25. Defendant GHAITH R. PHARAON was a Saudi Arabian businessman and a shareholder in the BCCI Group.

The Conspiracy

26. Beginning in or about January 1978, the exact date being unknown to the Grand Jury, and continuing until in or about July 1991, in the District of Columbia and elsewhere, the Defendants

AGHA HASAN ABEDI,

SWALEH NAQVI, and

GHAITH R. PHARAON

knowingly and willfully combined, conspired, confederated, and agreed together and with each other, and with others, both known and unknown to the Grand Jury,

(a) to defraud the United States, in particular the Board,

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the OCC, FDIC, FHLBB, and FSLIC, of and concerning their right to have their business and affairs conducted free from deceit, dishonesty, impairment and obstruction, by impeding, hindering, obstructing and defeating by deceitful and dishonest means the lawful functions and operations of said agencies of the United States in regulating and supervising activities of the BCCI Group and their United States branches or agencies, ICIC Overseas, National Bank of Georgia, CCAH, Independence, and CenTrust, and

(b) to commit offenses against the United States, that is:

(1) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, of deposits of Independence, by means of fraudulent and false pretenses, representations and promises, and to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343;

(2) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, of deposits of Independence, by means of fraudulent and false pretenses, representations and promises, and for the purpose of

executing and attempting to execute the scheme and artifice, knowingly to cause to be delivered by the United States Postal Service various mail matter, in violation of Title 18, United States Code, Section 1341;

(3) to knowingly execute and attempt to execute a scheme and artifice to defraud a federally insured financial institution, and by means of fraudulent and false pretenses, representations and promises to obtain moneys, funds and other property owned by or under the control of such a financial institution, in violation of Title 18, United States Code, Section 1344;

(4) to knowingly and willfully make false, fictitious and fraudulent statements to the FHLBB, and to knowingly and willfully make and cause to be made false entries in the books, reports and statements of CenTrust, in violation of Title 18, United States Code, Sections 1001 and 1006;

(5) to knowingly and willfully cause to be made false entries, including material omissions, in the books and records of Independence with the intent to deceive the Board and FDIC, in violation of Title 18, United States Code, Sections 1001 and 1005;

(6) to devise and intend to devise a scheme and artifice to defraud persons and entities throughout the United States of money and property, namely, funds from purchasers of subordinated debentures issued by CenTrust, by means of false and fraudulent pretenses, representations and promises, and for

purposes of executing said scheme, to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343;

(7) to devise and intend to devise a scheme and artifice to defraud persons and entities throughout the United States of money and property, namely, funds from purchasers of subordinated debentures issued by CenTrust, by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing said scheme, to cause to be placed in an authorized depository for mail matter things and matters to be delivered by the United States Postal Service, in violation of Title 18, United States Code, Section 1341.

The Manners and Means of the Conspiracy

It was a part of the conspiracy that:

27. Defendants would enrich Defendants AGHA HASAN ABEDI, SWALEH NAQVI, GHAITH R. PHARAON, their associates, and the BCCI Group by taking advantage of opportunities to deceive and exploit United States financial institutions, deceive United States Federal regulatory agencies, and deceive persons and entities throughout the United States.

It was further part of the Conspiracy that:

28. Defendants AGHA HASAN ABEDI, SWALEH NAQVI, their co-conspirators and the BCCI Group would acquire and maintain control and influence over National Bank of Georgia and

Independence with the aid of GHAITH R. PHARAON, through deceptive stock purchases by way of hidden stock pledges, nominee agreements, nonrecourse loans, loan releases, beneficial interest agreements and outright falsehoods, fabrications and omissions in applications and reports filed with state and federal regulatory agencies.

29. Defendants AGHA HASAN ABEDI, SWALEH NAQVI their co-conspirators and the BCCI Group would acquire and maintain control and influence over CCAH, through deceptive stock purchases by way of hidden stock pledges, nominee agreements, nonrecourse loans, loan releases, beneficial interest agreements and outright falsehoods, fabrications and omissions in applications and reports filed with state and federal regulatory agencies.

30. Defendants AGHA HASAN ABEDI, SWALEH NAQVI their co-conspirators and the BCCI Group would use ICIC Overseas to facilitate deception of the Board, OCC, FDIC, FSLIC and FHLBB concerning the involvement of the BCCI Group, AGHA HASAN ABEDI, SWALEH NAQVI and GHAITH R. PHARAON in matters involving NBG, Independence and CCAH.

31. Defendant SWALEH NAQVI and his co-conspirators would deceive and cause the deception of regulators as to the amount of regulatory capital on the books of the National Bank of Georgia by engaging in a sham transaction which created the appearance of a $10 million capital infusion, when in truth and in fact, as the Defendants well knew, no capital infusion was made, said sham

transactions occurring so that the National Bank of Georgia would obtain regulatory approval to purchase other banks.

32. When Defendant GHAITH R. PHARAON was in financial difficulty, in order to keep NBG assets under the control and influence of the BCCI Group, Defendants AGHA HASAN ABEDI and SWALEH NAQVI caused NBG to be sold to CCAH:

a) by participating in negotiations in which the sale price was negotiated;

b) by setting up real and sham "loans" to CCAH shareholders, amounting to approximately $220 million, for the purchase of additional CCAH stock, thus providing CCAH capital to purchase NBG.

33. Defendants AGHA HASAN ABEDI and SWALEH NAQVI would cause loans to be made from BCCI (Overseas) to the two highest ranking officers of CCAH for their purchase of CCAH shares, under the terms of these agreements:

a. The borrowers would not be held personally liable for the loans, rather the shares would be pledged to the BCCI Group and the BCCI Group would be limited to collecting against the CCAH shares pledged as collateral; and

b. The BCCI Group would agree to find a buyer for the CCAH shares at a "mutually agreeable price";

c. The loan and share agreements were structured such that the BCCI Group's promises to hold the borrowers harmless on the loans and to find a buyer for the CCAH stock at a "mutually agreeable price" were in separate documents -- "side agreements"

-- from the loan agreements and the pledge agreements.

34. Less than 18 months after the aforementioned loans from BCCI (Overseas) to the two CCAH officers, Defendant SWALEH NAQVI would cause the sale and transfer of the borrowers' CCAH shares at a price resulting in a profit of millions of dollars to the borrowers.

35. Defendant GHAITH R. PHARAON, the owner of approximately 25 percent of the stock of CenTrust, would use his relationship with the BCCI Group and Defendant SWALEH NAQVI to arrange for a branch of the BCCI Group to purchase approximately $25,000,000 of the total $150,000,000 CenTrust subordinated debentures in order to mislead and deceive regulators and investors as to the true market for the CenTrust subordinated debentures.

36. Defendant GHAITH R. PHARAON would agree with the BCCI Group and Defendant SWALEH NAQVI that the BCCI Group would purchase the CenTrust subordinated debentures and that Defendant GHAITH R. PHARAON would guarantee the repurchase of the subordinated debentures at BCCI's acquisition cost, thereby eliminating market risk to BCCI and knowingly facilitating the deception of other investors as to the true market for the CenTrust subordinated debentures.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed, in the District of Columbia and elsewhere, the following overt acts, among others:

Overt Acts Relating to NBG

Initial Acquisition

1. On or about October or November 1977, in New York, New York, AGHA HASAN ABEDI met with a shareholder of the National Bank of Georgia concerning possible United States investments in financial institutions.

2. On or about November 1977, in Washington, D.C., AGHA HASAN ABEDI, SWALEH NAQVI, and a representative of GHAITH R. PHARAON met concerning potential bank purchases, including National Bank of Georgia.

3. On or about December 27, 1977, at an unknown location, GHAITH R. PHARAON signed an agreement with a shareholder of the National Bank of Georgia to purchase the shareholder's shares ("Agreement No. 1").

4. On or about December 27, 1977, at an unknown location, GHAITH R. PHARAON signed an agreement with certain shareholders of the National Bank of Georgia to purchase certain shares of NBG stock (the "SPS Agreement").

5. On or about January 5, 1978, in Hong Kong, an affiliate of the BCCI Group provided GHAITH R. PHARAON with approximately $2,438,120 for the purchase of certain NBG shares under Agreement No. 1.

6. On or about May 18, 1978, in Saudi Arabia, GHAITH R. PHARAON sent a telex to London, England, which requested his brother to contact AGHA HASAN ABEDI or SWALEH NAQVI to send $10.25 million to an account under the control of GHAITH R.

PHARAON in Houston, Texas, of which $6 million was to be used to purchase NBG shares.

7. On or about May 18, 1978, in London, England, an employee of the BCCI Group prepared an internal memorandum instructing $10.25 million be transferred from BCCI (Overseas) Grand Cayman branch, to an account in the name of Arabian Service Corporation, Redec Escrow Account No. 10060635 at First City National Bank in Houston, Texas.

8. On or about May 22, 1978, the BCCI Group transferred by wire $10.25 million from BCCI (Overseas), Grand Cayman branch, to an account under the control of GHAITH R. PHARAON at First City National Bank in Houston, Texas.

9. On or about May 30, 1978, at an unknown location, the attorney-in-fact for GHAITH R. PHARAON signed a Form F-11 filed with the OCC, which stated in part the source of the funds to be used to purchase certain shares under the SPS Agreement was to be "Pharaon's own personal funds unless Pharaon arranges financing for a portion of the purchase price" and that "[n]o such financing arrangements have yet been made."

10. On or about June 7, 1978, at an unknown location, the attorney-in-fact for GHAITH R. PHARAON signed a Form F-11 filed with the OCC, which stated in part that the source of the funds to be used by GHAITH R. PHARAON to purchase certain shares, both under Agreement No. 1 and the SPS Agreement, was "Pharaon's own personal funds unless Pharaon arranges financing for a portion of the purchase price" and "[n]o such financing arrangements have

yet been made."

11. On or about June 30, 1983, the BCCI Group caused a $5,000,000 capital contribution to NBG Financial Corporation.

12. On or about July 7, 1983, an employee of the BCCI Group confirmed to a representative of GHAITH R. PHARAON that GHAITH R. PHARAON was liable for only 50% of the June 30, 1983 capital contribution described in Overt Act No. 11.

Sham $10 Million Transaction

13. Beginning on or about September 1980 and continuing through on or about December 1983, GHAITH R. PHARAON, through entities under his control, sought to and did acquire Georgia banks, including First Bank & Trust Company, Clayton County Bank and First Commercial Bank of Buford.

14. On or before September 23, 1980, GHAITH R. PHARAON contacted SWALEH NAQVI to discuss the acquisition of the banks.

15. On or before February 15, 1982, in response to the Federal Reserve Bank of Atlanta's requirement of an additional capital contribution to GRP, Inc. prior to approval of the acquisition of the smaller banks, an attorney for GRP, Inc. and NBG represented that an additional $10,000,000 capital contribution would be made by GHAITH R. PHARAON.

16. On or about March 9, 1982, an employee of the National Bank of Georgia requested another employee of the National Bank of Georgia to have $10,000,000 wire transferred from the BCCI Group to GRP, Inc.'s account at the First National Bank of Boston, said transaction to occur on April 26, 1982.

17. On or about April 23, 1982, in Atlanta, Georgia, the second of the employees mentioned in Overt Act No. 16, with the help and assistance of two other National Bank of Georgia employees, sent a telex to SWALEH NAQVI in Karachi, Pakistan, which set forth certain financial data concerning bank acquisitions and requested funds be sent to an account under the control of GHAITH R. PHARAON so that said funds could be used to bolster NBG's assets, with a promise to return the funds five (5) days after the transaction.

18. On or about April 29, 1982, the BCCI Group caused $10,000,000 to wired into GRP Inc.'s account at First National Bank of Boston, and subsequently wired to GRP, Inc.'s account at the National Bank of Georgia.

19. On or about May 6, 1982, an employee of the National Bank of Georgia caused $10,000,000 to be wired from NBG in Atlanta, Georgia, through Bank of America International in New York City, to the BCCI Group in London, England.

Stock Pledges by Pharaon to the BCCI Group

20. In or before May 1980, GHAITH R. PHARAON directed an employee in Houston, Texas to forward NBG shares to an affiliate of the BCCI Group in Geneva, Switzerland.

21. Beginning on or before May 23, 1980, the shares were forwarded to an affiliate of the BCCI Group on the instructions of GHAITH R. PHARAON, with the receipt of such shares being reported to SWALEH NAQVI.

22. On or about January 1, 1985, GHAITH R. PHARAON executed

a Memorandum of Deposit of Stocks and Shares and other Marketable Securities under which GHAITH R. PHARAON pledged all outstanding shares of NBG Financial Corporation to the BCCI Group, which document, among its terms, granted the BCCI Group the right to:

> "exercise at its discretion (in the name of the Depositor or otherwise at any time whether before or after any demand for payment hereunder and without any further consent or authority on the part of the Depositor) in respect of the Securities or any of them any voting rights as if BCC or its nominees were a sole beneficial owner thereof."

23. On or about January 1, 1985, GHAITH R. PHARAON executed certain documents relating to the transfer of stock of the holding company for NBG.

Personnel Matters

24. In or about 1979, AGHA HASAN ABEDI met with GHAITH R. PHARAON and others in London, England to introduce and recommend a new Chief Executive Officer for NBG, said person having been previously associated with BCCI.

25. On or about January 1980, the person recommended by AGHA HASAN ABEDI was hired as Chief Executive Officer of NBG (Employee No. 1).

26. On or about October 15, 1982, Employee No. 1 authorized a $1,500 housing differential for another former employee of the BCCI Group, then employed by NBG (Employee No. 2) to "offset the expenses incurred for housing because of [his] being required by

the Bank of Credit and Commerce International S.A. to relocate to Atlanta."

27. On or about October 15, 1982, Employee No. 1 authorized a $500 housing differential for another former employee of the BCCI Group, then employed by NBG (Employee No. 3) to "offset the expenses incurred for housing because of [his] being required by the Bank of Credit and Commerce International S.A. to relocate to Atlanta."

28. On or about October 15, 1982, Employee No. 1 authorized a $500 housing differential for another former employee of the BCCI Group, then employed by NBG (Employee No. 4) to "offset the expenses incurred for housing because of [his] being required by the Bank of Credit and Commerce International S.A. to relocate to Atlanta."

29. On or about September 20, 1985, Employee No. 2 authorized a $1,000 increase, retroactive to January 1985, for Employee No. 4 to bring his salary in line with BCCI compensation policy.

Americas Coordinating Committee

30. On or about April, 1985, the BCCI Group formed a group to monitor the BCCI Group's United States and Latin American operations, denominated the "Americas Coordinating Committee."

31. On or about April 24, 1985, in New York, New York, officers of the BCCI Group held a meeting of the Americas Coordinating Committee, which included among its attendees Employee No. 2 from the National Bank of Georgia.

32. On or about June 2, 1985, at the BCCI Regional Caribbean offices in Miami, Florida, officers of the BCCI Group held a meeting of the Americas Coordinating Committee, which included among its attendees Employee No. 2 from the National Bank of Georgia.

33. On or about July 22, 1985, in New York City, New York, employees of the BCCI Group held a meeting of the Americas Coordinating Committee, which included among its attendees Employee No. 2 from the National Bank of Georgia.

Overt Acts In Connection of Sale of NBG to CCAH

34. On or about September 19, 1986, Defendant SWALEH NAQVI met with a National Bank of Georgia employee in London concerning the sale of NBG to CCAH.

35. On or about December 18, 1986, in Washington, D.C., documents in the nature of an "Option Agreement" were signed under which CCAH was to pay Defendant GHAITH R. PHARAON approximately $80 million for an option to purchase NBG.

36. On or about August 19, 1987, in New York, New York, documents were signed completing the transfer of NBG to CCAH for the balance of approximately $140 million plus interest.

Overt Acts Relating to CCAH

37. Between on or about 1982 through 1988, Defendants AGHA HASAN ABEDI and SWALEH NAQVI did cause to be created and signed documents in the nature of loan and pledge agreements related to the purchase of CCAH stock.

38. On or about a date after July 25, 1986, an employee of

the BCCI Group signed documents relating to: (1) loans from BCCI (Overseas) to two members of CCAH management for the borrowers' purchase of CCAH shares at approximately $2,200 per share; (2) the borrowers' pledging the CCAH shares to BCCI (Overseas) as security for the loan; and (3) side agreements, which, among other terms, stated that the borrowers would not be held personally liable on their loans and that BCCI would agree to find a buyer for the shares at a "mutually agreeable price".

39. On or about August 14, 1987, an employee of the BCCI Group signed a set of documents, similar to those described in Overt Act No. 38 above, relating to additional loans by BCCI (Overseas) for the purchase by the borrowers of shares of CCAH and the sale of said CCAH shares;

40. On or about March 31, 1988, one of the borrowers sold 3,200 shares of CCAH stock and the other sold 1600 shares of CCAH stock for $6,800 per share in a transaction arranged by defendant SWALEH NAQVI resulting in a profit of several million dollars to the two borrowers.

Overt Acts Relating to Independence Bank

41. On or about January 27, 1984, in Los Angeles, California, Defendant AGHA HASAN ABEDI had a conversation with an employee of the BCCI Group working in California, concerning the purchase by the BCCI Group of a bank on the west coast of the United States.

42. On or about August 28, 1984, in California, the employee referred to in Overt Act No. 41 had a conversation with

the then-Chairman of Independence, Encino, California concerning the fact that Independence was for sale.

43. On or about November 13, 1984, the employee referred to in Overt Act No. 41 wrote letters to Defendants AGHA HASAN ABEDI and SWALEH NAQVI, in each of which he discussed the acquisition by BCCI of Independence.

44. In or about November 1984, Defendant AGHA HASAN ABEDI had a telephone conversation with the employee referred to in Overt Act No. 41 in California, in which it was discussed that Defendant GHAITH R. PHARAON was interested in purchasing Independence himself.

45. On or about November 30, 1984, the employee of the BCCI Group referred to in Overt Act No. 41 signed a "letter of intent," confirming the willingness of a then-unnamed principal to purchase all of the capital stock of Independence.

46. Between in or about December 1984 and January 1985, Defendant GHAITH R. PHARAON in his personal capacity and Defendant SWALEH NAQVI on behalf of the BCCI Group signed an Investment Advisory Agreement.

47. Between in or about November of 1984 and April of 1985, representatives, agents and/or employees of the BCCI Group had conversations with the then owners of Independence concerning the purchase of Independence.

48. In or about April 1985, an employee of the BCCI Group had conversations with employees of the First National Bank of Boston ("Bank of Boston") concerning obtaining financing for

Defendant GHAITH R. PHARAON to be used for a portion of the purchase price for Independence Bank.

49. On or about April 30, 1985, Defendant GHAITH R. PHARAON signed a stock purchase agreement with the then owners of Independence, pursuant to which Defendant GHAITH R. PHARAON agreed to purchase all of the capital stock of Independence Bank for $23,000,000.00.

50. On or about May 17, 1985, Defendant GHAITH R. PHARAON signed a memorandum agreement with Defendant ICIC Overseas, which agreement provided, among other things, that:

a. Pharaon and ICIC have agreed to acquire 100% of Independence from the present shareholders;

b. all shares would be held in the name of Pharaon but only 15% were to be held by Pharaon as the beneficial owner; and

c. Pharaon was to hold the remaining 85% of the shares in a fiduciary capacity for ICIC.

51. On or about May 17, 1985, Defendant SWALEH NAQVI signed the memorandum agreement referred to in Overt Act No. 50 on behalf of Defendant ICIC Overseas.

52. On or about June 10, 1985, Defendant GHAITH R. PHARAON signed a document entitled "Notice of Acquisition of Control" which was filed with the FDIC and the California State Department of Banking, which called for the following information in question number 3:

"Indicate the full name of each acquiring party or transferee, the total number of shares presently held by each, the total number of shares to be purchased or

transferred to each and the total number of shares to be held by each following completion of the proposed transaction. Indicate names of beneficial owners if shares are to be registered in another name."

the response to which disclosed the only purchaser to be Defendant GHAITH R. PHARAON.

53. On or about June 11, 1985, in Los Angeles, California, Defendant GHAITH R. PHARAON met with members of the California State Banking Department, in the course of which meeting Defendant GHAITH R. PHARAON failed to disclose the existence of the agreement between Defendant ICIC Overseas and Defendant GHAITH R. PHARAON which was executed on or about May 17, 1985 and which is referred to in Overt Act No. 50.

54. On or about August 30, 1985, an employee of the BCCI Group had a conversation with another employee of the BCCI Group in which the first of these employees requested a loan be made by the BCCI Group to Defendant GHAITH R. PHARAON for purposes of acquiring Independence.

55. On or about August 30, 1985, an employee of the BCCI Group sent a telex which confirmed that the deposit of $8.5 million of Defendant GHAITH R. PHARAON will be held in an account at Banque Arabe et Internationale D'Investissement (BAII), Paris, France.

56. On or about August 29, 1985, an employee of the BCCI Group sent a telex to BAII which instructed BAII to confirm to the FDIC and the California State Banking Department, care of

Defendant GHAITH R. PHARAON's attorney, that Defendant GHAITH R. PHARAON had in excess of $8.4 million on deposit with BAII, which funds were to be used by Defendant GHAITH R. PHARAON towards the purchase of Independence.

57. On or about September 4, 1985, BAII confirmed by telex to the California State Banking Department, care of Defendant GHAITH R. PHARAON's attorney, that it held in excess of $8.4 million on deposit for Defendant GHAITH R. PHARAON, which funds were to be used by Defendant GHAITH R. PHARAON towards the purchase of Independence.

58. On or about September 5, 1985, Defendant GHAITH R. PHARAON caused to be delivered to the California State Banking Department a letter. This letter stated that enclosed was a: "Telex dated September 4, 1985 also from BAII confirming that Pharaon has available in excess of $8.4 million on deposit for the portion of the purchase price not being financed."

59. In or about August 1985, employees of the BCCI Group had conversations with representatives of BAII concerning the issuance by BAII of a letter of credit to the Bank of Boston in the amount of $5 million.

60. On or about August 29, 1985, an employee of the BCCI Group sent a telex to BAII instructing BAII to confirm by telex to the FDIC and the California State Banking Department, care of Defendant GHAITH R. PHARAON's attorney, that BAII had agreed to issue a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston as security for the Bank of Boston's

loan to Defendant GHAITH R. PHARAON to purchase Independence.

61. On or about August 30, 1985, BAII sent a telex to the California State Banking Department and the FDIC, in care of Defendant GHAITH R. PHARAON's attorney, concerning the issuance by BAII of a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston as security for the Bank of Boston loan to Defendant GHAITH R. PHARAON to purchase Independence.

62. On or about September 5, 1985, Defendant GHAITH R. PHARAON caused his attorney to deliver a letter to the California State Banking Department confirming the availability of the $5 million letter of credit to be issued by BAII.

63. On or about September 30, 1985, Defendant GHAITH R. PHARAON signed an "Acquisition Promissory Note" for $12.6 million with the Bank of Boston.

64. On or about October 1, 1985, BAII issued a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston, which letter of credit secured the Bank of Boston loan to Defendant GHAITH R. PHARAON.

65. On or about October 1, 1985, the BCCI Group issued a $5 million counter-guarantee to BAII.

66. On or about October 1, 1985, agents of the BCCI Group, and Defendant GHAITH R. PHARAON caused the Bank of Boston to take acts affecting the distribution of funds completing the sale of all the capital stock of Independence Bank to Defendant GHAITH R. PHARAON.

67. On or about October 1, 1985, Defendant GHAITH R. PHARAON appointed the first of the employees of the BCCI Group referred to in Overt Act No. 54 as a Director of Independence.

68. From in or about March 1986 to in or about January 1989, Defendants AGHA HASAN ABEDI and SWALEH NAQVI met with and corresponded with the Chief Executive Officer of Independence on numerous occasions regarding personnel and operational matters involving Independence.

69. On or about June 25, 1986, in Paris, France, Defendant GHAITH R. PHARAON wrote a letter to Defendant SWALEH NAQVI which stated in pertinent part:

"According to [the Chief Executive Officer of Independence], and even if I established a holding co. for the purpose of sheltering some of the bank's income it is unlikely that under the present capital structure the bank would greatly grow without any additional capital. In the present circumstances, and until I have worked out some kind of re-scheduling with the Redec banks, I may face some difficulties in arranging independent facilities for Independence Bk for additional capital.

"Therefore I would suggest that for the time being the 15/85 arrangement be maintained until we can determine the course we want Independence to take, and the degree of capital that needs to be made available, if we want the bank to grow, as well as the return on

this capital, when compared to other investment opportunities.

"If after meeting with [the Chief Executive Officer of Independence] you are convinced that additional capital is required and the returns on such capital are attractive, I would be prepared to meet with you and modify the 15/85 arrangement in accordance with my earlier discussion with you and Mr. Abedi. Should this be the course to be followed it may also be necessary to have more support from BCCI in terms of management support, and international contacts."

70. On or about July 3, 1986, Defendant SWALEH NAQVI directed agents of the BCCI Group to cause BCCI Overseas (Panama) to make a loan in the amount of $12,631,000 to Defendant GHAITH R. PHARAON, which proceeds were used to repay the Bank of Boston loan to Defendant GHAITH R. PHARAON referred to in Overt Act No. 66.

71. In or about July of 1987, in London, England, Defendants AGHA HASAN ABEDI and SWALEH NAQVI met with an individual concerning prospective employment with Independence.

72. On or about December 29, 1987, Defendant SWALEH NAQVI directed an employee of the BCCI Group to cause BCCI Overseas (Grand Cayman) to advance $3,500,000 to Independence.

73. On or about May 17, 1988, an employee of the BCCI Group caused a branch of the BCCI Group in Bahrain to advance $4,000,000 to Defendant GHAITH R. PHARAON, which proceeds were

added to the capital account of Independence.

74. On or about August 7, 1989, an employee of the BCCI Group caused a branch of the BCCI Group in Bahrain to advance $10,000,000 to Defendant GHAITH R. PHARAON, which proceeds were used to repay a BAII loan dated on or about July 5, 1989, in the amount of $10,000,000 to Defendant GHAITH R. PHARAON.

Overt Acts Relating to CenTrust Savings Bank

Application to FHLBB for Sale of Subordinated Debentures

75. On or about April 12, 1988, Defendant GHAITH R. PHARAON and another person caused to be filed a document titled "Amendment No. 1 To FORM OC" with the FHLBB.

76. Between on or about April 1, 1988, and on or about May 19, 1988, throughout the United States, Defendant GHAITH R. PHARAON and another person and various other employees and agents of CenTrust, together with underwriters, Merrill Lynch Capital Markets and Drexel Burnham Lambert, distributed a preliminary prospectus and conducted marketing seminars relating to the sale of CenTrust's subordinated debentures.

77. On or about May 16, 1988, Defendant GHAITH R. PHARAON and another person caused to be filed a document bearing the title "Amendment 3 to FORM OC" with the FHLBB.

78. On or about May 19, 1988, Defendant GHAITH R. PHARAON and another person caused to be filed with the FHLBB a document bearing the title "Amendment 4 to FORM OC."

79. On or about May 19, 1988, in Washington D.C., Defendant GHAITH R. PHARAON and another person caused to be filed with the

FHLBB a document bearing the title "OFFERING CIRCULAR" relating to subordinated debentures to be issued by CenTrust.

Contacts with United States Regulators

80. On or about May 3, 1988, Defendant GHAITH R. PHARAON caused a letter to be delivered to the FHLBB in Washington D.C., which stated in pertinent part that the "subordinated debt issue would add $200 million of additional regulatory capital and thus, additional protection for the FSLIC insurance fund."

81. On or about May 3, 1988, Defendant GHAITH R. PHARAON communicated by telephone from in or near Savannah, Georgia, with a FHLBB employee in Washington, D.C., concerning the CenTrust subordinated debt issue.

82. In or about May of 1988, in Washington D.C., Defendant GHAITH R. PHARAON and another person met with employees of the FHLBB concerning the issuance by CenTrust of subordinated debentures.

Sale of Subordinated Debentures to Institutional Investors

83. On or about May 24, 1988, Defendant GHAITH R. PHARAON and others caused to be transmitted by wire approximately $2,500,000 from Safeco Insurance Co., Seattle, Washington, to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

84. On or about May 25, 1988, Defendant GHAITH R. PHARAON and others caused to be transmitted by wire approximately $3,000,000 from Washington Mutual Savings and Loan Association, Seattle, Washington to a firm in New York, New York, for the

purchase of CenTrust subordinated debentures.

Sale to BCCI and Repurchase of CenTrust Subordinated Debentures

85. On or about May 23, 1988, in Savannah, Georgia, Defendant GHAITH R. PHARAON caused a telex to be sent from Interedec, a company controlled by Defendant GHAITH R. PHARAON, to London, England, related to the purchase of the CenTrust subordinated debentures in which it was indicated that the beneficiary of the $25 million of the CenTrust subordinated debentures "will be BCC in Paris."

86. On or about May 24, 1988, in New York, New York and Paris, France, Defendants SWALEH NAQVI and GHAITH R. PHARAON and the BCCI Defendants caused BCCI Overseas (Paris), a branch of the BCCI Group, to purchase approximately $25,000,000 of CenTrust subordinated debentures.

87. On or about June 24, 1988, Defendants GHAITH R. PHARAON and SWALEH NAQVI caused to be mailed from New York, New York, to London, England, three CenTrust subordinated debenture registered certificates, labelled RU 10, RU 11 and RU 12, in the name of BCCI Paris, totalling $25,000,000.

88. On or about July 15, 1988, Defendant GHAITH R. PHARAON caused to be mailed a letter from an employee of Interedec, located in Georgia, to an employee of CenTrust in Florida, concerning the purchase by CenTrust of the subordinated debentures previously purchased by BCCI Overseas (Paris), a branch of the BCCI Group, in which it was stated:

"[The Chairman of the Board of CenTrust] had asked me

to provide relevant details to you in order for Centrust to repurchase the USD 25 million Debentures from BCCI Paris on 27th July 1988 together with interest accrued up to 27th July 1988."

89. On or about July 25, 1988, defendant GHAITH R. PHARAON caused to be delivered a letter from London, England, to Richmond Hill, Georgia, which transferred the CenTrust debentures referred to in Overt Act No. 87.

90. On or about July 27, 1988, the Defendant GHAITH R. PHARAON and another caused CenTrust to transmit by wire approximately $25,000,000 to Security Pacific International Bank in New York, New York, related to the purchase by CenTrust of the subordinated debentures previously purchased by BCCI Paris.

91. Between on or about July 1, 1988, and March 1, 1989, on several occasions, in Atlanta, Georgia, Defendant GHAITH R. PHARAON and another caused false and fraudulent statements to be made to federal banking regulators concerning the actual level of regulatory capital of CenTrust.

(Title 18, United States Code, Section 371)

COUNT TWO

1. The allegations contained in paragraphs 3, 4, 14, and 15 through 25, inclusive, of COUNT ONE of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. From in or about January 1988 to in or about July 1988, Defendants

AGHA HASAN ABEDI,

SWALEH NAQVI, and

GHAITH R. PHARAON

and others, devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises;

3. It was part of said scheme that:

a) Defendant GHAITH R. PHARAON and another would seek to sell CenTrust subordinated debentures to investors;

b) Defendant GHAITH R. PHARAON, who owned approximately 25 percent of the stock of CenTrust, would use his relationship with the BCCI Group and Defendant SWALEH NAQVI to arrange for a branch of the BCCI Group to purchase $25,000,000 of the CenTrust subordinated debentures in order to deceive other investors as to the true market for the CenTrust subordinated debentures;

c) Defendant GHAITH R. PHARAON and another would agree with the BCCI Group and Defendant SWALEH NAQVI that CenTrust would repurchase any CenTrust subordinated debentures purchased

by the BCCI Group;

d) Defendant SWALEH NAQVI would direct and approve the purchase by BCCI (Overseas) Paris, of approximately $25,000,000 of CenTrust subordinated debentures;

e) Defendant GHAITH R. PHARAON and another would cause CenTrust Trust to repurchase said subordinated debentures from BCCI (Overseas) Paris, after approximately eight weeks, thus making the BCCI Group whole and completing the deception of other investors as to the true market for the CenTrust subordinated debentures;

f) Defendant GHAITH R. PHARAON and another would cause material misrepresentations and omissions to be made to investors.

4. On or about May 3, 1988, in the District of the Columbia and elsewhere, Defendants GHAITH R. PHARAON, SWALEH NAQVI, and AGHA HASAN ABEDI, aided and abetted by one another and the BCCI Group, for the purpose of executing the aforesaid scheme and artifice and attempting to do so, knowingly and willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds to wit: a communication by telephone between the Defendant GHAITH R. PHARAON in Savannah, Georgia and an employee of the FHLBB in Washington, D.C.

(Title 18, United States Code, Sections 1343 and 2)

COUNT THREE

Introduction

1. The allegations in Paragraphs 1 through 25 of COUNT ONE of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein.

The Enterprise

2. At all times material to this Indictment, the BCCI Group, International Credit and Investment Company (Overseas), Limited ("ICIC Overseas"), AGHA HASAN ABEDI, SWALEH NAQVI, GHAITH R. PHARAON, and others known and unknown to the Grand Jury, constituted an "enterprise" as defined in Title 18, United States Code, Section 1961(4), that is, a group of organizations and individuals associated in fact.

3. At all times material to this Indictment, this enterprise was engaged in, and its activities affected, interstate and foreign commerce.

The Racketeering Conspiracy

4. From in or about January of 1978, to in or about July of 1991, in the District of Columbia and elsewhere, Defendants

AGHA HASAN ABEDI,

SWALEH NAQVI, and

GHAITH R. PHARAON

along with others known and unknown to the Grand Jury, being persons employed by and associated with the enterprise described in paragraph two of this Count, which enterprise was engaged in and the activities of which affected interstate and foreign

commerce, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other, and with persons known and unknown to the Grand Jury, to commit an offense against the United States, to wit: to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity.

5. It was part of the conspiracy that the Defendants and their co-conspirators would and did commit acts of racketeering activity as set forth below in paragraph 16 of this Count.

It was further part of the conspiracy that:

6. Defendants would enrich Defendants AGHA HASAN ABEDI, SWALEH NAQVI, GHAITH R. PHARAON, their associates, and the BCCI Group by taking advantage of opportunities to deceive and exploit United States financial institutions, deceive United States Federal regulatory agencies, and deceive persons and entities throughout the United States.

7. Defendants AGHA HASAN ABEDI, SWALEH NAQVI, their co-conspirators and the BCCI Group would acquire and maintain control and influence over National Bank of Georgia and Independence with the aid of GHAITH R. PHARAON, through deceptive stock purchases by way of hidden stock pledges, nominee agreements, nonrecourse loans, loan releases, beneficial interest agreements and outright falsehoods, fabrications and omissions in applications and reports filed with state and federal regulatory agencies.

8. Defendants AGHA HASAN ABEDI, SWALEH NAQVI their co-conspirators and the BCCI Group would acquire and maintain control and influence over CCAH, through deceptive stock purchases by way of hidden stock pledges, nominee agreements, nonrecourse loans, loan releases, beneficial interest agreements and outright falsehoods, fabrications and omissions in applications and reports filed with state and federal regulatory agencies.

9. Defendants AGHA HASAN ABEDI, SWALEH NAQVI their co-conspirators and the BCCI Group would use ICIC Overseas to facilitate deception of the Board, OCC, FDIC, FSLIC and FHLBB concerning the involvement of the BCCI Group, AGHA HASAN ABEDI, SWALEH NAQVI and GHAITH R. PHARAON in matters involving NBG, Independence and CCAH.

10. Defendant SWALEH NAQVI and his co-conspirators would deceive and cause the deception of regulators as to the amount of regulatory capital on the books of the National Bank of Georgia by engaging in a sham transaction which created the appearance of a $10 million capital infusion, when in truth and in fact, as the Defendants well knew, no capital infusion was made, said sham transactions occurring so that the National Bank of Georgia would obtain regulatory approval to purchase other banks.

11. When Defendant GHAITH R. PHARAON was in financial difficulty, in order to keep NBG assets under the control and influence of the BCCI Group, Defendants AGHA HASAN ABEDI and SWALEH NAQVI caused NBG to be sold to CCAH:

a) by participating in negotiations in which the sale price was negotiated;

b) by setting up real and sham "loans" to CCAH shareholders, amounting to approximately $220 million, for the purchase of additional CCAH stock, thus providing CCAH capital to purchase NBG.

12. Defendants AGHA HASAN ABEDI and SWALEH NAQVI would cause loans to be made from BCCI (Overseas) to the two highest ranking officers of CCAH for their purchase of CCAH shares, under the terms of these agreements:

1) The borrowers would not be held personally liable for the loans, rather the shares would be pledged to the BCCI Group and the BCCI Group would be limited to collecting against the CCAH shares pledged as collateral; and

2) The BCCI Group would agree to find a buyer for the CCAH shares at a "mutually agreeable price";

3) The loan and share agreements were structured such that the BCCI Group's promises to hold the borrowers harmless on the loans and to find a buyer for the CCAH stock at a "mutually agreeable price" were in separate documents -- "side agreements" -- from the loan agreements and the pledge agreements.

13. Less than 18 months after the aforementioned loans from BCCI (Overseas) to the two CCAH officers, Defendant SWALEH NAQVI would cause the sale and transfer of the borrowers' CCAH shares at a price resulting in a profit of millions of dollars to the borrowers.

14. Defendant GHAITH R. PHARAON, the owner of approximately 25 percent of the stock of CenTrust, would use his relationship with the BCCI Group and Defendant SWALEH NAQVI to arrange for a branch of the BCCI Group to purchase approximately $25,000,000 of the total $150,000,000 CenTrust subordinated debentures in order to mislead and deceive regulators and investors as to the true market for the CenTrust subordinated debentures.

15. Defendant GHAITH R. PHARAON would agree with the BCCI Group and Defendant SWALEH NAQVI that the BCCI Group would purchase the CenTrust subordinated debentures and that Defendant GHAITH R. PHARAON would guarantee the repurchase of the subordinated debentures at BCCI's acquisition cost, thereby eliminating market risk to BCCI and knowingly facilitating the deception of other investors as to the true market for the CenTrust subordinated debentures.

The Pattern of Racketeering Activity

16. It was a further part of the conspiracy that each defendant agreed that they and their co-conspirators would commit two or more of the acts of racketeering set forth below in the conduct of the affairs of the enterprise involving the unlawful control, operation, and manipulation of United States financial institutions and fraud against United States Federal bank regulatory agencies, and fraud against the investing public, constituting violations of Title 18, United States Code, Sections 1341, 1343 and 1344.

RACKETEERING ACT ONE

Wire Fraud Related to Independence Bank

17. Between on or about January 1, 1984, and December of 1989, Defendants AGHA HASAN ABEDI, SWALEH NAQVI, and GHAITH R. PHARAON, along with the BCCI Group and ICIC Overseas, devised and intended to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, for deposits of Independence, by means of fraudulent and false pretenses, representations and promises;

18. It was part of said scheme and artifice that on or about May 17, 1985, Defendant GHAITH R. PHARAON and Defendant SWALEH NAQVI, acting in the name of ICIC Overseas, did enter into a secret agreement whereby 85% of the shares of the stock of Independence, with the attendant voting rights, purportedly to be purchased in their entirety by Defendant GHAITH R. PHARAON, were instead pledged to ICIC Overseas; it was further part of said scheme that Defendant GHAITH R. PHARAON did conceal and cause to be concealed this material fact from the FDIC and other regulators through fraudulent conduct and deceit; it was further part of the scheme that the BCCI Group exercised influence and control over the affairs of Independence Bank;

19. On or about the dates set forth below, the above Defendants transmitted and caused to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures,

and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343:

Act	Date	From	To	Nature of Wire
a)	8/30/85	Banque Arabe et Internationale d'Investissement ("BAII") Paris, France	Morrison and Foerster Los Angeles, CA	Telex
b)	9/4/85	Banque Arabe et Internationale d'Investissement ("BAII") Paris, France	Morrison and Foerster Los Angeles, CA	Telex
c1)	10/1/85	First National Bank of Boston (hereinafter "Bank of Boston") Boston, MA	Citibank New York, NY	Wire Transfer $3,066,228.33
c2)	10/1/85	Bank of Boston Boston, MA	Citibank New York, NY	Wire Transfer $1,113,771,67
c3)	10/1/85	Bank of Boston Boston, MA	First Wisconsin International Bank New York, NY	Wire Transfer $3,840,000.00
c4)	10/1/85	Bank of Boston Boston, MA	Crocker Bank International New York, NY	Wire Transfer $3,840,000
c5)	10/1/85	Bank of Boston Boston, MA	Irving Trust New York, NY	Wire Transfer $535,040.00
c6)	10/1/85	Bank of Boston Boston, MA	Barclays Bank New York, NY	Wire Transfer $4,584,960.00
c7)	10/1/85	Bank of Boston Boston, MA	First American Bank New York, NY	Wire Transfer $478,000.00
c8)	10/1/85	Bank of Boston Boston, MA	First American Bank New York, NY	Wire Transfer $3,022,000.00

d)	10/1/85	BCCI London, England	Amer Lodhi c/o Morrison and Foerster Los Angeles, CA	Telex
e)	10/2/85	Morgan Guaranty New York, NY	Bank of Boston Boston, MA	Wire Transfer $7,900,000
f)	4/2/88	Independence Bank Encino, CA	Ghaith Pharaon Georgia	Telex
g)	5/17/88	BankAmerica International New York, NY	Independence Bank Encino, CA	Wire Transfer $4,000,000

(Title 18, United States Code, Sections 1343 and 2)

RACKETEERING ACT TWO

Mail Fraud in Connection
with the National Bank of Georgia

20. Between on or about January 1, 1978, and December of 1987, Defendants AGHA HASAN ABEDI, SWALEH NAQVI, and GHAITH R. PHARAON, and others including the BCCI Group, devised and intended to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, for deposits of the National Bank of Georgia, by means of fraudulent and false pretenses, representations and promises;

21. It was part of said scheme and artifice that on or before January 1, 1985, GHAITH R. PHARAON and the BCCI Group entered into an arrangement kept secret from the regulators whereby the BCCI Group obtained 50% ownership of the National Bank of Georgia; it was further part of said scheme that GHAITH R. PHARAON did conceal and cause to be

concealed this material fact from the OCC, the FDIC and other regulators through fraudulent conduct and deceit; it was further part of the scheme that the BCCI Group exercised influence and control over the affairs of the National Bank of Georgia.

22. On or about the dates set forth below, the above Defendants, and for the purpose of executing and attempting to execute the scheme and artifice, knowingly did cause to be delivered by the United States Postal Service various mail matter:

Act	Date of Mailing	From	To	Description
a)	5/30/78	[unknown]	NBG Shareholders in Alabama and elsewhere throughout the United States	Offer to Purchase NBG Stock
b)	6/7/78	Houston, TX	Office of the Comptroller of the Currency, Washington, D.C.	Form F-11
c)	1/30/80	Houston, TX	NBG Shareholders in Georgia and elsewhere throughout the United States	Offer to Purchase NBG Stock
d)	12/21/81	Atlanta, GA	William Floyd, Esq., Atlanta, GA	Letter
e)	2/27/82	Atlanta, GA	Federal Reserve Bank, Atlanta, GA	Letter

f)	5/3/82	Atlanta, GA	Federal Reserve Bank, Atlanta, GA	Letter
g)	5/20/82	Atlanta, GA	NBG Shareholders located in Georgia and through the United States	Notice of Approval of Plan of Acquisition and Agreement of Merger

(Title 18, United States Code, Sections 1341 and 2)

RACKETEERING ACT THREE

Wire Fraud in Connection with Purchases of CCAH Stock

23. On or about between January of 1983 and December of 1989, the Defendants AGHA HASAN ABEDI and SWALEH NAQVI and others known and unknown including the BCCI Group and ICIC Overseas, devised and intended to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, for deposits of the First American Banks, by means of fraudulent and false pretenses, representations and promises.

24. It was part of said scheme that between on or about 1983 and on or about 1989, on several occasions, the BCCI Group secretly acquired ownership of CCAH stock through various means, including, among other things, financing and directing the purchase of the stock by others, pursuant to various agreements or arrangements, such as pledge agreements, memoranda of deposits and powers of attorneys, whereby actual control of the stock would be transferred to the BCCI Group and ICIC Overseas, and the BCCI Group and ICIC Overseas would

have no recourse against the personal assets of the purported buyer, and causing said secret ownership to be concealed from the FRS.

25. For the purpose of executing said scheme, the Defendants, their coconspirators and their agents, did on several occasions, the precise dates not presently known, transmit and cause to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, to wit, wire transfers from the BCCI Group and its affiliates to financial institutions in the United States for purposes of purchasing CCAH stock.

26. For the purpose of executing said scheme, the Defendants, their co-conspirators and their agents, did on the following specific dates, transmit and cause to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for purposes of facilitating the purchase by CCAH of NBG:

Date	Wire	From	To
September 2, 1986	Telefax	NBG Atlanta, GA	Swaleh Naqvi BCCI London, UK
July 8, 1987	Telefax	Clifford & Warnke Washington, D.C.	Law Firm in Atlanta, Georgia
July 9, 1987	Telephone	Attorney Atlanta, GA	Clifford & Warnke Washington, D.C.
August 7, 1987	Telefax	Clifford & Warnke Washington, D.C.	BCCI London, UK
August 17, 1987	Telefax	BCCI London, UK	Clifford & Warnke Washington, DC

(In violation of 18 United States Code, Section 1343)

RACKETEERING ACTS FOUR THROUGH SIX

Mail Fraud and Wire Fraud in Connection with CenTrust

Racketeering Act Four

27. The allegations contained in Paragraphs 1 through 3, inclusive, of COUNT TWO are realleged and incorporated by reference as though fully set forth herein.

28. On or about May 25, 1988, Defendants AGHA HASAN ABEDI, SWALEH NAQVI and GHAITH R. PHARAON, and the BCCI Group, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, knowingly and willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds, namely, a wire transfer of approximately $3,000,000 of funds from Washington Mutual Savings and Loan Association, Seattle, Washington, to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

(Title 18, United States Code, Sections 1343 and 2)

Racketeering Act Five

29. The allegations contained in Paragraphs 1 through 3, inclusive, of COUNT TWO are realleged and incorporated by reference as though fully set forth herein.

30. On or about the dates set forth below, the above Defendants transmitted and caused to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343:

Act	Date	From	To	Nature of Wire
a)	5/3/88	GHAITH PHARAON Georgia	FHLBB Regulator Washington, D.C.	Telephone Call
b)	5/23/88	BCCI Group London, England	Interedec Savannah, GA	Telex
c)	5/24/88	Citibank New York, NY	BCCI Overseas (Paris) Paris, France	Wire Transfer approximately $25,000,000
d)	7/27/88	CenTrust Miami, FL	Security Pacific International Bank New York, NY	Wire Transfer approximately $25,000,000

(Title 18, United States Code, Sections 1343 and 2)

Racketeering Act Six

31. The allegations contained in Paragraphs 1 through 3, inclusive, of COUNT TWO are realleged and incorporated by reference as though fully set forth herein.

32. On or about May 25, 1988, in the District of the District of Columbia and elsewhere, Defendants AGHA HASAN ABEDI, SWALEH NAQVI and GHAITH R. PHARAON, and the BCCI Group, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, knowingly and willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds, to wit: wire transfer of approximately $2,500,000 of funds from Safeco Insurance Co., Seattle, Washington, and a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

debentures.

(Title 18, United States Code, Sections 1343 and 2)

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

33. In furtherance of the conspiracy, and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed, in the District of Columbia and elsewhere, the following overt acts, among others:

NATIONAL BANK OF GEORGIA

34. The allegations contained in Overt Acts paragraphs 1 through 33, inclusive, of COUNT ONE of this Indictment are realleged and incorporated by reference as if fully set forth herein.

SALE OF NATIONAL BANK OF GEORGIA TO CCAH

35. The allegations contained in Overt Acts paragraphs 34 through 36, inclusive, of COUNT ONE of this Indictment are realleged and incorporated by reference as if fully set forth herein.

ACTS RELATING TO CCAH

36. The allegations contained in Overt Acts paragraphs 37 through 40, inclusive, of COUNT ONE of this Indictment are realleged and incorporated by reference as if fully set forth herein.

ACTS RELATING TO INDEPENDENCE BANK

37. The allegations contained in Overt Acts paragraphs 41 through 74, inclusive, of COUNT ONE of this Indictment are

1325015-000-7982

realleged and incorporated by reference as if fully set forth herein.

ACTS RELATING TO CENTRUST SAVINGS BANK

38. The allegations contained in Overt Acts paragraphs 75 through 91, inclusive, of COUNT ONE of this Indictment are realleged and incorporated by reference as if fully set forth herein.

(Title 18, United States Code, Sections §1962(d) and 2)

FORFEITURE

The Grand Jury further charges:

1. The allegations contained in COUNT THREE of this Indictment are hereby realleged and incorporated by reference herein, for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 1963.

2. The Defendants AGHA HASAN ABEDI, SWALEH NAQVI, and GHAITH R. PHARAON have property constituting, and derived from, proceeds which they obtained directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, thereby making such property, or an amount of cash equivalent thereto, forfeitable to the United States of America pursuant to Title 18, United States Code, Section 1963(a)(3). Said properties consist of any and all proceeds the Defendants received as a result of the racketeering activity alleged in Racketeering Acts One through Six of Count Three.

(Title 18, United States Code, Section 1963.)

A TRUE BILL:

FOREPERSON

JAY B. STEPHENS
United States Attorney for
the District of Columbia

G. ALLEN CARVER, JR.
Principal Deputy Chief
Fraud Section
Criminal Division
United States Department
of Justice

1325015-000-7984

CLERK'S OFFICE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CO-931
New 3/78
Rev. 12/86

NOTICE OF DESIGNATION OF PENDING* RELATED CRIMINAL CASE PURSUANT TO RULE 405 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JOYCE HENS GREEN

Criminal Number: 91-655
(To be supplied by the Clerk)

NOTICE TO PROSECUTOR:

Pursuant to Rule 405(b)(1) of this Court's Rules, you should prepare this form and submit it to the Clerk's Office along with the indictments in any related cases. One copy is needed for the Clerk's records, one for the Judge to whom the case is assigned and one additional copy for each defendant. Therefore, in a one defendant case you should submit 3 copies, for a two defendant case you should submit 4 copies, etc. The Clerk will mail copies of this form to all defense counsel along with the arraignment notice.

NOTICE TO DEFENDANT:

Rule 405(b)(1) of this Court's Rules requires that any objection by the defendant to the related case designation shall be served on the U.S. Attorney and filed with the Clerk within 10 days after arraignment.

NOTICE TO ALL COUNSEL:

Rule 405(c)(2) requires, in part, that as soon as an attorney for a party becomes aware of the existence of a related case or cases, such attorney shall immediately notify in writing, the Judges on whose calendars the cases appear and shall serve such notice on counsel for all other parties.

The prosecutor will please complete the following:

1. Name of defendant: AGHA HASAN ABEDI, SWALEH NAWVI, GHAITH PHARAON

2. Number of related case: 91-0655(JHG)

3. Name of Judge assigned to related case: Joyce Hens Green

4. Name of United States Court in which the related case is pending (if other than this Court):

5. Relationship of new case to related case:

[Check appropriate box(es).]

[XX] (a) New case is superseding indictment.

[ ] (b) More than one indictment is filed or pending against defendant.

[ ] (c) Prosecution against different defendant(s) arises from:

[ ] a common wiretap

[ ] a search warrant

[ ] activities which are a part of the same alleged criminal event or transaction

SUPERSEDING

* A case is considered pending until a defendant has been sentenced.

1325015-000-7985

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 1/27/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

Due to transfers, the names of three of the co-case agents on captioned matter should now be deleted: SA [redacted] SA [redacted] and SA [redacted] Joining the remaining case agent, SA [redacted] (currently assigned to Sq. C-2), as co-case agent will be SA [redacted] (currently assigned to Sq. C-8). b6 b7C

7-WMFO
1-29B-WF-171994
1-SA [redacted] b6 b7C
1-SA
1-SSA
1-SSA
1-SSA
1-IIC

JNR:jnr
(7)

Reassign 1/27/93

2-2-93

[redacted] b6 b7C

29B-WF-171994 Main - 578

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 2 1993
FBI — WASH. FIELD OFFICE

1325015-000-7987

29B-WF-171994 Main -599

SEARCHED SU INDEXED SU
SERIALIZED SU FILED SU
FEB 2 1993
FBI — WASH. FIELD OFFICE

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, WMFO

SUBJECT:

HIDDEN INTERESTS;
MC #38
FIF; FAG
OO:WMFO

b6
b7C

Reference FD-515 dated 1/18/91

Bureau File Number
29B-WF-171994
Field Office File Number
C-5
Squad or RA Number
Agent's Social Security No.

☐ X if a joint operation with: _____ (identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 1/26/93

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 2 = Helped, but only minimally 3 = Helped, substantially 4 = Absolutely essential

1. Acctg Tech Assistance		ating	8. Eng. Sect. Tape Exams		15. Photographic Coverage		22. Telephone Toll Recs
2. Aircraft Assistance			9. Hypnosis Assistance		16. Polygraph Assistance		23. UCO Group I
3. Computer Assistance			10. Ident Div Assistance		17. Search Warran Executed		24. UCO Group II
4. Consensual Monitoring			11. Informant Information		18. Show Money Usage		25. UCO Other
5. ELSUR FISC			12. Lab Div Exams		19. Surveil Sqd (SOG) Asst		26. NCAVC/ VI-CAP
6. ELSUR Title III			13. Lab Div Field Suppor		20. SWAT Team Action		27. Visual Invest Analysis (VI
7. Eng. Sect. Field Suppo			14. Pen Registers		21. Tech. Agt. or Tech Equip		

b7E

A. Preliminary Judicial Process (Number of subjects)

Complaints	Informations	Indictments
		3

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

Subject Priority*	A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

		Government Defendant	Government Plaintiff
RICO -Civil Convictions	Civil Suits Amount of Suit	$	$
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District _____ (District / State) Conviction or Pretrial Div. Date _____ Sentence Date _____ No. of Subjects _____ Acquitted _____ Dismissed _____

Subject 1	Subject Description Code* -						Subject 2	Subject Description Code* -					
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion	Conviction: Title	Section	Counts	Combined Sentence: In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.	☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion	Conviction: Title	Section	Counts	Combined Sentence: In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.
				Total Fines $							Total Fines $		
				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.							Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
AGHA HASAN ABEDI	1/1/21	W	M	Mahmudabad, India	
		W	M	Unknown	
GHAITH RACHAD PHARAON	9/7/41	W	M	Riyadh, Saudi Arabia	

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Explanation of accomplishment claimed:

On 1/15/93, a superceding indictment was returned by the Federal Grand Jury, Washington, D.C. This superceding indictment adds additional information and details of additional criminal acts by ABEDI, [redacted], and PHARAON, in relation to The National Bank of Georgia and Credit and Commerce American Holdings as previously charged in a four (4) count indictment returned on 11/15/91. It is noted that, although no additional charges were added in the superceding indictment, the information added supports and enhances the existing four (4) counts. The indictment charges ABEDI, [redacted] & PHARAON with violations of Title 18 USC 371 (Conspiracy); Title 18 USC 1343 (Wire Fraud); Title 18 USC 1962(d) (Racketeering Conspiracy), and Title 18 USC 2 (Aiding and Abetting).

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2 - Bureau
2 - Field Office
* See codes on reverse side.

1325015-000-7989

(1) - 29B-WF-171994; 1 - 66-2178 Sub A; 1 - C-5 Secretary

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 7/14/92

To: [redacted] Washington, D.C. b6 b7C
(Name and Address of USA)

From: [redacted]
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by [redacted]
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] on 7/14/92
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Accompanying this transmission are the following FD-302's:

NAME	DATE(S)
[redacted]	.....5/15/92
	.....1/7/92
	.....1/9-10/92,1/9/92, 1/13/92
	.....1/8/92
	.....9/27/91
	.....11/13/91
	.....2/26/92
	.....2/24/92
	.....12/11/91
	.....10/4/91, 10/22/91

b6 b7C

-580

29B-WF-171994 main

SEARCHED Su INDEXED
SERIALIZED Su FILED Su
FEB 4 - 1993
FBI - WASH. METRO FIELD OFFICE

1325015-000-7990

Su/JR

NAME	DATE(S)
	..11/12/91
	..2/4/92
	..2/26/92
	..5/6/92
	..1/9-10/92, 8/8/91
	..12/16/91
	..2/11/92
	..2/24/92
	..9/24/91
	..1/3/92
	..5/5/92
	..2/26/92
	..1/29/92
	..1/16/92
	..7/31/91, 8/14/91, 8/15/91
	..10/18/91
	..4/14/92
	..1/13/92
	..3/11/92, 3/27/92

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Also accompanying this transmission are the following investigative inserts:

INVESTIGATION BY	DATE(S)
	.....12/18/91
	.....1/21/92

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1325015-000-7991

O MKI 01559

RR FBIWMFO

DE FBIWMFO #0035 0132107

ZNR UUUUU

R 132034Z JAN 93

FM FBI WMFO (298-WF-171994) (P) (BCC1)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: SSA [redacted] FBIHQ; OFFICE OF CONGRESSIONAL b6 b7C

AFFAIRS; SSA [redacted] FBIHQ; WCCS, FIF.

SUBJECT; HIDDEN INTERESTS; MAJOR CASE NUMBER 38; FIF; FAG;

OO:WMFO.

REFERENCE TELCALL BETWEEN SA [redacted] WMFO AND SSA b6 b7C

VINSON ON NOVEMBER 6, 1992.

REQUEST OF FBIHQ:

FBIHQ IS REQUESTED TO CONTACT THE UNITED STATES ETHICS

[redacted] A FORMER SENATE b6 b7C

STAFFER FOR UNITED STATES SENATOR ORRIN G. HATCH. FBIHQ

581

298-WF-171994/main

SEARCHED SU INDEXED SU
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FEB 4 - 1993
FBI - WASH. METRO FIELD OFFICE
BU JR

1325015-000-7992

TWO DE FBIWMFO 0035 UNCLAS

SHOULD ALSO ACQUIRE ALL INVESTIGATION BY THE SENATE ETHICS COMMITTEE IN RELATION TO THESE ALLEGATIONS, AS WELL AS TO THE DISPOSITION OF THE COMMITTEE'S INVESTIGATION.

SSA [redacted] ADVISED DURING REFERENCED TELCALL THAT HE HAD BEEN UNABLE TO LOCATE ANY EXISTENCE OF A SENATE ETHICS COMMITTEE INVESTIGATION OR ANY ALLEGATIONS AGAINST [redacted] WHILE A SENATE STAFFER FOR SENATOR HATCH. IN DECEMBER, 1991, SENATOR HATCH ADVISED THAT HE HAD SENT A WRITTEN REQUEST TO THE SENATE ETHICS COMMITTEE TO INVESTIGATE [redacted] FURTHERMORE, UNITED STATES SENATOR JOHN KERRY, WHO CONDUCTED A SENATE INVESTIGATION OF BCCI, ALSO SENT A REQUEST IN EARLY [redacted]OBER, 1992, TO THE SENATE ETHICS COMMITTEE FOR AN INVESTIGATION OF [redacted] SENATOR KERRY PROVIDED THE ETHICS COMMITTEE WITH NUMEROUS DOCUMENTS REGARDING [redacted] THAT WERE ACCUMULATED DURING THIS INVESTIGATION. THE DEPARTMENT OF JUSTICE HAS ALSO ADVISED THAT THEY HAVE BEEN INFORMED BY THE SENATE ETHICS COMMITTEE THAT A FULL INVESTIGATION OF [redacted] WAS CONDUCTED AS A RESULT OF SENATOR HATCH'S REQUEST.

THEREFORE, WMFO IS REQUESTING FBIHQ TO RECONTACT THE SENATE ETHICS COMMITTEE TO ACQUIRE THE INVESTIGATION AND DOCUMENTATION. [redacted] IS DESCRIBED AS FOLLOWS:

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29B-WF-171994-main
Su Su

Su/JR

1325015-000-7993

THREE DE FBIWMFO 0035 UNCLAS

NAME:

DOB:

SSAN:

ADDRESS:

b6
b7C

DOCUMENTS SHOULD INCLUDE, BUT NOT BE LIMITED TO:

1) BCCI ATTORNEYS NOTES AND CORRESPONDENCE IN RELATION TO MEETINGS WITH

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b7C

2) LETTER DATED JULY 31, 1992 TO KERRY'S SUBCOMMITTEE STAFF FROM

3) AFFIDAVIT, DEPOSITION, OR DECLARATION MADE BY AND/OR BY

#0035

NNNN

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29B-WF-171994-main
Sec Sec

Sec/JR

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/5/93

[redacted] **Legislative Assistant/Counsel for U.S. SENATOR JOHN KERRY,** was contacted at his office located in the Russell Building, Room 421, Washington, D.C. Also present during the interview was **ATTORNEY-ADVISOR** [redacted] **U.S. DEPARTMENT OF JUSTICE (DOJ),** Washington, D.C. b6 b7C

After being advised of the identities of the agents and the purpose of the interview, [redacted] provided the following information: b6 b7C

Based on advice from the **OFFICE OF SENATE LEGAL COUNSEL,** [redacted] can only provide public information documents and information received from the press/media to the interviewers. Additional documents, such as those provided to the **SENATE ETHICS COMMITTEE,** may be obtained by submitting a written request to the Chairman of the Senate Subcommittee, who would then present the request to a vote in the form of a Senate Resolution. [redacted] also stated that he did not want to become a witness in any public proceeding that may result from his consent to be interviewed. b6 b7C

Pursuant to a letter written by [redacted] dated November 20, 1992 requesting information relating to the investigation conducted by the **U.S. SENATE SUBCOMMITTEE ON TERRORISM, NARCOTICS, AND INTERNATIONAL OPERATIONS (of the COMMITTEE ON FOREIGN RELATIONS)** regarding the **BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI),** [redacted] provided photocopies of certain documents in response to the request and specifically addressed the inquiries as follows: b6 b7C

1. Regarding the alleged penny-stock market manipulation involving BCCI; [redacted] stated that the best explanation of this allegation is included in a recently published book entitled **"False Profits"** by **PETER TRUELL** and **LARRY GURWIN.** [redacted] provided photocopies of pages 172 through 176 of the book. [redacted] has also contacted [redacted] and urged [redacted] to assist federal investigators. [redacted] is b6 b7C

-582

Investigation on 1/5/93 at Washington, D.C. File # 29B-WF-171994

SA [redacted]

by SA [redacted] : CWS Date dictated 1/5/93 b6 b7C

SEARCHED ___ INDEXED ___
SERIALIZED SU FILED SU
FEB 4 - 1993
FBI - WASH. METRO FIELD OFFICE
SU/JR

1325015-000-7995

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

 b6 b7C

currently employed at [redacted] telephone number [redacted] s home telephone number is [redacted] b6 b7C

2. Regarding [redacted] referred to one document that was reproduced in Volume 3, page 650, of the Subcommittees report entitled "THE BCCI AFFAIR." [redacted] will attempt to locate additional records that can be turned over to the interviewers at a later time. b6 b7C

3. Regarding the involvement of BCCI-related people and [redacted] provided photocopies of various news articles. b6 b7C

4. Regarding [redacted] stated that those documents are not accessible. Senate Investigators obtained their documentation primarily from two sources: (1) the BCCI document repository in New York, which is currently under the control of the **NEW YORK STATE DEPARTMENT OF BANKING** (**NYSDB**) and (2) the **RESOLUTION TRUST CORPORATION** (**RTC**). Senate investigators did spend time reviewing the [redacted] transactions and concluded that they were simply a "straight-forward fraud" against BCCI. [redacted] believes that it would be easier for the FBI to obtain the [redacted] records directly from the NYSDB rather than from the U.S. Senate Subcommittee. b6 b7C

5. Regarding documents from the **OVERSEAS PRIVATE INVESTMENT COMPANY** (**OPIC**) referred to in footnotes 161-162 of the Subcommittee report; [redacted] stated that OPIC can provide a copy of the letter of recommendation from BCCI concerning [redacted] and **ANTIGUA MELON FARM** (Royden). The document is also on file in the U.S. District Court in Washington, D.C. b6 b7C

6. Regarding an affidavit referred to in footnote 837 of the Subcommittee report; [redacted] advised that [redacted] is a former DOJ attorney and can be contacted at telephone number [redacted] has produced several versions of the affidavit and has additional documentation relating to the Iran Arms Deals and BCCI. b6 b7C

b6 b7C

7. Regarding the **HONG KONG DEPOSIT AND GUARANTY COMPANY** and **TETRA FINANCE** references in footnotes 842 and 852-854 of the Subcommittee report and the identification of individuals involved; [redacted] provided photocopies of the documents requested as well as information obtained from press reports and legal decisions involving [redacted] that came about as a result of the financial collapse of the aforementioned companies. b6 b7C

8. Regarding documents referred to in footnote 849 of the Subcommittee report; [redacted] provided the requested documents. b6 b7C

9. Regarding the identification of the law enforcement document referenced in the last paragraph of page 601 of the Subcommittee report; [redacted] would not discuss this matter whatsoever. [redacted] explained that he utilizes confidential sources in the same manner as law enforcement and by disclosing the identity of a source, he would impair his ability to perform his job. [redacted] guaranteed confidentiality to the person that provided the document and advised that he could not provide the document or describe it inasmuch as it would reveal the identity of the person that provided it to him. [redacted] admitted that he is in possession of the document. b6 b7C

10. Regarding assistance in contacting a particular source; [redacted] said that he would again ask his former colleague to provide [redacted] with a telephone number for the source. b6 b7C

11. Regarding the Minutes of Evidence taken before the **HOUSE OF COMMONS**; [redacted] advised that his copy has been filed in storage and recommended that a copy be obtained from the HOUSE OF COMMONS or **DISTRICT ATTORNEY FOR NEW YORK(DANY) MORGENTHAU**'s office. b6 b7C

12. As requested, [redacted] provided two (2) computer data diskettes containing the **"KERRY REPORT"** in electronic format. b6 b7C

b6
b7C

13. Regarding the report references to the activities of **MOHAMMED HAMMOUD:**

a) Records showing that HAMMOUD borrowed over $110 million from BCCI (one loan guaranteed by **FIRST AMERICAN BANK**); [redacted] referred to the **PRICE-WATERHOUSE** reports that were reprinted in volume 1 of the hearings, pages 356-358. b6 b7C

b) Records showing that HAMMOUD's real estate investments were managed by the current **U.S. AMBASSADOR TO BAHRAIN CHARLES W. HOSTLER** and his contacts with the **U.S. STATE DEPARTMENT** regarding the release of U.S. hostages from Beirut; [redacted] referred to the documents reprinted in volume 4 of the hearings, pages 741-778. [redacted] explained that a request for documents was made to the STATE DEPARTMENT for records and the records were provided. However, some of the documents were classified as "eyes only," and therefore, photocopies could not be obtained. [redacted] recommended that a request be made directly to the STATE DEPARTMENT regarding HAMMOUD. b6 b7C

c) Records showing that HAMMOUD met with high officials from the **U.S. TREASURY DEPARTMENT** and **DOJ** regarding BCCI are from attorney notes which have been turned over to the Senate Ethics Committee.

d) Documents regarding allegations that HAMMOUD's companies were front companies for BCCI; [redacted] referred to the PRICE-WATERHOUSE reports reprinted in volume 1 of the hearings, pages 356-358. b6 b7C

b6 b7C

e) Documents showing FIRST AMERICAN BANK issued a $4 million letter of credit to HAMMOUD; [redacted] explained that the only published reference is contained in volume 3 of the hearings, page 429. Further, [redacted] knew about this transaction and detailed records were reviewed by the FBI at BCCI-New York.

b6 b7C

f) The Power of Attorney held by [redacted] for HAMMOUD is reprinted in volume 3 of the hearings, page 427.

b6 b7C

g-k) All records regarding [redacted] were personally turned over to the **SENATE ETHICS COMMITTEE** by [redacted] in early October 1992.

b6 b7C

l) Regarding the videotape recording of the HAMMOUD funeral, [redacted] stated that he has not seen the tape and has only heard that it exists. [redacted] believes that [redacted] (supra) may have viewed the film.

b6 b7C

[redacted] admitted that Senate investigators are not held to the same high degree of standards as the FBI when conducting its investigation and subsequent reporting of results. [redacted] also admitted that much of the information contained in the Subcommittee report was obtained from media sources and other journalists and contains speculation and conclusions drawn by the investigators as well as their sources. [redacted] made frequent references to author LARRY GURWIN's work ("False Profits") during the interview.

b6 b7C

[redacted] has no knowledge regarding any new developments involving BCCI and is no longer involved in any matters relating to the investigation of BCCI.

b6 b7C

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
X AIRTEL ☐ _____

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 1/7/93

TO : DIRECTOR, FBI

FROM : SAC, WMFO (29B-WF-171994) (BCCI) (P)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Enclosed for FBIHQ are four copies of an FD-302 reporting an interview of [redacted] b6 b7C

REQUEST OF THE BUREAU

FBIHQ-PCU is requested to present the facts contained in this communication to the Department of Justice (DOJ)-Office of Public Integrity (OPI) for a prosecutive opinion. FBIHQ-OGA is requested to contact the Chairman of the United States Senate Committee on Foreign Relations to request that the FBI be allowed access to the law enforcement document referred to in "The BCCI Affair" hearings and to the name of the source of that document.

8 - FBIHQ
(2-[redacted] Section Chief, WCCS; 2-SSA [redacted] b6 b7C
PCU, WCCS; 2-SSA [redacted], FIF, WCCS; 2- Office of Congressional Affairs)
(2) WMFO

58

29B-WF-171994 Main

Searched _____
Indexed _____
Filed _____

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-8000

[redacted] a Legislative Assistant/Counsel for United States Senator John Kerry, was primarily responsible for the publication of the Senate hearings before the Subcommittee on Terrorism, Narcotics, and International Operations regarding "The BCCI Affair." Senator Kerry was Chairman of this subcommittee. The publication reported many allegations of federal criminal violations, as well as, alledging the existence of key documentary evidence to support these allegations. As a result, [redacted] was interviewed; whereby, he was requested to explain the basis for the allegations and to provide the documentary evidence. [redacted] while appearing to be cooperative, was unable to substantiate many of the allegations and admitted that much of information was supplied to him by investigative reporters. [redacted] specifically stated that the Senate investigators were not held to the same high standards as the FBI when investigating and reporting the investigative results, therefore relying on hearsay is not only permissible but a common practice. b6 b7C b6 b7C

The report referred to a law enforcement document that is believed to be a FD-302 reporting an interview of Senator Orrin G. Hatch, R-Utah. [redacted] refused to provide a copy of this document to the FBI, stating that he received the document from a source and that by providing the document, that he might disclose the identity of his source. Although what was quoted from the law enforcement document in the report was not relevant, the content of the FD-302 could be very damaging to Senator Hatch. Regardless, if this is in fact the interview of Senator Hatch, it is possible that there is a "leak" in the DOJ. It is believed that this "leak" could be politically motivated to provide information to outside sources. WMFO feels strongly that there is an existence of such a "leak", and therefore, that this "leak" should be referred to the DOJ-OPI to determine whether a full investigation should be conducted. b6 b7C

WMFO has conducted only a preliminary investigation into this matter to determine who, within the DOJ, received this FD-302. WMFO will conduct no further investigation into this matter pending a prosecutive opinion from DOJ-OPI and/or the acqusition of the law enforcement document from the U. S. Senate.

1325015-000-8001

Memorandum

E-5

To : SAC, WMFO (29B-WF-~~181994~~ 171994) (P) Date 2/1/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference WMFO airtel dated 1/7/93 and WMFO teletype dated 1/13/93.

The purpose of this memo is to outline the investigative matters that are ongoing at this time, due to my transfer to FBIHQ.

Referenced airtel (attached) contained a request of the Bureau to acquire a prosecutive opinion from the Department of Justice (DOJ)-Office of Public Integrity as to the possible "leak" by someone in DOJ to U.S. Senator John Kerry's Senate Committee. The document alleged to be "leaked" is an FBI FD-302 recording an interview of U.S. Senator Orrin Hatch.

Preliminary investigation has revealed that SSA [redacted] provide the Hatch FD-302 to [redacted] Principal Deputy Chief, Fraud Section, DOJ, within a week subsequent to the interview. SSA [redacted] did not provide the FD-302 to anyone else outside of the Bureau. WMFO records (FD-320 attached) show that the Hatch FD-302 was provided to Assistant United States Attorney (AUSA) on 7/14/92. This record is reportedly misleading, in that all of the FD-302's went directly to [redacted] through his [redacted] LNU. In September, 1992 [redacted] was again given a copy of the Hatch FD-302 by myself. The only other person outside the Bureau given a copy of the Hatch FD-302 was [redacted] DOJ-OPI. The FBI agents who had copies of the Hatch FD-302 were limited to myself, SSA [redacted] SA [redacted] SA [redacted] and SA [redacted]

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Referenced teletype (attached) requested FBIHQ to contact the U.S. Senate Ethics Committee to determine the disposition of their investigation of [redacted] and to acquire copies of documents Senator Kerry provided to the Committee.

b6 b7C

29B-WF-171994 Mem -584

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB - 1993
FBI - WASH. METRO FIELD OFFICE

1325015-000-8002

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 2/3/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

Throughout the investigation of the above captioned matter, there have been allegations of money laundering through the transactions of the Bank of Credit and Commerce International (BCCI). Money laundering activity appears to have been conducted by, but not limited to, U.S. citizens who utilized BCCI. The specified unlawful activities (SUA) are not known.

FBIHQ SSA [redacted] has advised that he has several leads concerning U.S. citizens and their possible involvement in laundering illicit profits of SUA through BCCI. Theses leads were developed during the investigation of captioned matter, yet lay unresolved as they are outside the scope of the current investigation. It is recommended that an investigation be opened under the subclassification of 272B - Money Laundering-White Collar Crime Program, to address the charges known to SSA [redacted] b6 b7C

1-WMFO
(1 - 29B-WF-171994)

585

MRM:mm
(1)

SA [redacted] 188

29B-WF-171994 Main b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 4 1993
FBI — WASH. FIELD OFFICE

Please discuss this with SA [redacted] SSA [redacted] SSA [redacted] and me.

Thanks!

1325015-000-8003

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/8/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST
MAJOR CASE #38
FIF;
OO:WF

For information, on 2/5/93 SA [redacted] removed the following evidence from the documents seized from INTEREDEC: b6 b7C

1. Weekly Minders for the years 1985, 1986, 1987 from box number E-2.

2. One date book marked [redacted] and [redacted] from box number E-5.

3. One file marked "[redacted] file for GRP" and one file marked " Misc. for [redacted] " from box number E-5. b6 b7C

4. One file marked " GRP Visit April 1987 " and one file marked " GRP Visit January 1987 " from box number E-2.

5. The entire contents from Box 18 " Room N ".

All of the above items were provided to [redacted], Department of Justice, to be used in upcoming trials in Atlanta, Ga. The above items were removed from 29B-WF-171994 1B 21. b6 b7C

29B-WF-171994 -586

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 9 - [illegible]
[redacted] FIELD OFFICE
182

b6 b7C

2 WMFO
(1- 29B-WF-171994)
(1- Evidence control center)

1325015-000-8004

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 1/19/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 92 - "ROSS COSMETICS & [redacted] b6 b7C

The writer conducted searches for the above names in the "Who's Who/What's What" and "Aspen". There were no references to Ross Cosmetics or [redacted] A Global search on indices provided information that New York has a case on Ross Cosmetics with a reference to [redacted] b6 b7C

New York provided the following information concerning Ross Cosmetics and [redacted] b6 b7C

Ross Cosmetics Distribution Centers Inc. is currently (as of 6/12/92) being investigated by the Securities Exchange Commission (SEC) regarding the companies activities and ownership (see attached news articles).

The allegation regarding Ross Cosmetics, based in Duncan, South Carolina, is that parties related to its principle supplier, S & J Perfume Co., in London, may directly or indirectly own up to 60% of its shares - a relationship which was hidden from the SEC.

There are no references to BCCI in any of the news articles or in any part of the New York investigation. The securities analyst, [redacted] appears to work for a company called 'Strategic Investment Advisors'. [redacted] has not been spoken to at this point in time. b6 b7C

-587

29B-WF-171994 Main

1 - WMFO (29B-WF-171994)
1 - [redacted] (DOJ) b6 b7C

RHM:rhm

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The following names, which appear in the news articles and in the New York investigation were searched through the "Who's Who/What's What", all were negative:

1. [redacted] b6 b7C
2. Ross Cosmetics and Merchandise
3. Ross Cosmetics Distribution Centers
4. MC Peg, Ross, O'Connell and Goldberger
5. S & J Perfume, LTD.
6. [redacted]
7. [redacted]
8. Starion International, Ltd.
9. Starion International Investments
10. Jaywir Trading Company
11. Starion Cosmetics
12. Tranvit

RECOMMENDATION:

It is recommended that Lead # 92 be considered "covered", and that [redacted] DOJ, Fraud Section, be provided a copy of this memo and the attached news articles. b6 b7C

1325015-000-8006

Ross Cosmetics Shares Off $9.50 As SEC Probes

By Martha Brannigan
Staff Reporter of The Wall Street Journal

Ross Cosmetics Distribution Centers Inc. disclosed that the Securities and Exchange Commission is investigating the company's activities and ownership, prompting a 65.5% decline in its stock price Friday.

The perfume and cosmetics concern's shares closed at $5 a share, off $9.50, on heavy volume of 2.8 million shares in over-the-counter trading.

Ross Cosmetics, based in Duncan, S.C., said it "has learned" that parties related to its principal supplier, R.J.R. Perfume Co., in London, may directly or indirectly own up to 60% of its shares. A relationship, according to the company, that had been hidden from the SEC and the public.

In recent months, Ross Cosmetics has been the focus of short selling and speculation about possible irregularities in its operations.

Michael E. Emery, chief operating officer, reading a statement on the telephone Friday, said apart from the relationship between Ross Cosmetics and its main supplier, the company has "no basis to believe that the rumors circulating in the marketplace are true." He added: "We know of no reason to be concerned about the company, its prospects, or its future and we believe the company's underlying business is sound and will continue." He declined to answer questions.

Ross Cosmetics retained Harvey Pitt and his law firm, Fried, Frank, Harris, Shriver & Jacobson, in New York, last week as special counsel to investigate the matter. The company plans to name two additional outside directors, whom the firm will represent, to investigate the ownership issue "along with other rumors of which it has been apprised," Ross Cosmetics said in a prepared statement Friday.

ASAC O'CONNOR
SCAGLIONE (CS)
✓ BOCRA (C-1)
THORNTON (C-2)
COLGAN (C-3)
LEE (C-4)
DUFF (C-12)
CODD (C-14)
DOTLO (C-21)
D'AMURO (C-28)
LEWIS (C-33)
_____
GRACE (LAST)

Newspaper: Wall Street Journal
Date: 6/15/92
Page: C9

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196B-NY-227674

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FBI — NEW YORK

1325015-000-8007

The company said the SEC's "informal investigation" includes "certain of its accounting practices and the activities of certain of its present and former officers and directors." The SEC wouldn't confirm or deny the probe.

The company, which distributes so-called "knockoffs," or inexpensive alternatives to designer-label fragrances, said in its statement that it doesn't yet know whether any board members or senior managers knew about the secret ownership. The company added that it is cooperating fully with the SEC, "but doesn't have any knowledge that any improprieties actually have occurred."

Mr. Pitt, who is a former general counsel to the SEC, said the internal investigation will focus, among other things, on possible ties between S&J Perfume and certain foreign shareholders, including Starion International Ltd. According to Ross Cosmetics' proxy statement, Starion, based in the British Virgin Islands, owns a 38.6% stake in Ross Cosmetics. A Starion director, Shashikant S. Sheth, who lives in Dubai, United Arab Emirates, sits on Ross Cosmetics' board.

The company will also investigate whether its chairman and president, Eugene Derry, who lives in Geneva, Switzerland, has ties to S&J, Mr. Pitt said. Mr. Derry, who the proxy said owns no shares, couldn't be reached for comment. Mr. Sheth didn't return calls to his home and office in Dubai over the weekend.

Mr. Pitt said the previously undisclosed majority ownership by parties related to the company's main supplier "raises questions that must be investigated."

Indeed, shortsellers have been raising questions about the company's operations for several months. Bob Doviak, a principal at Doviak Partners in Dallas, who has a short position in the stock, wonders how the company could have achieved such rapid growth in sales. "What caught our eyes is the stock came from nowhere. Sales have gone through the roof in a stable, mature industry," Mr. Doviak said.

On Friday, Ross Cosmetics reported net income for its third quarter ended May 31 of $902,893, or 13 cents a share, compared with year-earlier earnings of $371,085, or six cents a share. Third-quarter sales rose 38%, to $10.5 million from $7.6 million a year earlier, the company said. For the nine months, it reported net income of $3.2 million, or 47 cents a share, compared with year-earlier net income of $1.5 million, or 22 cents.

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Indicate page, name of newspaper, city and state

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Date
Edition

Title: ROSS FREITAS; Former President, ROSS COSMETICS DIST CTR;

Character: FBW, SECURITIES FRAUD
or
Classification: 00: NY

Submitting Office: NEW YORK

Indexing

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THE WALL STREET JOURNAL TUESDAY, JULY 14, 1992

Ross Cosmetics' Derry Placed on Leave During Investigation

By a WALL STREET JOURNAL Staff Reporter

DUNCAN, S.C. — Ross Cosmetics Distribution Centers Inc. said Lurene D. Derry was placed on administrative leave from his posts as chairman and president of the troubled fragrance distributor, pending the completion of an investigation by a special committee of the board.

The special committee is examining the circumstances surrounding the closure in late last month that as much as 10% of the company's shares and control by its major supplier, S&J Parfums Inc. The committee is also examining the possible ties to S&J, which is based in London.

Mr. Derry requested that he be placed on leave, the company said. The executive, who resides in Geneva and will continue as a board member during the investigation, couldn't be reached for comment on the company's move.

Ross Cosmetics also said that because of the flurry of rumors surrounding the company and the need to restore public confidence, the committee has set an August 31 deadline for completing its probe and to facilitate the company's audit for the fiscal year ending Aug. 31."

In addition, Ross Cosmetics said that its board has decided the company will not pay a $1.8 million accounts payable due to S&J until it interviews certain S&J officials and determines whether payment is appropriate. Ross Cosmetics said its concern relates to the fact it has a high level of inventory, despite continued strong growth in its sales and order backlog.

Shares of Ross Cosmetics, which plummeted from $14.50 when the secret ties to its major supplier were disclosed in late, closed yesterday at $6, unchanged, in additional over-the-counter trading.

* * *

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Submitting Office: NEW YORK

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Ross Cosmetics Defends Dealings With Big Supplier

By Martha Brannigan
Staff Reporter of The Wall Street Journal

Despite the disclosure that as much as 60% of Ross Cosmetics Distribution Centers Inc. is controlled by its main supplier, the company's president insisted the relationship hasn't influenced their business dealings.

Eugene D. Derry, the chairman and president of Ross Cosmetics, asserted that the company's accounting practices are "sound" and that its "commercial dealings" with its principal supplier, S&J Perfume Co., "have been completely at arm's length."

Mr. Derry's made his comments following the disclosure Friday that Ross Cosmetics is under investigation by the Securities and Exchange Commission. Mr. Derry couldn't be reached for additional comment, and the company didn't return calls.

The company's stock, after plunging Friday to $5, down $9.50, regained some ground yesterday, closing at $7.25 in over-the-counter trading, up $2.25.

Ross Cosmetics, based in Duncan, S.C., said Friday that it had learned that parties related to S&J Perfume, based in London, may directly or indirectly own as much as 60% of the company's shares. The relationship was previously hidden from the SEC and from the public.

Ross Cosmetics, which sells inexpensive alternatives to designer label fragrances, said the SEC is informally investigating the company, some of its accounting practices, and certain present and former officers and directors.

The SEC and an internal investigation launched by the company last week are examining, among other things, possible ties between S&J Perfume and at least two Ross Cosmetics officials -- Mr. Derry and another director, Shashikant S. Sheth, who lives in Dubai, United Arab Emirates, Mr. Derry, according to the company's proxy statement, owns no shares. Mr. Sheth is a director of Starion International Ltd., a British Virgin Islands company which lists a 38.6% stake in Ross Cosmetics.

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SEP 22 1992
FBI — NEW YORK

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 2/19/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

All BCCI Squad personnel have been reassigned to other squads, with the understanding that, once they complete any remaining work on the leads still assigned to them in the captioned matter, and absent exigent circumstances, they will be released from working on the case. Any new leads or spin-off cases related to the captioned matter will be handled by Squad C-5. Therefore, the captioned matter should be reassigned to me.

2-WMFO
(1-29B-WF-171994 MAIN)
(1-SSA [redacted]) b6 b7C

JNR:jnr
(2)

ASAC [redacted] b6 b7C
SSA
SSA
SSA

Sue -
Please have all initial this.
Thanks!

-589

2-25-93

Session [redacted]
To 2/19/93

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Delayed reassign resulted.
Sue/C5/2-25-93

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Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 2/18/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

The purposes of this memorandum are to summarize a meeting at DOJ to discuss [redacted] proffer by [redacted] b7D

On 2/17/93, in the offices of DAAG [redacted] b6 b7C at DOJ, a proffer was received from [redacted] b7D

[redacted] Those attending the meeting from the FBI were SSA [redacted] (FBIHQ), SA [redacted] and myself. Others attending the proffer are shown on the attached sheet.

[redacted] b7D

(2)-WMFO

JNR:jnr
(2)

ASAC [redacted]
SSA [redacted]
SSA [redacted]
SA [redacted]
SA [redacted]

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b7C

[redacted]

DOJ Crim Div [redacted]
DOJ
FBI (202) 324-9301
DOJ - Tax [redacted]
DOJ - Criminal/Fraud
Atty for GRP
" " "
"
"

AUSA, SD Florida [redacted]
FEDERAL RESERVE (NY)
ASST. D.A. NEW YORK [redacted]
FEDERAL RESERVE [redacted]
Asst U.S. Atty - Atlanta [redacted]
FBI 202-324-5658
FBI 202-324-6330

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 3/18/93

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE #38
FIF; FAG;
OO:WMFO

RE: Status Report on [redacted] (56C-WF-184420). b6 b7C

FBIHQ has instructed WMFO to conduct no further investigation re 56C-WF-184420 absent specific authorization from FBIHQ.

DOJ Trial Attorney [redacted] has advised that, although a final decision has not been made, in all probability, the matter will not be pursued criminally but will be referred to the FEC for whatever administrative action they deem appropriate. No further investigation is being conducted by WMFO pending a final prosecutive decision by DOJ. b6 b7C

2 - WMFO
(1 - 29B-WF-171994)
(1 - SSA [redacted]) b6 b7C

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SERIALIZED [redacted] FILED [redacted]
MAR 2 6 1993
FBI — [redacted] OFFICE

1325015-000-8022

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
April 2, 1993

[redacted] Esq. b6 b7C
Alexander & Partners
17/19 High Street,
London, NW10
England

Dear [redacted] b6 b7C

Re: [redacted]

Concerning your letter of March 17, 1993, I provided a copy of it to Trial Attorney [redacted] of the U.S. Department of Justice and, subsequently, discussed your request with him. In that discussion I learned that [redacted] had earlier spoken with you about his perception of [redacted] prior to their arrest of [redacted] b6 b7C

I concur completely with that which [redacted] reports he told you, and can add nothing to it. b6 b7C

Sincerely yours,

[redacted] b6 b7C
Supervisory Special Agent

cc: [redacted] b6 b7C
Fraud Section, Criminal
Division
U.S. Department of Justice
Washington, D.C. 20530

3-Addressees
(2-[redacted]
(1-TA [redacted]
(1)-WMFO b6 b7C

JNR:jnr
(4)

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SERIALIZED [redacted] FILED [redacted]
1993
FBI ... OFFICE

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Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 4/12/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

Attached material was received 4/1/93 and 4/8/93 from FBIHQ, FIFU SSA [redacted] concerning [redacted] b6 b7C b7D

1-WMFO (Att. 3)

JNR:jnr
(1)

29B-WF-171994 Main -596

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
APR 15 1993
FBI [redacted]

1325015-000-8028

From: [redacted] b6 b7C
To:
Date: Tuesday, April 6, 1993 4:10 pm
Subject: BCCI; [redacted] SOURCE INFORMATION b7D

[redacted] b6 b7C b7D

INFORMATION PERTAINING TO BCCI

On [redacted] contacted SAs assigned to the BCCI investigation at WMFO. The source advised that [redacted] b6 b7C b7D

[redacted]

By way of background, the source has provided reliable information pertaining to [redacted] in the past. The source has been open and providing reliable information to the FBI [redacted] Among information provided by the source was [redacted] b6 b7C b7D

[redacted]

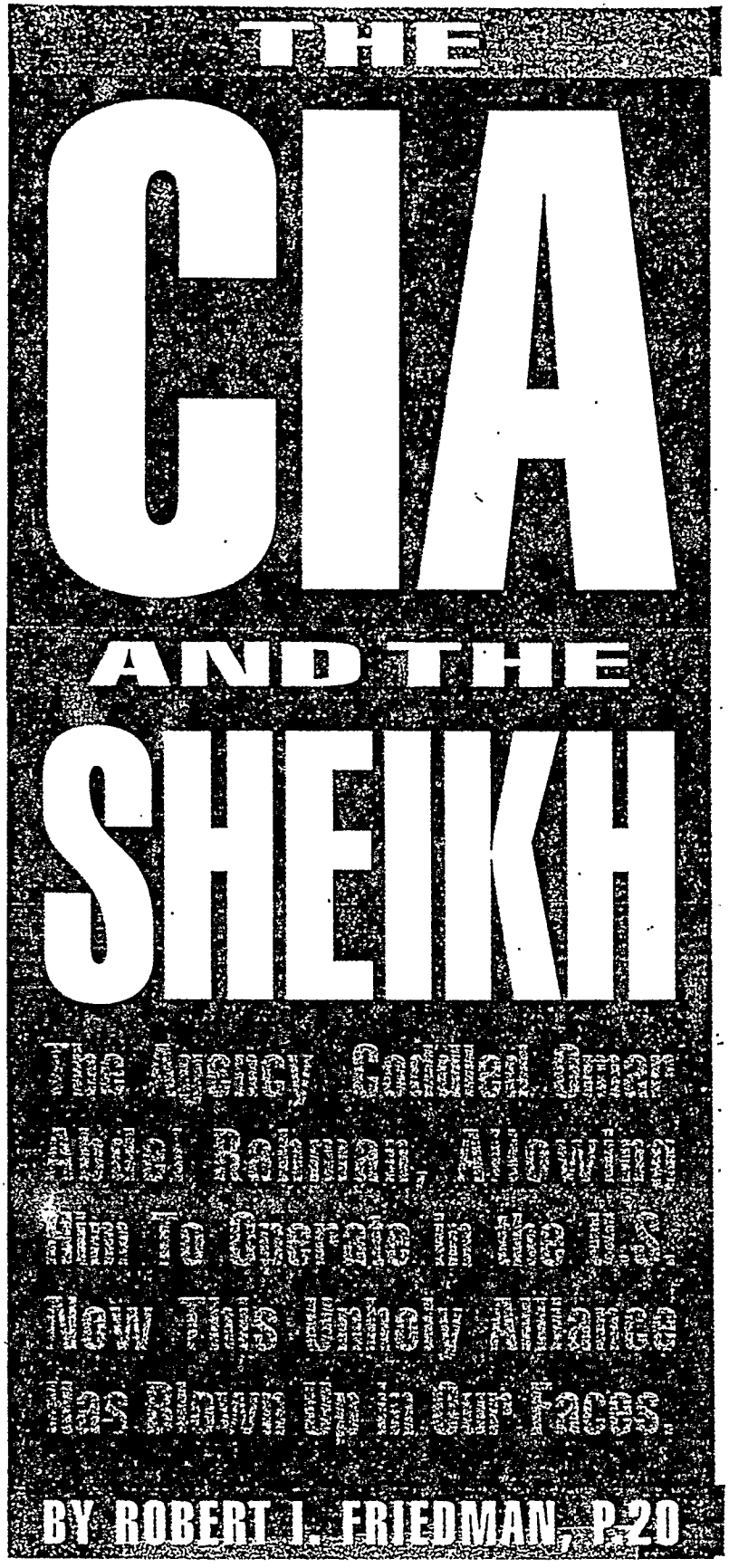
On 4/1/93, WMFO SAs met with the source. The meeting was coordinated with [redacted] SAs that the source has been dealing with. [redacted], the source advised that [redacted] b6 b7C b7D

[redacted]

[redacted] b6 b7C b7D

The source advised that [redacted] b6 b7C b7D

[redacted]



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Exec. AD Inv.
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Asst. Dir.
Adm. Servs.
Crim. Inv.
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Insp.
Intell.
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Legal Coun.
Off. Cong. &
Public Affs.
Rec. Mgmt.
Tech. Servs.
Training
Telephone Rm.
Director's Sec'y

The Washington Post
The Washington Times
Daily News (New York)
The New York Times
The Wall Street Journal
The Chicago Tribune
The Los Angeles Times
The Christian Science Monitor
USA Today
VILLAGE VOICE

Date 3-30-93

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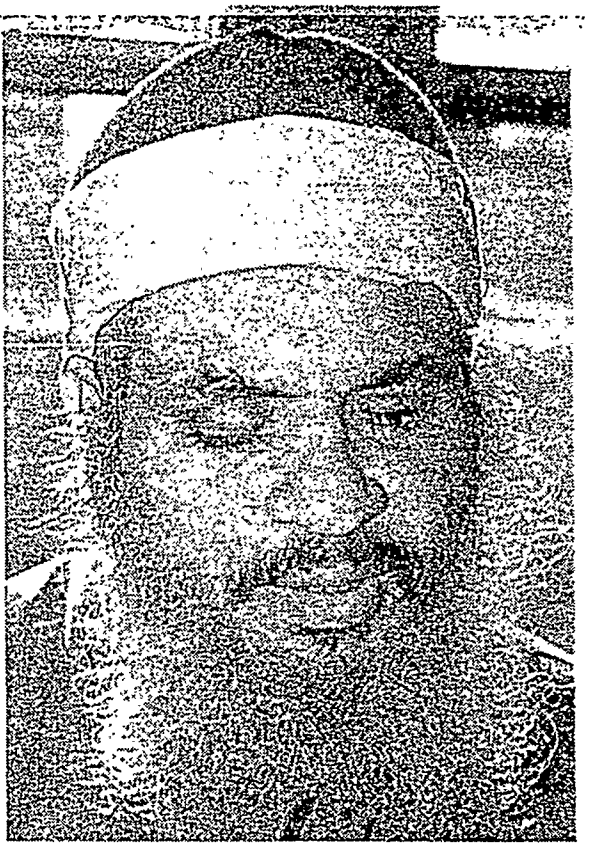
REUTERS/BETTMANN



SHEIKH OMAR ABDEL RAHMAN: NO ONE HEEDED THE EGYPTIANS' WARNINGS

NIDAL AYYAD: HE ALLEGEDLY CONCOCTED THE WORLD TRADE CENTER BOMB.

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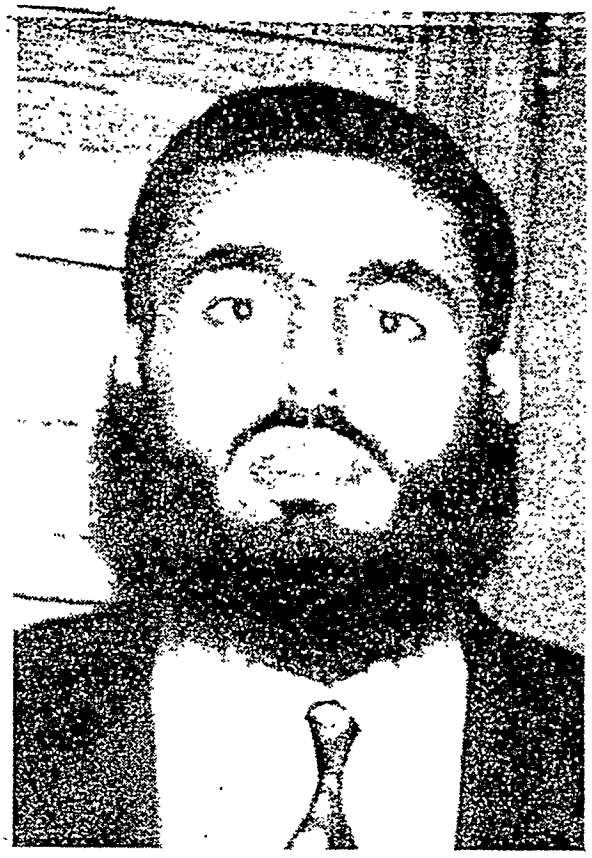

MOHAMMAD SALAMEH: "THE BOMBING WAS COMING FROM HIS HEART, NOT HIS BRAIN."

EL SAYYID NOSAIR: "I SAW THE SHEIKH MEET WITH HIM AT A BROOKLYN RESTAURANT."

MES HAMILTON, AP/WIDE WORLD NEWSPHOTOS.

1325015-000-8047

THE CIA AND THE SHEIKH

BY ROBERT I. FRIEDMAN

"They were talking all the time about targeting American symbols," says the FBI undercover informant, "the Empire State Building, the Statue of Liberty. A few of the guys came to the mosque to pray and go home. But others gathered to conspire in small groups, talking in deep, low voices. They see the U.S. as an imperialist power, the Big Satan, the root of all the evil in the world."

The FBI operative, Mamdouh Zaki Zakhary, monitored the radical activities at the El Salaam Mosque in Jersey City, which was the headquarters of the terrorist cell that allegedly planned and carried out the bombing of the World Trade Center on February 26. Zakhary, a heavily bearded Coptic Christian from Egypt who owned an import-export firm in Jersey City, spent a year and a half spying on the local Arab American

1325015-000-8048

community and the mosque, beginning January 10, 1990. During this time, he watched the first two men arrested in connection with the bombing, Mohammad Salameh and Ibraham Elgabrowny, as well as the spiritual leader who may have inspired them, the fiery blind fundamentalist cleric Sheikh Omar Abdel Rahman, who is infamous throughout the Arab world for his alleged role in the assassination of Egyptian president Anwar el-Sadat.

"The only thing they want is to establish an Islamic world," Zakhary told *The Village Voice* during an interview from his home in Alexandria, Egypt. "They will do anything to achieve it. You have to understand their desire to strike out, to avenge anything that hurts Islam. I asked Elgabrowny, 'Why do you stay here [in Brooklyn]?' And he told me, 'I want to earn their dollars so that I can stab them in the back.' "

Zakhary reported the group's subversive activities in regular meetings with his FBI handler, Special Agent Kenneth Strange. But Zakhary, who was not able to penetrate the cell's inner circle, had no advance warning that there was a plan to commit one of the most sensational acts of foreign terrorism on American soil before the bombing of the World Trade Center: the assassination of the controversial right-wing Zionist leader Rabbi Meir Kahane.

On November 5, 1990, El Sayyid Nosair, a pudgy, bearded 34-year-old Egyptian American and a core member of the El Salaam Mosque, calmly walked up to the podium of a conference room in the Halloran House, a midtown Manhattan hotel, after Kahane had finished a one-hour speech. Moments later, Kahane was shot once in the throat at point-blank range with a .357 magnum, and Nosair bolted outside. During a running gun battle down Lexington Avenue, Nosair was wounded by an off-duty postal inspector and finally captured by New York City police.

"At first, no one knew who Nosair was," recalls Zakhary, "so when I heard about it I called the FBI and identified him. I told them he was a member of the mosque and that he was very close with the sheikh [Abdel Rahman]. I told them that, four days before, I saw with my own eyes the sheikh meeting with Nosair at a Lebanese restaurant on Atlantic Avenue in Brooklyn. It was 7 p.m. There was Nosair, the sheikh, a person escorting the sheikh, and another person I don't know. They were deep in conversation."

Shortly after police arrested Nosair they found startling evidence that the Kahane killing was just the first in a planned spree. Scrawled on a bank calendar in Nosair's home was a "hit list" that included the names of a U.S. representative, two federal judges, and a former assistant U.S. Attorney. Local police searching Nosair's Cliffside Park, New Jersey, home discovered a trove of terrorist paraphernalia: bomb-making manuals, AK-47 cartridges, a stolen New York State license plate, and a bullet-riddled target board. There were also a number of passports and driver's licenses under various names, as well as articles about the assassination of Anwar Sadat.

But despite Zakhary's reports, Nosair's hit list, and the suspicious cache at his home, the authorities seemed to be downplaying all signs of a terrorist conspiracy. Within 12 hours of the shooting, New York City chief of detectives Joseph Borrelli declared the Kahane assassination was the work of a "lone gunman." Borrelli added, "There was nothing found [at Nosair's house] that would stir your imagination."

One New York City detective close to the investigation told me that the case was handled like a routine homicide. "They [the NYPD] wanted to make it as simple as possible," said the detective. "It was treated as a homicide at the precinct level. The higher-ups didn't want to take it further.

1325015-000-8049

The police department stated that they got the gunman and that was it. We're not equipped to investigate international terrorism."

But the FBI is. On the eve of Nosair's trial, a frustrated federal investigator told me that he didn't believe Nosair had acted alone. "There's nothing to prove that Nosair took it upon *himself* to [kill Kahane]. There are many conspiracy theories. We hit a lot of dry wells." Yet the federal agent

"IT WAS NO ACCIDENT THAT RAHMAN GOT A VISA AND HE'S STILL IN THE COUNTRY," SAYS ONE AGENT. "HE'S HERE UNDER THE BANNER OF NATIONAL SECURITY."

said that the NYPD had jurisdiction in the case and that the FBI's investigation was "superficial."

What investigators would have found if they had done their job thoroughly is that Sheikh Abdel Rahman and El Sayyid Nosair were at the heart of a far-flung terrorist conspiracy. A magnet for the angry and dispossessed of the Muslim world, Abdel Rahman, through his violent preaching, has been linked to dozens of terrorist incidents in Egypt and now to the attack on the World Trade Center, an act he says he deplores.

In the aftermath of the bombing, many are wondering why there wasn't a comprehensive, wide-ranging investigation of Meir Kahane's murder. One possible explanation is offered by a counterterrorism expert for the FBI. At a meeting in a Denny's coffee shop in Los Angeles a week after the Kahane assassination, the 20-year veteran field agent met with one of his top undercover operatives, a burly 33-year-old FBI contract employee who had been a premier bomber for a domestic terrorist group before being "turned" and becoming a government informant.

"Why aren't we going after the sheikh [Abdel Rahman]?" demanded the undercover man.

"It's hands-off," answered the agent.

"Why?" asked the operative.

"It was no accident that the sheikh got a visa and that he's still in the country," replied the agent, visibly upset. "He's here under the banner of national security, the State Department, the NSA [National Security Agency], and the CIA." The agent pointed out that the sheikh had been granted a tourist visa, and later a green card, despite the fact that he was on a State Department terrorist watch-list that should have barred him from the country. He's an untouchable, concluded the agent. "I haven't seen the lone-gunman theory advocated [so forcefully] since John F. Kennedy."

Why might the U.S. government protect a militant sheikh linked to numerous acts of terrorism?

Sheikh Abdel Rahman left Egypt in 1990, in the wake of a series of bloody clashes between his militant fundamentalist group, Al Gamaat al Islamia, and the secular Egyptian government. The sheikh traveled to Pakistan, where he met with representatives of the Afghan mujahedeen, who were providing training for his underground ter-

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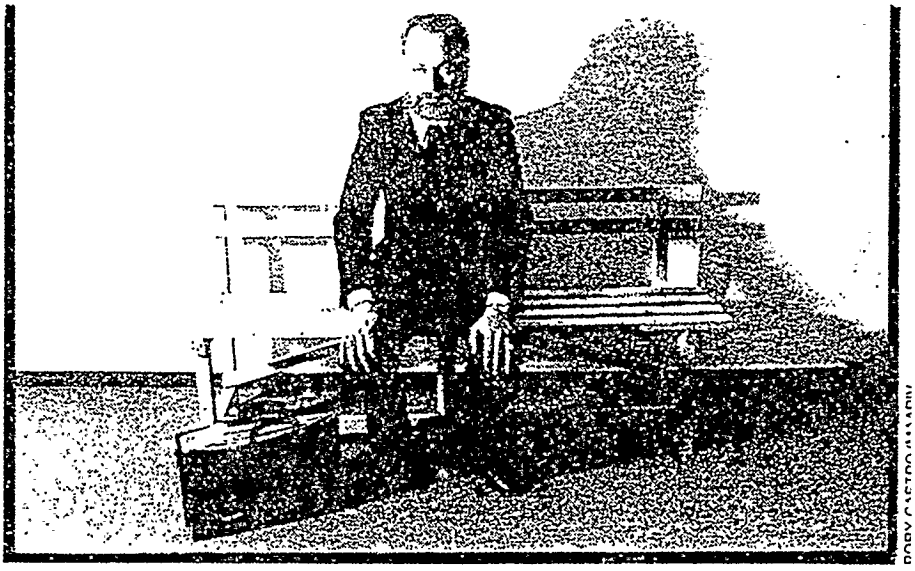

FBI INFORMANT MAMDOUH ZAKI ZAKHARY

rorist group in Egypt, the very same mujahedeen who were receiving financial aid and training from the CIA in the war to rid Afghanistan of the Soviet Army. Even after the Soviets pulled out of Afghanistan in February 1989, the U.S. and the Saudis continued to aid the mujahedeen through Pakistan until December 1990, in an attempt to topple the Afghan government.

According to a very high-ranking Egyptian official, when the sheikh moved to Brooklyn in May 1990, he worked closely with the CIA, helping to channel a steady flow of money, men, and guns to mujahedeen bases in Afghanistan and Pakistan. The camps became a mecca for disaffected youth from across the Muslim world.

Of course, the mujahedeen's agenda was not exactly the same as the CIA's. While Abdel Rahman was perfectly happy to accept CIA help to chase the godless Russians out of Afghanistan, it didn't stop him from teaching his recruits his revolutionary agenda. The camps, says the high-ranking Egyptian official, were "schools for jihad," or holy war. The sacred mission was to be waged on two fronts. In the Middle East, his holy warriors were to overthrow secular, pro-Western Arab regimes and replace them with austere Islamic theocracies. The main target was Egypt, the largest and most powerful nation in the Arab world. The sheikh believes, the high-ranking Egyptian official says, "that if you take Egypt, you take all the Middle East." Mamdouh Zaki Zakhary concurs: "Abdel Rahman repeatedly preached that Egypt is the hand of Satan, and that you have to cut off the hand of Satan immediately."

The Great Satan itself, of course, is America, a state that, in the eyes of the sheikh and his supporters, has routinely committed atrocities against the Muslim world. "Americans," said the sheikh on a recent Arabic-language radio broadcast, "are descendants of apes and pigs who have been feeding from the dining tables of the Zionists, Communism, and colonialism." He advocates the destabilization of the U.S. by violent attacks on its symbols of prestige and power, while proselytizing among African Americans and other disenfranchised minorities. Abdel Rahman's "long-term goal is to weaken U.S. society and to show Arab rulers that the U.S. is not an invulnerable superpower," says Matti Steinberg, an expert on Islamic fundamentalism at the Hebrew University in Jerusalem.

According to Western intelligence sources, Abdel Rahman has 10,000 fanatic disciples in Egypt and several hundred in America. But, as far as anyone knows, he never issues them direct orders. "He talks about the importance of jihad in the U.S. without being concrete," says Matti Steinberg. "It's a form of spiritual brainwashing called *Dawa*. All it takes is a few angry people to understand his message." A high-ranking Egyptian official agrees: "This man is instigating violence in a very clever way. You can't really hope to establish a direct link" between the sheikh and the World Trade Center bombing.

Just four months before the bombing, Egyptian intelligence officials warned the U.S. that the sheikh's principal mosques in America, the El Salaam Mosque and the El Farouq Masjid Mosque in Brooklyn, were "hotbeds of terrorist activity," and that the fiery blind Muslim preacher was plotting a new round of terrorist attacks in Egypt. "There were many, many contacts between Cairo and Washington," says the official.

The FBI received a violent reminder of the sheikh's agenda on November 12, 1992, when a terrorist hit squad linked to Abdel Rahman machine-gunned a busload of Western tourists in Egypt, injuring five Germans. In the last year, three Western tourists have been killed in Egypt and at least two dozen have been wounded, crippling the country's $2.5 billion tourist industry. When asked on an Arabic-language radio show in Washington, D.C., about terrorist attacks on foreign tourists, the sheikh replied, "Force is used with tourists. But tourists should use good manners. Tourism is not nightclubs, alcohol, gambling, fornicating. They should stay away from this behavior, the spread of AIDS and corruption with which they have filled Egypt."

Some three months after the attack on the tourist bus, a rental van packed with a witches' brew of sulfuric acid, nitric acid, and urea exploded in the sub-basement of the World Trade Center, killing six people and injuring more than 1000. "If they had found the exact architectural Achilles' heel [of the World Trade Center]," says an explosives expert who works for the FBI, "or if the bomb had been a little bit bigger, not much more, 500 pounds more, I think it would have brought her down. It's really scary."

As Americans reeled from the worst terrorist attack in U.S. history, the first rumors that swept the country centered on an unidentified Serbian terrorist group. The theory was abandoned only after a sharp-eyed investigator from the Bureau of Alcohol, Tobacco and Firearms and a New York City cop who were combing through the rubble found a tiny metal fragment with the identification number of the van rented by Mohammed Salameh. "It was a miracle that it wasn't destroyed," says the explosives expert. If it had been, the FBI might have been tracking Serbians for weeks instead of Sheikh Abdel Rahman and his labyrinthine web of local Arab terrorists.

Lost in the press avalanche about the World Trade Center bombing was the news that *on the same day* terrorists linked to Abdel Rahman had detonated a bomb packed with rusty nails in the Wadi el-Nil café, a fashionable restaurant in Cairo, killing two tourists and two Egyptians, and wounding 16. "They wanted to show the Egyptian authorities that they could operate in the heart of the nation's capital," says the high-ranking Egyptian-government official, who adds bitterly, "We begged America not to coddle the sheikh."

Jack Blum, a widely respected former special investigator for the Senate Foreign Relations subcommittee, puts it bluntly: The CIA trained the mujahedeen in terrorism, then dumped them in 1990 as part of an agreement with Moscow, leaving behind a ragtag army of anti-Western Muslim ex-

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tremists burning to vent their rage on their former patrons, America. "One of the big problems here is that many suspects in the World Trade Center bombing were associated with the mujahedeen," says Blum. "And there are components of our government that are absolutely disinterested in following that path because it leads back to people we supported in the Afghan war."

The first suspect arrested in the World Trade Center bombing was Mohammed Salameh, a 25-year-old Palestinian with a thick black beard and a degree from a Jordanian university in the *shariah*, Islamic religious law. On February 23, he rented the Ryder van that was packed with explosives and detonated underneath the World Trade Center. When it was revealed that he had returned four times to claim a $400 refund for the vehicle, which he claims was stolen the night before the bombing, many assumed he was either a patsy or the stupidest terrorist in history. What was forgotten, of course, was that the odds against identifying the van were astronomical.

"He's not a clever man, but he's not a stupid man," says Zakhary, the FBI undercover operative who met Salameh at the El Salaam Mosque. "He's an ordinary man, a working man. I think that, for him, the bombing was coming from his heart, not his brain."

The seeds of Salameh's discontent were sown in Bidya, a dusty, nondescript farming village of 6000 Palestinian Arabs near the Nablus–Tel Aviv Highway, on the Israeli-occupied West Bank. The squat, ramshackle, cinder-block homes line unpaved streets that are strewn with garbage. Indoor plumbing is rare, and the town doesn't have a single telephone. The gray concrete walls of Bidya's four schools are covered with pro-PLO graffiti and fierce tirades against Israel.

Bidya is a glaring contrast to nearby Ariel, the gleaming suburban settlement of 15,000 secular Jews that was built on land expropriated from Bidya and other nearby Palestinian villages in the mid 1970s. Ariel has the look and feel of an American Sunbelt suburb in the midst of a boom. At the mall in the heart of town, shops sell everything from falafel for $1.50 to expensive clothes. A large outdoor swimming pool attracts suntanned Jewish settlers, who moved to this West Bank outpost for its front yards and scenic vistas.

Bidya has a long history of violence and rebellion. In 1936, when Palestinian Arabs began a three-year revolt against the British Mandatory authorities then ruling Palestine and the Jewish minority who were struggling for statehood, Bidya became a staging base for *fedayeen*, or Palestinian guerrillas. The British Army was far more brutal putting down the revolt than the Israeli Army has been during the *intifada*. British planes strafed Arab villages, thousands of Palestinians were herded into concentration camps, and authorities passed emergency laws that made the possession of a gun or even a bullet a crime punishable by death. More than 10,000 Palestinians were killed in the fighting; Bidya suffered hundreds of casualties.

After Israel's 1948 War of Independence, the Jordanian Arab Legion occupied the West Bank, and Bidya spearheaded Palestinian opposition to Jordan's King Hussein, a Hashemite originally from Saudi Arabia who treated West Bank Palestinians with high-handed contempt. In 1959, 15 high-ranking officials of the Jordanian military, including a leading notable from Bidya, plotted King Hussein's assassination. But the Jordanian *mukhabarut* (secret police) discovered the scheme, and the plotters were sentenced to death.

Mohammed Salameh was born in Bidya in September 1967, just three months after it was occupied by Israeli troops in the June 1967 Six Day War. "When the Israelis came to our village," says Osama Odeh, a distant cousin of Salameh, "they made a gentlemen's agreement with my father and uncle, who is a lawyer. 'We know your family is very nationalistic and won't accept occupation,' they said, 'so if the *fedayeen* come to Bidya, you can feed them so long as you then tell them to go. We will

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give you money for your new school and build roads and sewers.'"

But from the onset of Israeli rule, Bidya's residents waged a fierce guerrilla war against the Israeli occupation, and Mohammed Salameh's family was in the forefront of that opposition. Salameh's maternal grandfather, one of Bidya's largest landowners, was active in the 1936 Arab Rebellion and later joined the PLO. He was arrested in the early 1980s for membership in the PLO, and, in spite of his advanced age, was imprisoned by the Israelis and allegedly tortured. He died soon after his release. Salameh's uncle spent 18 years in prison for a PLO attack on Israeli civilians. Odeh told me that Salameh's "hate" comes from the "injustice" of the Israeli occupation, his uncle's and grandfather's imprisonment, and Ariel's rapid expansion. "Ariel," says Odeh, "is growing, and sucking the red blood of our land."

When I last journeyed to Bidya, in the fall of 1990, the main entrance was blocked by a knot of heavily armed Israeli soldiers in riot gear. "A shooting took place," explained a soldier, who looked no more than 18. "The road is closed. If you go in, we will shoot you."

SHORTLY AFTER POLICE ARRESTED NOSAIR THEY FOUND STARTLING EVIDENCE THAT THE KAHANE KILLING WAS JUST THE FIRST IN A PLANNED SPREE.

Earlier in the day, students had gathered in the center of Bidya, shouting anti-Israeli slogans under a huge banner that read FATAH AND HAMAS TOGETHER. (Hamas is the large Palestinian Islamic fundamentalist group dedicated to Israel's destruction.) Then hundreds of Palestinian youth marched to the Nablus–Tel Aviv Highway, where young boys and girls began to throw stones at Israeli cars. Soldiers raced to the scene and fired into the air, trying to disperse the demonstrators. Several armed Jewish settlers got out of their cars and fanned out among the almond trees that line the side of the road and started shooting. Akhlam Abed, a 13-year-old girl, was killed. She was Bidya's first casualty of the *intifada*.

In the wake of Israel's lightning victory in the June 1967 Six Day War, Salameh's parents left Bidya for a squalid shantytown on the outskirts of Amman, Jordan, forfeiting their home and possessions, as did tens of thousands of Palestinians. Like all Palestinian youth, Salameh passionately followed the course of the *intifada*, the Palestinian uprising that began in the Gaza Strip in December 1987 and quickly spread to every Arab town, village, and refugee camp in the Occupied Territories. Every day Jordanian television broadcast images of Palestinian boys, their faces swathed in black-and-white-checkered *kaffiyehs*, their eyes unafraid, hurling pomegranate-sized stones at Israeli troops brandishing automatic weapons. The children of the "stone revolution," as they are called, gave Palestinians around the world a collective sense of pride and determination.

Salameh, one of 11 brothers and sisters, was an indifferent student with a poor self-image. According to Odeh, he became a devout Muslim in his teens. Salameh's parents have expressed surprise about his alleged role in the World Trade Center bombing. "The Jews, this is from the Jews, who have done this and blamed my son," Salameh's mother, Aysha, told *The New*

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York Times.

Aysha might well blame Sheikh Abdel Rahman for leading her wayward son down the combustible path of Islamic fundamentalism. Salameh, who received a tourist visa from the American consulate in Amman in December 1987, moved to New Jersey, where he worked at menial jobs, constantly changing addresses. He met Abdel Rahman not long after the sheikh arrived in Brooklyn; he was captivated by the sheikh's call for jihad and the downfall of America, becoming his sometime gofer, according to one U.S. law-enforcement source. Salameh quickly fell into a circle of like-minded Muslims, including Nidal Ayyad, a chemical engineer of Palestinian descent who allegedly concocted the World Trade Center bomb.

In Egypt, Abdel Rahman's name lives in infamy for his role in the October 6, 1981, assassination of Anwar Sadat, who was cut down in a hail of grenade and automatic-weapons fire while he reviewed a military parade. In 1980, Abdel Rahman had issued a *fatwa*, or religious decree, that called Sadat an infidel for turning his back on Islam and for making peace with Israel. This made Sadat a prime target for assassination, an act eventually executed by the operational arm of Abdel Rahman's organization, Al Gamaat al Islamia, which had penetrated the Egyptian army and security services.

"IF THE BOMB HAD BEEN A LITTLE BIT BIGGER, NOT MUCH MORE, I THINK IT WOULD HAVE BROUGHT THE TOWERS DOWN. IT'S REALLY SCARY."

During a tumultuous trial in which the defendants publicly charged they had been tortured by police interrogators, the sheikh was acquitted. The sheikh, who continued to agitate against the Egyptian government while his followers carried on a campaign of lethal bombings, was imprisoned for three months in 1985, for one month in 1986, and for four months in 1989. He finally left his homeland in 1990, saying, "It was too much for me."

After brief stays in Saudi Arabia and Iraq, the sheikh slipped into Pakistan, where he forged operational links with mujahedeen strongman Gulbuddin Hekmatyar, the head of a radical Afghan Islamic fundamentalist army that was being covertly backed by the CIA. According to Stephen Van Evera, an affiliate of Harvard's Center for Science and International Affairs, Hekmatyar "strongly chastised the United States and its 'immoral' society, even while Washington lavished him with aid." In Hekmatyar's guerrilla training camps, American advisers taught everything from using explosives to shooting down enemy planes with shoulder-held Stinger missiles.

The mujahedeen base camps in Peshawar were also places where militant Muslims were caught up in the spirit of the two supreme moments in recent Islamic history: the revolution in Iran, which transformed the country into a self-righteous bastion of zealous fundamentalism, and the Afghan war. "Iran symbolizes the rise of the Islamic state," says the Egyptian official, "and the Afghan war was a real battlefield for these people to acquire the stamina and capabilities to wage war." And since these two events were successful, the militants "decided to pursue this march and spread their revolutionary message to other countries."

In America, Abdel Rahman raised funds

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and recruits for the mujahedeen, many of them first-generation Muslim immigrants. His mosques in Jersey City and Brooklyn also attracted fundamentalists expelled from the Gulf Emirates after the Gulf War. But many Muslims repudiate his radical preachings. Mosques across the country closed their doors to the rabble-rousing blind man. Local Muslims grew even more wary in March 1991 when Mustafa Shalabi, a 39-year-old Egyptian electrical contractor living in Brooklyn, was found lying face down on his kitchen floor in his pajamas. He had been shot once at close range near the left ear and stabbed in the back and stomach.

Police sources say Shalabi had been running guns to the Afghan rebels, as well as raising money for the legal defense of El Sayyid Nosair before his trial on charges of assassinating Rabbi Meir Kahane. Earlier, Shalabi had helped Abdel Rahman find an apartment in Brooklyn. Police speculate that Abdel Rahman had Shalabi murdered for pocketing some of the money. Shalabi "had a lot of enemies," says a police source. "There was also a lot of intrigue and infighting at his mosque in Brooklyn."

Shalabi worshipped at the El Farouq Masjid Mosque, located in a bleak storefront building at 554 Atlantic Avenue in Brooklyn. The Friday sermons were delivered by Abdel Rahman, until the directors of the mosque expelled him soon after Kahane's assassination.

The sheikh then moved entirely to the El Salaam Mosque in Jersey City. The founder of the mosque is Sultan Ibraham El Gawli, a wealthy 55-year-old Egyptian businessman who was convicted by a federal jury in July 1986 for conspiring to export 150 pounds of C-4 plastic explosives to Israel for use by the PLO in a Christmas bombing. El Gawli, who sports a full, white Santa Claus beard, served 18 months in prison before returning to Jersey City. He often marched in front of the courthouse during Nosair's trial, carrying banners with fierce anti-Israel slogans. "It's no crime praying together, is it?" El Gawli asked me when I questioned him about his friendship with Nosair.

It was the infiltrator Mamdouh Zaki Zakhary who helped U.S. Customs set up the sting operation that netted El Gawli. Zakhary, a frail man afflicted with blindness in one eye and a large goiter on his neck, wore a wire into El Galwi's office at a travel agency he owned, Sultan Travel, recording five incriminating conversations. "There were some references on the tapes about doing it [transporting the explosives] for God," recalls Kevin McCarthy, the assistant U.S. attorney who prosecuted El Gawli.

"Sultan El Gawli was the brains behind the terror cell at the mosque," says Zakhary. "There were lots of meetings in his office. He also got foreign money from the PLO and Iran. Many times he entertained and was visited by officials from Saudi Arabia, the PLO, and Iran."

"I always thought the El Gawli case was just scratching the surface of what was really going on [in the El Salaam Mosque]," admits a federal official who worked on the case. "First, El Gawli himself was this businessman who seemed to be trying to do things for the money, not for any grander scheme. And secondly, since Mamdouh was a [Coptic Christian], I thought he wouldn't have access to the real inner world of whatever was going on in the mosque. At the same time, I didn't have any indications that there was more stuff going on in the mosque."

After testifying as the key witness in a Camden, New Jersey, courthouse, Zakhary entered a federal witness-protection program. At first, he and his new bride lived in New Orleans, before he became convinced the PLO was stalking him. He moved throughout the Southwest, driving the federal marshals responsible for him crazy with complaints about the program.

Homesick and desperate for cash, Zakhary offered to return to Jersey City to spy on the Arab American community and the El Salaam Mosque, this time for the FBI, under the code name Mubarak. He stayed away from the mosque itself except for

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three visits, gathering what information he could through friends and acquaintances.

"I didn't know Salameh very well," says Zakhary, who was better acquainted with Ibraham Elgabrowny, a cousin of both El Gawli and El Sayyid Nosair. "Elgabrowny was a very extreme fundamentalist. He belonged to the Muslim Brotherhood in Egypt. In 1985, when the TWA plane was hijacked to Beirut, Elgabrowny said he was very happy. He said, 'If I was the kidnapper, I would start executing passengers right now.'"

In 1991, a year and a half after he began to work for the FBI, Zakhary reported to his handler that he had overheard a plot to assassinate the two U.S. senators from New York, Daniel Patrick Moynihan and Alfonse D'Amato. When incredulous FBI agents hooked him up to a lie detector, Zakhary failed the test. He blames the result on prescription medication he was taking at the time because of an automobile accident. The FBI did not believe him and terminated his employment.

"Mamdouh [Zakhary] is an honest man with very good intentions," Richard Kennan, a U.S. Customs agent, told the Israeli newspaper *Ma'ariv*. "[He] prevented a mass terror attack on Christmas 1985. Unfortunately, he didn't understand the American system. He was confused. I'm very sorry about what happened to him. We tried to get him asylum in the U.S., but his behavior didn't help."

The U.S. has had a long and tortured history with the Islamic world. While most Americans see Muslims as the aggressors, Muslims view the West the same way. In fact, the U.S. and the Islamic world have been trading acts of terrorism for years. In 1986, Libyan-backed terrorists bombed the La Belle discotheque in Berlin, killing two American servicemen. In response, the U.S. bombed Libya, killing 36 civilians and wounding 92. On July 3, 1988, during the Iran-Iraq war, the U.S.S. *Vincennes* accidentally shot down an Iranian passenger plane over the Gulf, killing 290 people. Six months afterward, Pan Am 103 disintegrated in a shower of fire and debris over Lockerbie, Scotland. No one claimed credit, but it is widely believed in intelligence circles that the Pan Am bombing was Iran's revenge.

The U.S.-funded attack that killed the greatest number of innocent civilians took place on March 8, 1985, when the U.S. tried to liquidate what it believed was the very symbol of international terrorism: fundamentalist Muslim leader Sheikh Mohammed Fadlallah, the head of Hizbollah, the Party of God. On October 23, 1983, Fadlallah had sent a suicide bomber barreling into the Marine compound in Beirut, killing 241 Marines. CIA director William Casey contracted out the job of retaliation to Saudi intelligence, which sent a car packed with explosives into a Beirut slum near Fadlallah's headquarters. A city block was devastated and more than 90 people were buried under the rubble.

Because of the persistent fear of Arab terror during the Gulf War, Arab Americans say they have been unfairly targeted for special surveillance by federal agencies. Actually, there has been little evidence of Arab terrorism on American soil. The PLO raises money and spreads propaganda in the U.S., but has refrained from attacking targets here—although it has staged murderous assaults against Americans abroad. Ironically, the week the World Trade Center was bombed, a PLO official was being tried in a Brooklyn federal court for planting powerful time bombs in rented cars parked outside two Israeli banks in Manhattan and the El Al terminal at Kennedy Airport in 1973.

Most Americans would be surprised to learn, however, that the terrorist group that led the hit parade through much of the 1980s was the Jewish Defense League, Rabbi Meir Kahane's fanatical right-wing Zionist organization. By 1985, the JDL was ranked by the FBI as the most lethal domestic terrorist group in America, overtaking the Aryan Nation, the American Nazi Party, and the Puerto Rican Revolution. The JDL has been linked to dozens of

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bombings and at least two assassinations, including the widely admired regional director of the Arab-American Anti-Discrimination Committee, Alex Odeh.

For years the Brooklyn-born Kahane had been calling for the expulsion of all Arabs from Israel. After moving to Jerusalem, he established the Kach Party and was elected to Israel's parliament in 1984. He drafted a slew of bills that were never passed, including one that would have made it a crime punishable by two years in prison for a Jew to have sex with an Arab. Israel's High Court banned Kahane from running for reelection in 1988 on the grounds that his party was racist and antidemocratic.

It seems certain now that Kahane's fanatical ideas made him the target of terrorism himself. On November 5, 1990, he gave the last speech of his life. "My whole life has been ideas which eventually were taken up by other people and succeeded," said Kahane in his characteristic stutter, an impediment since childhood. "Today Jewish defense is an accepted thing. A patrol in a neighborhood is an accepted thing." But patrols were no longer adequate to defend Jews in a country that was becoming increasingly anti-Semitic, Kahane warned. He urged his Jewish audience to move to Israel before a new Holocaust engulfed them in America. "They hate us with a passion out there," thundered Kahane, "with a virulence that's frightening to see."

TERRORISTS LINKED TO ABDEL RAHMAN DETONATED A BOMB IN A FASHIONABLE CAIRO RESTAURANT ON THE SAME DAY AS THE WORLD TRADE CENTER BOMBING.

Following Kahane's speech, El Sayyid Nosair approached the podium wearing a black yarmulke, as if to ask a question. Moments later, Kahane was dead. In the irony of ironies, the FBI put the New York branch of the Kach Party under surveillance to prevent it from avenging their slain leader. The FBI failed, however, to monitor activities at the radical mosques.

I interviewed Nosair for *The Village Voice* in a tiny detention cell on Rikers Island on the eve of his trial. Nosair, who was wearing a white tunic and a white skullcap with the words ALLAH WILL BE VICTORIOUS knitted in bold blue Arabic calligraphy across the front, began our 90-minute talk by handing me a number of pamphlets showing why Islam was the true path. "I started to practice my religion as much as I can since I came to the United States," said Nosair. "Of course, I read a lot. I read about different religions—Christianity, Judaism—I studied all these religions that led me to believe that Islam is the true way of life.

"You face many different doors" in America, continued Nosair, who had immigrated to Pittsburgh from Egypt on July 14, 1981. The true path is behind one door, he explained, while evil lurks behind the others. "Because I believe that Islam is the true way of life, I began to preach Islam, to prove to people from their own [religious] books that Islam is the correct way of life." Islam, he told me, is encoded in each of us at birth. Each person is created in submission to Allah. We pervert nature, he said, when we embrace Judaism or Christianity. "Judaism has a lot of materialistic rituals with a minimum of spiritual rituals, and that's why Allah sent Islam to mankind," Nosair said. Judaism is an abomination, he explained, not because of race or blood (the

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Arabs ,too ,are ,Semites), but ,because ,the Jews refuse to accept Mohammed as the Prophet.

I asked Nosair if the Koran says there is such a thing as a just killing. "Of course, there has to be," he replied. "We have to have an Islamic state—that's why we try to preach Islam to everybody."

Nosair admitted he is a big "celebrity" in the Muslim world, where he is credited with killing Kahane. When Nosair's wife, Caren, a blue-eyed Irish Catholic convert to Islam, and three children traveled to Egypt a year after Kahane's murder, they were met at the airport by government officials and driven through Cairo in a motorcade. Caren's chaperone was none other than Nosair's cousin, Ibraham Elgabrowny.

Elgabrowny had helped raise more than $250,000 for Nosair's legal defense. The trial turned out to be one of the most shocking in New York history. The Manhattan D.A.'s case against Nosair was as narrowly focused as the investigation had been. The prosecution didn't present any of the evidence police found in Nosair's apartment ,suggesting his terrorist connections and never offered the jury an explanation of Nosair's motive, despite the fact that Manhattan Assistant District Attorney William Greenbaum knew that Nosair was bragging to fellow inmates at Rikers Island that "Allah chose me to kill the big Jew." At least one inmate reported Nosair's confession to the D.A.'s office, according to sources close to the investigation. After close questioning that included a lie-detector test, the inmate was deemed highly credible by the D.A. But in a catastrophic miscalculation, Greenbaum decided not to put the inmate on the stand.

The D.A. believed there was ample evidence to convict Nosair without delving into his motive, which would have led the trial into the swamp of Kahane's radical ideas, 50 years of Arab-Israeli enmity, and the internal politics of Israel and Egypt. What looked to every observer like an open-and-shut case ended with Nosair's stunning acquittal: he was, however, sen-

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tenced to 22 years for related charges.

"In this case the result is so jarring that it has tempted people to talk about taking the law into their own hands," former U.S. attorney Rudolph Giuliani wrote to Manhattan U.S. Attorney Otto Obermaier after the verdict. Giuliani recommended that the FBI reopen the Nosair investigation. The Justice Department refused, and the case dimmed from public memory until the World Trade Center was bombed.

The authorities are just now reopening the Kahane investigation. It is possible that Nosair will be tried in federal court for violating Kahane's civil rights, much as the police in the Rodney King case are now being tried. A new investigation may find that the bombers of the World Trade Center were also Kahane's killers. The connections seem strong. Both Elgabrowny and Salameh visited Nosair in Attica. And federal agents found forged Nicaraguan passports made out to Nosair and his family in Elgabrowny's Brooklyn brownstone. Attica officials are currently investigating whether an escape was being planned.

Another suspect in the case, Mahmud Abouhalima, a New York City taxi driver and an associate of both Nosair and Salameh, fled the U.S., reportedly for Egypt. Investigators believe he may now be in Pakistan, where he had trained with the mujahedeen and later fought in the Afghan war. Investigators are also looking for links between the bombing suspects and Mir Aimal Kansi, who is being sought for the slaying of two CIA employees in front of the agency's Virginia headquarters. According to a federal prosecutor, Kansi had told his roommate that he was going to commit a violent act to protest what he perceived as Western mistreatment of Muslims.

This much is certain: Just 12 hours afer Kahane's killing, the government was espousing the lone-gunman theory and Nosair's terrorist connections were ignored. Had the investigation into the assassination of Rabbi Meir Kahane been vigorously pursued, the World Trade Center bombing may never have happened. ■

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29B-WF-171994 (MAJOR CASE 38)
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1

On [redacted] a source who has provided reliable information in the past, advised that [redacted]

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Main

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SW SW

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29B-WF-171994 Sub Main

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FBI

06/16/93 ********** INDICTMENT **********

~~SENSITIVE~~ / UNCLASSIFIED

Case Number: WF0171994 Stat Agent Name: [redacted] Report Date: 03/23/1993 b6
Serial No.: Stat Agent SSN.: [redacted] Accom Date.: 01/15/1993 b7C

Does Accomplishment Involve		Assisting Agents SSN	Subject Name			b7E
Forfeiture Assets . . . . . : N	[redacted]	°	PHARAON, GHAITH, RACHAD			
Corruption of Public Officials: N		°				
Drugs . . . . . : N		°				
A Fugitive. . . . . : N		°	RA	Squad	Task Force	
Bankruptcy Fraud. . . . . : N		°	----	-----	----------	
Computer Fraud/Abuse. . . . . : N		°	CRIM	C5		

Investigative Assistance or Technique Used

[redacted]	FINAN ANALYST	[redacted]	INFORMNT INFO	[redacted]	TECH AG/EQUIP	b7E
	AIRCRAFT ASST		LAB DIV EXAMS		TEL TOLL RECS	
	COMPUTER ASST		LAB FIELD SUP		UCO-GROUP I	
	CONSEN MONITR		PEN REGISTERS		UCO-GROUP II	
	ELSUR/FISC		PHOTO COVERGE		UCO-OTHER	
	ELSUR/III		POLYGRAPH		NCAVC/VI-CAP	
	ENG FIELD SUP		SRCH WAR EXEC		VISUAL INVEST	
	ENG TAPE EXAM		SHOW MONEY		CRIS NEG-FED	
	HYPNOSIS ASST		SOG ASST		CRIS NEG-LOC	
	IDENT DIV AST		SWAT TEAM			

1 = Used, but did not help
2 = Helped, Minimally
3 = Helped, Substantially
4 = Absolutely Essential

Serial Number of Indictment . . . . :

United States Code Violation

Title	Section	Counts
18	371	1
18	1343	1
18	1962	1
18	2	1

Accomplishment Narrative

~~SENSITIVE~~ / UNCLASSIFIED

598X1

29B-WF-171994

SEARCHED ___ INDEXED SL
SERIALIZED SL FILED SL
JUN 25 19-3
FBI - WASH. METRO FIELD OFFICE

65-0015-000-8065

06/16/93 ********** INDICTMENT **********

~~SENSITIVE~~ / UNCLASSIFIED

Case Number: WF0171994
Serial No.:

Stat Agent Name:
Stat Agent SSN.:

Report Date: 03/23/1993
Accom Date.: 01/15/1993

b6
b7C

Does Accomplishment Involve		Assisting Agents SSN	Subject Name
Forfeiture Assets	: N		
Corruption of Public Officials	: N		
Drugs	: N		
A Fugitive.	: N		
Bankruptcy Fraud.	: N		
Computer Fraud/Abuse.	: N		

b7E

b6
b7C

RA	Squad	Task Force
CRIM	C5	

Investigative Assistance or Technique Used

b7E

	FINAN ANALYST		INFORMNT INFO		TECH AG/EQUIP
	AIRCRAFT ASST		LAB DIV EXAMS		TEL TOLL RECS
	COMPUTER ASST		LAB FIELD SUP		UCO-GROUP I
	CONSEN MONITR		PEN REGISTERS		UCO-GROUP II
	ELSUR/FISC		PHOTO COVERGE		UCO-OTHER
	ELSUR/III		POLYGRAPH		NCAVC/VI-CAP
	ENG FIELD SUP		SRCH WAR EXEC		VISUAL INVEST
	ENG TAPE EXAM		SHOW MONEY		CRIS NEG-FED
	HYPNOSIS ASST		SOG ASST		CRIS NEG-LOC
	IDENT DIV AST		SWAT TEAM		

1 = Used, but did not help
2 = Helped, Minimally
3 = Helped, Substantially
4 = Absolutely Essential

Serial Number of Indictment . . . . :

United States Code Violation

Title	Section	Counts
18	371	1
18	1343	1
18	1962	1
18	2	1

Accomplishment Narrative

~~SENSITIVE~~ / UNCLASSIFIED

S98X2

29B-WF-171994

SEARCHED ____ INDEXED Su
SERIALIZED Su FILED Su
JUN 25 [illegible]
FBI - WASH. METRO FIELD OFFICE

1325015-000-8067

Memorandum

To : SAC, WMFO [redacted] Date 4/9/93 b7D

From : SSA [redacted] (C-5 BCCI) b6 b7C

Subject: [redacted] b6 b7C b7D

PURPOSE

The purpose of this memorandum is to [redacted] b7D b7E anticipated expeditures relating to, "HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO" (i.e., the BCCI investigation).

DETAILS

The captioned source has been providing consistently-reliable information to the FBI [redacted] On numerous occasions [redacted] has furnished relevant, timely, valuable information relating to [redacted] (X) b6 b7C b7D

Currently, MC #38 is at a point where singular, inside information is required to identify, investigate and prosecute any U.S. citizens, who were/are culpable in any illegal, BCCI-related activities. Also at this time, MC #38 has several fugitives, all foreign nationals, who could provide such inside information and whose capture and presentation for U.S. trial is, at best, problematic. These fugitives include: AGHA HASAN ABEDI, the founder and chairman of BCCI, who reportedly is in extremely poor health in his native Pakistan; [redacted] who presently is being [redacted] GHAITH RACHAD PHARAON, a Saudi Arabian, who was a major BCCI nominee and whose exact whereabouts are unknown; and b6 b7C

(2)-WMFO (1)-29B-WF-171994) b7D

JNR:jnr
(2)

29B-WF-171994 Main -599

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
APR 12 1993
FBI -- [redacted] FIELD OFFICE

Approved 4/13/93 RMB

1325015-000-8069

[redacted] b7D

[redacted] who was a BCCI officer who b6 b7C
essentially [redacted]

There are also two witnesses--both [redacted] and, b6 b7C
therefore, for all intents and purposes, unavailable--who are either known or believed to possess very valuable information, some of which is immediately needed in the New York trial of [redacted] The witnesses are [redacted]

In recent days, [redacted] has reported that [redacted] b6 b7C b7D
[redacted]

Another of [redacted]'s contacts is reputed to have b6 b7C b7D
[redacted]

Deputy Assistant Attorney General [redacted] b6 b7C
DOJ, very recently stated that, in his opinion, the U.S. should expend its resources in discovering and prosecuting culpable U.S. citizens; that, given the distinct possibility that none of the foreign fugitives will ever appear here, it may be preferable to negotiate deals with them in return for cooperation. In that context, DAAG [redacted] said he would certainly value the cooperation of ABEDI and/or [redacted], if it were offered.

[redacted] b6 b7C b7D

1325015-000-8070

[redacted] b7D

[redacted] b6 b7C b7D

The amount being requested, [redacted] was calculated as follows (figures are approximates): b6 b7C b7D b7E

Roundtrip airfare [redacted]
Per diem (7 days at [redacted] day)..... [redacted]
Payment for past and future services... [redacted]

RECOMMENDATION

Based on the foregoing, [redacted] b6 b7C b7D b7E

[redacted]

600

29B-WF-171994 Main

SEARCHED INDEXED
SERIALIZED FILED
MAY 6 1993
FBI - WASH. METRO FIELD OFFICE

b6
b7C

Memorandum

To : IIC [redacted] & SSA [redacted] Date 1/26/93

From : [redacted]

Subject: NEW YORK CITY MEETINGS 1/25/93

b6
b7C

1. Interview [redacted] at the law offices of Skadden Arps, 919 Third Avenue, New York City. [redacted] was represented by [redacted] of the New York Office and [redacted] of the Washington Office. SA [redacted] and myself questioned the witness, and [redacted] will prepare a FD-302.

b6
b7C

2. Meeting with NFYO agents [redacted] (Supervisor of I-6) and SA [redacted] about an FCI investigation.

b6
b7C

3. Meeting with representatives of [redacted] DOJ. [redacted] Attending for DOJ were [redacted] and myself. As yet, the French had not extradited [redacted] to England, but they have reportedly agreed to do so. I asked [redacted] to ask [redacted] has discovered any criminal activity within our jurisdiction as a result of their PW investigation. This meeting was to resume the next day, when [redacted] and DANY would be in attendance. One item for discussion would be whether and how to [redacted]

b6
b7C
b7D

(X) b3

[redacted]

-599

[redacted]

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SERIALIZED [redacted] FILED [redacted]

1325015-000-7986

JAN 26 1993

FBI — WASH. FIELD OFFICE

[redacted]

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FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 16
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Page 5 ~ b6 - Per CBP; b7C - Per CBP; b7E - Per CBP;
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Page 18 ~ b6 - Per CBP & DEA; b7C - Per CBP & DEA; b7D - Per DEA; b7E - Per CBP & DEA;
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FEB 8 1992
FBI — WASH. FIELD OFFICE

-510

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
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☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-6969

Indices Search Slip
FD-160 (Rev. 7-28-89)

b6 Per FBI
b7C

To: Office Services Manager

Date	11/2/92
Requested	SA
Ext. 9338	Squad: 7 BCCI
File No.	29B-WF-171994
Social Security Account #	UNK

Address	Birth Date	Birth Place	Race	Sex
North Dade Detention Center Miami FL	2/6/29	UNK	W	☒ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☐ All References ☒ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☐ Main Criminal *(if no Main, list all Criminal References)*

☐ **General Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ISIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **OCIS:** ☐ NEG ☐ POS	Searched by	Date	
☒ **ELSUR Indices:** ☒ NEG ☐ POS	Searched by	Date	11/4
☐ **IIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **FOIMS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **MICRO:** ☐ NEG ☐ POS	Searched by	Date	
☐ **GLOBAL:** ☐ NEG ☐ POS	Searched by	Date	
☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by	Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-509
29B-WF-171994

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED SERIALIZED INDEXED FILED
NOV 1992
FBI — WASH. FIELD OFFICE

1325015-000-6968

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 15
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Page 15 ~ b6; b7C; b7E;
Page 16 ~ b6; b7C; b7E;

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b6 (Per FBI)
b7C
ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8-3-92

To: Office Services Manager

b6 (Per FBI)
b7C

Requ

Ext. 9300 | Squad: BCC1 | File No.: 29B-WF-171994

Subject

Social Security Account #

Aliases

T15/1152

Address	Birth Date	Birth Place	Race	Sex ☑ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only

☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*

☐ Restrict Locality of

Searched by	8/13/92 Date	☑ ISIS: ☐ NEG ☐ POS Searched by	10/1/92 Date
☐ Confidential Indices: ☐ NEG ☐ POS Searched by	Date	☑ OCIS: ☐ NEG ☑ POS Searched by	9/2/92 Date
☑ ELSUR Indices: ☐ NEG ☐ POS Searched by	8/14 Date	☑ See attached 8-19-92	Date
☑ Searched by	8/18/92 Date	☐ MICRO: ☐ NEG ☐ POS Searched by	b6 (Per FBI) b7C b7E Date
☑	8/13/92 Date	☐ REGIONAL: ☐ NEG ☐ POS Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
Unattached			

29B-WF-171994 -

SEARCHED ____ INDEXED ____ 434X7
SERIALIZED ____ FILED ____

FBI - WASH. METRO FIELD OFFICE

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

LAST-UPDATE: 25 SEP 1989
ENTERED-BY: HO
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: TX
HOME-ADDR-S: HO*245C*361*304

b6 (Per FBI)
b7C

P-D: [redacted]-*5
QUICK-REF: PERSON-UNION
QUICK-REF: PERSON-PERSON
FILE-SER: NY*183A*3703-IIU*16 NY
CREATED: 15 MAR 1991
LAST-UPDATE: 15 MAR 1991
ENTERED-BY: NY

COMPLETED 279661.000 CTIME=07:42 STATUS 3642,6,,,3642

ADDR-DATE: 02 AUG 1983
HOME-ADDR-S: NO*12*382*53 (6E)
SPECIAL-CHAR: SSA[redacted]
SPECIAL-CHAR-S: [redacted] (6E)
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: NO*12*382*53 (6E)
SPECIAL-CHAR: [redacted]LA
SPECIAL-CHAR-S: NO*12*382*53 (6E)

b6 (Per FBI)
b7C

P-D: [redacted]-*2
QUICK-REF: PERSON-ORG
CREATED: 31 JAN 1986
LAST-UPDATE: 04 FEB 1986
ENTERED-BY: PX
HOME-ADDR: 01
CITY: MEXICO CITY
STATE: MM
ADDR-DATE: 12 JUL 1982
HOME-ADDR-S: [redacted]
SPECIAL-CHAR: 1) [redacted]
SPECIAL-CHAR-S: PX*92A*511-C*176
SPECIAL-CHAR: 2[redacted]
SPECIAL-CHAR-S: PX*92A*511-C*176

P-D: [redacted]-*3
QUICK-REF: PHONES
QUICK-REF: CRIMINAL-DATA
CREATED: 17 APR 1987
LAST-UPDATE: 20 APR 1987
ENTERED-BY: NY
HOME-ADDR: [redacted]
STREET: [redacted]
CITY: [redacted]
STATE: NY
PHONE: [redacted]
HOME-ADDR-S: [redacted] BQ
TYPE-PERSON: [redacted]
TYPE-PERSON-S: NY*31C*11747*82 BQ
PHY-DESC: 01
HT: 600
WT: 225
SEX: M
HAIR: BROWN
EYES: BROWN
RACE: LATIN
SKIN: LIGHT
PHY-DESC-S: [redacted] BQ
SPECIAL-CHAR: SSAN [redacted]
SPECIAL-CHAR-S: [redacted]7*84 BQ
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: NY*31C*11747*82 BQ
SPECIAL-CHAR: SUBJECT OF NY.31C.11747
SPECIAL-CHAR-S: NY*31C*11747*92 BQ
DOB: 30 MAY 1950
AGE: 42
DOB-S: [redacted]11747*84 BQ
POB: [redacted]UY
POB-S: NY*31C*11747*84 BQ

P-D [redacted]*4
QUICK-REF: VEHICLES
FILE-SER: HO*245C*361*304
CREATED: 20 SEP 1989

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

FOR P-D WITH NYSIIS-NAME [redacted] AND WITH LN [redacted] AND WITH FN [redacted] L ALL-INFO #
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P-D: [redacted]-*1
QUICK-REF: VEHICLES
CREATED: 16 FEB 1984
LAST-UPDATE: 17 FEB 1984
ENTERED-BY: SD
ALIAS: [redacted]
ALIAS-S: SD*245*39-15*83
ALIAS: [redacted]
ALIAS-S: SD*245*39-15*83
ALIAS: [redacted]
ALIAS-S: SD*245*39-15*83
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: MM
HOME-ADDR-S: SD*245*39-15*83

b6 (Per FBI)
b7C

P-D: [redacted]*I*1
QUICK-REF: PHONES
QUICK-REF: PERSON-PERSON
CREATED: 31 JUL 1984
LAST-UPDATE: 31 JUL 1984
ENTERED-BY: NO
INVEST-INTEREST: NO*SQ08
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: FL
ADDR-DATE: 01 AUG 1982
HOME-ADDR-S: NO*12*382*53 (6E)
HOME-ADDR: 02
STREET: [redacted]
CITY: [redacted]
STATE: LA
PHONE: [redacted]
ADDR-DATE: 13 AUG 1982
HOME-ADDR-S: NO*12*382*53 (6E)
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STREET: [redacted]
CITY: [redacted]
STATE: LA
ZIP: [redacted]
PHONE: [redacted]
ADDR-DATE: 29 NOV 1982
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STREET: [redacted]
CITY: [redacted]
STATE: LA
ZIP: [redacted]
PHONE: [redacted]
ADDR-DATE: 19 APR 1983
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HOME-ADDR: 05
STREET: [redacted]
CITY: [redacted]
STATE: LA
ZIP: [redacted]

OCIS
Processed 9/2/92
Initialed BJ

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FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 165
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Page 271 ~ b6; b7C; b7D;
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Page 273 ~ b6; b7C; b7D;
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Page 284 ~ b6; b7C; b7E;
Page 285 ~ b6; b7C; b7E;
Page 286 ~ b6; b7C; b7E;
Page 287 ~ b3; b6; b7C; b7D; b7E;
Page 288 ~ b3; b6; b7C; b7D; b7E;
Page 289 ~ b3; b6; b7C; b7D; b7E;
Page 295 ~ b3; b6; b7C; b7D; b7E;
Page 296 ~ b6; b7C; b7E;

Page 297 ~ b6; b7C; b7E;
Page 298 ~ b6; b7C; b7E;
Page 299 ~ b7E;
Page 300 ~ b6; b7C; b7E;
Page 301 ~ b6; b7C; b7E;
Page 302 ~ b6; b7C; b7E;
Page 303 ~ b6; b7C; b7E;
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Page 305 ~ b3; b6; b7C; b7E;
Page 306 ~ b3; b6; b7C; b7E;
Page 307 ~ b3; b6; b7C; b7E;
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Page 317 ~ b3; b6; b7C; b7D; b7E;
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FD-448 (Rev. 5-23-90)

Rec'd 9:45 am KTW 3/17/92

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE
- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: ____
Sender's Initials: ORW
Number of Pages: 2

To: SAC, WMFO (Name of Office) Date: 3/17/92

Facsimile number: 324-6426

Attn: SSA [redacted] SQUAD C-5
(Name) (Room) (Telephone No.)

From: DIRECTOR, FBI (FIFU, WCCS)
(Name of Office)

Subject: ~~HIDDEN~~ INTERESTS
MAJOR CASE 38
OO:WMFO

MAIN b6 b7C

ORIGI [redacted]
RECEIVED
MAR 17 1992
[redacted]

Special Handling Instructions: ~~PLEASE HAND CARRY TO SSA~~ [redacted] (Squad C-5)

b6
b7C

Originator's Name: ~~SSA~~ [redacted] Telephone: ~~324-5595~~

Originator's Facsimile Number: ~~324-6492~~

Approved: [redacted]

29B-WF-171994 Sub R

Budget unit, CID

FBI/DOJ

EXT 1125, Required An Answer to attached ASAP-ie DOJ 5 hr received on Inquiry from [redacted] Budget Section. THANKS A LOT [redacted] 3/17/92

"Short Sweet"

1325015-000-6278

QUESTION: WHAT IS THE FBI DOING TO MANAGE THE DOCUMENTS ASSOCIATED WITH THE BCCI INVESTIGATION? (EXAMPLE: HOW ARE THE FILES STORED - HOW IS THE INFORMATION RETRIEVED - IS THEIR ONE MAIN FILE - ARE THERE ANY COMPUTERIZED SYSTEMS USED ETC.)

b6
b7C

Please

FBI MANAGEMENT OF
DOCUMENTS ASSOCIATED
WITH THE BCCI INVESTIGATION

As of 3/18/92, the following conditions exist:

FBI Files:

Records created by the FBI during this (and any) investigation, e.g., reports of interviews (FD-302s) and administrative documents, are stored in hard-copy form in the case file and are locatable through a Bureau-wide, computerized indices.

Documentary Evidence:

With the notable exception of original records acquired by means of a search warrant, the documentary evidence in this case is almost exclusively photocopies. The original records derived from the search are under the care and custody of the FBI/WMFO, stored in an evidence room at its Tysons Corner offices. The other, photocopied documents are not managed by the FBI; rather, they are in the possession of the Department of Justice (DOJ), stored in Washington, D.C., either at the U.S. Attorney's Office, or DOJ's Bond Building, or, temporarily, in the "Aspen" imaging facility (for processing) in the National Press Building.

Retrieval of only those search-derived records under FBI/WMFO's control is accomplished by means of selection from a hard-copy, box-file-level index, which is a serial in one of the volumes of the FBI/WMFO's file on the BCCI case.

29B-WF-171994-365

SEARCHED - INDEXED
SERIALIZED - FILED
MAR 19 1992
FBI - WASH. METRO FIELD OFFICE

MAIN 1325015-000-6280

Memorandum

To : FBIHQ Date 3/17/92

From : SAC, WMFO (29B-WF-171994 (C-5) (P)

Subject: HIDDEN INTEREST;
MAJOR CASE #38
OO:WMFO

RE: WMFO telcall to Assistant Unit Chief, Voucher Unit [redacted] 3/17/92. b6 b7C

REQUEST OF THE BUREAU

In reference to WMFO Memo to FBIHQ dated 2/26/92 and to faxed transmission from FBIHQ to WMFO dated 2/27/92; FBIHQ is requested to approve the reimbursement of actual expenses to be incurred on travel of FA [redacted] to Grand Cayman Islands 3/24/92 - 4/4/92. [redacted] b6 b7C b7E

FBIHQ indicated that actual expenses for lodging, for FA [redacted] could be approved for this location. FBIHQ is requested to approve actual expenses, for FA [redacted] s official travel, so he may complete the investigation as it relates to the above case. This travel has prior FBIHQ approval for investigative purposes of the captioned matter.

As mentioned in previous memoranda, SA's [redacted] and [redacted] with prior travel approval, will already be in the Cayman Islands and FA [redacted] will be joining them on the 24th of March. b6 b7C

3 - FBIHQ
1 - WMFO
SRD/srd
(4)

29B-WF-171994 - Main
-367

Searched _____
Serialized _____
Indexed _____
Filed _____

1325015-000-6298

Memorandum

To : SAC, WMFO 29B-WF-171994 (P) Date 3/20/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
OO:WMFO

RE memorandum from AUSA [redacted] to WMFO dated 2/10/92. b6 b7C

It is requested that an administrative subfile for the above captioned case be opened to handle matters related to the above referenced memorandum.

1 - 29B-WF-171994 - Main
1 - 29B-WF-171994 - Sub V

369
Main
29B-WF-171994 Sub 1

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
MAR 20 1992
[redacted] TRO FIELD OFFICE b6 b7C

1325015-000-6303

Office of the Deputy Attorney General

Washington, D.C. 20530

January 25, 1992

Honorable William S. Sessions
Director
Federal Bureau of Investigations
U.S. Department of Justice
J. Edgar Hoover Building, Rm. 7176
Washington, D. C. 20530

Dear Director Sessions:

This morning, Judge Joyce Hens Green accepted the guilty plea of the BCCI liquidators to the federal racketeering information we filed in District Court here in Washington. She also entered the forfeiture order we proposed as the sentence in the case. In accepting the plea, the plea agreement and the proposed sentence, she complimented the "extraordinary effort and cooperation" which brought us to this day. That praise is due all of you whose help, support and work made this milestone attainable.

Thank you for your past assistance and continuing efforts to make this work for the best interests of the public.

Sincerely,

George J. Terwilliger, III
Acting Deputy Attorney General

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29B-WF-171994 Main

SEARCHED 51 INDEXED
SERIALIZED 51 FILED 54
MAR 2 1992
FBI - FIELD OFFICE

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1325015-000-6304

FEB 2 5 1992

Mr. George J. Terwilliger, III
Acting Deputy Attorney General
Department of Justice
Washington, D.C.

Dear Mr. Terwilliger:

Thank you for your January 25th letter acknowledging the efforts of FBI personnel in connection with the investigation of Bank of Credit and Commerce International (BCCI). It is always a pleasure to receive favorable comments about our personnel, and I will share your praise with those who worked so diligently on this case.

The international aspects of this investigation made it particularly challenging, and my colleagues and I are delighted by the Government's success in obtaining the guilty plea. We hope the Government's dogged pursuit of justice in this case will curtail any similar activity contemplated by others.

Sincerely yours,

William S. Sessions
Director

1 - WMFO - Enclosure
Personal Attention SAC: Bring to the attention of appropriate personnel.

(K)

29B-WF-171994 Main - 371

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FEB 27 1992
FBI — WASH. FIELD OFFICE

1325015-000-6305

Memorandum

To : SAC, WMFO (29B-WF-171994)(8) Date 3/25/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MC #38
FIF; FAG;
OO:WMFO

Re writer's memo dated 3/16/92.

In referenced memo, writer outlined the contents of various House papers regarding BCCI and third-world nuclear capabilities. It was noted in the memo that follow-up would be made with SSA [redacted] Congressional Affairs Office. b6 b7C

On 3/20/92, writer and SA [redacted] met with SSA [redacted] at his office and discussed issues relating to this topic. SSA [redacted] had discovered that the author of these papers may have had ulterior objectives in preparing these works. SSA [redacted] agreed to make contacts with appropriate FCI personnel to determine if contact with anyone at Congress would be appropriate. Writer and SA [redacted] agreed to await word from [redacted] before contacting anyone on the Hill. b6 b7C

1 - WMFO
1 - SA [redacted]
DEV:das
(2)

Main
29B-WF-171994-372

b6 b7C

1325015-000-6306

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 3/17/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MC #38
OO:WMFO

Writer was recently provided with materials forwarded to the squad from the White Collar Section, Financial Institution Fraud Unit. These materials are four papers prepared by the House Republican Research Committee, Task Force on Terrorism and Unconventional Warfare. The papers were apparently sent to the Financial Institution Fraud Unit by the Counter-Terrorism Section, and are titled: BCCI and the Nuclear Question; Iran's Strategy and Nuclear Capabilities; BCCI - An Introduction; and BCCI - Between Peru and Washington, D.C.

Writer has conducted a review of these papers to determine what statements and allegations are contained therein that should be of interest to Federal Law Enforcement. Each of these papers is replete with allegations and summary statements of wrong-doing on the part of BCCI. Most of these allegations have surfaced previously, and when mentioned in the papers are not accompanied by evidence of factual support. The writers of the papers offer no basis of knowledge for the statements made.

A summary of each paper is provided below. Writer has reviewed these materials with SA [redacted] and it was agreed that follow-up would be made through SA [redacted] Congressional Liaison. b6 b7C

[redacted] b3 b7E

29B-WF-171994-374

1 - WMFO
1 - SA [redacted] b6 b7C
DEV:das (2)

Main

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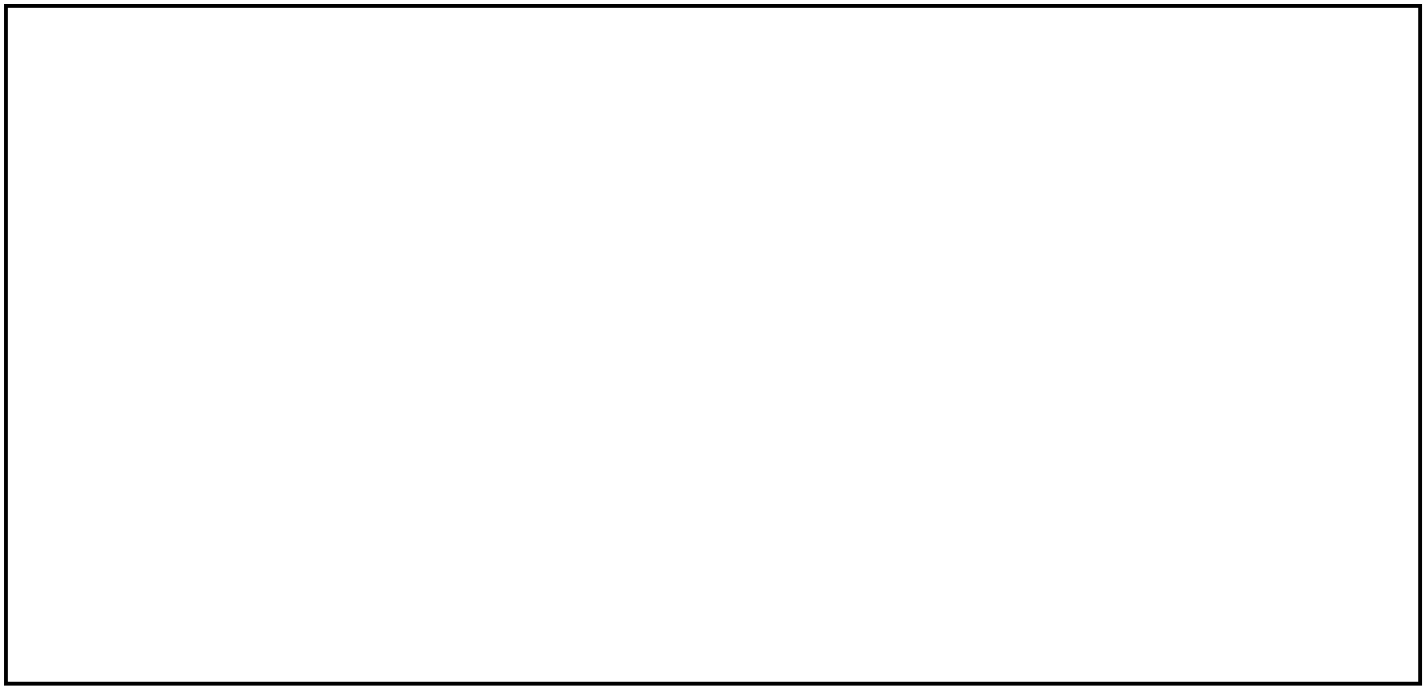
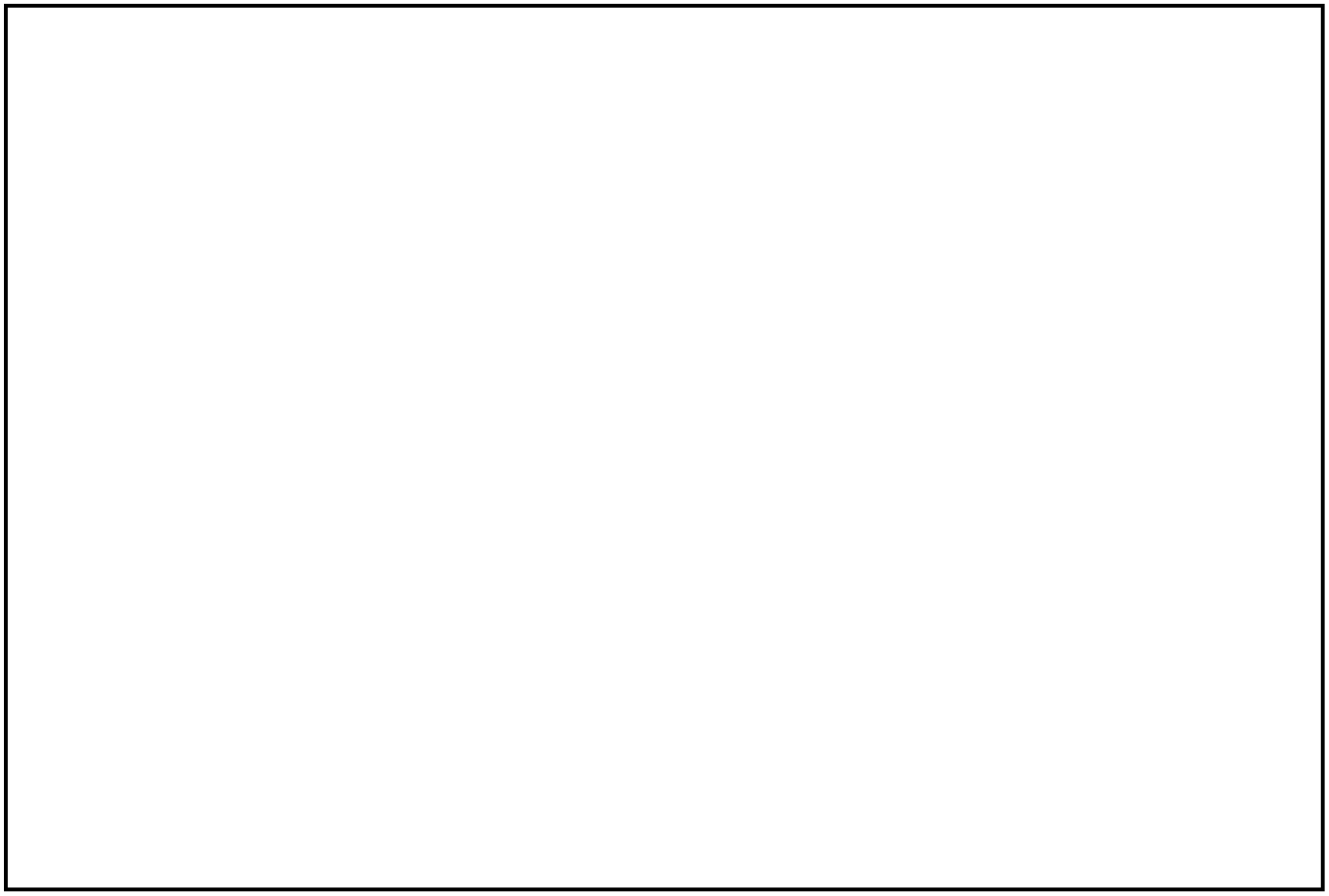
MAR 27 1992
FBI - WASH. METRO FIELD OFFICE
1325015-000-6315



b3
b7E

There is no direct discussion within this paper of BCCI or the role played in weapons acquisition.



b3
b7E

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/1/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38
FIF; FAG;
OO:WMFO

On March 27, 1992, [redacted], Reporter, Time Magazine, (505) 894-9455, was telephonically contacted in order to schedule an interview. [redacted] advised that he would be in the Washington, D.C. area after April 15, 1992 and would contact the writer at that time. b6 b7C

On March 31, 1992, [redacted] Attorney, U.S. Department of Justice (DOJ), Washington, D.C., (202) 514-4193, was advised of the tentative schedule for an interview of [redacted] [redacted] stated that he, or another DOJ attorney, would like to be present during the interview. b6 b7C

29B-WF-171994-375

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SERIALIZED FILED Sa

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1325015-000-6317

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/3/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO.

Re: BCCI/NY Records Review

On 3/30/92, a comprehensive review of NYSBD Inventory Sheets for records in the 5000 series through the 8500 series was completed by SA [redacted] and SA [redacted] b6 b7C Based on the NYSBD Inventory Sheet review, a selective list of boxes were compiled for review. A review of the records in the selected boxes was then conducted by SA [redacted] and SA [redacted] on 3/30/92.

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1 - 29B-WF-171994 Sub J
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29B-WF-171994-376

SEARCHED INDEXED
SERIALIZED FILED
APR 7 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6318

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/8/92

From : [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 4/7/92, the writer attended a conference at the Department of Justice (DOJ). Attendees included Assistant Attorney General (AAG) ROBERT MUELLER, Deputy Assistant Attorney General LAWRENCE URGENSON, Chief of the Fraud Section [redacted] b6
[redacted] Deputy Chief of the Fraud Section [redacted] b7C
Trial Attorney (TA) [redacted] AUSA [redacted] and AUSA [redacted]

The purpose of the meeting was to discuss/review the status of the FBI/DOJ BCCI Task Force Investigation. AAG MUELLER received a thorough briefing of the investigative status and developments based on the recent trip to London by Task Force members.

The following points were discussed and should be of interest to us:

1. DOJ has made an official request for documents from the British Liquidators of BCCI.

2. It is anticipated that First American Bank (FAB) will fail in the near future. DOJ believes that the Federal Reserve will take steps to have a Court appointed Trustee named to run FAB.

3. AAG MUELLER stated that [redacted] b7D b7E

4. DOJ plans to vigorously pursue the extradition of [redacted] b6 b7C b7D

5. AAG MUELLER advised that DOJ has requested that the [redacted] b7D b7E

29B-WF-171994-377

1-ASAC, NVMRA
1-Each BCCI SA

1325015-000-6319

The following investigative steps are anticipated, contingent upon evidence reviews and the development of additional evidence:

A. First American Bank

1. Consider indictments against nominee shareholders of CCAH stock. TA [redacted] opined that such action could be accomplished in the near future. b6 b7C

2. Attempt to obtain the cooperation of one or more nominees.

3. Consider an indictment against [redacted]

4. Consider an indictment against CLARK CLIFFORD.

In order to accomplish the above steps the review of records from sources including the Cayman Islands, Miami and London need to continue.

With respect to [redacted] and CLIFFORD, it is believed that stronger evidence exists against [redacted] at this juncture. However, at this time, prosecutive evidence is lacking. It is believed that the following BCCI insiders could provide direct evidence against [redacted] and CLIFFORD: b6 b7C

[redacted] b6 b7C

Other BCCI insiders who are believed to be knowledgeable of [redacted] and CLIFFORD are: b6 b7C

[redacted]

Efforts are under way to gain access to the above individuals through different channels.

Further, additional interviews at London need to be conducted. Such should include:

[redacted] b6 b7C

1325015-000-6320

B. National Bank of Georgia
---

1. Consider a superseding indictment against GHAITH PHARAON.

2. Consider additional indictments.

AUSA [redacted] has requested that the writer attempt to contact [redacted] in [redacted] The writer will attempt to arrange a meeting with [redacted] at an agreed upon location. DOJ will consider [redacted] b6 b7C b7D

C. Independence Bank
---

1. [redacted] b6 b7C b7D

In addition to the above investigative activities, it is anticipated that [redacted] b7D

An evidence review of this entire investigation will be conducted on 4/10/92, at the Fraud Section, DOJ. The writer will participate in said review.

A follow up meeting has been scheduled with AAG MUELLER for 4/14/92. The purpose of this meeting will be to solidify the tentative investigative plan set forth above. The writer will participate in this meeting.

1325015-000-6321

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/10/92

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE #38
FIF; FAG;
OO:WMFO

On 4/10/91, SA [redacted] contacted the Martinsburg, WV, police department. SA [redacted] advised the desk sergeant that he would like to speak to the detective in charge of the CASOLARO suicide investigation. SA [redacted] was advised by the sergeant that Captain [redacted] has requested that all questions re CASOLARO be directed to the prosecutor, [redacted] (304) 267-3000. b6 b7C

SA [redacted] left a message at [redacted] s office as [redacted] is on vacation until 4/20/92. b6 b7C

Main
29B-WF-171994 -378

1325015-000-6322

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5) Date 4/15/92

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
OO:WMFO

On 4/14/92, WMFO BCCI Task Force received from the U.S. Marshals in Miami, Florida, 1 NEC mini-file server, 8 terminals and keyboards, 1 IBM PS/2 computer and keyboard, 2 printers and related cables. The computer equipment had been seized under the forfeiture/plea agreement with BCCI.

WMFO SAC is requested to assign SA [redacted] Squad A-5, the task of analyzing forfeited computer equipment for any possible evidentiary matter and to provide assistance in the installation of said computer system(s) for use by the BCCI Task Force.

b6
b7C

4-WMFO
(1-ASAC [redacted]
(1-SSA
(1-SA [redacted]

b6
b7C

29B-WF-171994-379

MAIN

[redacted]

1325015-000-6323

DE LON #0013 0921256

ZNR UUUUU

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FM LEGAT LONDON (29A-LA-126283) (29B-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI LOS ANGELES/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //5200:LON524.091 31 MAR 1992//

PASS: HQ FOR SSA [redacted], WCCS, ECU; WMFO ATTN SA [redacted] b6 b7C

[redacted]

SUBJECT: INDEPENDENCE BANK, ENCINO, CALIFORNIA; BCCI, LOS ANGELES, CALIFORNIA; FIF (A); OO: LOS ANGELES (29A-LA-126283) CLARK MCADAMS CLIFFORD: [redacted] BCCI; OO: WMFO (29B-WF-171994). b6 b7C

DURING THE PAST THREE-AND-A-HALF WEEKS A NUMBER OF SPECIAL AGENTS (SA) AND DEPARTMENT OF JUSTICE (DOJ) TRIAL ATTORNEYS HAVE

29B-WF-171994 main

SUBR

-380

SEARCHED INDEXED SERIALIZED FILED

APR 1 1992

[redacted] b6 b7C

62

1325015-000-6324

BEEN IN LONDON WORKING ON VARIOUS ASPECTS OF THE BANK OF CREDIT AND COMMERCE (BCCI) INVESTIGATION. WMFO SPECIAL AGENTS [redacted] b6 b7C

[redacted] LOS ANGELES SPECIAL AGENTS [redacted]

[redacted] AND DOJ TRIAL ATTORNEYS [redacted]

HAVE BEEN CONTACTING AND INTERVIEWING WITNESSES, REVIEWING AND ANALYZING DOCUMENTS, DEVELOPING COOPERATIVE WITNESSES AND INFORMANTS. [redacted] b7D

[redacted] b7D

PAGE THREE LON 29A-LA-126283 AND 29B-NF-171994 UNCLAS

THE UTMOST PROFESSIONALISM, DEDICATION AND STRONG WORK ETHIC DISPLAYED BY THE FBI SPECIAL AGENTS AND DOJ TRIAL ATTORNEYS OVER THE PAST SEVERAL WEEKS IS DESERVING OF MENTION.

OF PARTICULAR NOTE HAS BEEN THE TASK OF SA [redacted] AND DOJ TRIAL ATTORNEY [redacted] IN NEGOTIATING WITH PRICE WATERHOUSE TO OBTAIN WITNESS STATEMENTS FROM THREE KEY PRICE WATERHOUSE EMPLOYEES. SEVERAL SENSITIVE MEETINGS, NUMEROUS TELEPHONE CONVERSATIONS, THE EXCHANGE OF SEVERAL LETTERS ALONG WITH ATTENDANCE AT CIVIL AND CRIMINAL COURT HEARINGS, IN AN EFFORT TO OBTAIN THESE STATEMENTS IN ACCORDANCE WITH THE CRIMINAL JUSTICE ACT OF 1990 TOOK PLACE. THE FACT THAT ANY INFORMATION WAS OBTAINED FROM THESE CRITICAL WITNESSES IS IN NO SMALL PART ATTRIBUTABLE TO THE HARD WORK, PERSISTANCE AND COMPETENCE OF TRIAL ATTORNEY [redacted] AND SA [redacted] PRICE WATERHOUSE, ALTHOUGH PROFESSING COMPLETE COOPERATION, WAS QUITE THE OPPOSITE, BEING OBSTRUCTIVE AND CONFRONTATIONAL AT EVERY OPPORTUNITY. A CONTINUING EFFORT WILL BE REQUIRED AND PURSUED THROUGH LEGAL AND DIPLOMATIC CHANNELS TO QUESTION THESE WITNESSES IN REGARD TO ALL ASPECTS OF OUR INVESTIGATIONS.

b6
b7C

1325015-000-6326

COMMENTS RECEIVED FROM [redacted] COLP OFFICERS, AND b7D

HOME OFFICE PERSONNEL PRAISING THE WORKING RELATIONSHIP WITH THE FBI AND DOJ DURING THIS DIFFICULT TIME ARE MOST NOTEWORTHY. THE BENEFITS RESULTING. THEREFORE, WILL ASSIST OTHER INTERNATIONAL INVESTIGATIONS AS WELL.

[redacted] b6 b7C b7D

[redacted] AS WERE THE COLP OFFICERS INVOLVED. IN LIGHT OF ALL THE PRESSURES AND DIFFICULTIES WHICH EXIST IN THIS INVESTIGATION, THE PERFORMANCE OF THE SPECIAL AGENTS AND ATTORNEYS [redacted] ARE QUITE SIGNIFICANT.

LEGAT, LONDON, WISHES TO EXPRESS ITS SINCERE APPRECIATION FOR THE EFFORTS OF THESE AGENTS AND ATTORNEYS.

BT

#0013

NNNN

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/3/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Re: Attached Teletype from Legat London

For the information of recipients, the attached teletype commended the performance/professionalism of the team of Agents who traveled to London during March, 1992. I would like to express my thanks to SA's [redacted] b6 b7C b7D

It should be noted that I participated in a series of meetings Assistant Legat [redacted] had with [redacted] and [redacted] b6 b7C b7D

On 4/3/92, SSA [redacted] FBIHQ, advised that he had forwarded the attached teletype to ADIC POTTS. b6 b7C

[redacted] b6 b7C

1-CC to [redacted]

Main 38A
29B-WF-171994
Sec 5w-1

[redacted]

1325015-000-6328

April 3, 1992

[redacted] b6 b7C

Special Agent [redacted] b6 b7C
Washington Metropolitan Field Office
POB 3269
Falls Church, VA 22043

Re: News Items on Kissinger's Consultant Sergio Correa da Costa and other Kissinger-related Material

Dear Sir:

I have enclosed the news items on Sergio Correa da Costa, who was Kissinger's personal consultant while serving as a BCCI executive in Brazil, as well as other matters of interest.

Although you may have these, I am including documents that I received from Sen. John F. Kerry's (D-Mass.) Senate Foreign Relations Subcommittee probe of BCCI. These are copies of BCCI documents on Sergio Correa da Costa.

Finally, I have included the Journal Graphics transcript of the March 29, 1992 CBS 60 Minutes broadcast dealing with Kissinger's conflicts-of-interest over China and Iraq. If you are interested, I have a great deal of information on both. And, I can tell you that Kissinger's conflicts include Golden Triangle (opium/heroin) proceeds to a significant degree, according to sources of mine associated with the CIA and business analysis.

Thank you for your cooperation.

Sincerely yours,

[redacted] b6 b7C

[redacted]

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SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
APR 3 1992
FBI — WASH. FIELD OFFICE
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DBS

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CBS News--60 Minutes
On Kissinger's Conflicts-of-interest

CBS NEWS — 60 MINUTES
Volume XXIV, Number 28

March 29, 1992

HENRY KISSINGER: *[PBS, "MacNeil/Lehrer NewsHour"]* I think it's outrageous to imply that my views would be influenced by economic considerations, and I want to make— as the man who took the trip to China, I don't need economic motives to have a position on China.

JIM LEHRER: Well, I was going to ask you about that later—

Dr. KISSINGER: It is a disgraceful story.

[Graphic: "Wall Street Journal" headline: "Mr. Kissinger Has Opinions on China— And Business Ties."]

LEHRER: —yeah—

Dr. KISSINGER: It's a shameful story.

LEHRER: —yeah, but—

Dr. KISSINGER: I mean, we ought to be able to have our debates on the merit of the issues, as you pose them, without always attacking the motives of the people who have positions.

ED BRADLEY: *[voice-over]* You would think that the man who made *E.T.*, the number-one box-office success of all time, wouldn't have any doubts about himself or his movies.

STEPHEN SPIELBERG: I have doubts about myself in both worlds.

Every movie I make, and every movie I start, I don't think I can pull it off. The same feeling I get going to work every morning is the feeling I got going to school every day, being a bit of an outsider, and not being normal and not quite getting the grades, and not being able to compete, and I— my tummy is shpilkas [sp?], my mom would call it.

H. ROSS PEROT: The total national debt was only $1 trillion in 1980, when President Reagan took office. It is now $4 trillion. Maybe it was voodoo economics.

MORLEY SAFER: *[voice-over]* Who is this lonesome rider? Well, he's a man who says he'll spend $100 million of his own money to make himself president and get us out of— well, let him tell you.

Mr. PEROT: We are now in deep voodoo, I'll tell you that.

MIKE WALLACE: I'm Mike Wallace.

SAFER: I'm Morley Safer.

BRADLEY: I'm Ed Bradley.

STEVE KROFT: I'm Steve Kroft.

LESLEY STAHL: I'm Lesley Stahl. Those stories and Andy Rooney, tonight on 60 Minutes.

[Commercial break]

Kissinger

WALLACE: Isn't it curious that four living former presidents of the United States together don't appear on television as often as one living former secretary of state? You can't turn on a television set during a foreign policy crisis without finding Henry Kissinger on CBS, PBS, NBC, ABC, CNN or C-SPAN.

But what does he do when he's not on television? Well, through a consulting firm that he calls Kissinger Associates, he sells advice to a gold-plated list of corporate clients, sometimes about how to do business with the very same governments, the same leaders, that he talks about on television.

Is there a conflict there? Does Henry Kissinger ever use his fame and connections, his public appearances, to advocate public policies which serve his own financial interests as well as those of his clients? And is he selling his clients not just advice, but also influence and access?

That's what we wanted to talk to him about, but this time he didn't want to go on television, not unless we played by his ground rules; in effect, he wanted to control the editing. So we decided to go ahead without him.

[voice-over] After many years of public service, Henry Kissinger told me, he was several hundred thousand dollars in debt. Today, as a public/private figure, he is reportedly worth more than $30 million. How did he do it? Well, for starters, he gives speeches, at up to $40,000 a throw. He nets about a million a year from that. He collects fees for sitting on the boards of some of America's biggest companies, including CBS, American Express, Union Pacific, Revlon, Macy's. That earns him probably another quarter-million a year. He writes 20 columns a year for the *Los Angeles Times* syndicate, like this one shortly after the Tiananmen Square massacre *["The Caricature of Deng as a Tyrant Is Unfair"]*, for which he collects up to half a million dollars annually.

But the lion's share, between $3 and $5 million a year, comes from Kissinger Associates, a company that he formed in 1982, six years after he left the government. His client list, while a closely guarded secret, is known to include, at any one time, about 30 of the largest companies in the world, American Express, Coca Cola, Anheuser Busch, H.J. Heinz, Volvo, Arco, Hunt Oil, Chase Manhattan, the American International Group (AIG), and Freeport McMoRan, an international mining company. Each pays Kissinger Associates fees between a quarter-million and a half-million dollars a year.

WALTER ISAACSON: These are hard-headed people. They're not going to be spending half a million dollars a year if they aren't getting something out of it.

WALLACE: *[voice-over]* *Time* magazine senior editor Walter Isaacson has spent five years researching and writing Henry Kissinger's unauthorized biography. Isaacson had the cooperation of some of Kissinger's clients. He says that what they get is foreign policy advice, strategic insights and, sometimes, extraordinary access.

Mr. ISAACSON: There's only one consultant in New York or Washington who can travel with you to China, and you can have lunch in the Great Hall of the People with Deng Xiaoping, and that's Henry Kissinger.

WALLACE: *[voice-over]* That happened with one of his clients in 1989, only five months after the Tiananmen Square massacre. With diplomatic relations badly frayed

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between China and the U.S., Dr. Kissinger flew to Beijing with his client, Maurice Greenberg, chairman of the American International Group, AIG, and in Beijing they had lunch with China's paramount leader, Deng Xiaoping. By the time Greenberg left China, we've been told, AIG had an agreement to expand its business there, this at a time when the Chinese wouldn't even let the U.S. ambassador, James Lilly, meet with Deng Xiaoping.

JAMES LILLY: I tried to see him, and I was told that he was unavailable, he was retired.

WALLACE: And yet Henry Kissinger went—

Amb. LILLY: Well, I was— I was—

WALLACE: —with Maurice Greenberg—

Amb. LILLY: —yes.

WALLACE: —and he sat down and had lunch with Deng Xiaoping.

Amb. LILLY: Well, you see, I was— I was the heavy. I was the representative of the United States government, which had imposed sanctions on China, and my embassy was surrounded by troops with helmets and guns, and I was not— I was not their favorite boy.

WALLACE: *[voice-over]* The extraordinary access that Kissinger is able to give his clients is based on the contacts and relationships he established while in government as national security adviser and secretary of state under two presidents.

Mr. ISAACSON: Kissinger has a nice web of people around the world he has known for years, people who have come to power since he left office, but he's formed connections with. That's how he makes his money. He has a nice seamless web of interests and influence.

WALLACE: *[voice-over]* And Kissinger Associates has been a revolving door for people like Brent Scowcroft and Lawrence Eagleburger, who worked for Kissinger in the Nixon and Ford administrations. Scowcroft and Eagleburger left government to work for Kissinger Associates, and then they left Kissinger Associates to return to government, Scowcroft as national security adviser to George Bush, and Eagleburger as number two man at the State Department. Both men are still close to Henry Kissinger.

For example, just six days after the Tiananmen massacre, Scowcroft flew on a government plane to spend the weekend at Kissinger's Connecticut estate. He listed this trip as official business.

Henry Kissinger's "seamless web" of interests and influence came into play in Kissinger Associates' dealings with Iraq. Ken Timmerman, publisher of *Middle East Defense News*, who wrote the book, *The Death Lobby: How the West Armed Iraq*, says that Iraq's biggest problem in late 1988 was money.

KEN TIMMERMAN: Iraq was bankrupt at the end of the war with Iran, and was saddled with about $35 billion worth of commercial debt and again as much, another $35 billion, in debts to the Arab world.

WALLACE: Seventy billion dollars?

Mr. TIMMERMAN: Seventy billion dollars. And Iraq was also spending 50 percent of its GNP on weapons, and weapons manufacturing.

WALLACE: Right. So?

Mr. TIMMERMAN: So they needed to somehow restructure their debt to regain the confidence of western banks.

WALLACE: *[voice-over]* Iraq needed money badly, and in June of 1989, less than a year after the end of the Iran/Iraq war, a delegation of U.S. business executives from a group called the U.S.-Iraq Business Forum was invited to Baghdad to discuss, among other things, how Saddam could get easier terms on his loans, so he could borrow even more money. This was during the time the U.S. was covertly supporting Iraq as a counterforce to Iran. At least one Kissinger client was in the group, and Kissinger Associates' senior economist, Allen Stoga [sp?], was part of the group, too. Marshall Wiley, a former U.S. ambassador to Oman, headed the delegation. We asked him, why Allen Stoga?

MARSHALL WILEY: I'm sure his association with Kissinger had— was probably the primary reason why he was invited to go along.

WALLACE: *[voice-over]* And what did Stoga do in Baghdad?

Mr. WILEY: He talked generally about the feasibility of debt restructuring for Iraq and—

WALLACE: In other words, he was giving them advice.

Mr. WILEY: Yeah. As we all were. That was one of the purposes of our trip.

WALLACE: *[voice-over]* Joe Conason wrote about Kissinger Associates' involvement in pre-Gulf-war Iraq for the magazine *The New Republic*, and the key element in Conason's story concerned Allen Stoga's trip to Baghdad.

JOE CONASON: I believe that the U.S.-Iraq Business Forum wanted a representative of Kissinger Associates along because it gives them greater weight. I also believe that they wanted someone who they know has connections to major banking interests.

WALLACE: *[voice-over]* And Kissinger Associates did have a longstanding relationship with a major banking interest: the Banca Nazionale del Lavoro, BNL, a leading Italian bank with branches in the United States, which would prove to be the vehicle through which Iraq would get its major infusion of cash. BNL had been a client of Kissinger Associates from 1986 to '88, and Brent Scowcroft, at that time vice chairman of Kissinger Associates, met three times to give advice, as he put it, to the BNL board of directors. Kissinger himself was a member of BNL's international advisory committee from 1985 to '91.

BNL's branch in Atlanta had been lending Saddam big money, supposedly for agricultural products, because it was against U.S. law to lend Saddam money for military equipment. But the Justice Department discovered that the money was going instead, illegally, for arms, and they seized the bank's records. Nonetheless, Deputy Secretary of State Lawrence Eagleburger, formerly of Kissinger Associates, wrote this 1989 memo proposing even larger "agricultural loans to Saddam." It is unmistakably clear from Eagleburger's memo that he was aware BNL was already under investigation because its previous loans had been used for military supplies.

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Well, that investigation continued and in February of 1991, it resulted in a 347-count indictment against a number of former BNL employees. But Kissinger Associates' involvement with BNL and Iraq, and Kissinger's membership on BNL's international advisory committee didn't become public for another four months, until the House Banking Committee investigated BNL and those illegal loans. Representative Henry Gonzalez of Texas is chairman of the House Banking Committee.

Rep. HENRY GONZALEZ: Mr. Kissinger held this position during the height of the biggest banking scandal in United States history, $4 billion in unreported loans to Iraq by the Atlanta branch of the Banca Nazionale. Many Kissinger Associates clients were doing business with the Iraqis as a direct result of the unreported $4 billion in BNL loans to Iraq. Volvo, whose chairman serves on the Kissinger Associates board of directors, was doing big business in Iraq, and it was a beneficiary of BNL loans.

WALLACE: *[voice-over]* Henry Kissinger told *The Financial Times* of London that he had resigned from the BNL advisory committee just days before the 347 indictments were handed down because, he said, "I don't want to be connected, I don't want to be asked about this sort of question." But in fact, Henry Kissinger did not resign from the BNL advisory committee until August of 1991, some six months after those BNL indictments were handed down.

Kissinger also told *The Financial Times*, "I didn't have any idea of what BNL was doing in Iraq," but Ken Timmerman of *Middle East Defense News* thinks that there is no way Kissinger could not have known about what BNL was doing, because some of his clients were involved in the build-up of Iraq's military.

Mr. TIMMERMAN: I don't think Kissinger could not have known, with his contacts in the intelligence community and his contacts in the companies that were actually doing the building.

WALLACE: And the fact that Brent Scowcroft and Larry Eagleburger, ex-Kissinger Associates people, were now at the top of the Bush administration.

Mr. TIMMERMAN: Frankly, you couldn't be better plugged-in than that.

Mr. CONASON: he only thing that could happen if you reschedule Saddam Hussein's debt was that he was going to buy more weapons, and that's what he did.

WALLACE: After your piece was published in *The New Republic*, Henry Kissinger wrote *The New Republic* a letter in which he claimed, "I have read with surprise and outrage an article in your edition of October 2. The piece is alive with false allegations about my consulting company's activities in Iraq which, in fact, are non-existent." True?

Mr. TIMMERMAN: Absolutely false. Allen Stoga was in Baghdad; that means he was in Iraq. That means he was engaged in consulting activities in Iraq.

WALLACE: To "listen and learn," says Henry Kissinger.

Mr. TIMMERMAN: No. No. Ask the people who were on the trip and, for that matter, ask Allen Stoga, if he'll come on camera, what he was doing there. Was he just a tourist who got to sit and listen to Saddam Hussein for two hours? Absolutely not, and no one who has ever been in Baghdad, no one who knows anything about Iraq, would believe for a moment that Allen Stoga was there to listen to Saddam Hussein. Saddam Hussein was listening to Allen Stoga.

Mr. WILEY: Kissinger's man Stoga was there at the request of the Iraqis, to go along at this delegation, and I am certain one of their motives was to find out more about what was going on so they could advise their clients. Another motive was to participate in the discussion, along with the rest of us, with the Iraqi government on what the problems were, and I see nothing wrong with this, no.

WALLACE: We were surprised when we got a letter about the Conason article from the publisher of *The New Republic*, Martin Peretz. Peretz is an old and close friend of Henry Kissinger's. Peretz said that he hadn't given Conason's piece "the scrutiny which I should have given it before." He wrote us that the editors of *The New Republic* regretted retailing this story. And then Peretz apparently had second thoughts about his second thoughts, and he had his lawyer call us to ask us not to use the letter in any way.

[voice-over] But *The New Republic* article wasn't the first time Henry Kissinger revealed his sensitivity about criticism of his consulting activities. In 1989 *The Wall Street Journal* had chided him for his dual role as a commentator and businessman dealing with the rulers of the People's Republic of China. Al Hunt is Washington bureau chief of *The Wall Street Journal*.

AL HUNT: I have never seen the kind of reaction that I saw with Henry Kissinger. There have been people who have been even madder about pieces, and people who probably had more cause to be angry about pieces, but usually they have quarreled with the facts, they have said it was, you know, it was inaccurate, et cetera. Dr. Kissinger never suggested it was inaccurate. What he basically said was that we didn't have the right to address the issue.

WALLACE: *[voice-over] The Wall Street Journal* story revealed that Henry Kissinger and a number of his clients had set up a $75-million corporation called China Ventures to make investments in China. One of China Ventures' partners was the China International Trust and Investment Corporation, the official investment agency of the Chinese government, widely known to be staffed by various family members of the Chinese ruling elite. *The Wall Street Journal* pointed out that when Kissinger went on television to comment on the Tiananmen massacre, his financial relations with China were never mentioned.

Kissinger didn't like *The Wall Street Journal* story, and he said so when he appeared on the MacNeil/Lehrer NewsHour.

Dr. KISSINGER: *[MacNeil/Lehrer NewsHour]* I think it's outrageous to imply that my views would be influenced by economic considerations, and I want to make— as the man who took the secret trip to

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China, I don't need economic motives to have a position on China.

JIM LEHRER: Well, I was going to ask you about that later, but—

Dr. KISSINGER: It is a disgraceful story.

Mr. LEHRER: —yeah— and— but it's—

Dr. KISSINGER: It's a shameful story.

Mr. LEHRER: —yeah, but—

Dr. KISSINGER: I mean, we ought to be able to have our debates on the merit of the issues, as you pose them, without always attacking the motives of the people who have positions.

WALLACE: *[voice-over]* And later, on CNN's *Crossfire*, he told host Michael Kinsley that, after Tiananmen, he had suspended his China Ventures business enterprise.

MICHAEL KINSLEY: *[CNN]* But is *The Wall Street Journal* incorrect in saying that you did have business interests that were threatened and, in fact, put on hold by the Tiananmen Square massacre, and that you do have — not that this necessarily interests— that you do have business interests that would profit from a restoring of normal relations with China?

Dr. KISSINGER: Absolutely not.

Mr. KINSLEY: That's completely false?

Dr. KISSINGER: It is substantially false. I suspended these— these— any actions that raise a question of where the Chinese government might benefit, I suspended them, not anybody else, the day after Tiananmen—

Mr. KINSLEY: Well, every business— every business— every American business contact in China was suspended.

Dr. KISSINGER: Absolutely not, almost— most— 95 percent of American businesses continued in China unchanged.

Mr. KINSLEY: So, have you unsuspended—

Dr. KISSINGER: And—

Mr. KINSLEY: —wait, let me ask, have you unsuspended them?

Dr. KISSINGER: —they're still suspended.

Mr. KINSLEY: They're still suspended? But why, if you're urging that we renew—

Dr. KISSINGER: Because— precisely to prevent smart-alecks from creating the impression that my opinions are for sale.

Mr. HUNT: He went absolutely ballistic. He called virtually everyone who was quoted in the story, and asked them to recant what they had said afterwards.

WALLACE: *[voice-over]* One of the people quoted in the story was Peter Jennings, who had used Kissinger as an expert on an ABC News special the day of the Tiananmen massacre.

Dr. KISSINGER: *[ABC News]* I wouldn't do anything, since I think what President Bush did yesterday, the statement he made, seemed to me exactly right. He deplored the action, he called on the government to return to the path of conciliation and dialogue, and I believe that this is the wisest course to take.

Mr. HUNT: And Peter told us that if he had known that Dr. Kissinger had had the kind of business ties that he had in China, he would not have used him as an analyst on ABC to talk about U.S. policy toward China. And Dr. Kissinger called Peter Jennings and, in essence, talked about the good, long relationship he had had with ABC and suggested that Peter say that he was misquoted or it was taken out of context.

WALLACE: And Peter wouldn't?

Mr. HUNT: And Peter told him to go fly a kite, or something to that effect.

WALLACE: *[voice-over]* Peter Jennings confirmed the story.

So where do we come down? What's the bottom line on Kissinger Associates? We go back to Walter Isaacson, the man who has spent five years writing a Kissinger biography.

Mr. ISAACSON: People aren't just paying for the foreign policy advice, or the strategic insight. They're paying for the name Henry Kissinger. They're paying for the aura that comes around Henry Kissinger. They're paying for the fact that Henry Kissinger can land with them in Malaysia, or in Beijing, and that cabinet ministers will come out and want to see him. So what they get is a whole package, and I don't think we have to characterize it as being excessively sleazy or a paragon of virtue.

WALLACE: As we said, Henry Kissinger declined to sit for an interview unless we went along with his ground rules, ground rules about controlling the editing that have been traditionally unacceptable on 60 Minutes.

But during the course of our reporting, we did hear several times from his Washington attorney, Lloyd Cutler who, by the way, was White House counsel under Jimmy Carter. Mr. Cutler wrote us this in respect to Dr. Kissinger's activities with Iraq.

"Dr. Kissinger," he wrote, "was a vigorous public critic of Saddam Hussein's behavior before and after the Gulf war. As for China, you heard Dr. Kissinger himself defend his conduct, both with Jim Lehrer and Michael Kinsley."

Finally, on Dr. Kissinger's behalf, Lloyd Cutler wrote us: "In the light of his well-deserved reputation as a scholar and his considerable accomplishments as a public servant, I would think it outrageous to suggest that his published writings are designed to line his pockets rather than to advocate policies that he believes will best serve the public interest."

[Commercial break]

Spielberg

BRADLEY: If there were an Academy Award category, "best producer and/or director of money-making movies," Stephen Spielberg would win, hands down. Spielberg has either directed and/or produced six of the top moneymakers of all time. If there were category, "creator of blockbusters who isn't always taken seriously by some in his profession," he'd win that one, too.

1325015-000-6334

Copies of BCCI Documents and Paystubs
on Sergio Correa da Costa

Sergio Correa da Costa
Joined Kissinger Associates
Nov. 3, 1986

LATIN AMERICA REGIONAL OFFICE
1200 BRICKELL AVENUE, 15th FLOOR, MIAMI, FLORIDA 33131-3288 U.S.A.

DATE: December 4, 1986 - SER/7763

FROM: [redacted]

TO: [redacted]
BCC Grand Cayman

b6
b7C

SUBJECT: SALARY OF MR. SERGIO CORREA DA COSTA

You are requested to pay salary of Mr. Sergio Correa da Costa with effect from November 3, 1986. He will be paid a monthly salary of US$12,500 (US Dollars Twelve Thousand Five Hundred), which may please be credited to his account #0260075661 with BCC New York Agency under advice to us.

Regards.

[redacted]

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/mj

SEN 000647

Sent: 0117/1.11666 Line: 1
264080 BCCMI UR

RIA DEC 04 1550 264080 BCCMI UR

425902 BCCINY EO
BCC, NEW YORK, DECEMBER 4, 1986, AL

TO: [redacted] b6 b7C
BCC, MIAMI

TELEX SENT TO [redacted] VIA [redacted] IN LONDON.

QUOTE

BCC, NEW YORK, DECEMBER 4, 1986, AL

TO: [redacted] b6 b7C
6TH FLOOR
BCC, LONDON

BRAZIL

THE BRAZILIAN SHAREHOLDERS OF BCC BRAZIL ARE:

[redacted] b6 b7C

OWNER IAT CO. IAT IS BRAZIL'S LARGEST EXPORTER OF INDUSTRIAL ALCOHOL USED IN CHEMICAL AND ENERGY PROCESSES. THESE EXPORTS GO PRIMARILY TO THE USA AND JAPAN. IN ADDITION, IAT CARRIES OUT EXPORTS AND IMPORTS BETWEEN BRAZIL AND A NUMBER OF OTHER COUNTRIES. SALES IN 1986 ARE IN THE RANGE OF US$ 350 MILLION.

[redacted] HAS A NUMBER OF OTHER INTERESTS IN REAL ESTATE AND OTHER COMMERCIAL ACTIVITIES. HIS NET WORTH IS ESTIMATED AT US$ 80 MILLION TO $100 MILLION. b6 b7C

A DUN & BRADSTREET REPORT ON [redacted] WAS OBTAINED. THIS REPORT IS BEING SENT TO [redacted] BY DHL TODAY. THE REPORT INDICATES [redacted]'S VARIOUS HOLDINGS IN BRAZIL AND FURTHER CONFIRMS THE REPORTS WE ALREADY HAVE ON [redacted] b6 b7C

C 0002239

[redacted] IS A LEADING ATTORNEY IN BRAZIL AND IS BASED IN RIO. b6 b7C

1325015-000-6337

[redacted] IS THE SENIOR PARTNER OF HIS LAW FIRM. [redacted] IS A MEMBER OF THE BOARD OF DIRECTORS AND CHIEF OUTSIDE ADVISOR TO: b6 b7C

GRUPO GERDAU: THIS IS BRAZILS LARGEST PRIVATELY OWNED STEEL MANUFACTURING COMPANY WITH SALES OF US$ 1.5 BILLION.

IBM BRAZIL: IBM HAS VAST MANUFACTURING AND DISTRIBUTION OPERATIONS IN BRAZIL.

[redacted] b6 b7C

HE IS HIGHLY RESPECTED BOTH PROFESSIONALLY AND THRU HIS EXTENSIVE FAMILY CONNECTIONS. [redacted] IS PRESENTLY REPRESENTING BANKERS TRUST AND MITSUBISHI IN AN IMPORTANT ACQUISITION IN THE INDUSTRIAL SECTOR IN BRAZIL. b6 b7C

[redacted]'S NET WORTH IS ESTIMATED AT US$ 15 MILLION. b6 b7C

[redacted] b6 b7C

[redacted] RETIRED FROM SERVICE IN NOVEMBER 1996 AND IS PRESENTLY: b6 b7C

[redacted] b6 b7C

[redacted] b6 b7C

BEST REGARDS.

C 0002240

1325015-000-6338

MEMORANDUM

FROM [redacted]

TO [redacted]

LOCATION: BCCI- Miami

LOCATION BCCI- London

DATE May 6, 1986

REF Telephone Conversation with Ambassador Da Costa

SUBJECT.

Ambassador Da Costa Telephoned me to introduce [redacted] will be visiting the bank tomorrow and requested me to introduce him to [redacted] as well.

According to Ambassador Da Costa [redacted]

Ambassador Da Costa also informed of his meeting with Dr. Pharoan recently in Florida and then Dr. Pharoan informed him of our proposed acquisition in Brazil and the problems BCC was facing in Brazilia.

Ambassador Da Costa has promised Dr. Pharoan to assist the Bank in any way he can and he also has asked [redacted] to use his association with the President of the Republic to assist BCC.

[redacted]

Latin American Region

AS/rmp

b6
b7C

1325015-000-6339

BANK OF CREDIT AND COMMERCE INTERNATIONAL
(OVERSEAS) LIMITED
APARTADO 6-4507 ESTAFETA EL DORADO PANAMA REPUBLIC OF PANAMA

INTERNATIONAL LOANS

APRIL 30, 1988

[redacted]	LOAN	670,508.15
GOODLUCK INVESTMENT	LOAN	8,812,189.21
[redacted] BORTHERS	LOAN	1,213,338.46
MELROSE MARITIME	LOAN	1,525,576.63
MAXITREASURER CO. LTD	LOAN	16,971,795.17
B.V. FOOD INVESTORS	LOAN	1,286,333.00
B.V. FOOD INVESTORS	LOAN	1,286,332.98
INTERGULF HOLDINGS,INC	LOAN	1,230,101.76
INTERGULF HOLDINGS, INC	LOAN	1,230,101.73
ONS GENOEGEN B.V.	LOAN	2,414,059.89
ONS GENOEGEN B.V.	LOAN	2,414,059.89
ASPAC TRUST INC.	LOAN	1,889,071.57
SIMDEGA TRADING INC.	O/D	3,500,715.66
DEMRAY TRADING CORP.	O/D	3,000,861.95
FRENDA INTERNATIONAL TRADING	O/D	1,695,426.09
AGRA ENTERPRISES	LOAN	5,105,933.09
VIDERO SHIPPING CO.	LOAN	830,299.38
VIDERO SHIPPING CO.	O/D	1,112,161.00
CHINNOK TRADING CO.,S.A.	LOAN	7,829,069.68
ONIDA TRADING INC,S.A.	LOAN	7,440,469.41
H.H.M.M.(Shipping Loan)	LOAN	39,329,490.77
MR. SERGIO DACOSTA(Parked by BCCI Miami)	LOAN	1,563,723.85
[redacted] arked by BCCI Miami)	LOAN	1,597,136.95
CREDIT AND COMMERCE TIONAL (OVERSEAS) LTD TOTAL		113,948,756.27

b6 b7C

b6 b7C

b6 b7C

[redacted]

Auth. Signature

L-01

PHONES 69-3322 TELEX INTEL 2669 AND INTEL 3482 TRT 2127 FAX (507) 63-8542 CABLES BANCRECOM
Incorporated in Grand Cayman *A Subsidiary of BCCI Holdings (Luxembourg) S. A.*

1325015-000-6340

News Items on Sergio Correa da Costa

- SECOND INTERVIEW WITH DEPUTY SECRETARY LARRY EAGLEBURGER -
- (PD/BIR at Charlottesville, Va. on 11/24/91) -
- (Reproduced from Tape) -

This was a pretext call done with the name of [redacted] b6 b7C from Business International Review on the above date.

Q. Is this Secretary Eagleburger?

A. It is...

Q. (Read October 7, 1988 letter from Kissinger Associates [redacted] b6 b7C to BCCI [redacted] about ongoing talks for contracting a business relationship. I also read the October 12 memo from [redacted] to BCCI international [redacted] about how [redacted] said Kissinger had recommended they hire Burson-Marstella to handle public relations on the October 11 bust of Tampa BCCI. I then ask if Kissinger Associates, Inc. usually renders such services for firms with which they are negotiating to become clients?).

A. No.

Q. Now in the Dec. 19 interoffice memo from [redacted] b6 b7C states: ``It would be of interest for you to know Mr. Scowcroft is the Nationational Security Designate in the Bush Administration and another Partner of Kissinger Associates is being tapped for Assistant Secretary of State in the Bush Administration.'' Now is that latter person you?

A. Yeah, but he got the wrong title.

Q. I do not remember when you were actually nominated? Wasn't it after the swearing in on Jan. 20, 1989?

A. It wasn't until after the Administration had come in, but I had pretty well cut out of Kissinger Associates by December.

Q. I seem to recall there was some discussion about what post you would get, that it was somehow not certain except that it would be a high-level one in the State Department.

A. Well, it was always only one. And by that time in December I had pretty much left Kissinger Associates.

Q. You mean in other words you were involved in transition activities?

A. Yeah. Yeah.

Q. Now [redacted]s last memo to [redacted] on Jan. 11 is sort of strange. b6 b7C It says he had lunch with ``the gentlemen'' and a talk in the

same early-January dates referred to earlier for a meeting with [redacted] again... b6 b7C

A. Yeah.

Q. Then it says how ``they'' were well-aware of the BCCI situation, and had made ``certain `unofficial' recommendations'' as to how to deal with it. It said that [redacted] would meet with the gentlemen's senior partner, which presumably would mean Henry Kissinger, but he could only tell [redacted] about the recommendations face-to-face. Do you know what sor of recommendations [redacted] might have made? b6 b7C

A. I don't know. I have no idea. It's the first I've heard of it.

Q. So you think maybe this was something that [redacted] and perhaps Henry Kissinger were dealing with directly independent of other Kissinger Associates' staff? b6 b7C

A. All I can say is that I know nothing about it. I know nothing about it. If they were doing it...I know what [redacted] has said, which was that he discussed a business relationship with BCCI and then turned it down. The memoes you just read to me are the first time I ever heard of it. b6 b7C

Q. Yeah, from what [redacted] told The New York Times, the firm had a nibble, started to real it in, then threw it back. But, these memoes make it seem to be far more ongoing. b6 b7C

A. As far as I know they never signed a contract and never took BCCI as a client, but that's only what I read.

Q. Again, I'd like to ask, would your firm do services for a client before a contract has been signed as is claimed with Burson-Marsteller. I know an attorney aware of the situation who swears Burson-Marstellar did work for BCCI after the Tampa bust.

A. No...Not as far as I ever knew. Now the Burson-Marsteller thing though. You know. I don't know that they had a contract with Burson-Marsteller or not. They have have just said: `If you need a public relations firm, that's where you ought to go.' I don't know. I'm just guessing.

Q. It would have been nothing other than to say this firm did good work in banking?

A. Well, I know there had been earlier contacts between Kissinger Associates with Burson-Marsteller. Burson-Marsteller had been a client at an earlier stage.

Q. I recall the last time we spoke you said you had talked to Henry Kissinger about his being on the international policy board of Banca Nazionale del Lavoro (BNL).

A. I knew he was on it. I don't know when he was first on it, but I think he was on it when I came on board Kissinger Associates.

Q. Do you think his relationship with BNL pre-dated Kissinger Associates?

A. My very hazy recollection is he was probably on that board when I came on board Kissinger Associates.

Q. That's circa 1984?

A. I came in '84. I couldn't say whether it went back earlier. But, I know the advisory board that he was on, when he was on it, had Rockefeller and a number of other people.

Q. Was [redacted] on it? b6 b7C

A. He may well have been.

Q. Well, I think Kissinger Associates is referring all of these sorts of questions to Ambassador Bremer to think of a response.

A. Yeegads. He can have fun with it.

Q. But, of course, he was there for far less time than you.

A. He wasn't there long. He came on when I left.

Q. I cannot remember whether I mentionned this. You know several BCCI witnesses keep talking about evidence of a 'passthrough' from BCCI Tampa to your firm.

A. A which? That's the first I ever heard of it. What do you mean by a passwhatever?

Q. A bribe. Money transfer. Payoff. Excuse me, it's an old New York expression.

A. I don't know nuthing.

Q. Well, I didn't really think you would say you had, if you had. But, there are several people who claim that these documents exist and that they will come out soon.

A. Well, they'll have to come out then. If it's true, it's true.

- FIRST INTERVIEW WITH DEPUTY SECRETARY LARRY EAGLEBURGER -
- (PD/BIR on 11/17/91 at Charlottesville) -
- (Reproduced from Notes) -

From his home Charlottesville, Va. this weekend, which is

near the estates of [redacted] and other families with ill-gotten wealth, Deputy Secretary of State Lawrence Eagleburger spoke about the growing scandal that involves BCCI/BNL links with Kissinger Associates. What follows is Eagleburger's responses, where the questions are implict: b6 b7C

``I've read some of the stories, and I see that [redacted] at Kissinger Associates, Inc. had been approached by the BCCI and that there was some discussion of taking them as a client in 1988, but Kissinger Associates, Inc. turned them down. I knew nothing about these negotiations at the time. Nor, do I know anything about the charges that [redacted] and Henry Kissinger suggested they should hire the public relations firm Burson-Marsteller after the indictment of BCCI staff in their Tampa, Florida branch.... I know nothing, even though, as you state, I was president of Kissinger Asssociates, Inc. b6 b7C

``It is true that Henry Kissinger was on the board of the BNL.... But, I never discussed it with Henry. And, I knew nothing about a connection between the loan officers and loans of my bank, LBS Bank of New York, with BNL Atlanta.... If there was LBS Bank business with BNL Atlanta, then there was business. But, I would like to get Rep. [Henry] Gonzalez's [D-Tex.] statement on that and the Federal Reserve Board reports upon which the LBS Bank-BNL Atlanta branch bank were based, because I knew nothing of this when I was on the LBS board.... It is true that Henry was on the BNL board, and, it may well be true as you say, that Brent Scowcroft went to Italy to brief them. We frequently did that sort of thing, whether or not a firm was a client.

``Also, when [redacted] made his trip twith the U.S.-Iraqi business forum to Baghdad, that you mention, I was already in office and I had no knowledge of his trip at the time. So, I have no firsthand knowledge whether [redacted] lied to the House Banking Committee [chaired by Gonzalez], when he said he went there as a tourist, no matter what Ambassador Marshall Wiley of the U.S.-Iraqi Business Forum says to the contrary. b6 b7C

``It is true, as you say the Boston Globe reports, that Kissinger Associates did hire the former Brazilian Ambassador to the U.S. Sergio Correa da Costa, as a consultant while I was president of Kissinger Associates.... I agree with you that this may have had something to do with our concern on behalf of clients in the debt situation in certain Latin American countries. That is why I believe that Henry directly, perhaps in collaboration with [redacted] who put together our financial picture on such matters, worked directly with da Costa.... b6 b7C

``Apart from suggestions in the press coverage, I have no idea when da Costa became one of three owners of BCCI in Brazil, but I suspect he got involved in this after he left the firm in 1988.''

Throughout the interview Eagleburger, whose first action was to get a cigarette despite chronic emphysema, seemed unusually anxious about the growing number of documents seized in BCCI/BNL raids, prosecutions, and released by those already under investigation, that are coming into the hands of congressional investigative committees and prosecutors.

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<+<jf21>Kissinger Tied to BCCI Drug-Money Laundering Schemes<cm

<${Investigative Leads} has obtained copies of internal documents which show that Dr. Henry Kissinger and his employee [redacted] were deeply involved with the Bank of Credit and Commerce International (BCCI), when its Tampa, Florida branch was indicted for laundering $32 million from the Medelli@aan Cartel. b6 b7C

The documents, which were the basis of articles appearing in the Nov. 11 and 12, 1991 {Boston Globe,} also show that former Brazilian ambassador to the U.S. Sergio Correa da Costa was chairman of the BCCI Brazil branch at the same time that he was a special consultant to Kissinger during 1986-88. Correa da Costa is also alleged to have been a chief officer of Claymore International Bank in the Grand Cayman Islands, which was established with funds from [redacted] who had fled to Brazil after being indicted for cocaine and marijuana trafficking in Louisiana. [redacted]'s narcotics-trafficking enterprise was suspected by law enforcement officials of being linked to the same Medelli@aan Cartel partners of BCCI. b6 b7C

One thank you note, from former First American Bankshares chairman Clark Clifford, suggests that Kissinger [redacted] may have helped cover up the BCCI drug-money laundering scandal when it first broke, by arranging a plea bargain. Others, including Tampa BCCI attorney [redacted] have reported that BCCI did hire the public relations firm of Burson-Marstellar to aid the coverup, as the documents indicate Henry Kissinger himself had suggested. And the (D-Mass.) Senate Foreign Relations Subcommittee hearings on BCCI chaired by Sen. John Kerry (D-Mass.), a witness who had extensive financial dealings with BCCI frontman Ghaith Pharaon, has alleged that a payoff was arranged from Tampa BCCI through Clifford to Kissinger Associates for such services. b6 b7C

Ambassador L. Paul Bremer, who had headed the U.S. State Department Office to Combat Terrorism before joining the global influence-peddling firm of Kissinger Associates, Inc. in the late-1980s, has threatened journalists that they ``had better get a good lawyer'' if they print the story told in the documents. But Lawrence Eagleburger, who was president of Kissinger Associates at the time of Kissinger Associates negotiations with BCCI (until he was confirmed as President Bush's Deputy Secretary of State in March 1989), himself confirmed several parts of the story during telephone interviews with a journalist from his Charlottesville, Virginia home. This included Eagleburger ackowledging the possibility that Kissinger Associates may have opened doors with its old client Burson-Marstellar for BCCI, although senior partner [redacted] denies it. b6 b7C

The principal documents range from an Oct. 7, 1988 letter from Kissinger Associates chief economist [redacted] to [redacted] who was [redacted] BCCI's New York branch, and they include several memos from [redacted] to BCCI's number-two man in b6 b7C

international operations at the time, [redacted] This record of [redacted]'s negotiations with Henry Kissinger et al. point to Kissinger Associates, Inc. having helped put a lid on the Oct. 11, 1988 bust of the Tampa, Florida offices of BCCI and nine employees. This indictment, which originated from a drug money-laundering investigation that U.S. Customs Commissioner William von Raab called ``Operation C-Chase,'' which traced BCCI drug money-laundering to the Medelli@aan, Colombia cartel. Before an outrageous plea bargain was reached between the Federal Reserve and the U.S. Justice Department allegedly with assistance of Kissinger Associates, prosecutors had subpoenaed 41 other banks that were also suspected of worldwide drug money-laundering.

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<jf30>Kissinger's Dope, Inc. Bank Links<cm

Several of the banks whose records were subpoenaed were involved in business with Kissinger or his clients. One was Marine Midland Bank, which has been owned since 1978 by the Hongkong and Shanghai Banking Corp., whose involvement in illegal narcotics dates back to the 19th-century ``Opium Wars.'' {Executive Intelligence Review} has previously documented extensive ties between the ``Hongshang'' and Kissinger Associates, including the fact that, until his recent death, Hongshang director Sir Y.K. Pao was a member of the international advisory board of Chase Manhattan Bank, whose chairman and vice-chairman are respectively David Rockefeller and Henry Kissinger. This board steered Chase into extensive dealings with the Beijing regime, and Kissinger sought to protect those investments when he was a member of the President's Foreign Intelligence Advisory Board (PFIAB), telling President Bush to take no strong action for the June 3-4, 1989 Tiananmen Square massacre. Congressional hearings when Kissinger was President Nixon's national security adviser, also show Kissinger issued an injunction against U.S. intelligence naming mainland China as part of ``Golden Triangle'' opium and heroin production.

Another highlight is that Hongshang board member [redacted]) is believed to be a major financial backer for newspaper acquisitions, like the buyup of the London {Daily Telegraph} and the {Jerusalem Post} at several times book value, by Conrad Black's Toronto, Canada-based Hollinger Corp. Kissinger is a board member of Hollinger Corp. Then, the Hongshang also signed a global merger with the British-based Midland Bank PLC, which is not only a client of Kissinger Associates but has Kissinger's employee [redacted] on its board. Another of the 41 banks whose records prosecutors subpoened in the Tampa BCCI case were those of Edmond Safra's Republic National Bank, which has merged with American Express. Kissinger is on the board of American Express.

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If the Tampa BCCI prosecution had allowed Commissioner von Raab to ``follow the money,'' going up a stepladder of prosecutions leading to establishment figures like Clark Clifford, Esq., whom {Investigative Leads} had already identified

in 1988-1989 coverage as a co-owner with BCCI of First American Bankshares, Kissinger Associates and many of its clients would have been in big trouble. However, the commissioner testified to Sen. John Kerry's hearings on BCCI that an outrageous plea agreement was reached in the Tampa BCCI case. The Justice Department, under then-Attorney General Richard Thornburgh, and the Federal Reserve Board not only quashed the subpoenas of other banks' records, but said that the evidence Customs had gathered to date could not be used in future prosecutions.

While this plea bargain was being reached, [redacted] b6
reported in the Nov. 12 {Boston Globe} that [redacted] who is b7C b7D
[redacted] and
[redacted] Kissinger
Associates. The {Boston Globe} has reported, that a note was discovered that chairman of First American Clark Clifford wrote in April 1989, addressed to [redacted] and to then-general counsel of the Federal Reserve [redacted] The note thanks them for meeting and discussing the BCCI case. Subsequent to the {Globe} article [redacted] told a journalist that he had met the New York head of BCCI, [redacted] who was then in negotiations with [redacted] on more than one occassion, and he had frequently met during this time with BCCI Brazil chairman and [redacted] Associates consultant Sergio Correa da Costa.

Yet, [redacted] chose to deny the charges of [redacted] b6
appearing in the{ Globe} categorically in an interview with the{ b7C
New York Times}. And, he told a journalist recently that he could not locate a copy of Clark Clifford's thank you note, suggesting this was proof that the note's contents were spurious. But, a growing amount of evidence implicates Kissinger [redacted], in having helped arrange the Tampa BCCI plea bargain, thereby protecting any business partners of Kissinger Associates from potential prosecution, if the case had been allowed to continue through due process.

<jf30>Don't Put It in Writing<cm

What follows are excerpts from the new documents; Kissinger Associates has threatened to sue anyone who reprints them: <pa

@sb^An Oct. 7, 1988 letter from Kissinger Associates' [redacted] b6
[redacted] to [redacted] states: ``Dear [redacted] I enjoyed lunch b7C
yesterday and, even more, your suggestion that BCCI might be interested in developing a relationship with Kissinger Associates.... I am reluctant to be more specific, at least on paper, about the kinds of consulting projects we undertake for our clients.... I agree that a next step should be for me to meet your management in London or New York.... I look forward to hearing from you soon. Best regards, [redacted]' <pa

@sb^From an Oct. 12, 1988 memo of [redacted] to [redacted]: ``Further to our recent conversation in London, I met with [redacted] who is one of three partners in Kissinger Associates, Inc. Subsequently, the developments in the United States took place [i.e., the Oct. 11 Tampa BCCI bust]. Judging by the high level of adverse publicity that is being generated by the media, it is imperative that a firm response be made....

``I received a call today from [redacted] who informed me that Dr. Kissinger recommends that a public relations offensive be made by us and in that context has suggested using Burson-Marstellar, a highly reputable public relations firm that successfully dealt with the First Chicago crises last year. Kissinger Associates, Inc. have indicated that they shall be happy to use their personal contacts with the firm and make necessary recommendations.'' <pa

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@sb^From an Oct. 14, 1988 memo of [redacted] to [redacted]: ``I just met with [redacted] Dr. Kissinger's partner and discussed the relevant matters as per our phone conversation yesterday....

``I emphasized to [redacted] that our conversations in getting our two respective organizations together have been going on for over a year and hence, have not been generated as a result of present circumstances.

``I feel that a relationship could be established in the near future depending on how fast the present publicity ends.

``I shall keep you duly informed of my next meeting with Dr. Kissinger himself which should be sometime next week.''<pa

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@sb^From a Dec. 19, 1988 memo of [redacted] to [redacted]: ``I am in communication with [redacted] Kissinger Associates, Inc. Their response was they are interested in principle but would like to wait a bit longer. I will be meeting [redacted] the first week of January 1989....

``It would be of interest to you to know that Mr. Scowcroft is now the National Security Designate in the Bush administration and another senior Partner of Kissinger Associates [Eagleburger] is being tapped for Assistant Secretary of State in the Bush administration....

``You may agree that this association with Kissinger Associates, Inc. needs time to be cultivated. I am working in that direction.''

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@sb^From a Jan. 11, 1989 memo of [redacted] to [redacted]: ``I had a lunch meeting with the gentleman [believed to be [redacted]-ed.] on Jan. 5, 1989 and a follow up telephone conversation on January 10, 1989. It was established that it is in our best interests for both parties to continue with the conversations. As such, the door for an eventual relationship remains open.

``They were far more knowledgeable of the details of our situation during this meeting and made certain `unofficial' general recommendations which I shall convey to you at our next meeting. I am meeting my contact's senior partner [believed to be Henry Kissinger--ed.] by the end of January with a view of

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discussing our overall worldwide activities.''

<jf30>Damage Control <cm

From [redacted]s Oct. 7, 1988 letter to [redacted]' where [redacted] says he is ``reluctant'' to place ``on paper'' precisely what Kissinger Associates does for its clients like BCCI to [redacted]s Jan. 11, 1989 memo to [redacted] where he appears to refer to [redacted] as ``the gentlemen'' and Kissinger as ``my contact's senior partner,'' it is clear that much was going on in-between the lines of these documents. Perhaps the most important for law enforcement to discover is what were the ``certain `unofficial' general recommendations'' that ``they'' (an apparent reference to Kissinger Associates) had made to [redacted], which [redacted] thought were so sensitive he had to speak to [redacted] face to face, rather than put them on paper. It is also notable from the memos that [redacted] were aware that top personnel of Kissinger Associates, Inc. would be playing a major role in the incoming Bush Administration, and the question is raised whether the the Jan. 11, 1989 memo, that was written nine days before President Bush was sworn in, indicated that some hope had been given by Kissinger Associates that the new Administration would aid in covering up the Tampa BCCI case. Afterall, Bush's Attorney General Richard Thornburgh was later shown protecting a longtime aide, [redacted], from prosecution for cocaine trafficking.

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Asked what the ``recommendations'' might be, Deputy Secretary Eagleburger, who was still president of Kissinger Associates when the Jan. 11, 1989 memo was written, said: ``I don't know. I have no idea.'' However, ather than deny the memo, Eagleburger said he could not know, because he ``had pretty much left Kissinger Associates by December'' to join President Bush's transition team. This contrasts with Ambassador Bremer, who had not yet even joined Kissinger Associates, who has insisted that [redacted]'s memos are ``self-promoting inventions'' after the initial Oct. 7, 1988 [redacted] letter to [redacted].

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As noted above, however, while Burson-Marstellar officials have denied ever working for BCCI, as [redacted]'s memo to [redacted] states Henry Kissinger had suggested, BCCI attorney [redacted] claims they did. And, Deputy Secretary Eagleburger has told journalists that it is possible Henry Kissinger did help BCCI hire Burson-Marstellar at the time, since the public relations firm was an old client of Kissinger Associates. So much for Ambassador Bremer's ``damage control''--including threats--on matters over which he can have no first-hand knowledge as a witness.

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<jf30>Another Kissinger-BCCI Tie<cm

Deputy Secretary Eagleburger also confirmed for a journalist that Sergio Correa da Costa, who had been Brazilian ambassador to the U.S. until Nov. 3, 1986, was a very special consultant of Kissinger Associates for the years from 1986-1988:

``It is true, as you say the {Boston Globe} reports, that Kissinger Associates did hire the former Brazilian ambassador to

the U.S. Sergio Correa da Costa, as a consultant while I was president of Kissinger Associates.... I agree with you that this may have had something to do with our concern on behalf of clients about the debt situation in certain Latin American countries, especially Brazil. That is why I believe that Henry--perhaps in collaboration with [redacted] who put together the financial picture on such matters--worked directly with Correa da Costa....'' b6 b7C

{Jornal do Brasil} reported on Nov. 16, 1991 that Correa da Costa had been one of the nominee owners of BCCI Brazil throughout the period that he was a personal consultant to Kissinger and, possibly, [redacted]. Interestingly, it was when Correa da Costa left Kissinger Associates, that the record of [redacted]'s talks with New York BCCI head [redacted] starts. b6 b7C

An article on Aug. 28, 1989, in {Jornal do Brasil} said that Correa da Costa then controlled two-thirds of the voting capital of BCCI Brazil, and he is its chairman. But, but control of the bank's finance capital was held by BCCI's international offices in London, then managed by [redacted]'s boss, [redacted]. The Nov. 16 {Jornal do Brasil} article is supported by documents released during testimony of [redacted] (e.g. including Tampa, Boca Raton, etc.) befoer Kerry's Senate Foreign Relations Subcommittee on Oct. 22, 1991. b6 b7C

One of the first documents dated May 6, 1986 is a memo from [redacted] to [redacted] in BCCI London, which states that ``Ambassador Da Costa Telephoned to introduce [redacted] ... [who] is a high net worth and a highly influential individual in Sa@ato Paulo, Brazil. He is chairman of two companies in Brazil, in which the President of Brazil has an interest and was a director until the time he became president. Ambassador Da Costa also informed me of his meeting with Dr. [Ghaith] Pharaon recently in Florida and then Dr. Pharaon informed him of our proposed acquisition in Brazil and the problems BCC was facing in Brasilia. Ambassador Da Costa has promised the Bank in any way he can and he has also asked [redacted] to use his association with the President of the Republic to assist BCC.'' b6 b7C

Another Dec. 4, 1986 memo from [redacted] of the Latin America Regional Office to [redacted] of BCC Grand Cayman is on the subject: ``Salary of Mr. Sergio Correa Da Costa.'' Written after Correa da Costa had ceased being Brazilian Ambassador to the U.S. to become a special consultant to Henry Kissinger, the memo states: ``You are requested to pay salary of Mr. Sergio Correa da Costa with effect from November 3, 1986. He will be paid a monthly salary of U.S. $12,500 ... which may please be credited to his account #0260075661 with BCC New York Agency under advice to us.'' b6 b7C

A Dec. 4, 1986 telex from BCC New York to a [redacted] via [redacted] in London lists the Brazilian shareholders of BCCI Brazil as: 1) [redacted], which is [redacted] (mainly to the U.S. and Japan), whose net worth is estimated at [redacted] million; 2) [redacted], who is [redacted] in a law firm having a net worth of $15 million and [redacted] b6 b7C

which is Brazil's [redacted] and [redacted] b6 b7C
Brazil; 3) and, Ambassador Sergio Correa da Costa, who is Brazil's most senior ambassador and who is presently employed as a ``partner of Henry Kissinger in Kissinger Associates New York and, consultant to Coudart Brothers, a very large law firm in New York.''

BCCI's appraisal continues that Sergio Correa da Costa ``is very close to President Sarney, where both individuals are members of Brazil's prestigious Academy of letters. The Ambassador comes from an excellent family and has land holdings thru his family. His net worth is in the U.S.|$5 million range.''

A list of international loans from BCCI (Overseas) Ltd. in Panama dated April 30, 1988 notes that Sergio da Costa received a loan of $1,563,723.85 that was ``parked by BCCI Miami.'' Often, BCCI gave such loans for persons to act as nominees, who were not expected to pay interest or principal, since the money was used for them to front for BCCI in bank acquisitions and deals.

Throughout the month of September, 1989 {Jornal do Brasil} ran a series of exposes, that linked Sergio Correa da Costa to the Jan. 1, 1986 creation in the Cayman Islands of Claymore International Bank, which Senate Subcommittee documents suggest overlap his dealings with BCCI starting in that year. Before demonstrating that link it is interesting that in a letter from Correa da Costa published Sept. 29, 1989 in the {Jornal} Correa da Costa, of course, denied the links with Claymore International, saying the bank had never been ``concretized,'' but admitted to participating in the capital of BCCI Brazil. As the {Jornal} noted, BCCI Brazil had twice been investigated by Brazilian federal police for aiding and abetting flight capital operations.

As for Claymore, {Jornal do Brasil} states it had begun to operate and that its main capital came from indicted drug trafficker William Reed Elswick, who had a $9.8 million balance in Claymore as of Dec. 31, 1988. Elswick, according to the {Jornal} had fled indictment in Louisiana on cocaine and marijuana trafficking charges, to set up shop in Brazil in 1983. He was assisted by Brazilian Pepsi Cola president [redacted] b6 and others. But, when Brazilian federal police seized him in 1985 b7C in compliance with a U.S. extradition request, the {Jornal} claims Elswick had to pay millions to attorneys who had influence with then-President Jose@aa Sarney to obtain a release and pardon. Among those said to be involved was a Lebanese [redacted], who had earlier helped Propaganda-2 Freemasonic member and Italian black nobility aristocrat Humberto Ortolani obtain Brazilian naturalization.

This creation of Claymore International Bank in the Cayman Islands with drug money took place while Correa da Costa was a personal consultant to Henry Kissinger and chairman of BCCI Brazil. According to the {Jornal}, the frontman for the founding of Claymore in January 1986 was Senator Alexandre Costa's [redacted] This is the same [redacted] b6 whom then Brazilian Ambassador to the U.S. had sought to b7C introduce to BCCI officials, while Correa da Costa himself was

meeting with BCCI nominee Ghaith Pharaon. (See memo dated May 6, 1986 from [redacted] to [redacted] above). b6 b7C

- BCCI and Iranamok -

Indicted drug trafficker [redacted] is also reported by the {Jornal do Brasil} as having had an account in Euro Bank in Georgetown, Grand Cayman, that was administered by [redacted], who was [redacted] with a man who had served five years in prison for participating in the [redacted] gang. Euro Bank is featured prominently in new documents released during Sen. John Kerry's Senate Foreign Relations Subcommittee hearings with former BCCI executive [redacted], as one of several possible passthroughs explored by [redacted] for the $10 million he fronted to Director of Central Intelligence William Casey and Israel for their arms-for-hostages deals with Iran involving middleman Manucher Ghorbanifar. b6 b7C

As {Executive Intelligence Review} documented in an Aug. 2, 1991 article, ``BCCI Trail Leads to `October Surprise,'|'' Casey's CIA made extensive use of the BCCI. Moreover, Iranian gun-runner and banker Cyrus Hashemi, who with his brother Jamshid, had purchased arms for Iranian Defense Minister Admiral Madani, were both key players in October Surprise--i.e. the successful attempt by Reagan-Bush to block the release of U.S. hostages held in the U.S. Embassy in Teheran until after the 1980 election. In interviews with {EIR}, Jamshid Hashemi implicated George Bush personally in this operation. Cyrus Hashemi's bank, First Gulf Bank and Trust was a wholly owned subsidiary of the Luxembourg-based First Arabian Corporation, whose investors were the same as BCCI, including former Saudi Intelligence chief Kamal Adham, Saudi financier Ghaith Pharaon, and Lebanese financier Rogert Tamraz.

Sources associated with British SIS have alleged to {Investigative Leads} that the $10 million paid by Iran and ostensibly misdirected to the wrong account number really went to [redacted], [redacted] the Geneva-based Bank of New York-Itermaritime joint venture, which is run by [redacted] Having risen to [redacted] at Union Bank of Switzerland, [redacted] became [redacted] of the Swiss subsidiaries of both BCCI and Banca Nazionale del Lavoro, respectively BCP and Lavoro Bank, through which many investigators believe the greatest amount of inter-bank transfers, arms-deals, and narcotics-trafficking were arranged. Since the scandals involving BCCI and BCP, [redacted] resigned from BCP and Lavoro Bank, but has remained a [redacted] of Rothschild Bank in Zurich and a [redacted] of Rothschild Continuation in Zug, which was created as a holding company for continuance of N.M. Rothschild & Sons, Ltd. based in London. His employer, [redacted] is known to have extensive dealings with the Israeli Government and its intelligence services, while [redacted]'s business partner, [redacted] who made his money in shady oil deals, is believed to be an Israeli Mossad go-between with U.S. intelligence. b6 b7C

The new documents released by [redacted] to the Kerry Senate subcommittee start with a telex from [redacted] of BCCI b6 b7C

Grand Cayman dated March 27, 1986 to [redacted] b6
[redacted] of the International Division of BCCI London. It states b7C
that ``a company which is under formation in the Cayman Islands'' approached [redacted]'s bank ``at the request of [redacted]'' to ask whether it could deposit $10 million for a credit line. In a return telex from [redacted] to [redacted] makes clear that he knows the ``company'' is Euro Bank (the same bank Correa da Costa's partner indicted drug-trafficker [redacted] is involved with), and [redacted] adds : ``In view of their [Euro Bank's] small size and because we do not know them we would not be interested in accepting their guarantee.''

However, further documents show [redacted] sought other b6
avenues through which to work his $10 million arms-for-hostages b7C
deal with BCCI on behalf of Casey and Israel. In an unclassified deposition of [redacted] dated June 8, 1989, he states that [redacted] came back with a flow chart explaining how the $10 million ``would move through Triad International Marketing.'' While [redacted] does not mention in the deposition that item ``Y'' where the arms were to be purchased for $10 million was probably Israel, he did say that [redacted] would be involved in the sale of the weapons to Iran. The Iranians would then pay $11 million through [redacted] and the $1 million profit would be divided among Triad International Marketing and others, including $40,000 proposed for BCCI's assistance. As a result of this sales pitch, Floor says that BCCI helped start to draw up documents for creation of an entity, Trivert International, as well as a promissory note for [redacted] to owe the money to another entity named Vertex.

This is part of the as yet unrevealed financial manipulations involving [redacted]'s funding on behalf of DCI b6
Casey and Israel of the arms-for-hostages deals involving b7C
[redacted] as go-between. Although it is an ``Arab Bank'' in name, BCCI is proud that it has done extensive business in the past with Israel. {IL} investigators are continuing to review documents relating to the BCCI-Kissinger Associates links and the tie-ins to the Irangate affair. Any subscribers interested in obtaining copies of any of the documents cited in this article should write to the Editor for details.

<+><jf130><cc42><cmKissinger caught in web<qlof lies on BCCI ties
<cmby [redacted] <cm b6
b7C

<jf20><$>{EIR} has obtained copies of documents which show that
Dr. Henry Kissinger and his employee [redacted] were deeply b6
involved in the Bank of Credit and Commerce International (BCCI) b7C
scandal dating back to 1988. The documents, which were the basis of articles appearing in the Nov. 11 and 12 {Boston Globe,} show that former Brazilian ambassador to the U.S. Sergio Correa da Costa was chairman of BCCI Brazil at the same time that he was a special consultant to Kissinger during 1986-88. One letter, from former First American Bankshares chairman Clark Clifford, suggests that Kissinger's [redacted] may have helped cover up the BCCI scandal when it first broke.

Ambassador L. Paul Bremer, who had headed the U.S. State Department Office to Combat Terrorism before joining the global influence-peddling firm of Kissinger Associates, Inc. in the late-1980s, has threatened journalists that they ``had better get a good lawyer'' if they print the story told in the documents. But Lawrence Eagleburger, who was president of Kissinger Associates at the time of its discussions with BCCI (until he was confirmed as President Bush's Deputy Secretary of State in March 1989), himself confirmed several parts of the story during telephone interviews with a journalist from his Charlottesville, Virginia home.

The documents range from an Oct. 7, 1988 letter from Kissinger Associates chief economist [redacted] to [redacted] who was then president of BCCI's New York branch, and include several memos from [redacted] to BCCI's number two man, [redacted] s negotiations with Henry Kissinger et al. point to Kissinger Associates, Inc. having helped put a lid on the Oct. 11, 1988 bust of the Tampa, Florida offices of BCCI and nine employees. This indictment, which originated from a drug money-laundering investigation that U.S. Customs Commissioner William von Raab called ``Operation C-Chase,'' charged that Tampa BCCI had laundered $32 million from the Medelli@aan, Colombia cocaine cartel. Before an outrageous plea bargain was reached, prosecutors had subpoenaed 41 other banks that were also suspected of worldwide drug money-laundering.

b6
b7C

- Banks with Kissinger links -

Several of the banks whose records were subpoenaed were involved in business with Kissinger or his clients. One was Marine Midland Bank, which has been owned since 1978 by the Hongkong and Shanghai Banking Group, whose involvement in illegal narcotics dates back to the 19th-century ``Opium Wars.'' {EIR} has documented extensive ties between the ``Hongshang'' and Kissinger Associates in past articles, but one highlight is that Hongshang board member [redacted]') is believed to be a major financial backer for newspaper acquisitions, like the buy-up of the London {Daily Telegraph} and the {Jerusalem Post,} by [redacted] Hollinger Corp. Kissinger is a board member of Hollinger Corp. Then, the Hongshang also signed a global merger with Midland Bank PLC, which is not only a client of Kissinger Associates but has Kissinger's employee [redacted] on its board. Prosecutors also subpoenaed the records of [redacted] Republic National Bank, which merged with American Express. Kissinger is on the board of American Express.

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If the Tampa BCCI prosecution had allowed Commissioner von Raab to ``follow the money,'' going up a stepladder of prosecutions leading to establishment figures like Clark Clifford, Esq., who was known in 1988 to be a co-owner, along with BCCI, of First American Bankshares, Kissinger Associates would have been in big trouble. However, the commissioner testified to Sen. John Kerry's (D-Mass.) hearings on BCCI that an outrageous plea agreement was reached in the Tampa BCCI case. The

Justice Department, under then-Attorney General Richard Thornburgh, and the Federal Reserve Board not only quashed the subpoenas of other banks' records, but said that the evidence Customs had gathered to date could not be used in future prosecutions.

While this plea bargain was being reached, [redacted] b6 b7C reported in the Nov. 12 {Boston Globe} that [redacted] who is [redacted] has said that Henry Kissinger sent BCCI officials to consult with William D. Rogers. Rogers, who had been Assistant Secretary of State for Latin American Affairs under Kissinger and who is today a board member of Kissinger Associates, denies [redacted]s claims. But, the {Boston Globe} reported, a note has been discovered that chairman of First American Clark Clifford wrote in April 1989, addressed to [redacted] and to then-general counsel of the Federal Reserve John D. Hawke. The note thanks them for meeting and discussing the BCCI case. Did [redacted] help arrange the Tampa BCCI plea bargain, which protected many business partners of Kissinger Associates from potential prosecution?

The following are excerpts from the documents; Kissinger Associates has threatened to sue anyone who reprints them:

- Business which cannot be 'put on paper' -

@sb^An Oct. 7, 1988 letter from Kissinger Associates' [redacted] to [redacted] states: ``Dear [redacted] I enjoyed lunch b6 b7C yesterday and, even more, your suggestion that BCCI might be interested in developing a relationship with Kissinger Associates.... I am reluctant to be more specific, at least on paper, about the kinds of consulting projects we undertake for our clients.''

@sb^From an Oct. 12, 1988 memo of [redacted] to [redacted] ``I met b6 with [redacted] who is one of three partners in Kissinger b7C Associates, Inc. Subsequently, the developments in the United States took place [i.e., the Tampa BCCI bust].... I received a call today from [redacted] who informed me that Dr. Kissinger recommends that a public relations offensive be made by us and in that context has suggested using Burson-Marstellar, a highly reputable public relations firm that successfully dealt with the First Chicago crises last year. Kissinger Associates, Inc. have indicated that they shall be happy to use their personal contacts with the firm and make necessary recommendations.''

@sb^From an Oct. 14, 1988 memo of [redacted] to [redacted]: ``I just b6 met with [redacted]... I emphasized to [redacted] that our b7C conversations in getting our two respective organizations together have been going on for over a year and hence, have not been generated as a result of present circumstances.... I shall keep you duly informed of my next meeting with Dr. Kissinger himself which should be sometime next week.''

@sb^From a Dec. 19, 1988 memo of [redacted] to [redacted]: ``I am in b6 communication with [redacted]... Their response was they are b7C interested in principle but would like to wait a bit longer. I will be meeting [redacted] the first week of January 1989.... It would be of interest to you to know that Mr. Scowcroft is now the

National Security Designate in the Bush administration and another senior Partner of Kissinger Associates [Eagleburger] is being tapped for Assistant Secretary of State in the Bush administration.''

@sb^From a Jan. 11, 1989 memo of [redacted] to [redacted]: ``I had a lunch meeting with the gentleman on Jan. 5.... It was established that it is in our best interests for both parties to continue with the conversations. As such, the door for an eventual relationship remains open. They were far more knowledgeable of the details of our situation during this meeting and made certain `unofficial' general recommendations which I shall convey to you at our next meeting. I am meeting my contact's senior partner by the end of January with a view of discussing our overall worldwide activities.'' b6 b7C

- Damage control -

The ``gentleman'' in the Jan. 11, 1989 memo from [redacted] to [redacted] who made ``certain `unofficial' general recommendations'' for BCCI, is thought to be [redacted] who had made an appointment with [redacted] for this time. His ``senior partner'' would be Henry Kissinger himself. b6 b7C

Asked what these ``recommendations'' might be, Deputy Secretary Eagleburger, who was still president of Kissinger Associates when the meeting occurred, said: ``I don't know. I have no idea.'' Rather than deny the memo, Eagleburger said he could not know, because he ``had pretty much left Kissinger Associates by December'' to join President Bush's transition team. But, Ambassador Bremer, who has even less first-hand knowledge, has insisted that Helmy's memos are ``self-promoting inventions'' so his boss will think negotiations with [redacted] continued after Oct. 7. b6 b7C

[redacted] who is [redacted] of the public relations firm Burson-Marsteller, also told the Nov. 13 {New York Times} that his firm has never represented BCCI. However, not only does one of BCCI's attorneys in the Tampa BCCI case swear that Burson-Marsteller did do public relations work for BCCI, but Deputy Secretary Eagleburger said it is possible, since Burson-Marsteller had once been a client of Kissinger Associates. b6 b7C

- Kissinger's consultant chairs BCCI Brazil -

Deputy Secretary Eagleburger also confirmed that Sergio Correa da Costa, who had been Brazilian ambassador to the U.S. until 1986, was a very special consultant of Kissinger Associates from 1986-1988:

``It is true, as you say the {Boston Globe} reports, that Kissinger Associates did hire the former Brazilian ambassador to the U.S. Sergio Correa da Costa, as a consultant while I was president of Kissinger Associates.... I agree with you that this may have had something to do with our concern on behalf of clients about the debt situation in certain Latin American countries, especially Brazil. That is why I believe that Henry--perhaps in collaboration with [redacted] who put together the financial picture on such matters--worked directly with da b6 b7C

Costa....''

As {Jornal do Brasil} reported on Nov. 16, Correa da Costa had been one of the nominee owners of BCCI Brazil throughout the period that he was a personal consultant to Kissinger and, possibly, [redacted]. Interestingly, when Correa da Costa left Kissinger Associates, [redacted] began talks with BCCI's [redacted] in New York. An article on Aug. 28, 1989, in {Jornal do Brasil} said that Correa da Costa controls two-thirds of the voting capital of BCCI Brazil, and he is its chairman. But, control of the bank's finance capital seems to be held by BCCI International of London, then controlled by [redacted].

Is it not amazing how the paper trail of a coverup often surfaces piece by piece?

<jf43>Kissinger in
trouble again

<cmHenry Kissinger's Brazilian friends are once again being linked to drugs.

Since Sept. 24, {Jornal do Brasil} has been running a series exposing the Brazilian networks who protected American drug-runner [redacted] who escaped prosecution in the U.S. by establishing operations in Brazil. Those operations included setting up Claymore International Bank in the Cayman Islands using [redacted]s dirty money. Brazilian Congressman [redacted] is calling for a parliamentary inquiry into the charge that [redacted]s money was used to found Claymore International.

``Claymore is currently an inactive bank. But in its initial phase it counted on important names on its board,'' {Jornal} notes. ``The President of Claymore International was Sergio Correa da Costa, Brazilian ambassador in the United States from 1985-87, and an ex-partner of Henry Kissinger in a consulting firm in New York.... In the same period, Correa da Costa was also director of the Brazilian branch of the Bank of Credit and Commerce International, BCCI, which has already been accused twice by the Federal Police of attempting to send dollars out of Brazil illegally; last year, the BCCI of Miami was accused of being one of the leading financial institutions laundering money earned by the mafia by drug trafficking.''

While Correa de Costa claimed he had never been President of Claymore International, {Jornal} replied, on Sept. 28, ``In fact, two-thirds of the voting capital of the BCCI de Brasil, of which Sergio Correa da Costa is chairman of the board, formally belongs to Brazilians, but its president is Englishman [redacted] and 50% of its finance capital is from the Bank of Credit and Commerce International of London.''

RIO DE JANIERO, Oct. 12 (EIRNS)--KISSINGER'S BRAZILIAN FRIENDS HAVE ONCE AGAIN BEEN LINKED TO DRUGS. Since Sept. 24, Jornal do Brasil has been running a series exposing the Brazilian networks who protected an american drug-runner named [redacted] who escaped prosecution in the U.S. by establishing operations in

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Jornal do Brasil's report hit something, for Correa de Costa sent a letter to the paper claiming he had never been President of Claymore International, but had just been invited to join the board of Claymore do Brasil, which never was concretized." He also took issue with report that he was a director of the Brazilian branch of BCCI, saying the BCCI has no branch in Brazil. Jornal replied, on Sept. 28: "In fact, 2/3 of the voting capital of the BCCI de Brasil, of which Sergio Correa da Costa is chairman of the board, formally belongs to Brazilians, but its president is Englishman [redacted] and 50% of its finance capital is from the Bank of Credit and Commerce Internacional of London." b6 b7C

- <BCCI IN BRAZIL: DISCLOSURES> -

CSM 8/9/91: Article reviews how employees of BCCI Brazil knew all along about the BCCi connections to the various implicated US banks such as First American, because it was common knowledge. Said one banker who worked at BCCI in 1988, the connection with First American "was transparent to the general banking community for a long time." Said another banker, who requested anonymity: "I never knew exactly what the relationship was, but I knew they had the same shareholders, and everybody else at BCCI knew, too."

More interesting in the article are the names of Brazilian prominents who held shares who sat on the board of Brazil's BCCI, described as not very large, with only 37 employees and $27 million in assets. It has been for sale for months, with no takers, and is planning to change its name.

"In addition to BCCI's one-third ownership of its Brazilian branch, a local trading company IAT owns another third. Sergo Correa da Costa, a former ambassador to the US, and Rio lawyer [redacted], share the remaining third. [redacted] a former [redacted] sits on the bank's four-man board." b6 b7C

Says Jornal do Brasil, the bank is "a known specialist in actively participating in foreign exchange remittances" during a period in which Brazil was restricting money sent abroad.

"Those of us who had worked at traditional banks were amazed to see how openly they did capital-flight operations in the bank," said the former BCCI Brazil employee. "They even telephoned the black-market dollar dealer if the client needed to buy the dollars to be sent abroad."

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KISSINGER ASSOCIATE SERGIO CORREA INVOLVED IN NARCO-LAUNDERING

SOURCE FOR ALL BELOW IS THE 5-PAGE 10/5 "Narcotrafico" report by SP in Rio. Most of her data is from Jornal do Brasil (JB).

JB of 10/27 reported Sergio Correa da Costa, who was Brazilian ambassador to the United States from 1985-87 [he was amb to the U.N. during the years before that--mds] is now active in two banks linked to money laundering. JB says that he is an "ex-partner of Henry Kissinger in a New York consulting firm." [It is mds and ggs recollection that Correa was a partner in Kissinger Associates, Inc., at least in 1987. We have no knowledge of if and when he left the firm.]

Correa wrote a letter published in JB 9/28 in which he denied its 9/27 report that he was a director of the Brazilian branch of BCCI, saying the BCCI has no branch in Brazil, but confirmed, "...I participate in the capital--within limits set by law-- of a bank constituted in Brazil, the Banco de Credito y Comercio de Inversiones of London." [This is Spanish, probably an error made by SP, but one which makes one want to have the Portuguese text for legal purposes-mds].

JB 9/28 writes, "In fact, 2/3 of the voting capital of the BCCI de Brasil, of which Sergio Correa da Costa is chairman of the board, formally belongs to Brazilians, but its president is Englishman [redacted] and 50% of its finance capital is from the Bank of Credit and Commerce Internacional [Intenational?] of London." Correa also denies in his letter that he was ever president of CLAYMORE INTERNATIONAL BANK of the Cayman Islands. He wrote, "What happened is that I was invited by Edmar Cid Perreira to join the board of Claymore do Brasil, which never was concretized. That happened in 1987, after having left the embassy in Washington." b6 b7C

JB 9/28 reiterates that Correa did provide services to Claymore. JB 9/27 reports Claymore International Bank was founded 1/9/86 in the Cayman Islands by Senator [redacted] [redacted] [relation to Correa da Costa?] and lawyer [redacted] It says it is presently inactive. b6 b7C

JB says two former Cayman Islands government [?] officials told JB that indicted drug trafficker [redacted] had a $9.5 mn balance in his account at Claymore International as of 12/31/88. JB says that [redacted] used to bank to bring in part of the money with which he established himself in Brazil. [This is incoherent, since the article also says that [redacted] fled to Brazil in 1983, after being indicted in Louisiana for leading a band which imported cocaine and marijuana to the U.S. via maritime transport. And, the bank was only started in 86. The report later states that [redacted]s money was used by lawyer [redacted] to found Claymore.] b6 b7C

JB and the Brazil narco report details Claymore's links to [redacted] (formerly [redacted] of Rockefeller's ADELA), [redacted] (now [redacted] at central bank). Also Pepsi-Cola [redacted] Lebanese [redacted] b6 b7C

Many of these folks helped [redacted] set up shop in Brazil. In 1984, [redacted] was [redacted] OF PEPSI-COLA. He presented [redacted] to prestigious lawyer [redacted] then presented him to businessmen for joint investments. [redacted] coinvested in an Amazon gold exploration venture with Rio Vivienda Construccion [what is real name?] [redacted] [redacted] got a habeas corpus from Supreme Court president [redacted] for Elswick out when the Federal Police seized him in early 1985 in compliance with US extradition request. Once free, [redacted] went underground, where he remains. b6 b7C

Report has lots more on [redacted] the key Brazil-US-offshore lawyfirm. Deputy [redacted] (PSDB) has asked Congress for an investigation of her, JB reports. [redacted]s investment seminars b6 b7C

were frequently attended by former US consul in Sao Paulo, [redacted] b6
[redacted] of Santos, Sao Paulo, helped found b6
Claymore and tried to get [redacted] to pardon [redacted] and return to b7C
him his illegally-obtained Brazilian naturalization. [redacted] lobbies
for companies, including Mendes Junior. Those asked for letters
of recommendation for [redacted] in this process include a Banco
Safra manager, [redacted] of the Brazil Selection football
team [list in report]
[redacted] lebanese, JB says: "indicated as one of b6
the people who helped [redacted] obtain a visa and naturalization." b7C
He also helped get visa and naturalization papers for [redacted]
[redacted] of P-2.
[redacted] reportedly created several big fish export companies b6
in the Brazilian Northeast, including Brazilian Tuna Exportacao. b7C
His group runs .

EURO BANK. The report includes several references to Euro Bank [probably European-American Banking Corp. of NY-mds] The only connection to Brazil is that [redacted] had an account there, b6
administered by one [redacted], the same person who is now b7C
[redacted] of Caribbean Seafood Exports, based in Cayman Islands,
which is a partner with Brazilian Tuna. Brazilian Tuna was
created by [redacted], who arrived in Brazil in 88 after
serving 5 years in jail for participating in the [redacted] gang in
the U.S.

ORIGINAL SOURCE: [redacted] the U.S journalist who is b6
writing a book to be published in 1990 on the Brazilian foreign b7C
debt, was the one who first informed Dep. [redacted]
([redacted]) of the presence of [redacted] in Brazil.
[redacted] gave the story to JB and is asking for a congressional
inquiery into the Brazilian partners of [redacted]

JB 10/26 Informe JB column note: "In Brazil, it is called the Banco de Credito, Comercio e Investimento [this 8is correct name in Portuguese--MDS] and has as its partner, among others, amb. Sergio Correa da Costa--who has represented Brazil is the United States. [Sergio Correa da Costa is member of Kissinger Associates.--Rio] [He also was amb to United Nations and to Great Britain. He is a total Anglo-phile, as shown by his statements and his book. --MDS] Ex-minister [redacted] is [redacted] of b6
[redacted] Investigations by the American [sic] police up b7C
to now show that the laundering problem is localized. Precisely
in Florida. Without ramifications in other countries."

<+<jf27>Economma y narcotrafico<cm

<jf23>Brasil<cm

Una vez mas, los amigos de Kissinger aparecen ligados al escandalo del narcotrafico. El 24 de septiembre el diario <cf2>Jornal do Brasil <cf1>comenzs una serie de revelaciones sobre el caso del narcotraficante [redacted] quien b6
escaps a la justicia en los Estados Unidos y traslads sus b7C
operaciones al Brasil. El escandalo cobrs importancia cuando el congresista brasileqo [redacted] solicits una investiqacisn parlamentaria del alegato de que se uss el narcodinero de [redacted] para establecer el banco Claymore International en las Islas Caimanes.

``El Claymore es actualmente un banco inactivo'', seqala <cf2>Jornal do Brasil. <cf1>``Pero en su fase inicial conts con importantes nombres en su junta... El presidente de Claymore International era Sergio Corrja da Costa, embajador brasileqo en los Estados Unidos de 1985 a 1987, y ex socio de Henry Kissinger en un bufete de consultorma en Nueva York''. Luego aqade el mismo diario: ``En ese mismo permodo, Corrja da Costa fue tambiin director de la sucursal brasileqa del Banco de Cridito y Comercio Internacional, BCCI, al que la policma federal ya habma acusado dos veces de intentar sacar dslares ilegalmente del Brasil; el aqo pasado el BCCI de Miami fue acusado de ser una de las principales instituciones financieras lavanderas de dinero obtenido del narcotrafico por la mafia''.

Corrja da Costa respondis en una carta al <cf2>Jornal do Brasil <cf1>que nunca fue presidente de Claymore International, y que sslo lo habman invitado a incorporarse a la junta directiva del Claymore do Brasil, lo ``cual nunca se concretizs''. Tambiin discreps con el informe de que il habma sido director de la sucursal brasileqa del BCCI, diciendo que el BCCI no tiene sucursal en Brasil. El <cf2>Jornal do Brasil <cf1>respondis el 28 de septiembre: ``De hecho, dos tercios del capital votante del BCCI do Brasil, cuya junta directiva preside Sergio Corrja da Costa, pertenecen formalmente a brasileqos, pero su presidente es el inglis [redacted] y 50 por ciento de su capital financiero b6
es del Banco de Cridito y Comercio Internacional de Londres''. b7C

EX-EMBAIXADOR RECEBIA SALARIO DE US$ 12.500 DO BCCI

As ligacoes do ex-embaixador Sergio Correa da Costa com o Banco de Credito e Comercio Internacional (BCCI), ...vam muito alem de sua participacao como acionista minoritario da subsidiaria brasileira da institucao. Ele prestava servicos para a rede internacional de BCCI.

Nas investigacoes americanas, porem, apareceu um memorando em que o entao coordenador das atividades do BCCI na America Latina, [redacted], instrui [redacted], do BCCI nas Ilhas b6
Cayman, a pagar salario a Correa da Costa a partir do 3 de b7C
novembro de 1986 --exatamente dois dias depois que ele deixou a embaixada. "Assunto " SALARIO DO SR. SERGIO CORREA DA COSTA" diz em letras maiusculas o cabecalho do documento, acrescentando : "Voce e solicitado a pagar salario do Sr. Sergio Correa da Costa

a partir do 3 de novembro de 1986. A ele sera pago um salario mensal de US$ 12.500, que por fineza seja acreditado na sua conta numero 0260075661 com a agencia do BCCI em New York sob nossa recomendacao".

Segundo o Jornal do Brasil, o chefe do BCCI em Miami, [redacted] b6 b7C disse que: "Ia regularmente a Sao Paulo"..."Nos tinhamos um homen chamado dr. Amorium, que tinha sido ministro da Fazenda no Brasil. Ele fundou um banco cujo controle acionario pertenecia a filha do entao presidente do Brasil. Nos verificamos isto e eu dei meu parecer de que esse banco estava absolutamente podre. Sem ativos, principais emprestimos mal feitos e assim por diante." [redacted] continua o Jornal do Brasil, se referia a Marcos Amorim, ja falecido, que foi chefe da assesoria Economica e secretario geral do Ministerio da Fazenda, na gestao de Mario Henrique simonsen, durante o governo Geisel. Quando Simonsen assumiu o Ministerio do Planejamento, no Governo Figueiredo, Amorim foi tambem seu secretario geral. Depois foi gerente do Banco do Brasil na Espanha. No governo Sarney, ele voltou ao pais e ocupou o cargo de diretor de Financas e Controle do Banco do Brasil.

O Jornal do Brasil da mais dados. "O ministro da Fazenda no governo Figueiredo, Ernane Galveas integra o Conselho administrativo do Banco de Credito e Comercio de Investimentos, subsidiaria brasileira do BCCI. gALVEAS TEM APENAS CINCO DOS 75.375 MILHOES DE ACOES QUE INTEGRAM O CAPITAL SOCIAL DO bcci brasileiro, o que representa uma participacao inferior a 0,01%"

"O advogado [redacted], apontado como socio b6 b7C de Edmar Cid Ferreira em outra aventura bancaria --a creacao do Claymore International Bank, das Ilhas Cayman, cujo capital inicial teria sido formado con US$ 1 milhao fornecidos pelo traficante de drogas [redacted] o capitao America--, reagiu com irritacao ao envolvemento de seu nome no escandalo do BCCI, mas confirmou conhecer o empresario Edemar Cid Ferreira e o embaixador Sergio Correa da Costa... Um dos asuntos de sua predileccao e "paraiso fiscal" Sua assesoria sempre o indicava aos jornais para falar sobre esse tema. antes do episodio Capitao America. Segundo o reportagem do JB, [redacted] pagou a Ferreira e Noronha para que lhe conseguissem o perdao do presidente Sarney, escapando a extradicao para os EUA". Jornal do Brasil, 14-11-91, P.3.

ACIONISTAS BRASILEIROS QUEREM SE DESLIGAR

O empresario [redacted], da trading I.A.T., maior b6 b7C acionista do banco (BCCI) no Brasil, se reuniu ontem com o presidente da institucao, [redacted] nao acredita que o ex-presidente [redacted] tenha intercedido junto ao BC para aliberacao da carta-patente do BCCI em 1986, da mesma forma que refuta as acusacoes a Sergio da Costa, que detem 10% do controle

acionario do banco. Folha de Sao Paulo, 14-11-91, P. 7.

EMPRESARIO TENTA TIRAR SOCIOS DO BCCI

O acionista maior do Banco de Financiamento Internacional, ex BCCI, [redacted] decidiu o aumento do capital do banco e reduzir a participacao dos inversionistas estrangeiros, informou o Estado de Sao Paulo. O jornal agrega que [redacted] e presidente da IAT Trading. "Os socios brasileiros --a IAT Trading, advogado [redacted] e Sergio Correa da Costa, ex embaixador do Brasil nos Estados Unidos--detem 67% do capital votante de BFI", agregou o jornal. Estado de Sao Paulo, 16-11-91, P.6) b6 b7C

ECOS DO ESCANDALO DO BCCI NO BRASIL

Os empresarios [redacted] e Sergio Correia da Costa assumiram com o Banco Central o compromisso de se livrarem, o mais rapido possivel, da participacao estrangeira no BCCI do Brasil, o qual tem em seu conselho o ex-ministro Ernane Galveas. b6 b7C

Sergio Correa da Costa, ex-embaixador brasileiro nos EUA, e (ou foi) socio de Kissinger na Kissinger Associates.

(Veja, 24/7)

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/20/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 4/7/92, the writer attended a meeting with AAG ROBERT MUELLER. Also participating in the meeting were DAAG [redacted] and the following representatives from the Fraud Section; [redacted] The purpose of the meeting was to provide AAG MUELLER with a briefing as to First American Bank (FAB) and the recent London trip. As a result of the meeting an evidence review was scheduled at the Fraud Section on 4/10/92 and a follow up meeting with AAG MUELLER on 4/14/92. b6 b7C

On 4/9/92, the writer contacted AUSA [redacted] AUSA [redacted] advised that the 4/10/92, meeting had been canceled. The Fraud Section was in the process of preparing a briefing book for AAG MUELLER. Such would address the evidence in the FAB case. b6 b7C

On 4/14/92, a meeting was held with AAG MUELLER. In attendance from DOJ were DAAG [redacted] In attendance from the FBI were ADIC LARRY POTTS, WCC Section Chief WILLIAM ESPOSITO, SSA [redacted] SA [redacted] and the writer. The FAB aspect of captioned investigation was discussed in detail. As a result of the meeting, AAG MUELLER directed that the investigation focus on FAB and principals thereof in the next few weeks. AAG stated that he wanted an written investigative summary on 4/30/92. b6 b7C

On 4/15/92, the writer met with [redacted] The purpose of the meeting was to set investigative priorities for the next 30 days. b6 b7C

29B-WF-171994

Main — 382

(1)-WMFO

DML

(1)

1325015-000-6366

On 4/16/92, SA [redacted] and the writer reviewed investigative efforts, set priorities in conjunction with DOJ (based on the above meeting of 4/15/92) and made investigative assignments accordingly. b6 b7C

On 4/20/92, a meeting was held at DOJ with [redacted] In attendance from the FBI were SA's [redacted] Discussed were the investigative priorities for the next 30 days and the FBI's approach to same. b6 b7C

1325015-000-6367

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 4/21/92

From SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

SA [redacted] and the writer have participated in a series of meetings in the past few weeks with representatives of the Department of Justice (DOJ). Such meetings have focused on investigative direction/priorities. As a result of same, it has been determined that investigative efforts in the next 30 day period will focus on First American Bank (FAB). Agents assigned to captioned matter will direct their investigative efforts, for at least the next 30 days, on issues/events pertaining to FAB. The only non-FAB activity will be the review of records at Miami, by one Agent on a rotating basis. Other investigative areas/responsibilities will be held in abeyance during the above time frame. Investigative priorities will be re-addressed within 30 days. b6 b7C

SA [redacted] and the writer have conducted a thorough review of events germane to the FAB investigation. It has been determined that the Agents assigned to this matter will form three teams. One team will focus on the pre-1986 time frame. One team will focus on the time period 1986-1987. One team will focus on the post 1987 time frame. The critical time frame is 1986-1987. The periods prior to 1986 and after 1987, will be used to build on events from 1986-1987. Due to the complexity of events, each team will work in concert with each other. b6 b7C

Each team will participate in the review of selective documents located at DOJ which came from :

Clifford & Warnke
BCCI
CCAH
Federal Reserve
BCCI/ICIC Cayman Islands
[redacted] b7D
BCCI New York
Miscellaneous

1-CC EA SA ASSIGNED

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SW SW

[redacted] b6 b7C

1325015-000-6368

Team assignments and focus for the next 30 days will be:

Team 1: Pre-1986

SA [redacted] (Team Leader) b6 b7C
SA [redacted]
SA [redacted]

Key Issues: 1983 - [redacted] $20,000,000 loan b6 b7C
1983 - First rights offering
1983 - 1985 BCCI/FAB contacts
-Americas Coordinating Committee
-Joint Marketing
-Appointment of BCCI personnel to FAB
1985 - [redacted] conversations re: Florida bank nominee

Leads: -Fed interviews (with AUSA [redacted]) b6 b7C
-Bank of America subpoena/records review (with AUSA [redacted])
-Obtain/review Millbank Tweed documents (with TA [redacted])
-OCC interviews (with AUSA [redacted])
-[redacted] interview (former Fed Official) (with AUSA [redacted])

Team 2: 1986-1987

SA [redacted] (Team Leader) b6 b7C
SA [redacted]
SA [redacted]
SA [redacted]
FA [redacted]

Key Issues: 1986 -NBG
-Share rights offering
-[redacted] stock purchase
-Clifford and [redacted] stock purchase b6
-[redacted] false filing b7C
1987 -Share rights offering

Leads: [redacted] documents/interviews (with TA [redacted]) b6 b7C
[redacted] interview (with TA [redacted])

Team 3: Post 1987

SA [redacted] (Team Leader) b6 b7C
SA [redacted]
SA [redacted]

1325015-000-6369

Key Issues: 1988 -CLIFFORD and [redacted] sale of stock b6 b7C
-CLIFFORD and [redacted] conduct in response to Congress/Tampa investigations
1989-1990 -CLIFFORD and [redacted] response to the regulators' inquiries concerning the role of BCCI in FAB
-Bank of Escambia

Leads: -Interview [redacted] (former [redacted] (with AUSA [redacted] b6 b7C
-Interview [redacted] (with TA [redacted]

In addition to the above, the following interviews/contacts will be made in the next 30 days by SA [redacted] and/or the writer: b6 b7C

[redacted] b6 b7C

The diaries, calendars, billings, telephone records and travel records for CLIFFORD and [redacted] will be reviewed/analyzed by FA [redacted] and two additional FA's. b6 b7C

1325015-000-6370

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 4/30/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

On this date, I attended a meeting at 500-1st St., NW, WDC, for the purpose of determining what remains to be done to make the space comply with security requirements. Representatives of FBIHQ Space Management Unit, TSS, DOJ, GSA, the contractor and the landlord were also there. A tour of the premises resulted in a list of 8 discrepancies, only one of which--there being no sure way of locking the double doors from the hallway into the reception area--was deemed to be a disqualifier. The landlord and contractor accepted the list, agreed to correct all of the items as quickly as possible and, in particular, agreed to rectify the unacceptable situation with the entry doors by COB 5/1/92. Therefore, assuming no further problems are encountered, I have set Monday, 5/11/92, as the date to begin operating from 500-1st St.

Also on this date, in anticipation of the move:

1) OSM [redacted] was requested to: b6 b7C
a) initiate a purchase order for leasing 12 parking spaces in the garage at 500-1st St. for the remainder of FY 92;
b) post an opening for a squad secretary; and
c) arrange for mail service.
2) [redacted] TSD, ext. 5367, was requested to arrange with C&P to install the telephones. b6 b7C
3) SA [redacted] was requested to initiate relocation and installation of our computer equipment.
4) [redacted] Property Unit warehouse, ext. 115-3873, was requested to provide additional furniture.

With regard to co-location with DOJ Fraud, SSA [redacted] b6 b7C

2-WMFO
~~(1-29B-WF-171994-Main)~~
(1-ASAC [redacted]) b6 b7C

JNR:jnr
(2)

-365

29B-WF-171994 Main

1325015-000-6378

[redacted] informed me that, although not all interested parties at FBIHQ have signed off on it, the proposal for the FBI to fund DOJ's participation has been approved. The funding will be done in the form of a money transfer from the FBI to an account held by DOJ, out of which DOJ will then pay its own expenses for everything other than rent. b6 b7C

1325015-000-6379

8-258 (Rev. 8-5-91)

REPORT OF THE
TECHNICAL SERVICES DIVISION
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

May 5, 1992

To: SAC, Washington Metropolitan Field (C-5)

FBI File No. 29B-WF-171994

Lab No. 20327029 E VT

Reference: Airtel dated March 26, 1992

Your No.

Re: HIDDEN INTERESTS,
MC #38
FIF; FAG

Specimens received: Personally delivered by SA [redacted] on March 27, 1992

b6
b7C

Q9 One Nagra reel of magnetic tape marked in part "3/28/89" and "F"

Q10 One Nagra reel of magnetic tape marked in part "3/28/89" and "H"

Q11 One Nagra reel of magnetic tape marked in part "VEH" and "3/29/89"

Result of examination:

Two enhanced stereo copies were made of each of specimens Q9, Q10 and Q11. In each instance one copy was made on four sides of two Maxell C90 magnetic tape cassettes with Dolby B noise reduction encoding and the second copy was made on two 7-inch reels of magnetic tape at a recording speed of 3 3/4 inches per second in a two-track configuration.

(CONTINUED - OVER)

This Report Is Furnished For Official Use Only

29B-WF-171994-380
1325015-000-6380

In order to obtain maximum intelligibility, the enhanced copies should be played back using high-quality stereo recorders and headphones, using Dolby B noise reduction for the cassette copies as indicated on the cassettes.

SSA [redacted] conducted the enhancement examination. b6 b7C

Specimens Q9, Q10, Q11, the enhanced copies of these specimens, and the chain of custody form FD-192, were forwarded to the Washington Metropolitan Field Office via Federal Express on April 6, 1992.

1325015-000-6381

8-258 (Rev. 8-5-91)

C-5

REPORT OF THE
TECHNICAL SERVICES DIVISION
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

May 5, 1992

To: SAC, Washington Metropolitan Field (C-5)

FBI File No. 29B-WF-171994

Lab No. 20327029 E VT

Reference: Airtel dated March 26, 1992

Your No.

Re: HIDDEN INTERESTS,
MC #38
FIF; FAG

Specimens received: Personally delivered by SA [redacted] on March 27, 1992

b6
b7C

Q9 One Nagra reel of magnetic tape marked in part "3/28/89" and "F"

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Q11 One Nagra reel of magnetic tape marked in part "VEH" and "3/29/89"

Result of examination:

Two enhanced stereo copies were made of each of specimens Q9, Q10 and Q11. In each instance one copy was made on four sides of two Maxell C90 magnetic tape cassettes with Dolby B noise reduction encoding and the second copy was made on two 7-inch reels of magnetic tape at a recording speed of 3 3/4 inches per second in a two-track configuration.

GENERAL INDICES:
☐ Automated Search
WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg
☐ Manual Search
WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

29B-WF-171994 -356

Page One (CONTINUED - OVER)

FBI - WASH. METRO FIELD OFFICE
MAY 05 1992
[redacted]

This Report Is Furnished For Official Use Only

b6
b7C

1325015-000-6382

In order to obtain maximum intelligibility, the enhanced copies should be played back using high-quality stereo recorders and headphones, using Dolby B noise reduction for the cassette copies as indicated on the cassettes.

SSA [redacted] conducted the enhancement examination. b6 b7C

Specimens Q9, Q10, Q11, the enhanced copies of these specimens, and the chain of custody form FD-192, were forwarded to the Washington Metropolitan Field Office via Federal Express on April 6, 1992.

1325015-000-6383

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
May 7, 1992

[redacted] b6 b7C

Front Office Manager
Holiday Inn Crowne Plaza
1605 Broadway
New York, New York 10019

Dear [redacted]:

I wanted to take a few moments to send you my thanks for your cooperation in allowing the Federal Bureau of Investigation to use a closed section of your restaurant to conduct an interview on the morning of May 5, 1992.

Special Agent [redacted] who initially spoke with you, has told me that, because of your assistance, he was able to conduct a successful interview and avoid a potentially difficult situation. b6 b7C

Again, thank you for your help in this matter.

Sincerely yours,

Robert M. Bryant
Special Agent in Charge

By: [redacted] b6 b7C
Acting Supervisory Special Agent

1 - Addressee
1 - WMFO (29B-WF-171994)
JPF:das
(2)

29B-WF-171994 - 387

1325015-000-6384

Memorandum

To : DIRECTOR, FBI
(ATTN: [redacted], PROPERTY MANAGEMENT)

Date 5/8/92

b6
b7C

From : SAC, WMFO (29B-WF-171994) (P) (C-5)

Subject: HIDDEN INTERESTS;
MC - #38;
FIF;FAG;
OO:WMFO

Regarding the issuance of international calling cards.

REQUEST OF THE BUREAU:

It is requested that the Bureau issue international calling cards to the below listed Special Agents due to the extensive travel, domestic and international, required by the above captioned investigation. These calling cards will be used for investigative purposes only.

SA [redacted]
SA
SA
SA
SA
SA
SA

SA [redacted]
SA
SA
SA
SA
SA
SA

b6
b7C

1 - FBIHQ (Attn: [redacted] Property Management)
1 - 66-6122
1 - WMFO (29B-WF-171994)

29B-WF-171994-38

b6
b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FBI - WASH. METRO FIELD OFFICE

1325015-000-6385

Indices Search Slip
FD-160 (Rev. 7-28-89)

C5

Date 5/8/92

To: Office Services Manager

Requested SA [redacted] b6 b7C

Ext. 6404 | Squad: C-5 | File No. 29B-WF-171994

Subject * Attached LIST (BUDED: 5/13/92)

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☒ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☒ Restrict Locality of ALL OFFICES

☐ **General Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ISIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **OCIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **IIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **FOIMS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **MICRO:** ☐ NEG ☐ POS	Searched by	Date	
☒ **GLOBAL:** ☐ NEG ☑ POS [redacted]	Searched by	Date 7-1-92	
☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by	Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			388X1
			29B-WF-171994

Consolidated by Date

Reviewed by Date

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 12 1992
[redacted] b6 b7C

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6386

ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
NORD BANKEN	INCOMPLETE FUNDS TRANSFER	$800.00
N.Y.S. CORPORATION TAX	UNPAID TREASURY CHECK	$375.00
[redacted]	INCOMPLETE TRANSFER	$486.22
OMEGA SHIPPING	TRADE CREDITOR	$12,111.41
[redacted] need Date of Birth	UNPAID TREASURY CHECK	$1,424.64
PACIFIC SCIENTIFIC INC	UNPAID EXPORT PMT ORDER	$1,505.00
PARLE AMERICA INC.	UNPAID TREASURY CHECK	$990.00
R J LEATHER CORP	CASH COLLATERAL	$2,954.71
[redacted] need Date of Birth	UNCREDITED DEPOSIT	$500.00
REED BUS. PUBLICATION	UNPAID OFFICIAL CHECK	$300.00
REUTERS INFORMATION SERVICE	TRADE CREDITOR	$5,837.23
[redacted] need DOB	UNPAID TREASURY CHECK	$803.22
need DOB	UNPAID TREASURY CHECK	$23.96
need DOB	UNPAID TREASURY CHECK	$181.55
need DOB	UNPAID TREASURY CHECK	$279.12
RONEY & CO	INCOMPLETE FUNDS TRANSFER	$4,745.16
RYTEMA	UNPAID EXPORT PMT ORDER	$10.50
[redacted] need DOB	UNPAID TREASURY CHECK	$10.00
SAGE INT'L CORP	UNPAID ESPORT PMT ORDER	$1,251.23
[redacted] need DOB	UNPAID TREASURY CHECK	$2.02
need DOB	UNPAID TREASURY CHECK	$438.57
SAM CORPORATION	UNPAID TREASURY CHECK	$45.00
SBM COURIER	TRADE CREDITOR	$494.50
[redacted] need DOB	UNPAID TREASURY CHECK	$414.59
[redacted] need DOB	INCOMPLETE FUNDS TRANSFER	$323.90
need DOB	UNPAID TREASURY CHECK	$100.00
[redacted] need DOB	UNPAID TREASURY CHECK	$100.00
SHESUNOFF INFORMATION SERVICES	TRADE CREDITOR	$320.37
SMITH AND ABRHAM	ESCROW ACCOUNT BALANCE	$0.79
SOCITET PARACH	UNPAID TREASURY CHECK	$1,032.87
[redacted] need DOB	UNPAID TREASURY CHECK	$158.00

b6
b7C

1325015-000-6387

ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
SUEDWEST DEUTSCHE LANDESBK	INCOMPLETE FUNDS TRANSFER	$190.35
[redacted] Need DOB	UNPAID TREASURY CHECK	$10.27
[redacted] Need DOB	UNPAID TREASURY CHECK	$1.59
[redacted] Need DOB	UNPAID TREASURY CHECK	$35.69
[redacted] Need DOB	UNPAID TREASURY CHECK	$597.91
[redacted] Need DOB	UNPAID TREASURY CHECK	$32.31
[redacted] Need DOB	UNPAID TREASURY CHECK	$260.67
S.W.I.F.T.	TRADE CREDITOR	$1,193.05
[redacted] Need DOB	UNCREDITED DEPOSIT	$33,304.26
TACTICIAN INTL CORP (ACC CLOSED)	UNPAID TREASURY CHECK	$484.84
[redacted] Need DOB	UNPAID PROV FUND	$253.00
[redacted] Need DOB	UNPAID TREASURY CHECK	$1,687.62
TEEKAY BAHAMAS LTD	INCOMPLETE FUNDS TRANSFER	$1,596.00
TELERATE SYSTEMS	TRADE CREDITOR	$14,710.53
THIRD WORLD RIZE	UNPAID TREASURY CHECK	$3,221.91
[redacted] Need DOB	UNPAID TREASURY CHECK	$1,795.99
TRANSBUSINESS INTERNATIONAL	UNPAID TREASURY CHECK	$219.90
TRANSHIP INTERNATIONAL LIBERIA LTD	UNPAID TREASURY CHECK	$86.66
TRANS. AMERICA HOLDINGS	UNPAID TREASURY CHECK	$848.58
TRARTHA INTL LTD	UNPAID TREASURY CHECK	$776.27
TRUMPINGTON LTD	UNPAID TREASURY CHECK	$130.09
TRW CREDIT SERVICE	TRADE CREDITOR	$437.38
[redacted] Need DOB	UNPAID TREASURY CHECK	$8.46
[redacted] Need DOB	UNPAID TREASURY CHECK	$49.83
UTTARA BANK DUAKA	ACCOUNT BALANCE	$112.22
WELLS FARGO BANK	UNPAID TREASURY CHECK	$1,059.90
[redacted] Need DOB	UNPAID TREASURY CHECK	$11.01
[redacted] Need DOB	INCOMPLETE FUNDS TRANSFER	$1,500.00
[redacted] Need DOB	UNCREDITED DEPOSIT	$36,468.90

b6
b7C

ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
AERO/MARINE VISUALS	UNPAID BANK CHECK	$72.45
[redacted] Need DOB	UNPAID BANK CHECK	$111.17
[redacted] Need DOB	UNPAID BANK CHECK	$600.00
[redacted] Need DOB	UNPAID BANK CHECK	$20.40
[redacted] Need DOB	UNCREDITED DEPOSIT	$28,540.38
ALL BEST COURIERS	UNPAID BANK CHECK	$40.00
[redacted] Need DOB	UNPAID BANK CHECK	$206.13
[redacted] Need DOB	UNPAID BANK CHECK	$260.37
[redacted] Need DOB	UNPAID BANK CHECK	$63.00
[redacted] Need DOB	UNPAID BANK CHECK	$49.35
BANCO INTERNACIONAL MEXICO S.A.	UNPAID BANK CHECK	$20.00
[redacted] Need DOB	UNPAID BANK CHECK	$225.78
BROADWAY TRAVEL	UNPAID BANK CHECK	$345.20
[redacted] Need DOB	UNPAID BANK CHECK	$3,092.25
[redacted] Need DOB	UNPAID BANK CHECK	$475.74
[redacted] Need DOB	UNPD BK CHECK - BOCA	$33.47
[redacted] Need DOB	UNPAID BANK CHECK	$235.24
CITY OF MIAMI	UNPAID BANK CHECK	$20.00
CLAYMONT INC.	UNPAID BANK CHECK	$350.00
CLERK COUNTY PARKING VIOLATIONS BUREAU	UNPAID BANK CHECK	$10.00
CNN TELEVISION	UNPD BK CHECK - BOCA	$3.00
COMMERCIAL DIVISION, EMBASSY OF PAKISTAN	UNPAID BANK CHECK	$5.00
CORDOBO GARLES S.A.	UNPAID BANK CHECK	$209.40
COUNSULATE OF PERU	UNPAID BANK CHECK	$35.00
[redacted] Need DOB	BCC TAMPA DORMANT	$9,000.00
DIONVIL INTL	UNPD BK CHECK - TAMPA	$560.00
EDITORIAL DIANA	UNPAID BANK CHECK	$209.00
[redacted] Need DOB	UNPD BK CHECK - BOCA	$11.74
[redacted] Need DOB	UNCREDITED DEPOSIT	$1,323.73
[redacted] Need DOB	UNPAID BANK CHECK	$373.65
FATHER AND SON LOCKSMITHS	UNPAID BANK CHECK	$227.07

b6
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ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
FEDERAL RESERVE BANK OF ATLANTA	UNPAID BANK CHECK	$16.50
FEDERAL RESERVE BANK OF MIAMI	UNPAID BANK CHECK	$10.60
[redacted] Need D.O.B	UNPAID BANK CHECK	$112.91
FINANCIAL CENTRAL TRAVEL INC.	UNPAID BANK CHECK	$162.00
FINANCIAL CENTRE TRAVEL	UNPAID BANK CHECK	$162.00
FLORIDA BUILDING SERVICES INC.	UNPAID BANK CHECK	$57.00
FLORIDA NATIONAL BROKERS INC.	UNPAID BANK CHECK	$123.50
[redacted] Need D.O.B.	UNPAID BANK CHECK	$900.14
[redacted] Need DOB.	UNCREDITED DEPOSIT	$1,786.91
[redacted] Need DOB	UNPAID BANK CHECK	$159.52
[redacted] Need D.O.B.	UNPAID BANK CHECK	$292.74
[redacted] Need D.O.B.	UNPAID BANK CHECK	$19.10
HI FASHION FABRICS	UNPAID BANK CHECK	$27.88
[redacted] Need D.O.B.	UNPAID BANK CHECK	$13.98
[redacted] Need DOB	UNPAID BANK CHECK	$97.54
[redacted] Need D.O.B	UNCREDITED DEPOSIT	$1,086.31
[redacted] Need D.O.B.	UNCREDITED DEPOSIT	$3,580.80
[redacted] Need D.O.B	UNCREDITED DEPOSIT	$4,156.24
[redacted] Need D.O.B	UNCREDITED DEPOSIT	$2,748.62
JONES CONSULTING	UNPD BK CHECK – BOCA	$377.38
[redacted] Need D.O.B	UNPAID BANK CHECK	$301.76
[redacted] Need D.O.B.	UNPAID BANK CHECK	$60.00
[redacted] Need D.O.B	UNPAID BANK CHECK	$115.49
KIFCO	UNCREDITED DEPOSIT	$230.00
KIRPLANIS IMPORT	UNPAID BANK CHECK	$273.03
[redacted] Need D.O.B	UNPAID BANK CHECK	$965.79
[redacted] Need D.O.B.	UNPAID BANK CHECK	$39.70
[redacted] Need D.O.B	UNPAID BANK CHECK	$174.71
[redacted] Need D.O.B	UNPAID BANK CHECK	$8.88
[redacted] Need D.O.B.	UNPAID BANK CHECK	$229.67

b6
b7C

ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
MARTINEZ TRADING INC.	UNPAID BANK CHECK	$674.39
MIAMI SAVINGS BANK	UNPAID BANK CHECK	$15.00
[redacted]	UNPAID BANK CHECK	$153.69
	UNPAID BANK CHECK	$77.47
	UNPAID BANK CHECK	$849.22
	UNPAID BANK CHECK	$104.38
PAN AMERICAN GRAPHIC	UNPAID BANK CHECK	$242.55
PAN AMERICAN GRAPHIC, INC.	UNPAID BANK CHECK	$288.75
PARADISE MANAGEMENT	UNPAID BANK CHECK	$68.00
[redacted]	UNPD BK CHECK – BOCA	$13,196.72
PITTSBURGH NATIONAL BANK/BUTLER 048 DEPT.	UNPAID BANK CHECK	$10.00
PRONTO BEEPERS INC	UNPAID BANK CHECK	$53.76
[redacted]	UNPD BK CHECK – BOCA	$6.25
ROSEMONT IMPORT EXPORT	UNPAID BANK CHECK	$80.69
ROSEMONT IMPORT EXPORT	UNPAID BANK CHECK	$142.38
[redacted]	UNPD BK CHECK – BOCA	$459.19
SECRETARY OF STATE	UNPAID BANK CHECK	$13.25
SOUTHEAST BANK, N.A. REGION 1	UNPAID BANK CHECK	$15.00
STANDARD REGISTER	UNPAID BANK CHECK	$1,761.34
THE RIGS NATIONAL BANK OF WASHINGTON D.C.	UNPAID BANK CHECK	$175.00
[redacted]	UNPD BK CHECK – BOCA	$25.89
TURBORG CORP.	UNPAID BANK CHECK	$3.82
[redacted]	UNCREDITED DEPOSIT	$5,550.35
VIDA MIAMI INC	UNPAID BANK CHECK	$182.24
WIMBLEDON TOWN HOUSE CONDO	UNPAID BANK CHECK	$124.00
[redacted]	UNPD BK CHECK – BOCA	$801.03
	UNPAID BANK CHECK	$411.15
	UNPAID BANK CHECK	$311.79
[MISSING]	UNPAID BANK CHECK	$6.00
[MISSING]	UNPAID BANK CHECK	$34.10
[MISSING]	UNPAID BANK CHECK	$3,389.43

b6
b7C

ndices Search Slip
FD-160 (Rev. 7-28-89)

Date 5/8/92

To: Office Services Manager

Requested SA

Ext. 6404 | Squad: C-5 | File No. 29B-WF-171994

Subject Attached LIST (BUDED: 5/13/92)

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☒ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☒ Restrict Locality of ALL OFFICES

☐ **General Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ISIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **OCIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **IIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **FOIMS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **MICRO:** ☐ NEG ☐ POS	Searched by	Date	
☒ [redacted] ☐ NEG ☑ POS	Searched by	Date 7-9-92	
☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by	Date	

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b7C

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

29B-WF-171994 - 3884

Consolidated by Date

Reviewed by Date

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
DEC 31 1992
FBI - WASH. METRO FIELD OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325013-000-6892

LIST OF ACCOUNTS PAYABLE

ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
[redacted]	UNPAID TREASURY CHECK	$208.44
	UNPAID TREASURY CHECK	$6,334.77
AEROCAR AVIATION	UNPAID TREASURY CHECK	$755.71
[redacted]	UNPAID TREASURY CHECK	$4.59
	UNPAID TREASURY CHECK	$12,993.32
	UNPAID TREASURY CHECK	$741.24
	MMDA ACCOUNT BALANCE	$24,837.00
AMKO INT'L INC.	UNPAID TREASURY CHECK	$392.98
AMTRAX HOLDING Neg	MMDA ACCOUNT BALANCE	$2,289.99
ANC LONDON NRG	INCOMPLETE FUNDS TRANSFER	$40,000.00
ANGELO INCORPOATED NEG	CASH COLLATERAL	$4,340.10
[redacted]	INCOMPLETE TRANSFER	$50.00
AT&T COMM	INCOMPLETE FUNDS TRANSFER	$39,560.68
[redacted]	INCOMPLETE TRANSFER	$41.67
	UNPAID TREASURY CHECK	$51.91
	UNPAID TREASURY CHECK	$3,884.31
	INCOMPLETE TRANSFER	$450.00
BANCA ANTONIANA DE PADOVA	INCOMPLETE FUNDS TRANSFER	$1,000.00
BANCO CREDIT CORP.	UNPAID TREASURY CHECK	$88.77
BANCO ESPIRITO SANTE	INCOMPLETE FUNDS TRANSFER	$31,022.00
BANCO HISPANO AMERICANO	INCOMPLETE FUNDS TRANSFER	$25.00
BANCO HISPANO AMERICANO	INCOMPLETE FUNDS TRANSFER	$700.00
BANK COMPANIE NORD AG	INCOMPLETE FUNDS TRANSFER	$7,500.00
BANK COMPANIE NORD AG	INCOMPLETE FUNDS TRANSFER	$700.00
BANK OF AMERICA	INCOMPLETE FUNDS TRANSFER	$20,000.00
BANK OF NEW YORK	INCOMPLETE TRANSFER	$500.00
BANQUE MAROCAINE	UNCREDITED DEPOSIT	$165,193.02
BANQUE BRUSSELS	INCOMPLETE FUNDS TRANSFER	$15.95

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ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
~~BCC ARGENTINA~~	INCOMPLETE FUNDS TRANSFER	$128.00
~~BCC LONDON~~	INCOMPLETE FUNDS TRANSFER	$5,950.00
~~BCC LUSAKA~~	INCOMPLETE FUNDS TRANSFER	$32.13
~~BCC SEOUL (MAKOR)~~	INCOMPLETE FUNDS TRANSFER	$12,177.00
~~BCC TOKYO~~	INCOMPLETE FUNDS TRANSFER	$476.88
~~BCC YEMEN~~	INCOMPLETE FUNDS TRANSFER	$9,515.00
~~BCCI - KARACHI~~	DEMAND ACCOUNT BALANCE	$169.40
BCITTMM700	INCOMPLETE FUNDS TRANSFER	$2,347.30
[redacted]	UNPAID TREASURY CHECK	$1,000.00
BLONDIES TREE SERVICE	TRADE CREDITOR	$140.73
BURRELLES CLIPPING SERVICE	TRADE CREDITOR	$1,096.53
CALIDONIAN STEAMSHIP	UNPAID TREASURY CHECK	$826.31
CANTONAL/BANK OF BERNE SW	INCOMPLETE FUNDS TRANSFER	$1,158.95
CARTEX INC.	UNPAID TREASURY CHECK	$60.06
[redacted]	ESCROW ACCOUNT BALANCE	$7,379.74
CELLOPACK	INCOMPLETE FUNDS TRANSFER	$3,808.00
CHAMPION CADILLAC SERVICE	TRADE CREDITOR	$397.93
CHASE MANHATTAN BANK	INCOMPLETE FUNDS TRANSFER	$80.32
[redacted]	UNPAID TREASURY CHECK	$54.00
	INCOMPLETE FUNDS TRANSFER	$9,985.00
	UNPAID TREASURY CHECK	$8.75
CHRISBEN IRELAND LTD	UNPAID TREASURY CHECK	$15.00
CITIBANK	UNPAID TREASURY CHECK	$437.40
CITIBANK VISA	UNPAID OFFICIAL CHECK	$43.00
CITY COLLECTOR	UNPAID TREASURY CHECK	$315.00
COMMISSION CHARGES	UNCREDITED DEPOSIT	$156.38
COTTON COLLERS INC.	UNPAID TREASURY CHECK	$95.42
COUNSULAT GENERAL	UNPAID TREASURY CHECK	$15.00
DIRECT REPRODUCTION CORP.	UNPAID EXPORT PMT ORDER	$125.00
[redacted]	INCOMPLETE FUNDS TRANSFER	$5,000.00
	UNPAID TREASURY CHECK	$100.00

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ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
DURATEC PROPERTIES INTL	UNPAID TREASURY CHECK	$6.11
[redacted]	UNPAID TREASURY CHECK	$335.17
	UNCREDITED DEPOSIT	$91,931.48
	UNPAID TREASURY CHECK	$488.31
EMBAJADA DE COLOMBIA	UNPAID TREASURY CHECK	$65.42
EMORY WORLDWIDE	TRADE CREDITOR	$479.98
ENQUIROQUIP CORP.	UNPAID EXPORT PMT ORDER	$196.87
ESPIC 101 US	UNPAID EXPORT PMT ORDER	$142.33
[redacted]	UNPAID OFFICIAL CHECK	$4,885.01
FAB	UNPAID TREASURY CHECK	$159.25
[redacted]	UNPAID TREASURY CHECK	$136.81
FENESTY INC. - NEW YORK	UNPAID EXPORT PMT ORDER	$5,438.58
[redacted]	UNPAID TREASURY CHECK	$11.31
FILTERED WATER SERVICE	TRADE CREDITOR	$97.43
FIRST INTERSTATE BK OF HAWAII	UNPAID TREASURY CHECK	$29.04
[redacted]	UNPAID TREASURY CHECK	$152.24
	UNPAID TREASURY CHECK	$208.48
	INCOMPLETE FUNDS TRANSFER	$45,000.00
GIBRALTER TELECOMMUNICATIONS/AMM. DELLE POSTE E DELLE TELE.	INCOMPLETE FUNDS TRANSFER	$700.93
[redacted]	INCOMPLETE FUNDS TRANSFER	$1,088.00
	UNPAID TREASURY CHECK	$9.18
	INCOMPLETE FUNDS TRANSFER	$750.00
	UNPAID TREASURY CHECK	$30.74
GUARDIAN GARAGE SERVICE	TRADE CREDITOR	$342.50
[redacted]	UNPAID TREASURY CHECK	$2.61
HNS AMERICA	UNPAID TREASURY CHECK	$3,215.66
[redacted]	UNPAID TREASURY CHECK	$61.00
	UNPAID TREASURY CHECK	$1,908.92
INDIAN DIAMOND & GEM CORP.	UNPAID TREASURY CHECK	$21.08
ISSCO INDUSTRIAL SECURITY	UNPAID OFFICIAL CHECK	$268.53
JASON OFFICE SUPPLIES	TRADE CREDITOR	$162.38

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b7C

ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
[redacted]	UNPAID TREASURY CHECK	$30.30
JEFFERSON DEVELOPMENT	UNPAID TREASURY CHECK	$3,891.44
[redacted]	UNPAID TREASURY CHECK	$16.60
	UNPAID TREASURY CHECK	$1,358.00
	UNPAID TREASURY CHECK	$430.43
	UNPAID TREASURY CHECK	$6,354.26
	UNPAID TREASURY CHECK	$110.51
	ESCROW ACCOUNT BALANCE	$885.00
	UNPAID TREASURY CHECK	$73.51
	UNPAID TREASURY CHECK	$10.55
	UNPAID TREASURY CHECK	$60.00
KUNDAN IMPORTERS	MMDA ACCOUNT BALANCE	$8,583.80
[redacted]	UNPAID TREASURY CHECK	$251.37
LEXINGTON FLOWER SHOP	UNPAID OFFICIAL CHECK	$32.50
LORONS INTERNATIONAL	CASH COLLATERAL	$62,202.68
[redacted]	UNPAID TREASURY CHECK	$1.67
LUXEMBOURG/TCB ACCOUNT	AFFILIATE A/P	$119,710.93
[redacted]	UNPAID TREASURY CHECK	$855.78
	UNPAID TREASURY CHECK	$19,407.47
	UNPAID TREASURY CHECK	$20,704.29
	UNPAID TREASURY CHECK	$12,929.37
[redacted]	UNPAID TREASURY CHECK	$149.94
	UNPAID TREASURY CHECK	$2,556.51
MANUFACTURERS HANOVER	UNPAID TREASURY CHECK	$592.00
[redacted]	UNPAID TREASURY CHECK	$2,947.74
	INCOMPLETE FUNDS TRANSFER	$295.60
	UNPAID TREASURY CHECK	$153.56
MCS BUSINESS SERVICES	TRADE CREDITOR	$1,195.26
[redacted]	MMDA ACCOUNT BALANCE	$363.55
[redacted]	TRADE CREDITOR	$1,365.00
	UNPAID TREASURY CHECK	$157.00

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b7C

ACCOUNT PAYABLE	NATURE OF ACCOUNT PAYABLE	AMOUNT OF ACCOUNT PAYABLE
MIDDLE SEX COUNTY COLLEGE	UNPAID TREASURY CHECK	$298.00
[redacted]	UNPAID TREASURY CHECK	$181.38
MINISTRY OF DEFENSE – SINGAPORE	INCOMPLETE TRANSFER	$1,656.77
MINISTRY OF FOREIGN AFFAIRS – MONTEVIDEO	INCOMPLETE FUNDS TRANSFER	$3,145.10
MMS INTERNATIONAL	TRADE CREDITOR	$438.41
[redacted]	UNPAID TREASURY CHECK	$330.48
	UNPAID TREASURY CHECK	$70.94
	UNPAID TREASURY CHECK	$275.83
	UNPAID TREASURY CHECK	$115.91
	UNPAID TREASURY CHECK	$196.58
	UNPAID TREASURY CHECK	$4,091.80
	UNPAID OFFICIAL CHECK	$162.19
	UNPAID OFFICIAL CHECK	$40.11
	UNPAID TREASURY CHECK	$285.00
	UNPAID TREASURY CHECK	$107.58
MULTIPARTS INTL	UNPAID TREASURY CHECK	$5,630.38
[redacted]	UNPAID TREASURY CHECK	$970.00
MUSLIM COMM BANK LTD	INCOMPLETE FUNDS TRANSFER	$13,794.44
MUSLIM COMM BANK LTD	INCOMPLETE FUNDS TRANSFER	$17,531.80
[redacted]	UNPAID TREASURY CHECK	$301.16
	UNPAID TREASURY CHECK	$460.05
M.H.T.C.	UNPAID TREASURY CHECK	$3,500.00
M.H.T.C.	UNPAID TREASURY CHECK	$900.00
[redacted]	UNPAID TREASURY CHECK	$3,995.00
NATL SAVINGS BANK – MUNICH	INCOMPLETE FUNDS TRANSFER	$50,000.00
NCB	UNPAID TREASURY CHECK	$175.00
NEW YORK CITY DEPARTMENT OF FINANCE	TAX	$44,820.00
NEW YORK STATE	UNPAID EXPORT PMT ORDER	$4.50
NEW YORK STATE	UNPAID EXPORT PMT ORDER	$12.00
NEW YORK STATE BANKING DEPARTMENT	MANAGEMENT FEES	$225,000.00
NEW YORK TELEPHONE	UNPAID TREASURY CHECK	$88.85

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b7C

ndices Search Slip
FD-160 (Rev. 7-28-89)

Date 5/8/92

To: Office Services Manager

Requested SA [redacted] b6 b7C

Ext. 6404 | Squad: C-5 | File No. 29B-WF-171994

Subject * Attached LIST (BUDED: 5/13/92)

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☒ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☒ Restrict Locality of ALL OFFICES

☐ **General Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **ISIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **OCIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **IIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **FOIMS:** ☐ NEG ☐ POS	Searched by / Date	☐ **MICRO:** ☐ NEG ☐ POS	Searched by / Date
☒ **GLOBAL:** ☐ NEG ☑ POS	[redacted] Searched by / 5-1-92 Date	☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by / Date

b6 b7C

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			29B-WF-171994-38843

SEARCHED INDEXED
SERIALIZED SU FILED SU
MAY 12 1992
FBI - WASH. METRO FIELD OFFICE

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6398

CLAIM NO.	CLAIMANT	NATURE OF CLAIM	AMOUNT OF CLAIM
201	WORLD COUNCIL OF CHURCHES	FUNDS TRANSFER	$20,000.00
202	[redacted]	FUNDS TRANSFER	$50,000.00
203	[redacted]	UNPAID BANK CHECK	$12,219.78
204	Z LANDERBANK BANK	FUNDS TRANSFER	$1,208.00
205	[redacted]	ACCOUNT BALANCE	$6,334.77
206	[redacted]	FUNDS TRANSFER	$4,800.00
207	[redacted]	TRADE CREDITOR	$11,740.00
208	ZEUS INTERNATIONAL COMPANY	FUNDS TRANSFER	$50,000.00
209	Z-LANDERBANK BANK AUSTRIA AG	FUNDS TRANSFER	$35,360.10

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b7C

EMPLOYEE CLAIMS

CLAIM NO.	CLAIMANT	NATURE OF CLAIM	AMOUNT OF CLAIM
210	[redacted]	SEVERANCE/DISABILITY/DAMAGES	$15,082,827.80
211		SEVERANCE/DAMAGES	$36,125.31+
212		SEVERANCE	$21,840.00
213		SEVERANCE	$42,486.90
214		SEVERANCE/DAMAGES	$33,388.66+
215		SEVERANCE	$8,062.50
216		PROVIDENT FUND	$54,070.00
217		DAMAGES/UNPAID WAGES	$181,344.31
218		SEVERANCE/PROV.FUND/UNP WAGES/DAMAGES	$191,810.00
219		SEVERANCE/DAMAGES	$1,607,857.00
220		SEVERANCE/DAMAGES	$19,440.00+
221		SEVERANCE	$9,952.72
222		SEVERANCE/DAMAGES	$20,300.59+
223		SEVERANCE	$22,644.00
224		SEVERANCE/DAMAGES	$17,303.46+
225		SEVERANCE	$12,794.05
226		SEVERANCE/DAMAGES	$24,606.17+
227		SEVERANCE	$27,581.41
228		SEVERANCE/DAMAGES	$9,693.17+
229		SEVERANCE/DAMAGES	$39,103.13+
230		SEVERANCE/DAMAGES	$64,588.76+
231		SEVERANCE/DAMAGES	$16,377.04+
232		SEVERANCE/DAMAGES	$8,853.81+
233		SEVERANCE	$6,500.00
234		SEVERANCE	$164,345.74
235		SEVERANCE/DAMAGES	$214,772.05+
236		SEVERANCE/DAMAGES	$18,553.94+
237		DAMAGES	$222,075.00

b6
b7C

CLAIM NO.	CLAIMANT	NATURE OF CLAIM	AMOUNT OF CLAIM
238	[redacted]	SEVERANCE/DAMAGES	$62,556.89+
239		SEVERANCE	$17,930.00
240		SEVERANCE/DAMAGES	$13,387.50+
241		SEVERANCE/DAMAGES	$11,378.08+
242		SEVERANCE	$9,709.98
243		SEVERANCE/DAMAGES	$14,525.78+
244		SEVERANCE/DAMAGES/PROV. FUND	$138,822.76+
245		SEVERANCE	$8,117.40
246		SEVERANCE	$46,038.46
247		UNPAID BANK CHECK	$326.40
248		SEVERANCE/DAMAGES	$28,512.00+
249		SEVERANCE	$5,042.38
250		SEVERANCE/DAMAGES	$134,842.76+
251		SEVERANCE/DAMAGES	$63,042.00
252		SEVERANCE/DAMAGES	$16,421.90+
253		SEVERANCE/DAMAGES	$32,313.67
254		SEVERANCE	$15,488.89
255		SEVERANCE	$8,312.50
256		SEVERANCE/DAMAGES	$38,111.93+
257		SEVERANCE/DAMAGES	$136,370.00
258		SEVERANCE	$14,114.62
259		SEVERANCE/DAMAGES	$1,000,000.00
260		SEVERANCE/DAMAGES	$83,564.12
261		SEVERANCE/DAMAGES	$651,339.10
262		SEVERANCE/DAMAGES	$45,602.37+
263		SEVERANCE/DAMAGES/PROV. FUND	$295,104.59
264		SEVERANCE/DAMAGES	$1,074,000.00
265		UNPAID WAGES	$900.00
266		SEVERANCE	$35,357.13
267		SEVERANCE/DAMAGES	$15,755.05+
268		SEVERANCE/DAMAGES	$12,783.71+

b6
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CLAIM NO.	CLAIMANT	NATURE OF CLAIM	AMOUNT OF CLAIM
269		SEVERANCE/DAMAGES	$169,454.43
270		SEVERANCE/DAMAGES	$54,050.88+
271		SEVERANCE/DAMAGES	$63,042.00
272		SEVERANCE/DAMAGES	$66,619.16+
273		SEVERANCE/DAMAGES	$70,861.68+
274		PROVIDENT FUND	$9,602.04
275		PROVIDENT FUND	$21,636.64
276		SEVERANCE/DAMAGES	$77,663.11
277		SEVERANCE/DAMAGES	$31,908.98+
278		SEVERANCE/DAMAGES	$56,904.34+
279		SEVERANCE/DAMAGES	$68,928.09+
280		SEVERANCE	$56,827.68
281		SEVERANCE	$59,837.65
282		SEVERANCE/DAMAGES	$40,023.56+
283		VACATION PAY	$6109.58
284		SEVERANCE	$36,657.48
285		UNPAID BANK CHECK	$162.19
286		SEVERANCE/DAMAGES	$21,342.70+

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"+" denotes additional unliquidated amount

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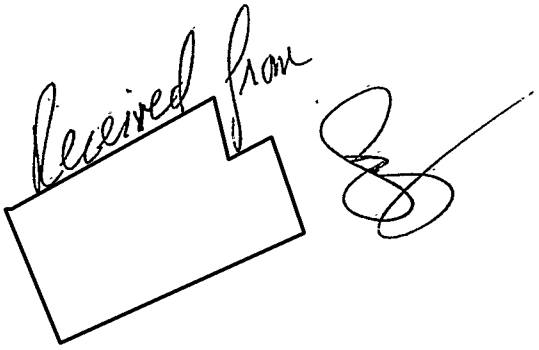

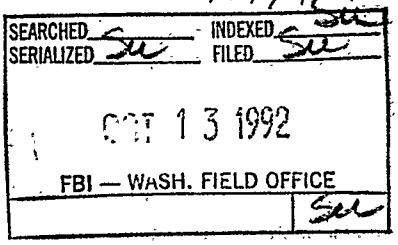

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Memorandum

To: [redacted] b6 b7C

From: [redacted]

Date: May 8, 1992

Re: BCCI

I would pursue many additional avenues as part of the C/A investigation. However, as we've discussed, it is just as important who is assigned to do the exploring. At a minimum, I would do the following:

1) Interview [redacted] b6 b7C who showed a high specificity of knowledge about BCCI within the NSC as early as 1981

2) Interview [redacted] b6 b7C. Start by having him give a complete exposition of the notes we already have, then ask follow-up questions, and pursue those leads. The notes may (or may not) indicate that the officials named therein were approached by BCCI.

3) Investigate fully the Hammond death and the frightened phone call to [redacted] b6 b7C Because of the size of the body, some argued Hammond wasn't dead, or at least that it was not his body in the grave. What was it that led to his phone call? What was going on w/i BCCI at the time? Among other things, [redacted] signs a waiver for his SSAnos in June 1990.

4) Fully explore the allegations from [redacted] b6 b7C and [redacted] including that Clifford [redacted] I have long felt that [redacted] offered us an opportunity to develop some significant evidence against C/A. They have each been interviewed, but in my opinion, the 302's are not comprehensive enough, nor have all leads been exhausted.

1325015-000-6404

11) I would also consid[redacted] talking to [redacted] about his concerns at the time of the 1951 application and any suspicious acts or limits imposed on him: and to [redacted]

5) I feel the same way about the allegations surrounding Clifford [redacted] who claimed to [redacted] The related 302's suggest he may have been [redacted] As I read it, the matter was left with him [redacted] If there is any chance such documents exist, we should run it down. Also, if C/A do or did believe he had such documents I suspect [redacted], providing another possible basis for prosecution.

6) I would want to know whatever [redacted] has in the Iran-Contra files that might pertain to BCCI (in its broad, conspiratorial role). To my knowledge, we've received little information. I can't believe that knowledgable [redacted] investigators would not be able to find a treasure trove of info there. I suspect our requests have been too narrow.

7) I would interview the informants and former BCCI officials involved in the 1985 investigation in Los Angeles and the case involving [redacted] in Chicago, neither of which resulted in any charges being followed.

8) I would closely follow the investigations noted in the "Hidden Interests" memo of 2/28/92 from [redacted], particularly the "General Media" allegations. Were any of those fruitful, I believe they would engender incriminating info on C/A.

9) I would have you personally interview [redacted] including questions about visits made to him in the early 80's by [redacted] and by [redacted]

10) [redacted]'s mandate to investigate started with activities in mid-1985. I would want to question [redacted] & others about earlier use of BCCI by the [redacted], esp.

1325015-000-6405

Memorandum of May 8 (cont'd)

To: [redacted] b6 b7C

Fr: [redacted]

Dt: May 11

12) I would pursue [redacted], and the missing 1978 [redacted] report and the missing communications in 1985. [redacted] b6 b7C b7E in particular, seems to have repeatedly misrepresented his knowledge of the [redacted] info to reporters who questioned him before he testified in front of Senator Kerry. When he did testify, he was still suspiciously vague and claimed some of what he did recall was still classified

13) I would consider talking with representatives of the former shareholders of FAB-Virginia. Clifford never acknowledged he was a CCAH shareholder at the time and therefore could not have been the disinterested buffer he claimed to be between the shareholders and the foreign investors. I would look for a RICO predicate somewhere in these actions.

14) I would pursue the hiring of [redacted] by [redacted] b6 b7C That connection did not arise in a vacuum. How, and through what channels, did it occur? Similarly, I would investigate the connections of [redacted]

15) To my knowledge, we have hardly scratched the surface of Capcom, which was a key link to BCCI's penetration of the U.S. Along with [redacted] and some of the other foreign investors common to CCAH and Capcom, there was [redacted], whose background is perfectly suited to the intelligence community and whose BCCI backed business in the Gulf was set up in Saudi Arabia w/ [redacted]'s help. b6 b7C

16) Before running all over the world, I would blanket the D.C. area for info on Clifford [redacted] and C/A. Have we yet interviewed former professional and clerical employees, especially those who left unhappily? b6 b7C

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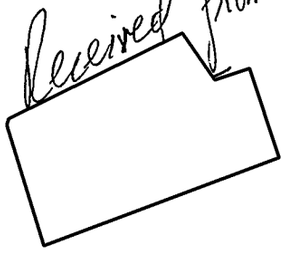

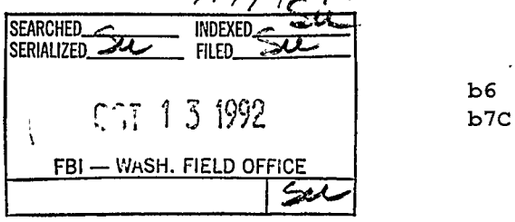

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OCT 13 1992

FBI — WASH. FIELD OFFICE

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0-9 (Rev. 8-16-79)

C-3
C-4
C-5

TRANSMIT VIA: AIRTEL

CLASSIFICATION: UNCLAS DATE: 4/29/92

FROM: Director, FBI

TO: SAC, WMFO

HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Re WMFO teletype to FBIHQ, dated 4/20/92.

The Criminal Investigative Division has established the Criminal Intelligence Section. This Section consolidated most of the major analytical entities, including Visual Investigative Analysis (VIA), under the purview of one Section Chief. The consolidation is to maximize the expertise of the existing analytical personnel in reference to a more comprehensive and involved mission. This new mission is inconsistent with traditional VIA applications, which has caused the duties and responsibilities of the VIA personnel to be redefined. Therefore, VIA as previously known will no longer be available for any investigations; consequently, your request for VIA assistance must be denied.

Questions concerning this matter may be directed to [redacted] FBIHQ, FTS 324-5718.

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29B-WF-171994 Main
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[redacted]

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1325015-000-6408

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
May 21, 1992

AUSA [redacted]
155 S. Miami Avenue
Miami, Florida 33130

b6
b7C

Re: BCCI - Search Warrant executed on April 8, 1992 at
The Fortress Corporation, Miami/Hialeah, Florida

Dear [redacted]

b6
b7C

Pursuant to your telephone conversations with Special Agent [redacted] enclosed are photocopies six (6) FD-302s as follows:

1. [redacted]
Special Agents
Federal Bureau of Investigation, Washington, D.C.
On April 8, 1992 re: Execution of Search Warrant at
Fortress Corporation, Miami/Hialeah, Florida

b6
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2. [redacted]
Fortress Corporation
On April 8, 1992 re: Search Warrant

3. [redacted]
Fortress Corporation
On April 8, 1992 re: Consent to Search

4. [redacted]
Fortress Corporation
On April 8, 1992 re: Amended Search Warrant

5. [redacted]
Fortress Corporation
On April 10, 1992 re: BCCI Inventory Update

1 - Addressee
1 - WMFO (29B-WF-171994-Main)
CWS
(2)

29B-WF-171994 Main - 391

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Serialized Sec
Indexed
Filed Sec

1325015-000-6434

29B-WF-171994

6. [redacted] b6 b7C
Special Agent
Federal Bureau of Investigation, Washington, D.C.
On April 24, 1992 re: Partial Preliminary Return / Inventory of Search Warrant

If you have any questions regarding any of the above, or require additional information, please contact Special Agent [redacted] or Special Agent [redacted] b6 b7C

Sincerely yours,

Robert M. Bryant
Special Agent In Charge

by:

[redacted] b6 b7C
Acting Supervisory Special Agent

CHK/cws
Enclosures (6)

1325015-000-6435

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 5/26/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

On 5/26/92, [redacted] telephonically contacted the FEDERAL BUREAU OF INVESTIGATION-WASHINGTON METROPOLITAN FIELD OFFICE. [redacted] advised that [redacted] Recently, [redacted] told [redacted] that [redacted] *"has been taken away"* and is probably in [redacted] *'s old room."* [redacted] explained that the expression "taken away" indicates that [redacted] was taken into custody or arrested by Abu Dhabi authorities. Further, [redacted] 's old room" refers to an isolation chamber or prison cell that [redacted] once occupied. b6 b7C

[redacted] advised that he is merely passing along this information is uncertain as to its validity. b6 b7C

29B-WF-171994 -392

Main

1 - WMFO
(1 - 29B-WF-171994 -Main)
CWS
(1)

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MAY 26 1992
FBI

1325015-000-6436

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/1/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

SA [redacted] and the writer have been conducting a comprehensive review of allegations relating to BCCI being investigated by the "Task Force." To better facilitate the investigation, four teams have been established to address specific aspects of the case. Three substantive investigative teams have been established. A documents/administrative team will be established when resources so permit. b6 b7C

Each BCCI Agent will receive outlines containing allegations and team structures. Said outlines cover the period 6/1/92 to 8/1/92. It is anticipated that investigative outlines will be prepared every 60 days. As previously set out, by SA [redacted] "Lead" forms will be disseminated to each Agent. b6 b7C

It should be noted that certain assignments/responsibilities for each Agent will be adjusted to better conform to the team structures. Each team needs to work in conjunction with the other teams, as numerous leads overlap and could impact on the teams differently.

It will be the responsibility of the Team Leaders to insure that all leads are prioritized and addressed accordingly. We will be flexible in making adjustments. It is requested that all Agents review the outlines and advise the writer of additional leads that should be addressed.

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29B-WF-171994 main

1-Each BCCI SA

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JUN 2 - 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6437

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 6/4/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS,
MAJOR CASE #38
FIF; FAG;
OO:WMFO

On 5/21/92, SA [redacted] telephone number (305) 944-9101, extension 6112, advised that the scheduled interview with [redacted], on 5/20/92, did not take place. The reason the interview was canceled was due to IRS Special Agent [redacted] telephone number (305) 480-6144, advising that [redacted] did not have the needed documents to corroborate his testimony, therefore the interview would be rescheduled for a time when [redacted] could retrieve these documents from Switzerland. b6 b7C

[redacted] stated that [redacted] could be reached through his attorney, [redacted] telephone number (305) 531-7300, if WMFO is interested in scheduling any additional interviews. b6 b7C

On 5/22/92, SA [redacted] spoke with [redacted] Investigator for the county of New York, telephone number (212) 335-9892. [redacted] advised that he was instantaneously conducting an interview of [redacted] but at this time did not believe [redacted] to be a reliable source of information. b6 b7C

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SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUN 11 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6438

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 6/8/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MC #38
OO: WMFO

As set forth in writer's memo of 3/17/92, materials containing speculations of BCCI's role in terrorism and nuclear proliferation were forwarded to this squad from the White Collar Section. The allegations of each of the papers were summarized in the referenced memo. Generally, the materials consisted of papers authored by [redacted] in his capacity as [redacted] b6 b7C Each of the papers contain allegations and summary statements of wrongdoing on the part of BCCI. Most of these allegations have previously surfaced, and when mentioned in the papers are not accompanied by evidence of factual support. Similarly, no basis of knowledge accompanies the statements.

Writer met with SSA [redacted], Congressional Liaison Office, and provided him with copies of the articles. SSA [redacted] soon thereafter contacted writer and advised that he did not believe [redacted] should be contacted or interviewed in light of information [redacted] had discovered during inquiries he had made. [redacted] advised that writer should speak with SSA BOB BLITZER, Assistant Section Chief, Counter-Terrorism Section for additional details. b6 b7C

On 5/21/92, writer spoke with SSA BLITZER who indicated he was familiar with [redacted] and his writings. SSA BLITZER indicated the Congressional Affairs Office had received an abundance of the documents on nuclear proliferation which were being distributed "all over the hill." SSA BLITZER described these documents as being riddled with false information and inaccuracies. SSA BLITZER said that the articles have some good information carefully interwoven with falsehoods and reach wild conclusions. b6 b7C

SSA BLITZER confirmed that [redacted] SSA BLITZER speculated that the b6 b7C

1-WMFO

[redacted] b6 b7C

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SERIALIZED [redacted] FILED [redacted]

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FBI — WASH. FIELD OFFICE

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articles may be either a disinformation campaign or an attempt to elicit contact by U.S. officials in an attempt to determine what information is had.

SSA BLITZER said that his section was already aware of [redacted]S writings and was not interested in contacting him. SSA BLITZER advised against interviewing [redacted] in that he could use that contact as a confirmation of his conclusions. This in turn could in SSA BLITZER's words "open a whole can of worms." SSA BLITZER thus advised against contacting [redacted] b6 b7C

In light of the evaluation given by the Counter-Terrorism Section to [redacted]'s works, and the fact that he offers no factual basis for his statements in those works, no contact will be made with [redacted] unless additional information is received to indicate he may have knowledge or evidence of interest to federal law enforcement. b6 b7C

1325015-000-6441

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 6/17/92
(Attn: SSA [redacted] (A-5)

From : SA [redacted] (C-5)

Subject: HIDDEN INTERESTS
MAJOR CASE #38
FIF; FAG;
(OO: WMFO)

On 5/8/92, four separate FD-160's, Indices Search Slips, were submitted for global searches. Attached to each of these FD-160's was a list of approximately 200 names, both companies and individuals. [redacted]. As such, this has become a monumental task.

Therefore, the purpose of this memo is to justify the reason for this task and to request that appropriate personnel be assigned so as to complete this search in an expeditious manner.

As a result of a plea agreement between the Department of Justice (DOJ) and the liquidators of Bank of Credit and Commerce International (BCCI), no distributions will be made by the liquidators to BCCI creditors without DOJ approval. Based upon DOJ's belief that a substantial amount of these funds are forfietable and/or will lead to important information for the criminal investigation, DOJ has requested the FBI to perform a computerized national search of each name. It is pointed out that many of the dollar amounts associated with these names are in the millions of dollars.

Attached are one of the four FD-160's. [redacted] still remains to be done. The other three FD-160's have previously been forwarded to Indices.

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3 - WMFO
(1 - SSA [redacted], (2) - 29B-WF-171994)

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SERIALIZED [redacted] FILED [redacted]
JUN 18 1992
FBI — WASH. FIELD OFFICE

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1325015-000-6442

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(C-5/BCCI) Date 6/25/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
OO:WMFO

The purpose of this memorandum is to request WMFO TSS to provide the following:

1) One two-drawer safe, in compliance with regulations for the storage of information classified as "~~Top Secret~~".

2) Prepare a survey for the laying of computer fiber and execute said survey for the installation of a LAN.

3) Purchase necessary computer hardware to complete the LAN (e.g.:hubs, network cards, etc.).

The above requests are for the office location of 500 First Street, N.W., Washington, D.C., 20001. Coordination of the computer related work should be made with SA [redacted] X6353. b6 b7C In the event that WMFO does not possess the necessary material and/or equipment to complete the above tasks, FBIHQ Unit Chief [redacted] can be contacted for any authorization of necessary purchases of material and/or equipment.

TSS is respectfully requested to expedite the above stated requests due to the complexity of the investigation, which requires access and utilization of computers.

3-WMFO
(1-SSA [redacted]
(1-SSA [redacted]
~~(1-~~29B-WF-171994)

MRM:mm
(3)

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Main - 398

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FBI — WASHINGTON FIELD OFFICE

1325015-000-6443

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 7/13/92

From : SA [redacted] (C-5) b6 b7C

Subject: HOLIDAY PAY

On 7/4/92, SA [redacted] was in Amsterdam, Netherlands and London, England conducting investigation relating to Major Case 38, Universal File 29B-WF-171994. Due to the fact that July 4th holiday is not observed in the Netherlands and England, writer conducted investigation on 7/4/92. b6 b7C

It is therefore requested that writer receive holiday pay for working on official business on 7/4/92.

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29B-WF-171994 Mail

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 1 4 1992
FBI — WASHINGTON FIELD OFFICE

See 302R

1325015-000-6444

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 7/14/92

To: [redacted] Washington, D.C.
(Name and Add

From: ROBERT M. BRYANT
(Name of Official in Charge and Field Division)

RE: HIDDEN INTERESTS [redacted]
(Name of Subject) Age Sex

b6
b7C

You are hereby advised of action authorized by [redacted]
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] on 7/14/92
(Name) (Date)

(Check One)

(X)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Accompanying this transmission are the following FD-302's:

NAME	DATE(S)
[redacted]	.....5/15/92
	.....1/7/92
	.....1/9-10/92,1/9/92, 1/13/92
	.....1/8/92
	.....9/27/91
	.....11/13/91
	.....2/26/92
	.....2/24/92
	.....12/11/91
	.....10/4/91, 10/22/91

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Main

Searched
Serialized SU
Indexed 5
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1325015-000-6445

NAME	DATE(S)	
	.11/12/91	b6
	.2/4/92	b7C
	.2/26/92	
	.5/6/92	
	.1/9-10/92, 8/8/91	
	.12/16/91	
	.2/11/92	
	.2/24/92	
	.9/24/91	
	.1/3/92	
	.5/5/92	
	.2/26/92	
	.1/29/92	
	.1/16/92	
	.7/31/91, 8/14/91, 8/15/91	
	.10/18/91	
	.4/14/92	
	.1/13/92	
	.3/11/92, 3/27/92	

Also accompanying this transmission are the following investigative inserts:

INVESTIGATION BY	DATE(S)	
	.....12/18/91	b6
	.....1/21/92	b7C

1325015-000-6446

8-258 (Rev. 8-5-91)

C-5

REPORT OF THE
TECHNICAL SERVICES DIVISION
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, Washington Metropolitan Field (C-5)

July 9, 1992

FBI File No. 29B-WF-171994

Lab No. 20327030 E VT

Reference: Airtel dated March 26, 1992

Your No.

Re: HIDDEN INTERESTS;
MC #38
FIF; FAG

Specimens received: March 27, 1992

Q12 One U.S. Customs Service magnetic tape cassette marked in part "5/13/89"

Result of examination:

The piece of recording tape was remounted in a Maxell C30 housing. Two enhanced monaural copies were made of specimen Q12 on side A of separate Maxell C90 magnetic tape cassettes with Dolby B noise reduction encoding. Each copy was made in two parts.

In order to obtain maximum intelligibility, the enhanced copies should be played back using a high-quality cassette recorder and headphones, using Dolby B noise reduction as indicated on the cassettes.

Supervisory Special Agent [redacted] conducted the enhancement examination.

29B-WF-171994 Main b6 b7C -401
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Page One (CONTINUED OVER)

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[redacted] b6 b7C

I325015-000-6447

Specimen Q12 including the original housing with the bulk of the tape, the remounted tape in the Maxell housing, and a small segment attached to a 3" X 5" card, together with the enhanced copies of specimen Q12, were forwarded to the Washington Metropolitan Field Office via Federal Express on April 17, 1992.

1325015-000-6448

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/16/92

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

In consideration of the writer's promotion to a supervisory position, the promotion and transfer of SSA [redacted] b6 b7C
[redacted] to FBIHQ, and the necessity of further administratively refining the structure of the captioned matter, the following changes are being implemented.

First, this memorandum will serve to reassign the captioned matter to four co-case agents: SA [redacted], SA [redacted] SA [redacted] and SA [redacted] b6 b7C
With the exception of SA [redacted] all are currently leaders of investigative teams.

Second, a new team to investigate areas of political corruption has been established, with SA [redacted] as its leader. At present, assignments include matters relating to U.S. Senator [redacted]; former White House chief of staff [redacted] b6 b7C
[redacted] and [redacted] In the near future, it is anticipated that administrative SSA [redacted] will form at least one more team and designate another leader for handling the records in this matter.

8-WMFO
(1)-29B-WF-171994 Main
1-IIC [redacted] b6 b7C
1-SSA
1-SSA
1-SA
1-SA
1-SA
1-SA

JNR:jnr
(8)

Reassign 7/16/92

7-20-92

29B-WF-171994-402

Main

Agreed 7/17/92

SA/JR FORMS per JR

SA/JR

SA/JR

SA/JR

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JUL 1 1992
FBI — [redacted] b6 b7C

1329615-000-6449

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 6/17/92

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Set forth below are estimated International travel needs in the near future:

1. Cayman Islands ----> 6/21 thru 6/25/92
SA's [redacted] b6 b7C

The above SA's will travel with DOJ Trial Attorney (TA) [redacted] and DOJ Attorneys from the Asset Forfeiture Section. Five interviews have been scheduled. Interviewees include former BCCI/ICIC officials and an Auditor from Price Waterhouse.

2. Ottawa, Canada ----> 6/21 thru 6/25/92
SA [redacted] b6 b7C

The above SA will travel to Canada to interview [redacted] former [redacted] This interview concerns asset forfeiture matters.

3. [redacted] ----> 6/26 thru 6/30 b6 b7C b7D
SA's [redacted] (Los Angeles) and SA [redacted] or SSA [redacted]

The above SA's will travel with DOJ TA [redacted] for [redacted]

4. Amsterdam ----> 6/27 thru 7/2/92
SA [redacted] b6 b7C

The above SA will travel with TA [redacted] to Amsterdam for the interviews of six officials of Etrusco. Etrusco was the transfer agent for CCAH. A major issue in the investigation has been the non-recording of the pledge of CCAH stock on CCAH's stock register. Such was maintained by Etrusco in the Netherlands Antilles.

[redacted]

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b6 b7C

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5. London ----> 7/2 thru 7/12/92
Inspector in Charge (IC) [redacted] b6
SSA's [redacted] b7C
SA's [redacted]

The above SA's will travel with TA [redacted] As many as 21 interviews will be scheduled. Such will include the interview of a nominee, Directors and officials of BCCI. In addition, a review of the index of records at BCCI will be conducted to narrow the focus of the records review in London.

6. London ----> No set date at this time.
Agent/Support personnel will be needed.
Numbers will be contingent on resource availability and the scope of the records review.

7. Paris ----> No set date at this time.
IC [redacted] SSA [redacted] SA [redacted] b6 b7C

The above SA's will travel to Paris to conduct a series of interviews, [redacted] b7D [redacted] retrieve records concerning GHAITH PHARAON.

1325015-000-6451

Memorandum

To : SAC, WMFO Date 7/1/92

From : SA [redacted] b6 b7C

Subject: MISSING NOTEBOOK COMPUTER NVMRA

On 6/22/92, SA [redacted] discovered that a Dell Notebook computer was missing from his office. The computer was left with SA [redacted] for maintenance by SSA [redacted] BCCI. The computer was last seen by SA [redacted] in his office on 6/12/92. SA [redacted] departed for a computer conference in Phoenix on 6/14/92. He did not returned until 6/21/92. The door to SA [redacted]'s office remains locked and was locked when he departed for the Phoenix trip. b6 b7C

Known key holders for SA [redacted]'s office are: b6 b7C

1- SA [redacted]
1- CS [redacted]
1- CS [redacted]
1- Assistant [redacted]

* Indicates individuals who were also in Phoenix during the week of 6/14/92 - 6/20/92.

The computer is described as a Notebook style computer, Dell 320 LT, Serial Number 0F6FL. It was in-cased in a black nylon case.

1- SAC
1- ASAC [redacted] b6 b7C
1- SSA [redacted]
1- SA [redacted]

4-WMFO

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FBI — WASH. FIELD OFFICE

1325015-000-6452

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/27/92

From SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

RE: LEAD #35; TELECOMMUNICATIONS INC. OF DENVER

Writer spoke with Denver SA [redacted] on 7/27/92 b6 b7C regarding captioned lead. SA [redacted] summarized what he had learned through his investigation and discussed future avenues to possibly follow. In general, [redacted] the subjects of the investigation are [redacted] The two were introduced to [redacted] by [redacted] was described as an individual from Florida with ties to the middle east. [redacted] said that there were questionable loans made from BCCI to the partnerships associated with [redacted] One of the partnerships was [redacted] and another may have been [redacted]

[redacted] said that records regarding the real estate b6 b7C transactions associated with the loans had been subpoenaed and it appeared that homes had been built in Vail Colorado with the proceeds.

[redacted] said that the Denver IRS is also involved in the b6 b7C investigation and that he is working with them on this matter. Writer informed [redacted] of the Aspen database after [redacted] mentioned difficulties encountered in searching for documents to help with their case. Writer has forwarded an Aspen guide to [redacted] and informed him of the records to which we have access. [redacted] will be forwarding appropriate FD-302's to writer and discussing possible investigative steps with IRS Denver.

[redacted] agreed that a meeting between writer and him as b6 b7C well as a review of their records may be helpful in charting a course for this aspect of the case. Further plans for such will be held in abeyance pending receipt of Denver FD-302's and [redacted]'s discussion with IRS.

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Main

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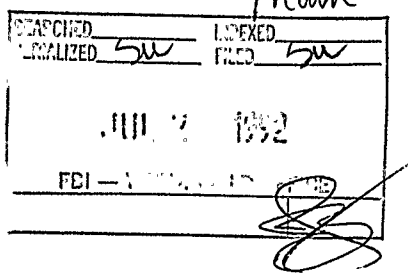

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 7/22/92

From : SSA [redacted] b6 b7C
SSA

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

For information, between 6/24 and 7/18/92, SA's assigned to the BCCI Task Force travelled to Istanbul, Amsterdam and London. Significant interviews/investigation were conducted. The purpose of this memorandum is to commend the performance of SA's [redacted] and [redacted] in furtherance of same. The planning and execution of interviews, coupled with the professionalism displayed by the above named SA's contributed to outstanding investigative results. b6 b7C

SA [redacted] travelled to [redacted] where he participated in [redacted] b6 b7C b7D
Subsequent to this trip, SA [redacted] travelled to London. He participated in the interviews of former BCCI [redacted] including [redacted] SA [redacted] found important documents relating to [redacted] in a records review. Such documents were used in an interview of [redacted] wherein important evidence was developed. SA [redacted] also participated in the interview of CCAH [redacted] wherein [redacted] admitted to being a [redacted]

SA [redacted] travelled to Amsterdam. He participated in the interviews of six Officials of the Equity Trust Company (ETRUSCO). ETRUSCO was the managing Director for CCAH and maintained the books and share register for CCAH. Based on the results of the interviews, evidence was developed which indicated that [redacted] deliberately withheld financial information from ETRUSCO. In addition, information was confirmed that [redacted]'s law firm instructed ETRUSCO not to place stock pledges on the share register. This information could be important for indictment purposes. SA [redacted] travelled from Amsterdam to London. SA [redacted] participated in interviews and records reviews. Such included the interview of [redacted] a [redacted] Attorney who was responsible for hiring [redacted] the [redacted] b6 b7C

1- Personnel Folder of each named SA

I agree. Good work by these guys. Ensure this memo goes to each PF and taken into consideration at PAR time. Thanks [redacted]

1325015-000-6459

SA [redacted] travelled to London. He conducted the necessary investigation to locate and arrange for the interviews of former BCCI Directors, Officials and related individuals. SA [redacted] was adept at locating said parties and arranging the interviews. SA [redacted] also was successful at locating and contacting [redacted] After several contacts, [redacted] consented to meet with SA [redacted] in Spain. SA [redacted] spent a considerable amount of time to meticulously prepare for this critical interview. Such included records reviews and initiating contact with the Behavioral Science Unit at Quantico to obtain guidance as how best to approach [redacted] Due to a family illness, [redacted] canceled the interview but agreed to meet with SA [redacted] at a future date.

b6
b7C

[redacted]

b6
b7C
b7D

As detailed above, SA's [redacted] and [redacted] are commended for their performance while abroad. Such efforts not only benefit the investigation but enhance the stature of the FBI in the International arena. The above named SA's are a credit to the FBI.

b6
b7C

1325015-000-6460

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Grand Jury Sworn in on January 16, 1991

UNITED STATES OF AMERICA	:	
	:	
v.	:	Crim. No. 92 - (JHG)
	:	
CLARK M. CLIFFORD ROBERT A. ALTMAN	:	Charges: 18 U.S.C. § 371 (Conspiracy); 18 U.S.C. § 1001 (Concealing Material Facts by Trick and Device).
Defendants	:	

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

AT TIMES MATERIAL TO THIS INDICTMENT:

1. The Board of Governors of the Federal Reserve System (sometimes referred to as the "FED") was an agency of the United States with primary responsibility for supervising and regulating activities of bank holding companies.

2. The Office of the Comptroller of the Currency (sometimes referred to as the "OCC") was an agency of the United States which regulated, examined and supervised nationally chartered banks to ensure they were operated in a safe and sound manner and in conformity with applicable laws and regulations.

3. BCCI Holdings (Luxembourg), S.A. (sometimes referred to as "BCCI Holdings") was a foreign bank holding company established under the laws of Luxembourg. It owned and controlled Bank of Credit and Commerce International S.A. (sometimes referred to as "BCCI S.A."), a foreign bank established under the laws of Luxembourg.

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4. BCCI Holdings also owned and controlled Bank of Credit and Commerce International (Overseas) Limited (sometimes referred to as "BCCI Overseas"), a foreign bank established under the laws of the Cayman Islands.

5. The term "BCCI" means a combination of BCCI Holdings, BCCI S.A. and BCCI Overseas.

6. International Credit and Investment Company (Overseas) Limited (sometimes referred to as "ICIC Overseas") was a foreign bank established under the laws of the Cayman Islands.

7. Credit and Commerce American Holdings, N.V. (sometimes referred to as "CCAH") was a Netherlands, Antilles corporation, headquartered in Curacao. Credit and Commerce American Investment, N.V. (sometimes referred to as "CCAI") was a Netherlands corporation, wholly owned by CCAH. As more fully described below, CCAH and CCAI were formed in 1978 to acquire control and ownership of Financial General Bankshares (sometimes referred to as "FGB"). CCAH, CCAI and FGB were bank holding companies under the Bank Holding Company Act.

8. First American Corporation (sometimes referred to as "FAC") was a bank holding company under the Bank Holding Company Act. It was wholly owned by Credit and Commerce American Investment, N.V. and owned First American Bankshares, Inc., (sometimes referred to as "FAB"), a bank holding company under the Bank Holding Company Act.

9. First American Bankshares, Inc. was the successor to Financial General Bankshares. FGB owned a number of banks

(sometimes referred to as "subsidiaries" of FGB) with state and federal charters, including First American Bank, Washington, D.C. and First American Bank of New York (sometimes referred to as "FABNY").

10. First American Bank of Georgia (sometimes referred to as "FABGA") was the successor to the National Bank of Georgia (sometimes referred to as "NBG"), after NBG was acquired by Credit and Commerce American Holdings, N.V. and First American Bankshares, Inc.

11. NBG Financial Corporation (sometimes referred to as "NBGFC") was a corporation organized and existing under the laws of the State of Georgia. NBGFC was the holding company for the National Bank of Georgia from 1983 until 1987, when NBGFC was acquired by First American Bankshares, Inc.

12. Defendant CLARK M. CLIFFORD was a partner in the Washington D.C. law firm of Clifford & Warnke. He was the chairman of the board of directors of Credit and Commerce American Holdings, N.V. and its wholly owned subsidiary holding companies, Credit and Commerce American Investment, N.V. and First American Corporation. He was the chairman of the board of directors of First American Bankshares, Inc., the principal operating company of CCAH. He was an attorney for BCCI and a borrower from BCCI. He was an attorney for CCAH and subsidiaries of CCAH.

13. Defendant ROBERT A. ALTMAN was a partner in Clifford & Warnke. He served on the boards of directors of Credit and Commerce American Holdings, N.V., Credit and Commerce American

Investment, N.V., First American Corporation, First American Bankshares, Inc. and three FAB subsidiaries --- First American Bank of New York, First American Bank of Georgia and First American Metro Corp. He was president of First American Corporation. He was an attorney for BCCI and a borrower from BCCI. He was an attorney for CCAH and subsidiaries of CCAH.

14. Agha Hasan Abedi was a principal of BCCI and ICIC Overseas.

15. Swaleh Naqvi was a principal of BCCI and ICIC Overseas.

16. Ghaith R. Pharaon was a Saudi Arabian businessman and purportedly a shareholder in BCCI. He was a BCCI borrower. He purportedly was the owner of Interedec (Georgia) Limited N.V. and through Interedec (Georgia) Limited N.V. and its subsidiaries purportedly owned NBG Financial Corporation.

Background

17. In or about December 1977 and January 1978, BCCI purchased nearly 20% of the shares of Financial General Bankshares, purportedly on behalf of four investors from the Middle East.

18. On or about February 17, 1978, FGB sued BCCI, Agha Hasan Abedi, the investors from the Middle East, and several others, alleging that the defendants had formed a secret group to acquire control of FGB without filing required disclosure statements with the United States Securities and Exchange Commission (sometimes referred to as the "SEC"). Before the litigation began, BCCI, Agha Hasan Abedi, and the four investors from the Middle East retained Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN as their counsel.

19. On or about March 18, 1978, the United States Securities and Exchange Commission filed a complaint against BCCI, Agha Hasan Abedi, and several others, alleging that the investors from the Middle East had acted as a group and had failed to file required disclosure statements. On advice of counsel, including advice of Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN, the investors from the Middle East entered into a consent agreement the same day, not admitting any violation but agreeing to make a tender offer for all shares of Financial General Bankshares.

20. Subsequently, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN directed the efforts by their clients to acquire Financial General Bankshares. In the course of the state and federal regulatory proceedings that followed, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN were put on notice of the regulators' concerns about the relationship between BCCI and Credit and Commerce American Holdings, N.V., and their concerns that BCCI not control or influence management or policies of CCAH or its subsidiaries.

21. On or about October 19, 1978, Defendant ROBERT A. ALTMAN, on behalf of Credit and Commerce American Holdings, N.V. and Credit and Commerce American Investment, N.V. (which had been formed to facilitate the acquisition of FGB shares), filed an application with the Board of Governors of the Federal Reserve System to become bank holding companies by acquiring all of the voting shares of Financial General Bankshares. The Board of Governors of the Federal Reserve System dismissed the application on or about

February 16, 1979, on the ground that if undertaken the proposed acquisition would violate Maryland law.

22. In or about July of 1980, the CCAH/CCAI investor group, represented by Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN, reached an agreement with Financial General Bankshares management whereby FGB agreed to support the proposed acquisition. This agreement permitted the investor group to resubmit an application to the Board of Governors of the Federal Reserve System.

23. On or about October 3, 1980, Defendant ROBERT A. ALTMAN, on behalf of Credit and Commerce American Holdings, N.V. and Credit and Commerce American Investment, N.V., resubmitted an application to the Board of Governors of the Federal Reserve System for approval to become bank holding companies by acquiring Financial General Bankshares. The application included the following representation: "BCCI owns no shares of FGB, CCAH or CCAI, either directly or indirectly, nor will it if the application is approved. Neither is it a lender, nor will it be, with respect to the acquisition by any of the investors of either FGB, CCAH or CCAI shares."

24. On or about December 11, 1980, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN met with regulators from the Office of the Comptroller of the Currency, who were analyzing the application at the invitation of the Board of Governors of the Federal Reserve System. In response to concerns about the relationship of BCCI and Agha Hasan Abedi to the proposed acquisition of Financial General Bankshares, Defendants CLARK M.

CLIFFORD and ROBERT A. ALTMAN assured the regulators that BCCI would neither lend money to the proposed investors nor become involved in controlling FGB.

25. On or about March 12, 1981, the Office of the Comptroller of the Currency expressed the following views in response to the December 11, 1980 meeting:

> It has now been represented to us that BCCI will have no involvement with the management and other affairs of Financial General nor will BCCI be involved in the financing arrangements, if any are required, regarding this proposal. This commitment is critical, both now and in the future, since such a relationship with another financial institution would be a significant factor in appraising this application. This is especially important in light of the overlapping ownership which will exist between Credit and Commerce American Holdings, N.V., Credit and Commerce American Investment, N.V., and BCCI. Moreover, any enhanced direct or indirect affiliation or relationship between BCCI and Financial General would take on even greater significance in light of the fact that BCCI is not subject to regulation and supervision on a consolidated basis by a single bank supervisory authority.

26. On or about April 23, 1981, the Board of Governors of the Federal Reserve System conducted a hearing at which Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN represented the proposed investors of Financial General Bankshares. In response to a question about what precisely was BCCI's function in the FGB acquisition proposal, Defendant CLARK M. CLIFFORD gave the following response:

> None. There is no function of any kind on the part of BCCI. I think when the question was asked, having to do with what might occur in the future, I think someone may have given the answer, 'Well, that would depend upon the judgment of Financial

> General in the future.' I know of no present relationship. I know of no planned future relationship that exists, and other than that, I don't know what else there is to say . . . .

27. On or about April 23, 1981, Defendant ROBERT A. ALTMAN gave the following response to a question about the similarity of names between Credit and Commerce American Holdings, N.V. and Credit and Commerce American Investment, N.V. and Bank of Credit and Commerce International: "[O]ther than similarity in certain respects, there is no connection between those entities and BCCI in terms of ownership or other relationship."

28. In or about June of 1981, the investor group created a subsidiary of Credit and Commerce American Investment, N.V., FGB Holding Corporation (sometimes referred to as "FGBHC"), which joined in the CCAH and CCAI application to acquire Financial General Bankshares.

29. On or about August 25, 1981, the Board of Governors of the Federal Reserve System, based on the entire record, including the representations made by Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN as counsel for the applicants, issued an order approving the applications of Credit and Commerce American Holdings, N.V., Credit and Commerce American Investment, N.V., and FGB Holding Corporation to become bank holding companies by acquiring Financial General Bankshares.

30. On or about March 2, 1982, FGB Holding Corp. made a tender offer to purchase all the shares of Financial General Bankshares. The transaction was consummated on or about April 16,

1982. Defendant CLARK M. CLIFFORD became chairman of the board of Credit and Commerce American Holdings, N.V., Credit and Commerce American Investment, N.V., FGB Holding Corp., and Financial General Bankshares. Defendant ROBERT A. ALTMAN became a director and secretary of CCAH and CCAI, director and president of FGBHC, and a director of FGB. In or about August of 1982, FGB changed its name to First American Bankshares, Inc. and FGB Holding Corp. changed its name to First American Corporation.

31. During 1984 and 1985, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN participated in studies analyzing alternative ways by which BCCI could enter the United States banking world, including the possibility of a merger between First American Bankshares, Inc. and BCCI.

The Conspiracy

Beginning in or about 1985, the exact date being unknown to the Grand Jury, and continuing until in or about August 1991, in the District of Columbia and elsewhere, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN knowingly and willfully combined, conspired, confederated, and agreed together and with others, both known and unknown to the Grand Jury, to hamper, hinder, impede, impair and obstruct, by deceit, craft, trickery and dishonest means, the lawful functions of the Board of Governors of the Federal Reserve System in regulating and supervising the activities of Credit and Commerce American Holdings, N.V. and its subsidiaries.

The Manner and Means of the Conspiracy

It was part of the conspiracy that:

1. The Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would enrich themselves through agreements with BCCI, as further described below.

It was further part of the conspiracy that:

2. Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would curry favor with BCCI and take steps to assist BCCI by:

a) purchasing the National Bank of Georgia, said purchase accomplishing the following for BCCI:

i. assisting a major BCCI borrower and purported shareholder, Ghaith R. Pharaon, who was facing financial problems, and thereby facilitating the repayment by Ghaith R. Pharaon of obligations due and owing to BCCI;

ii. bringing and keeping the National Bank of Georgia under the ownership of Credit and Commerce American Holdings, N.V., an entity with strong affiliations with BCCI, in awareness of BCCI's long-term strategic interest in acquiring or merging with CCAH;

b) causing $150 million to be deposited with BCCI (Overseas) in Grand Cayman from July of 1986 through December of 1986;

c) causing $45 million to be deposited with BCCI (Overseas) in Grand Cayman from December 1986 through May of 1987, and $29 million with ICIC (Overseas) from December 1986 through March of 1987;

d) permitting a valued BCCI customer to purchase at book value Credit and Commerce American Holdings, N.V. shares issued as part of the CCAH 1986 share offering;

e) backdating a document relative to the National Bank of Georgia acquisition at BCCI's request;

f) permitting NBG Financial Corporation shares to remain in London with BCCI after the execution of a pledge agreement which called for the shares to be kept in New York;

g) dispersing funds in connection with the National Bank of Georgia acquisition without a signed subordination agreement by BCCI which would protect Credit and Commerce American Holding's interests;

3. Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would receive loans from BCCI for the purchase of Credit and Commerce American Holdings, N.V. shares and would enter into agreements with BCCI concerning the sale of said CCAH shares, under the terms of these agreements:

a) Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would not be held personally liable for the loans and BCCI would be limited to collecting against the Credit and Commerce American Holdings, N.V. shares pledged as collateral; and

b) BCCI would agree to find a buyer for the Credit and Commerce American Holdings, N.V. shares at a "mutually agreeable price";

4. Aware that the loan and related agreements would be important to the Board of Governors of the Federal Reserve System

and might trigger FED regulatory action, including, but not limited to, an inquiry to ascertain whether BCCI exercised a controlling influence over Credit and Commerce American Holdings, N.V. and its subsidiaries, or controlled CCAH shares, or whether BCCI's relationship with CCAH was inconsistent with the representations made in connection with the purchase of Financial General Bankshares, and aware that such an inquiry might result in the FED's taking administrative action to their detriment, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would deliberately and affirmatively conceal the loan and share agreements between themselves and BCCI, and other aspects of CCAH's and the Defendants' relationship with BCCI, by:

a) withholding from counsel involved in drafting the agreements relating to the purchase of NBG Financial Corporation by Credit and Commerce American Holdings, N.V., for several weeks, the fact that the NBGFC shares were pledged by Ghaith R. Pharaon to BCCI;

b) structuring CCAH's purchase of NBGFC so as to avoid scrutiny by the Board of Governors of the Federal Reserve System as to BCCI's involvement in the transaction, thereby keeping the FED unaware of facts which might lead to the FED's discovery of Defendants CLARK M. CLIFFORD's and ROBERT A. ALTMAN's loan and share agreements with BCCI;

c) concealing from and failing to disclose to CCAH's regulatory counsel the loan and share agreements between BCCI and

Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN and the terms of the agreements;

d) withholding from partners of Defendants' own law firm the true details of the loan and share agreements;

e) making deceitful statements to the Board of Governors of the Federal Reserve System concerning CCAH shareholders' borrowings from BCCI;

f) attempting to keep pledges of CCAH stock from being registered on the books of CCAH in the Netherlands Antilles;

g) not informing the Board of Governors of the Federal Reserve System of facts relating to share purchases and sales by Mashriq Holding Company in connection with the 1986 share rights offering that raised an issue of a possible regulatory violation;

h) structuring the loan and share agreements with BCCI so that the promises from BCCI to hold Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN harmless on the loans and to find a buyer for the CCAH stock at a "mutually agreeable price" were in separate documents -- "side agreements" -- from the loan agreements and the pledge agreements;

5. Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would breach fiduciary duties of loyalty to CCAH and First American Bankshares, Inc., for purposes of financial gain, by means of deceit and dishonesty, by:

a) disregarding counsel's advice on the safest way to structure the National Bank of Georgia acquisition, and instead

causing the transaction to proceed in a fashion that benefited BCCI;

b) failing to disclose to First American Bankshares, Inc. directors the nature and extent of their agreements with BCCI, and making misleading statements to First American Bankshares, Inc. directors and officers concealing and intending to conceal their ownership of CCAH shares; and

c) failing to disclose to FAB directors the true nature and extent of BCCI's involvement in the National Bank of Georgia acquisition;

6. BCCI would cause the sale of Defendants CLARK M. CLIFFORD's and ROBERT A. ALTMAN's CCAH shares in 1988 to the same valued customer referred to in Paragraph 2(d) above, resulting in millions of dollars in profits to Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN;

7. BCCI would promise to purchase the balance of Defendants CLARK M. CLIFFORD's and ROBERT A. ALTMAN's CCAH shares in case of death at a guaranteed minimum price.

8. Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would conceal and cover up facts as to matters material to the Board of Governors of the Federal Reserve System.

Overt Acts

In furtherance of the conspiracy and to effect its objects, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN and other coconspirators committed and caused to be committed, in the

District of Columbia and elsewhere, the following overt acts, among others:

Overt Acts Relating to the Acquisition of National Bank of Georgia

1. On or about June 25, 1986, a letter was sent to the Board of Governors of the Federal Reserve System which described certain features of the Credit and Commerce American Holdings, N.V. and First American Bankshares, Inc. acquisition of the National Bank of Georgia but did not disclose: a) BCCI's role as a pledge agent in the transaction; and b) BCCI's role in making a related loan to Ghaith R. Pharaon;

2. On or about June 27, 1986, Defendant CLARK M. CLIFFORD signed a letter to Agha Hasan Abedi, attached to which was a memorandum prepared by counsel which stated:

> "[T]he proposed structure may focus unwelcome attention on the relationship between CCAH and BCCI";

3. On or about August 4, 1986, Defendant ROBERT A. ALTMAN returned a letter to an attorney who had advised against several features of the proposed National Bank of Georgia acquisition;

4. On or about October 16, 1986, Defendant ROBERT A. ALTMAN caused an attorney at Clifford & Warnke to have a conversation with other outside counsel for CCAH as to whether the Board of Governors of the Federal System would have access to information about the BCCI loan to Ghaith R. Pharaon;

5. On or about October 15, 1986, a letter was sent to the Board of Governors of the Federal Reserve System which described

certain features of the National Bank of Georgia acquisition but did not disclose: a) BCCI's role as a pledge agent in the transaction; and b) BCCI's role in making a related loan to Ghaith R. Pharaon;

6. On or about November 20, 1986, Defendant ROBERT A. ALTMAN spoke with an employee of BCCI about whether the Board of Governors of the Federal Reserve System would learn of BCCI's involvement in the National Bank of Georgia acquisition;

7. On or about December 18, 1986, Defendant ROBERT A. ALTMAN signed documents related to the execution of an "Option Agreement" for CCAH to purchase the National Bank of Georgia;

8. In or about March 1987, Defendant ROBERT A. ALTMAN signed a document related to a loan from BCCI to Ghaith R. Pharaon;

Overt Acts Relating to the 1986 and 1987 Share Rights Offerings and CCAH Stock Purchases by Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN

9. On or about July 23, 1986, Defendant ROBERT A. ALTMAN had a conversation with an employee of BCCI in which it was discussed whether Mashriq Holding Company would constitute a principal/controlling shareholder during the time that it held more than twenty (20) percent of CCAH stock;

10. On or about a date after July 25, 1986, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN signed documents relating to: 1) borrowing from BCCI for the purchase of CCAH shares; 2) pledging the CCAH shares to BCCI as security for the loans; 3) entering into

side agreements, which, among other terms, stated that Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN would not be held personally liable on their loans and that BCCI would agree to find a buyer for the shares at a "mutually agreeable price"; Defendant CLARK M. CLIFFORD borrowed $9,960,920 from BCCI for the purchase of 4,495 shares of CCAH and Defendant ROBERT A. ALTMAN borrowed $4,979,352 from BCCI for the purchase of 2,247 shares of CCAH.

11. On or about August 29, 1986, BCCI (Overseas) in Grand Cayman opened a loan account for Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN;

12. On or about August 12, 1987, Defendant ROBERT A. ALTMAN caused an attorney at Clifford & Warnke to have a conversation with an employee of Etrusco, the managing corporate director of CCAH, in which it was discussed whether a pledge of CCAH shares to the Saudi National Commercial Bank Bahrain should be recorded on the books and records of CCAH in Curacao;

13. On or about August 14, 1987, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN signed a set of documents, similar to those described in Overt Act 10 above, relating to additional loans by BCCI for the purchase of shares of CCAH and the sale of said CCAH shares;

14. On or about March 31, 1988, Defendant CLARK M. CLIFFORD sold 3,200 shares of CCAH stock and Defendant ROBERT A. ALTMAN sold 1600 shares of CCAH stock for $6,800 per share in a transaction arranged by BCCI; following the sale, Defendant CLARK M. CLIFFORD

retained 2,246 shares of CCAH stock and Defendant ROBERT A. ALTMAN retained 1,122 shares of CCAH stock;

Overt Acts Relating to Communications with the Board of Governors of the Federal Reserve System and Others

15. In or about early 1987, Defendant CLARK M. CLIFFORD had a conversation with a proposed First American Bankshares, Inc. director in which Defendant CLARK M. CLIFFORD stated that all the shares of CCAH were held by investors and were unavailable, and failed to disclose in said conversation that he and Defendant ROBERT A. ALTMAN were CCAH shareholders;

16. On or about August 9, 1988, Defendant ROBERT A. ALTMAN met with United States Senate investigators and made certain representations about the relationships between CCAH/FAB and BCCI, without making any mention of the loans he and Defendant CLARK M. CLIFFORD had received from BCCI.

17. In or about January of 1989, Defendant ROBERT A. ALTMAN met with an official of the Board of Governors of the Federal Reserve System and made representations that the relationship between CCAH/FAB and BCCI was no different in nature than it had been at the time of the original acquisition of FGB in 1982;

18. On or about December 13, 1989, Defendant ROBERT A. ALTMAN spoke with an attorney from Clifford & Warnke regarding an inquiry from a Board of Governors of the Federal Reserve System official requesting "information on any loans extended to the original or

subsequent investors, either directly or indirectly, by BCCI or any of its affiliated organizations";

19. On or about January 9, 1990, Defendant ROBERT A. ALTMAN had a conversation with a Board of Governors of the Federal Reserve System official about CCAH shareholder borrowings from BCCI, without making any mention that he and Defendant CLARK M. CLIFFORD had obtained BCCI loans to finance their own CCAH share purchases;

20. On or about January 9, 1990, Defendant ROBERT A. ALTMAN caused to be a drafted a letter addressed to Defendant ROBERT A. ALTMAN from Swaleh Naqvi regarding BCCI loans to CCAH shareholders, a letter which makes no mention of the BCCI loans to Defendant ROBERT A. ALTMAN and Defendant CLARK M. CLIFFORD;

21. On or about January 17, 1990, Defendant ROBERT A. ALTMAN caused to be sent to a BCCI official a draft letter addressed to Defendant ROBERT A. ALTMAN from Swaleh Naqvi regarding the December 13, 1989 inquiry from the Board of Governors of the Federal Reserve System;

22. On or about February 5, 1990, Defendant ROBERT A. ALTMAN sent a letter to the Board of Governors of the Federal Reserve System in response to the December 13, 1989 inquiry stating that "we do not have access here to information regarding any financial arrangements that might exist between a shareholder of Credit and Commerce American Holdings, N.V. and other financial institutions, including the Bank of Credit and Commerce International, S.A. ("BCCI")", and enclosing a letter from Swaleh Naqvi to Defendant ROBERT A. ALTMAN;

23. On or about May 8, 1990, Defendant ROBERT A. ALTMAN and others met with officials of the Board of Governors of the Federal Reserve System and Defendant ROBERT A. ALTMAN stated that he "had no concrete information" about BCCI loans to CCAH shareholders subsequent to the 1982 acquisition of FGB;

24. On or about August 14, 1990, Defendant ROBERT A. ALTMAN called a Board of Governors of the Federal Reserve System official to discuss press inquiries about the CCAH/BCCI relationship, and made no mention of the loans he and Defendant CLARK M. CLIFFORD had obtained from BCCI;

25. On or about September 19, 1990, Defendant ROBERT A. ALTMAN sent a letter and enclosure to a Board of Governors of the Federal Reserve System official describing the CCAH/BCCI relationship without making any mention of the BCCI loans to Defendant ROBERT A. ALTMAN and Defendant CLARK M. CLIFFORD;

26. On or about October 1, 1990, Defendant ROBERT A. ALTMAN sent a letter and enclosure to a Board of Governors of the Federal Reserve System official stating that "[w]e are not kept informed by our shareholders of their personal financial dealings" and making no mention of the BCCI loans to Defendant ROBERT A. ALTMAN and Defendant CLARK M. CLIFFORD;

27. On or about November 6, 1990, Defendant ROBERT A. ALTMAN sent a letter and enclosure to a Board of Governors of the Federal Reserve System official stating that "[w]e were not advised by our shareholders of their personal financial dealings -- including loans from BCCI or any other bank -- and could not respond to this

inquiry [about any borrowings by First American shareholders from BCCI]";

28. On or about December 17, 1990, Defendant ROBERT A. ALTMAN sent a letter to a Board of Governors of the Federal Reserve System official stating that he "did not have access to information regarding financial arrangements that might exist between the [CCAH] shareholders and BCCI," but that he had recently learned that a CCAH shareholder may have pledged his CCAH stock as collateral for large BCCI loans;

29. In or about 1988 or 1989, Defendant ROBERT A. ALTMAN made a statement to an officer of First American Bank of Georgia to the effect that all the shares of CCAH were held by investors from the Middle East;

30. In or about February 1991, Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN, at a meeting with First American Bankshares, Inc. officers, made numerous statements concerning the relationship between BCCI and CCAH, and failed to disclose that Defendants CLARK M. CLIFFORD and ROBERT A. ALTMAN were shareholders of CCAH and had been borrowers from BCCI.

31. On or about June 3, 1991, Defendant ROBERT A. ALTMAN, in a deposition before the Board of Governors of the Federal Reserve System, made statements to the effect that he was not involved and did not recall being involved in the decision to place $45 million in BCCI (Overseas) in Grand Cayman.

(In violation of Title 18 United States Code, Section 371)

COUNT TWO

On or about February 5, 1990, in the District of Columbia, Defendant ROBERT A. ALTMAN, in a matter within the jurisdiction of an agency of the United States, to wit, the Board of Governors of the Federal Reserve System, knowingly and willfully concealed and covered up by a trick and device a material fact, to wit, the fact that he and Defendant CLARK M. CLIFFORD had a financial arrangement with a financial institution, BCCI, said trick and device consisting of Defendant ROBERT A. ALTMAN's letter dated February 5, 1990, addressed to William A. Ryback, in which Defendant ROBERT A. ALTMAN stated, "We do not have access here to information regarding any financial arrangement that might exist between a shareholder of Credit and Commerce American Holdings, N.V. and other financial institutions, including the Bank of Credit and Commerce International, S.A. ("BCCI")," when, in truth and in fact, as Defendant ROBERT A. ALTMAN did then well know, Defendant ROBERT A. ALTMAN, in his personal and representative capacity, did have access to information regarding share repurchase agreements between Defendant ROBERT A. ALTMAN and BCCI, and between Defendant CLARK M. CLIFFORD and BCCI.

(In violation of Title 18, United States Code, Section 1001)

COUNT THREE

On or about June 3, 1991, in the District of Columbia, Defendant ROBERT A. ALTMAN, in a matter within the jurisdiction of an agency of the United States, to wit, the Board of Governors of the Federal Reserve System, knowingly and willfully concealed and

covered up by a trick and device a material fact, to wit, the fact that Defendant ROBERT A. ALTMAN was directly involved with and made the decision to invest $45 million in Bank of Credit and Commerce International (Overseas) Limited. Said trick and device consisted of Defendant ROBERT A. ALTMAN's making intentionally misleading and deceptive responses, as set forth below, to a Board of Governors of the Federal Reserve System official in a deposition, thereby concealing and covering up said material fact.

Questions("Q") and Defendant's Answers("A")

Q. Do you know who made the decision to invest $45 million in BCCI International Overseas?

A. Well, it's clear from the records that Mr. Scoffone was involved. As to who and how that decision was reached, I don't recall. I may have been consulted; I may not have been.

* * *

A. BCCI was not a bank that was unknown to First American in 1986. I do not know what we thought of its creditworthiness then, but, obviously, we thought it was a prudent act to place $45 million with that institution.

I might say our judgment was confirmed because we didn't lose a penny.

Q. Do you know how you derived your knowledge of BCCI Overseas back in 1986?

A. Yes. I had been representing, personally had been involved with, that bank since 1978.

Q. Representing as attorney?

A. Yes.

Q. And the information that you derived as attorney, you shared with the people who were making the investment decisions for First American Bankshares?

A. I've already said to you that I don't remember how this decision was made, whether I was even involved in this decision. I may have been consulted; I may not have been.

But I'm quite confident that BCCI was not unknown to Mr. Scoffone and others at First American Bankshares or, for that matter, to Mr. Afridi or Mr. Richter or other people who dealt with that organization. It was well-known to us.

Q. With respect to the $45 million transfer that was made to BCCI on December 23rd of 1986 by First American Bankshares, Mr. Richter wouldn't have been involved in that, would he?

A. Well, it is -- you're asking -- having told you that I don't remember who was involved in making the decision, it's hard for me to include or exclude people.

It is very possible that Mr. Scoffone talked to Mr. Afridi. Maybe we could look at his records or something.

And maybe Mr. Afridi made this recommendation. Maybe -- but this is all speculation. I don't remember.

(In violation of Title 18, United States Code, Section 1001)

A TRUE BILL:

FOREPERSON

J.B. Stephens

ATTORNEY OF THE UNITED STATES IN
AND FOR THE DISTRICT OF COLUMBIA

DATE: July 29, 1992

LIST OF INDICTMENT RETURN
GRAND JURY SWORN IN ON JANUARY 16, 1991
GRAND JURY 91-1

DOJ NUM	CCR NO.	PDID NO.	U.S. MAG. NO.	CRIMINAL CASE NO.	NAME AND ADDRESS OF DEFENDANT/DOB	VIOLATION & CODE SECTION	DATE OF ARREST	JUDGE ASSIGNED
			Grand Jury Original		Clark McAdams Clifford 9421 Rockville Pike Bethesda, Maryland DOB - 12/25/06 Robert Alan Altman 9200 Harrington Drive Potomac, Maryland DOB - 02/23/47 Defense Counsel: Robert S. Bennett, Esquire Carl S. Rauh, Esquire Skadden, Arps, Slate, Meagher & Flom 1440 New York Avenue, N.W. Washington, D.C. 20005-2107 (202) 371-7000 Robert Fiske, Esquire Davis, Polk, and Wardell 450 Lexington Avenue New York, New York 10017 (212) 530-4090 AUSA Mark H. Dubester AUSA Larry R. Parkinson AUSA Anthony L. Leffert 1400 New York Avenue, N.W. Fourth Floor Washington, D.C. 20005 (202) 514-1410/1406/1757	18 U.S.C. § 371 (Conspiracy); and 18 U.S.C. § 1001 (Concealing Material Facts by Trick and Device).		

1325015-000-6486

CLERK'S OFFICE
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CO-931
New 3/78

NOTICE OF DESIGNATION OF PENDING* RELATED CRIMINAL CASE PURSUANT TO RULE 3-4, UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Criminal Number: _____
(To be supplied by the Clerk)

NOTICE TO PROSECUTOR:

Pursuant to Rule 3-4(b)(1) of this Court's Rules, you should prepare this form and submit it to the Clerk's Office along with the indictments in any related cases. One copy is needed for the Clerk's records, one for the Judge to whom the case is assigned and one additional copy for each defendant. Therefore, in a one defendant case you should submit 3 copies, for a two defendant case you should submit 4 copies, etc. The Clerk will mail copies of this form to all defense counsel along with the arraignment notice.

NOTICE TO DEFENDANT:

Rule 3-4(b)(1) of this Court's Rules requires that any objection by the defendant to the related case designation shall be served on the U. S. Attorney and filed with the Clerk within 10 days after arraignment.

NOTICE TO ALL COUNSEL:

Rule 3-4 (c) requires, in part, that as soon as an attorney for a party becomes aware of the existence of a related case or cases, such attorney shall immediately notify in writing, the Judges on whose calendars the cases appear and shall serve such notice on counsel for all other parties.

The prosecutor will please complete the following:

1. Name of defendant: United States v. BCCI Holding
2. Number of related case: 91-655
3. Name of Judge assigned to related case: Joyce Hens Green
4. Name of United States Court in which the related case is pending (if other than this Court): _____
5. Relationship of new case to related case:

[Check appropriate box(es).]

- ☐ (a) New case is a superseding indictment.
- ☐ (b) More than one indictment is filed or pending against defendant.
- ☒ (c) Prosecution against different defendant(s) arises from:
  - ☐ a common wiretap
  - ☐ a common search warrant
  - ☒ activities which are a part of the same alleged criminal event or transaction

* A case is considered pending until a defendant has been sentenced. [Rule 3-4(a)(1)]

FPI-SST-3-22-79-1M-0660

1325015-000-6487

Memorandum

To : SAC, WMFO

Date 7/7/92

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTEREST

Reference Lead Number 32, BCCI Jamaica/ International Monetary Fund (IMF)/United States Treasury.

On June 26, 1992, writer conducted a review of captioned lead and contacted [redacted], IMF, Security Department, 623-6742 and [redacted] IMF, Legal Department, 623-7714. Because of the nature of the International Monetary Fund, writer was concerned that the United States (U.S.) may not be able to exercise jurisdiction over the fund for purposes of presenting them as a victim in a criminal fraud case. Additionally Not only, the IMF is immune from U.S. jurisdiction and cannot be compelled to comply with Federal subpoenas. The IMF may however, choose to come under the jurisdiction of the U.S. when it deems it is in its best interests. Specifically, the IMF has gone into U.S. courts for some crimes such as those committed on the premises of the IMF.

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In a June 25, 1992, Memorandum from Trial Attorney, [redacted] to [redacted] Principal Deputy Chief Criminal Division, Fraud Section, [redacted] indicated that each of the DOJ Attorneys who had worked on this matter had recommended declination of further investigation, because of these jurisdictional problems. On June 26, 1992, writer met with DOJ Trial Attorneys, [redacted] to discuss the legal issues surrounding this lead. All were in agreement that pursuing the case against the BCCI with IMF as the victim would be tenuous at best. The DOJ Attorneys did propose attempting to create jurisdiction over this fraud by showing a connection between U.S. Treasury Department and IMF to the point that the U.S. Treasury could be presented as the victim of the fraud. [redacted] has possession of the relevant records in this matter and, in response to a question from writer, indicated that he was unaware of any records showing a connection between Treasury and the IMF pertaining to this fraud.

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29B-WF-171994 -409

Main

2 - WMFO

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FBI — W...

1325015-000-6488

At the conclusion of the meeting, it was agreed that writer would contact U.S. Treasury and the IMF regarding communications that are had between the two agencies regarding IMF audits and dispersion of funds. Specifically, it will be determined if communications exist which U.S. Treasury may have relied upon in funding the IMF. It was also agreed, that DOJ Attorney, [redacted] would conduct legal research to help resolve the jurisdictional issues, and whether; as a last resort the U.S. Treasury could be used as a potential victim. b6 b7C

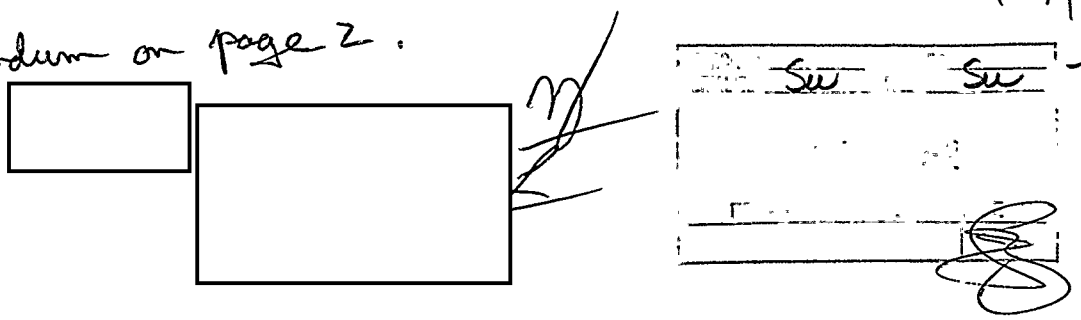
1325015-000-6489

(K)

. This is a revision

w/ addendum on page 2.

29B-171994 - Main



-410

b6
b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 6/17/92

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Set forth below are estimated International travel needs in the near future:

1. Cayman Islands ----> 6/21 thru 6/25/92
SA's [redacted] b6 b7C

The above SA's will travel with DOJ Trial Attorney (TA) [redacted] and DOJ Attorneys from the Asset Forfeiture Section. Five interviews have been scheduled. Interviewees include former BCCI/ICIC officials and an Auditor from Price Waterhouse.

2. Ottawa, Canada ----> 6/21 thru 6/25/92
SA [redacted] b6 b7C

The above SA will travel to Canada to interview [redacted] former [redacted] This interview concerns asset forfeiture matters.

3. [redacted] ----> 6/26 thru 6/30 b6 b7C b7D
SA's [redacted] (Los Angeles) and SA [redacted] or SSA [redacted]

The above SA's will travel with DOJ TA [redacted]

[redacted]

4. Amsterdam ----> 6/27 thru 7/2/92
SA [redacted] b6 b7C

The above SA will travel with TA [redacted] to Amsterdam for the interviews of six officials of Etrusco. Etrusco was the transfer agent for CCAH. A major issue in the investigation has been the non-recording of the pledge of CCAH stock on CCAH's stock register. Such was maintained by Etrusco in the Netherlands.

5. London ----> 7/2 thru 7/12/92
Inspector in Charge (IC) [redacted] b6 b7C
SSA's [redacted]
SA's [redacted]

The above SA's will travel with TA [redacted] As many as 21 interviews will be scheduled. Such will include the interview of a nominee, Directors and officials of BCCI. In addition, a review of the index of records at BCCI will be conducted to narrow the focus of the records review in London.

6. London ----> No set date at this time.
Agent/Support personnel will be needed.
Numbers will be contingent on resource availability and the scope of the records review.

7. Paris ----> No set date at this time.
IC [redacted] SSA [redacted] SA [redacted] b6 b7C

The above SA's will travel to Paris to conduct a series of interviews, [redacted] b7D and retrieve records concerning GHAITH PHARAON.

Addendum: (6/26/92)

It is anticipated that records will become available for revew in Abu Dhabi. Such include the most critical BCCI records that were shipped from various locations worldwide to Abu Dhabi. This travel could take place in 8/92 and involve as many as 5 SA's.

8 FA's will be assigned to BCCI on a TDY basis. Said FA's will participate in records reviews at WMFO and worldwide.

1325015-000-6492

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 8/4/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

RE: LEAD #31; REGULATOR/AUDITOR INTERVIEWS.

During the period of July 7-16, 1992, writer conducted interviews of Auditors and Regulators in London associated with BCCI matters. To facilitate these interviews, writer met with the solicitors for those who were represented. These included [redacted] of Herbert Smith (011-44-71-374-8000) and [redacted] of Linklaters and Paine (011-44-71-606-7080). Both agreed to be equally accommodating during any possible future interviews and asked that they again be provided advance notice of the interviews. b6 b7C

One of the auditors not interviewed and represented by [redacted] is [redacted] reported that [redacted] is on extended assignment (indefinitely-2 years) in Hong Kong. Additionally, contact was never made with [redacted] although an order was obtained for him. [redacted] of Linklaters and Paine advised that he had contacted [redacted] through [redacted], that he was advised [redacted]s lawyers would contact him, and that he did not hear from them and knows not who these lawyers are. [redacted] Writer contacted the firm, which would not confirm this but agreed to have someone call and did not. b6 b7C b7D

Concerning additional potential auditor interviews, [redacted] confirmed that the following were associated with Price Waterhouse: [redacted] also said that [redacted] is associated with Ernst and Young. b6 b7C

Arrangements for interview of the auditors remaining in London and [redacted] in Hong Kong will be left to the discretion of the supervisor. b6 b7C

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 4 1992
FBI — WASH. FIELD OFFICE

DEV/dev

2-WMFO

62-25015-000-6494

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 7/22/92

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 7/22/92, the writer was contacted by DOJ, Fraud Section, Trial Attorney (TA), [redacted] TA [redacted] b6 b7C advised that he heard about a newspaper article concerning [redacted] According to said article, [redacted] He was not comfortable with the arrangement and backed out of the picture. The writer and TA [redacted] discussed the value in attempting to interview [redacted] The writer advised that he would attempt to locate [redacted] determine what approvals would be needed to contact [redacted] and initiate contact.

On the above date, the writer contacted SA [redacted] b6 b7C Louisville Division. SA [redacted] checked the newspapers and found an article about [redacted] SA [redacted] advised that [redacted] was in [redacted] SA [redacted] stated that he would contact SA [redacted] Lexington R.A. and determine the whereabouts of [redacted]

Subsequently, on that same date, SA [redacted] contacted the b6 b7C writer and advised that [redacted] returned to Dubai earlier on this date. The writer contacted TA [redacted] and advised him of the above facts.

29B-WF-171994-412

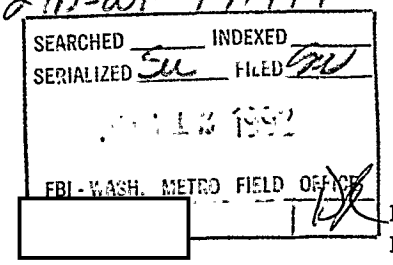
ATTACHED [redacted]

FILED [redacted]

62-325015-000-6495

Main 413

29B-WF-171994



b6
b7C

FD-1 (Rev. 4-26-78)

REPORT of the FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, WMFO (29B-WF-171994) (P) (C-5) August 10, 1992

FBI FILE NO. 29B-WF-171994

LAB NO. 20306026 D ZC

Re: HIDDEN INTERESTS
MAJOR CASE 38
OO: WMFO

YOUR NO.

Examination requested by: Addressee

Reference: Communication dated March 5, 1992

Examination requested: Magnetic Media

March 6, 1992

Specimens:

Q2 ALR computer system, S/N 0245462 and keyboard S/N 05251161 labelled "Room M"

Q3 80 Data computer system (no serial number) and 2001 keyboard labelled "Room G"

Q4 Intel computer system, S/N P70096330 and CSR keyboard labelled "Room J"

Q5 ALR computer system S/N 0230354 and keyboard S/N 00891191 labelled "Room L"

Q6 NEC computer system S/N 6700470 and IBM keyboard number 261013704 labelled "Room E"

Q6a One 5 1/4" floppy disk found in Q6

Q7 IBM PS2 model 30 computer system and IBM keyboard S/N 2014793 labelled "Room F"

Q8 IBM AT computer system, bar code # 5178-7253163 and keyboard S/N 6106755 labelled "Room O"

(over)

2- Atlanta

FBI/DOJ
1325015-000-6497

Results of Examination:

The Q2 through Q8 hard disk drives and Q6a floppy disk were analyzed using the computer resources currently available to the FBI Laboratory.

The following is the drive configuration of the submitted items: Q3, Q6, Q7 and Q8 are partitioned for logical drive C:\, Q2, Q5 and Q8 are configured for logical drives C:\ and D:\.

The operating system used on Q2, Q3, Q5 through Q8 is either MS/DOS or PC/DOS.

Directory listings have been produced for Q2, Q3, and Q5 through Q8.

A directory listing could not be produced for Q6a. This disk is probably a blank unformatted floppy disk.

The hidden files located on Q2, Q3, and Q5 through Q8 are either system, program or batch files. No hidden data files were located.

Hardcopy printouts of the deleted files contained on Q2, Q7 and Q8 have been produced. The remaining deleted files are either not recoverable, empty program files or contain no relevant text data.

Hardcopy printouts have been produced of the data files contained on Q2, Q3, and Q5 through Q8.

No duplicate diskcopies or hardcopy printouts have been retained by the FBI Laboratory.

You will be advised separately of the results of the examination of the Q4 computer system.

The Q5 computer system is being retained to assist in the examination of the Q4 computer system.

The Q2, Q3, Q6, Q7 and Q8 computer systems, Q6a floppy disk, and hardcopy printouts were personally picked up by Special Agent [redacted] on May 20, 1992. b6 b7C

1325015-000-6498

Routing Slip
0-7 (Rev. 10-9-84)

(Copies to Office Checked)

TO: SAC,

- ☐ Albany
- ☐ Albuquerque
- ☐ Alexandria
- ☐ Anchorage
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Boston
- ☐ Buffalo
- ☐ Butte
- ☐ Charlotte
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Columbia
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Honolulu
- ☐ Houston
- ☐ Indianapolis
- ☐ Jackson
- ☐ Jacksonville
- ☐ Kansas City
- ☐ Knoxville
- ☐ Las Vegas
- ☐ Little Rock
- ☐ Los Angeles
- ☐ Louisville
- ☐ Memphis
- ☐ Miami
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Mobile
- ☐ Newark
- ☐ New Haven
- ☐ New Orleans
- ☐ New York City
- ☐ Norfolk
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Philadelphia
- ☐ Phoenix
- ☐ Pittsburgh
- ☐ Portland
- ☐ Richmond
- ☐ Sacramento
- ☐ St. Louis
- ☐ Salt Lake City
- ☐ San Antonio
- ☐ San Diego
- ☐ San Francisco
- ☐ San Juan
- ☐ Savannah
- ☐ Seattle
- ☐ Springfield
- ☐ Tampa
- ☑ Washington Field
- ☐ Quantico
- ☐ ASAC, Brooklyn-Queens (MRA)

TO: LEGAT,

- ☐ Bern
- ☐ Bogota
- ☐ Bonn
- ☐ Canberra
- ☐ Hong Kong
- ☐ London
- ☐ Mexico City
- ☐ Montevideo
- ☐ Ottawa
- ☐ Panama City
- ☐ Paris
- ☐ Rome
- ☐ Tokyo

b6
b7C

Date

RE:

Retention For appropriate

☐ For information ☐ optional ☐ action ☐ Surep, by _____

☐ The enclosed is for your information. If used in a future report, ☐ conceal all sources, ☐ paraphrase contents.

☐ Enclosed are corrected pages from report of SA _____

dated _____ .

Remarks:

Main - 414

29B-WF-171994

AUG 12

Enc.
Bufile
Urfile

b6
b7C

FBI/DOJ

1325015-000-6499

Memorandum

To : LABORATORY DIVISION
ATTN: LANGUAGE SERVICES UNIT

Date 8/12/92

From : SAC, WMFO

Subject: HIDDEN INTEREST
MAJOR CASE #38
OO:WMFO

Attached hereto are copies of various documentation written in foreign languages that relate to a current investigation into the BCCI scandal that need to be translated for investigative purposes. A breakdown of the documents to be translated is as follows:

Language	Number pages to be translated
Spanish	2
French	36
Arabic	61

Of the total 61 Arabic written pages, approximately half of those are illegible. To the extent that the pages are legible translation will be required.

Each separate document comes attached to a Document Coding Form that identifies the document and will need no translation. Please ensure these coding forms remain attached to their respective documents.

Since these documents may have an impact on an upcoming trial in October, it is requested these documents be translated as soon as possible and provided to WMFO no later than September 10, 1992.

Any questions should be directed to SSA [redacted] telephone number (202) 324-9332. b6 b7C

4/14/X1

29B-WF-171994 Main

2-Bureau (enc.)
2-WMFO (enc.)
(1-29B-WF-171994) no encl.
(1-Administrative)

ABL:dml
(4)

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
FBI - WASH. METRO FIELD OFFICE

1325015-000-6500

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/7/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE NUMBER 38;
FIF;
FAG;
(OO: WMFO)

Reference Lead Number 47 assigned to SA [redacted] b6 b7C
[redacted] on June 11, 1992.

Referenced lead was to determine if documents furnished by Miami containing [redacted]s testimony had been declassified by the United States Senate. Contact with [redacted] a staff employee of Senator JOHN KERREY, United States Senate, disclosed that such testimony has been declassified and was published to the public in 1988. As such, writer will conduct no further investigation into this matter, and will advise Miami of same. b6 b7C

2-WMFO
DBS:vls
(2) vls

29B-WF-171994 - 415

main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 13 1992
FBI — WASH. FIELD OFFICE

1*

1325015-000-6501

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 8/5/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO:WMFO

On August 14, 1992, [redacted] Attorney [redacted] contacted the writer concerning his client [redacted] DOB [redacted] SSN [redacted] advised that he is [redacted] b6 b7C

[redacted] stated [redacted] had indicated that he possess information concerning [redacted] b6 b7C b7D

also claims to have information on [redacted]

[redacted] b6 b7C b7D

[redacted] advised he would send some information to the writer. The writer stated he would look at the information and talk it over with his supervisor to see if any of it is viable information, the writer would then recontact [redacted]

The writer contacted SA [redacted] the case agent to [redacted]. [redacted] gave a brief history of [redacted] and the fact that [redacted] has [redacted] Since [redacted] b6 b7C

29B-WF-171994 Main - 4/6

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 1 ? 1992
FBI — WASH. FIELD OFFICE

1 - 29B-WF-171994
RHM:rhm
RHM

139D15-000-6502

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 8/10/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO:WMFO

RE: LEAD #33, FUGITIVE MATTERS

Referenced lead has been assigned to writer since 6/09/92. To date, writer has conducted a review of the available information regarding the fugitives and made attempts to arrange the apprehension of GHAITH PHARAON. Per discussion with SSA [redacted] and IIC [redacted] this lead will be re-assigned to SA [redacted] Writer will brief SA [redacted] and provide materials regarding this lead to him. b6 b7C

DEV/dcv

29B-WF-171994 Main -417

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

AUG 13 1992

FBI — WASH. FIELD OFFICE

[redacted] WMS b6 b7C

1325015-000-6503

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 8/10/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO:WMFO

RE: LEAD #36, [redacted] CASE AND [redacted] b6 b7C

Referenced lead has been assigned to writer since 6/10/92. To date, writer has conducted a review of the available information regarding [redacted] Per discussion with SSA [redacted] this lead will be re-assigned to SA [redacted] b6 b7C Writer will brief SA [redacted] and provide materials regarding this lead to him.

DER/der

29B-WF-171994 Main - 418

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 13 1992
FBI - WASH FIELD OFFICE
[redacted] WMS

b6 b7C

Memorandum

To : SAC, WMFO (261A-WF-165601) Date 8/10/92

From : SA [redacted] b6 b7C
WMFO SECURITY OFFICE

Subject: MAJOR CASE 38 DESIGNATED FOREIGN TRAVEL BRIEFERS

Reference telephone call between SA [redacted] and SA [redacted] b6 b7C on 8/10/92.

The purpose of this memo is to designate SA's [redacted] b6 b7C as Foreign Travel Security Briefers for Major Case 38. Major Case 38 has a considerable amount of foreign travel and as such needs their own designated Foreign Travel Security Briefers.

SA [redacted] advised the writer that both he and SA [redacted] b6 b7C have Foreign CounterIntelligence experience. The writer then briefed SA [redacted] on how to conduct Foreign Travel Briefings, to include the proper completion of FD-772 (Report of Official/Unofficial Foreign Travel) and the need to send a copy to the Security Office control file (261A-WF-165601).

SA's [redacted] are hereby designated b6 b7C Foreign Travel briefers for Major Case 38.

Any questions concerning this matter can be resolved by contacting the writer at X7766.

4-WMFO
(1-261A-WF-165601)
(1-SSA [redacted] b6 b7C
(1-SA [redacted]
(1-SA [redacted]
BRT:brt
(4)

418X1

29B-171994 MAIN

1325015-000-6505

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/18/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST;
MC #38;
FIF; FAG;
OO:WMFO

RE: LEAD #33, FUGITIVE MATTERS

Writer has been assigned lead #33, Fugitive Matters, and in preparation for said lead spent 8-12-92 and 8-17-92 at Tyson's Corner reviewing the files of case 29B-WF-171994.

The purpose of this review was to note serials in the main file and sub files that should also be placed in the newly opened sub fug files of which there are four. These files should facilitate any future investigation concerning the subjects. These serials pertain not only to information regarding the fugitive status of each subject, but also information leading up to and inclusive of the indictments of the subjects.

Writer requests that IMC [redacted] be tasked with putting these files together as IMC [redacted] is familiar with the BCCI case and has already assisted writer during his review of the BCCI files. Writer also requests that this task be done as soon as possible, because as previously stated, it would facilitate the investigation of the fugitives. b6 b7C

Attached is a list of serials which should be included in each respective sub fug file.

5-WMFO
(1 - 29B-WF-171994)
(1 - Sub Fug 1)
(1 - Sub Fug 2)
(1 - Sub Fug 3)
(1 - Sub Fug 4)
1 - SSA [redacted] b6 b7C
NMS:nms
NMS (6)

29B-WF-171994 Main -419

SEARCHED SW INDEXED
SERIALIZED SW FILED SW

AUG 18 1992

FBI — WASH. FIELD OFFICE

1325015-000-6506

Sub Fug 1 - AGHA HASAN ABEDI

Main File - Serial # 107, 184, 209, 216, 222, 233X1, 266, 273, 277, 278, 284, 289, 292, & 298.

Sub A - Serial # 33, 35, 38, 48, 61, 157, & 182.

Sub D - Serial # 10, 14, 18, 19, 26, 29, 30, 34, 35, 37X4, 37X6, 39, 46, 46X1, 53, 58X1, 67, 68X1, 69, 73, 74X1, 103, 115, 116X1, 116X2, 125, 132X1, & 154.

Sub I - Serial # 24.

Sub N - Serial # 4.

Sub R - Serial # 81, 129, & 219.

Sub S - Serial # 47, 61, & 64.

Sub Fug 2 - [redacted] b6 b7C

Main File - Serial # 107, 184, 207, 209, 216, 233X1, 267, 273, 276, 279, 285, 287, 290, & 348.

Sub A - Serial # 33, 35, 38, 48, 61, 72, 149, 157, & 182.

Sub D - Serial # 8, 18, 19, 26, 30, 34, 35, 37X4, 37X6, 39, 46, 58X1, 67, 68X1, 73, 74, 97, 103, 115, 116X1, 125, 128X2, 131X2, 132, 132X1, & 154.

Sub I - Serial # 20 & 24.

Sub N - Serial # 4 & 9.

Sub R - Serial # 81, 95, & 185.

Sub S - Serial # 48, 63, & 66.

Sub Fug 3 - GHAITH PHARAON

Main File - Serial # 52, 53, 56, 57, 70, 105, 107, 114, 155, 181, 184, 209, 216, 222, 233X1, 268, 273, 275, 282, 283, 291 299, & 300.

Sub A - Serial # 19, 35, 38, 48, 49, 61, 74, 77, 78, 81, 89, 104, 106, 126, 152, 155, 157, 161, 180, 182, & 183.

Sub D - Serial # 9, 22, 23, 26, 29, 30, 31X1, 37X6, 39, 46, 50, 51X1, 57, 60, 67, 68, 68X1, 73, 74X1, 85, 86, 92, 94, 95, 96, 97, 103, 105, 106, 109, 109X1, 110, 116X1, 116X2, 118, 119, 128X2, 130, 131X2, 131X3, 132, 132X1, 141X1, 152X1, 207, & 208.

Sub G - Serial # 1X1, 3, 4, 20, 22, 26, 29, & 33.

Sub I - Serial # 1, 3, 5, 9, 20, 23, 24, 25, 26, 27, 28, 28X1, 28X2, 30X1, 30X2, 30X3, 31, 32, 34, 41, 42, 46, 52, & 54.

Sub J - Serial # 39.

Sub L - Serial # 7.

Sub N - Serial # 4.

Sub R - Serial # 125, 138, 139, 192, 194, 219, 242, & 247.

Sub S - Serial # 8, 49, 62, & 65.

Sub Fug 4 - [redacted] b6 b7C

Main File - Serial # 209, 216, 233X1, & 341.

Sub A - Serial # 33, 35, 38, 145, & 157.

Sub D - Serial # 29, 35, 37X4, 39, 58X1, 115, & 180.

Sub N - Serial # 4 & 9.

Sub R - Serial # 62 & 81.

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 8/20/92

To: [redacted] Chief, Fraud Section, DOJ b6 b7C
(Name and Address of USA)

From: SAC ROBERT M. BRYANT
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by [redacted] PDC, Fraud Section, DOJ b6 b7C
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] on 8/19/92
(Name) (Date)

(Check One)

- ☐ Request further investigation
- ☐ Immediate declination
- ☐ Filing of complaint
- ☐ Presentation to Federal Grand Jury
- ☐ Filing of information
- X ☐ Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: In reference to the requests for additional information, made by PDC [redacted] during a meeting with Inspector [redacted] and SSAs [redacted] the following items are herewith submitted: b6 b7C

(1) Regarding transmittal of FD-302s and other reports of investigation to Paralegal [redacted] copies of relevant "FBI Case Status Form(s)" (CSF), dated 11/6/91; 3/19/92; 5/27/92; and 7/14/92. b6 b7C

(2) Regarding transmittal of other material PDC [redacted] and/or AUSA [redacted] copies of FBI CSFs dated 1/15/92; 2/28/92; and 7/28/92. b6 b7C

29B-WF-171994 - 420

(3) A "BCCI - Interview Report," dated 7/20/92.

Searched Main
Serialized Sec 1325015-000-6509
Indexed
Filed Sec

(4) Regarding the review of records from:
(a) CLIFFORD & [redacted] BCCI and CCAH, done at DOJ: a memorandum by SA [redacted] dated 5/14/92. b6 b7C
(b) BCCI/Miami and [redacted] two memoranda, one (with attachment) by SA [redacted], dated 6/18/92, the other by FA [redacted] dated 7/6/92.
(c) BCCI/NY: three memoranda, two by SSA [redacted], dated 2/5/92 and 3/4/92, and one by SA [redacted], dated 7/14/92.
(d) [redacted] a memorandum by SSA [redacted] dated 1/16/92.
(e) INTERREDEC, resulting from the Savannah search: a memorandum by SA [redacted] dated 7/14/92.
(f) the NEW YORK COUNTY GRAND JURY: an FD-302 by SSA [redacted], dated 7/19-22/92.

(5) Regarding the receipt of records which were passed on to DOJ:
(a) from [redacted]s grand jury: an FD-302 by (NY) SA [redacted] b6 b7C
[redacted] and (NY) FA [redacted]
(b) from the [redacted] copies of two lists of items resulting b7D
from requests by DOJ TA [redacted]

(6) Regarding investigation to locate and recover BCCI records subpoenaed in a Western District of Washington "export diversion matter," in which the subjects/defendants were [redacted] b6 b7C
[redacted] a communication (with attachments) from FBI Seattle to the Director, FBI, dated 12/19/91.

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/19/92

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTEREST;
MC #38;
FIF; FAG;
OO: WMFO

Re attached memorandum dated 8/18/92.

Request that AOSM [redacted] assign task as described in attached memo to clerical personnel. It is also requested that assigned task be completed as soon as possible. b6 b7C

2-WMFO
(①) - 29B-WF-171994)
1 - AOSM [redacted] b6 b7C
JNR:nms
(2)

29B-WF-171994 - #22

Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 21 1992
FBI — WASHINGTON FIELD OFFICE

1325015-000-6514

Memorandum

To : SAC, WMFO (66-2516) Date 8/20/92
ATTN: AO [redacted] b6 b7C

From : IIC [redacted]

Subject: HIDDEN INTERESTS
MAJOR CASE #38
FIF; FAG
OO:WMFO

RE: Establishment of Evidence Control Room.

Major Case #38 is a massive investigation of the failure of the Bank of Credit and Commerce International (BCCI) and its related subsidiaries. This investigation involves multiple subjects in various states and foreign countries.

As with any financial institution failure and in particular with a bank the size of BCCI, a vast amount of both evidentiary and non-evidentiary documentation exists, which support the prosecution and investigation. Because the two squads (20 SAs and 9 Financial Analysts) conducting this investigation are located at an off-site (500 1St Street, N.W., Suite 400). A room has been set aside to become an Evidence Control Room (ECR) at that location. An on-site inspection of this proposed ECR was conducted recently by AO [redacted] and WMFO's Evidence Control Technician (ECT) [redacted] Their inspection found that the room was suitable to serve as an ECR provided certain modifications and additions were made which are required by existing FBI regulations. b6 b7C

These modifications/additions to the proposed ECR are:

1) The room presently has 2 doors. One of these doors must be permanently sealed so that there is only one entrance to the room and an entry/exit log (FD-415) can be placed there.

3-WMFO
(66-2516)
(1-29B-WF-171994)
(1-AO [redacted] b6 b7C

LMT:dml
(3)

29B-WF-171994-423

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
AUG 25 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6515

2) The lock on the remaining door must be changed to a combination 3-position dial type changeable lock or similar lock as set forth in the regulations.

3) An intrusion detection system must be installed.

These requirements are set forth in the Bureau airtel to all SAC's dated April 5, 1992 setting forth new requirements for handling seized, subpoenaed, and voluntarily contributed property.

During the aforementioned inspection of the off-site space it was determined that a support person must be designated as an ECT for this room. That person must be trained in evidence handling procedures and will be responsible for access to the ECR, Bar Coding of all items entering the ECR and general responsibilities associated with ECR. At this time it is estimated that these duties will occupy 50% of the employee's time.

At this time there is only one support employee assigned to the BCCI Special, a secretary. AO [redacted] has posted a second secretarial position as of August 18, 1992. A request has been made to AO [redacted] for a general clerical position. This individual would handle the evidence functions as well as numerous other duties. b6 b7C

Presently this major case is anticipating a significant amount of evidence and non-evidentiary documentation to be taken into custody. Therefore it is imperative that the ECR be established and a trained ECT be in place as soon as possible.

1325015-000-6516

[redacted] C-5 DATE: 7/26/92

NCIC VALIDATIONS
WANTED PERSONS

[redacted] is currently entered in the NCIC system. The WMFO file number is 29B-171994 and the date of warrant is 11/18/91. The NCIC number is [redacted].

b6
b7C

NOTE: PLEASE READ THE FOLLOWING CAREFULLY! THIS FORM IS NOT TO BE USED FOR CHANGING ANY INFORMATION OR TO BE USED AS A CANCEL CLEAR FORM.

1. THIS FORM HAS BEEN REVIEWED BY THE CASE AGENT.
2. THE RECORD CONTAINS ALL AVAILABLE INFORMATION.
3. THE INFORMATION ATTACHED HAS BEEN REVIEWED.
4. ANY NCIC ACTIVITY, TO INCLUDE VALIDATING, HAS BEEN REFLECTED ON THE NCIC ACTIVITY LOG.
5. THE NCIC ACTIVITY LOG IS MAINTAINED AS THE TOP SERIAL IN THIS FILE.

SA AND/OR SSA CERTIFIES

✓ The entry on the above is still valid and should remain in NCIC system as it appears.

____ The entry on the above is still valid, additional information has been found and an appropriate MODIFICATION/SUPPLEMENT is attached for modification in NCIC.

____ The entry on the above is no longer valid and should be removed from the NCIC system. The appropriate CANCEL/CLEAR form is attached.

RESPONSE REQUIRED SEVEN DAYS FROM ABOVE DATE
CASE AGENT PLEASE SIGN AND DATE BELOW.

b6
b7C

SA [redacted] DATE 7/29/92

SUBSEQUENT TO REVIEW BY AND COMPARISON TO NCIC VALIDATION LISTING, THESE DOCUMENTS WILL BE RETURNED TO THE APPROPRIATE ROTOR FOR INCLUSION IN THE CASE FILE.

PLS RETURN TO [redacted] WMFO COMM CTR BY C.O.B. 8/3/92. -42

b6
b7C

ANY QUESTIONS CALL AT X7808.

29B-171994 Main -

OK [redacted] 7/30/92
Rotor please file

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
SEP 3 1992
1325015-000-6524
FBI - WASH. METRO FIELD OFFICE

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 8/24/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On August 21, 1992, writer met with Associate Director LINDA CANDLER of DOJ/OIA. Also attending this meeting were [redacted] b6 b7C both of DOJ/OIA. This meeting was in regards to the future arrest and extradition of AGHA HASAN ABEDI to the United States.

For information of the reader, ABEDI was indicted by the state of New York on July 29, 1992, with conducting a criminal enterprise. [redacted] b7D

LEAD

Writer will compile an investigative summary regarding fugitive AGHA HASAN ABEDI. This summary will include all background information leading to ABEDI's indictment, copies of all documents relating to the efforts to locate and arrest ABEDI, and all future leads in the furtherance of this investigation.

Even though the majority of this information is in either the main or Sub Fug file of 29B-WF-171994, this investigative report will place all information in one comprehensive report and thus facilitate future research on the ABEDI fugitive investigation.

29B-WF-171994 - 4227
Main

(2) - WMFO
(1 - MAIN)
(1 - SUB FUG 1)
NMS/nms
(2)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP [illegible] 1992
FBI — WASH. FIELD OFFICE

1325015-000-6526

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 8/27/92

From : IIC [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Re Memorandum from SA [redacted] to SAC, WMFO dated 8/3/92. b6 b7C

For background information of reader: GHAITH PHARAON, along with AGHA HASAN ABEDI and [redacted] were indicted in the U.S. District Court in Washington, D.C., on Nov. 15, 1991. The defendants were charged with deceiving state and federal regulators in the BANK OF CREDIT AND COMMERCE INTERNATIONAL's (BCCI) secret acquisition of the INDEPENDENCE BANK, and fraudulent securities transactions involving CENTRUST SAVINGS BANK. On Nov. 18, 1991, the U.S. District Court for the District of Columbia issued an arrest warrant for PHARAON. PHARAON and others involved in this matter were also indicted by the Southern District of Florida on May 13, 1992, and by the State of New York on July 29, 1992. All these indictments were in connection with the unlawful activities of BCCI. b6 b7C

PHARAON is by birth a citizen of Saudi Arabia and is described as a W/M, 5'9", DOB - 9/7/41, 250lbs., with graying hair. PHARAON is very wealthy and has the capability to travel nearly anywhere by private transportation.

Recent information on PHARAON indicates he has been attempting to buy citizenship in Pakistan [redacted] b7D

[redacted]

Armed & Dangerous

29B-WF-171994 - 428

(2) - WMFO
(29B-WF-171994 Main)
(29B-WF-171994 Sub Fug 3)
1 - SAC BRYANT
1 - ASAC [redacted] b6 b7C
LMT:nms
(4)

Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 27 1992
FBI — WASH. FIELD OFFICE

1325015-000-6527

PHARAON is reportedly traveling in and out of Pakistan with no attempts to hide this travel. Reports also have PHARAON traveling outside the Middle East to South Korea. As PHARAON has worldwide business ventures his travel destinations are unlimited.

[redacted] b7D

It has been difficult to obtain total cooperation in this matter with many of the mideast countries. Even though the BCCI collapse caused many to lose money in the mideast, PHARAON still has many high-level connections and many loyal followers.

PHARAON does own a 150 foot yacht named "Le Pharaon", which is currently docked at Marina Smir Tetouan, Morocco. [redacted] b6 b7C b7D It is believed that PHARAON had intended to sail his yacht in August, 1992, into the Mediterranean, but did not do so. The captain for Le Pharaon is [redacted] a U.S. citizen, and attempts are being made to locate the city of residence for [redacted] will not be approached, as the belief is [redacted] will be loyal to PHARAON and will not cooperate with U.S. law enforcement officials.

It is proposed that the feasibility of using HRT to stop, board, and arrest PHARAON when Le Pharaon is in international waters be explored. Due to the number of people expected to be on board (crew and passengers) and reports that weapons are maintained on the yacht, it will be necessary to use HRT in such a maritime arrest scenario. In addition, if notification of PHARAON's plan to sail on Le Pharaon is short notice, HRT has the capabilities for quick response.

It is anticipated that IIC [redacted], SA [redacted] and SA [redacted] will meet with HRT and FBIHQ personnel as soon as possible to discuss this matter. At this meeting SAs [redacted] will provide to HRT all information obtained by the BCCI investigative squad on PHARAON and will seek to determine what other information HRT deems necessary to determine the feasibility of such an operation. b6 b7C

Armed & Dangerous

1325015-000-6528

Memorandum

To : SAC, WMFO

Date 9/2/92

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

On 9/1/92 SA [redacted] received the attached letter form [redacted]. At this point in time the contents of the letter are being reviewed for any possible merit.

b6
b7C
b7D

-429

29B-WF-171994 Main

1 - 29B-WF-171994

RHM:rhm

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 2 1992
FBI — WASH. FIELD OFFICE
[redacted]

b6
b7C

1325015-000-6529

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 8/24/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On August 21, 1991, writer met with Associate Director [redacted] of DOJ/OIA. Also attending this meeting were [redacted] both of DOJ/OIA. This meeting was in regards the future arrest and extradition of [redacted] to the United States. b6 b7C

For information of reader, [redacted] was indicted in the Southern District of Florida on May 13, 1992. The United States is now attempting to locate, arrest, and if necessary, extradite [redacted] to face these charges. b6 b7C

[redacted] b6 b7C b7D

LEAD

Writer will compile an investigative summary regarding fugitive [redacted] This summary will include all background information leading to [redacted]'s indictment, copies of all documents relating to the efforts to locate and arrest [redacted] and all future leads in the furtherance of this investigation. b6 b7C

Even though the majority of this information is in either the Main or Sub Fug file of 29B-WF-171994, this investigative report will place this information in one comprehensive report and thus facilitate future research on the [redacted] fugitive investigation. b6 b7C

29B-WF-171994-430

(2) - WMFO
(1 - MAIN)
(1 - SUB FUG 4)

NMS/nms
(2)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 4 1992
FBI — WASH. FIELD OFFICE

1325015-000-6534

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 8/24/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On August 21, 1992, writer met with Associate Director LINDA CANDLER of DOJ/OIA. Also attending this meeting were [redacted] both of DOJ/OIA. This meeting was in regards the future arrest and extradition of GHAITH PHARAON to the United States. b6 b7C

For information of the reader, GHAITH PHARAON was indicted on November 15, 1991, and is wanted by the District of Columbia to stand trial for conspiracy, fraud and racketeering charges. The United States District Court for the District of Columbia issued an arrest warrant for GHAITH R. PHARAON on November 18, 1991.

PHARAON has also been indicted in the Southern District of Florida on May 13, 1992, and in the State of New York on July 29, 1992. All these indictments are in connection with the unlawful activities of the Bank of Credit and Commerce (BCCI).

The following has been completed in an effort to insure the arrest and extradition of PHARAON to the United States:

[redacted] b7D

Interpol has issued a red notice regarding PHARAON.

29B-WF-171994 - 431

Main

(2) - WMFO
(1 - MAIN)
(1 - SUB FUG 3)

NMS/nms
(2)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 4 1992
FBI — WASH. FIELD OFFICE

1325015-000-6535

Stop notices have been placed with INS.

PHARAON has been entered into NCIC.

Legats in Europe and the Mideast have been notified of the arrest warrant and desire to extradite PHARAON to the United States.

LEAD

Writer will compile an investigative summary regarding fugitive GHAITH PHARAON. This summary will include all background information leading to PHARAON's indictment, copies of all documents relating to the efforts to locate and arrest PHARAON, and all future leads in the furtherance of this investigation.

Even though the majority of this information is in either the Main or Sub Fug file of 29B-WF-171994, this investigative report will place all information in one comprehensive report and thus facilitate future research on the PHARAON fugitive investigation.

1325015-000-6536

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 8/24/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On August 21, 1992, writer met with Associate Director LINDA CANDLER of DOJ/OIA. Also attending this meeting were [redacted] b6 b7C both of DOJ/OIA. This meeting was in regards the extradition of [redacted]

For information of reader, [redacted] was indicted in the Southern District of Florida [redacted] b6 b7C b7D

Extradition papers were filed immediately [redacted] appealed the request for extradition and the appeal was rejected. However, shortly after the United States filed extradition papers for [redacted] the United Kingdom did likewise. [redacted] again filed an appeal regarding the United Kingdom extradition request. This appeal is still pending.

All paperwork regarding [redacted]'s extradition to the United States is filed and U.S. officials are awaiting the outcome of [redacted]'s latest appeal. If and when [redacted]'s appeal is rejected, proceedings will continue to have [redacted] extradited to the United States. b6 b7C

Note - Prosecutor [redacted] of the U.S. Attorney's Office in Tampa, Florida, has been in contact with [redacted] [redacted]'s attorney, regarding a possible plea agreement. [redacted] expects an answer to this offer sometime in the fall of 1992. b6 b7C

LEAD

Writer will remain in contact with [redacted] of DOJ/OIA regarding the status of [redacted]'s appeal on the United Kingdom's extradition request and the subsequent proceedings to have [redacted] extradited to the United States. b6 b7C

Main

NMS NMS/nms
(2)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
A 1992
FBI — W[redacted]

1325015-000-6537

29B-WF-171994 - 432

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 8/25/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

On August 21, 1992, writer met with Associate Director LINDA CANDLER of DOJ/OIA. Also attending this meeting were [redacted], both of DOJ/OIA. This meeting was in regards to the arrest and extradition of [redacted] b6 b7C

For information of the reader, [redacted] was indicted by the State of New York and the District of Columbia for violations incurred during the illegal activities by BCCI. b6 b7C

[redacted] b6 b7C b7D

29B-WF-171994 - 433
Main

(2) - WMFO
(1 - MAIN)
(1 - SUB FUG 2)

NMS/nms
(2)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 4 1992
FBI — WASH. FIELD OFFICE

1325015-000-6538

LEAD

Writer will compile an investigative summary regarding fugitive [redacted] This summary will include all background information leading to [redacted]'s indictment, copies of all documents relating the efforts to locate and arrest [redacted] and all future leads in the furtherance of this investigation. b6 b7C

Even though the majority of this information is in either the Main or Sub Fug file of 29B-WF-171994, the investigative report will place this information in one comprehensive report and thus facilitate future research on the [redacted] fugitive investigation. b6 b7C

1325015-000-6539

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, WMFO (P)

SUBJECT: HIDDEN INTEREST
Major Case #38
FIF;FAG
OO:WMFO

b6
b7C

Bureau File Number: 29B-WF-171994

Field Office File Number: BCCI

Squad or RA Number:

Agent's Social Security No.:

☐ X if a joint operation with: _____ (identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 7/30/92

b7E

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help; 2 = Helped, but only minimally; 3 = Helped, substantially; 4 = Absolutely essential

1 Acctg Tech Assistance		8 Eng Sect Tape Exam		15 Photographic Coverage		22 Telephone Toll Recs	
2 Aircraft Assistance		9 Hypnosis Assistance		16 Polygraph Assistance		23 UCO Group I	
3 Computer Assistance		10 Ident Div Assistance		17 Search Warrant Executed		24 UCO Group II	
4 Consensual Monitoring		11 Informant Information		18 Show Money Usage		25 UCO Other	
5 ELSUR FISC		12 Lab Div Exams		19 Surveil Sqd (SOG) Asst		26 NCAVC VI-CAP	
6 ELSUR Title III		13 Lab Div Field Supp		20 SWAT Team Action		27 Visual Invest Analysis (VIA	
7 Eng Sect Field Supp		14 Pen Registers		21 Tech Agt or Tech Equip			

A. Preliminary Judicial Process (Number of subjects)	Complaints	Informations	Indictments
			2

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

Subpoenas Served _____

Criminal Summons _____

Local Crim. Summons _____

FBI Subj. Resisted _____ : Armed _____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists: _____ All Other Hostage Situations: _____

Missing or Kidnaped Children Located: _____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions _____ No. of Subj.

Civil Suits Amount of Suit

Settlement of Award

Government Defendant	Government Plaintiff
$	$
$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District _____ / District State

Conviction or Pretrial Div. Date _____ Sentence Date _____ No. of Subjects _____ Acquitted _____ Dismissed _____

Subject 1 — Subject Description Code* -	Conviction			Combined Sentence					
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion	Title	Section	Counts	In-Jail Yrs.	In-Jail Mos.	Suspended Yrs.	Suspended Mos.	Probation Yrs.	Probation Mos.
	Total Fines $								
	Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.								

Subject 2 — Subject Description Code* -	Conviction			Combined Sentence					
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion	Title	Section	Counts	In-Jail Yrs.	In-Jail Mos.	Suspended Yrs.	Suspended Mos.	Probation Yrs.	Probation Mos.
	Total Fines $								
	Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.								

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of Birth (if available)	Social Security Number (if available)
Clark McAdams Clifford	12/25/06	W	M		577-54-5387
		W	M		

b6
b7C

Explanation of accomplishment claimed:

On 7/29/92, Clark McAdams Clifford and [redacted] were indicted on two counts of concealing material facts by trick and device (18 use 1001) and one count of conspiracy (18 use 371) by a Federal Grand Jury, Washington, D.C.

b6
b7C

29B-WF-171994 Main-434

SEARCHED Sec INDEXED Sec
SERIALIZED Sec FILED Sec

JUL 31 1992

FBI — WASH. FIELD OFFICE

2 - Bureau
2 - Field Office
* See codes on reverse side.

SA [redacted]

b6
b7C

1325015-000-6540

Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes**

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
23	Counterfeit or Pirated Sound Recordings or Motion Pictures
24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
26	Theft from, or Fraud Against, Government Scheme Aborted
27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

Subject Description Codes*

- Enter Description Code Only When Reporting a Conviction -

Organized Crime Subjects (Include Family Name Or Group):
- 1A Boss, Underboss or Consigliere
- 1B Capodecina or Soldier
- 1C Possible LCN Member or Associate
- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer.

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

Instructions

Subject Priorities for FBI Arrest or Locates:

A - Subject wanted for crimes of violence (i.e. murder, manslaughter, forcible rape, robbery and aggravated assault) or convicted of such crimes in the past five years.

B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

Reporting Convictions:

Convictions should not be reported until the sentence has been issued. There are two exceptions to this rule. The conviction information can be submitted by itself if:

1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = White

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 9-3-92

Requested by: [redacted] b6 b7C

Ext.: 9300 | Squad: BCC 1 | File No.: 29B-WF-171994

Subject: TRI-STAR (COMPANY)

Social Security Account #:

Aliases:

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

- ☐ Exact Spelling
- ☑ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☐ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

[redacted] 8/12/92 Date

☑ ISIS: [illegible] NEG ☐ POS — Searched by: see attached — 9/3/92 Date b6 b7C

☐ Confidential Indices: ☐ NEG ☐ POS — Searched by — Date

☑ OCIS: [illegible] ☐ NEG ☐ POS — Searched by: [illegible] — 8/27/92 Date

☑ ELSUR Indices: ☐ NEG ☐ POS — Searched by: [illegible] — 8/14/92 Date

☑ IIS: [redacted] — See attached 8-19-92 Date

[redacted] 8/13/92 Date

☐ MI[redacted] — Searched by — Date

8/13/92 Date

☐ REGIONAL: ☐ NEG ☐ POS — Searched by — Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-434(X)1
29B-WF-171994 Main

Consolidated by — Date

Reviewed by — Date

SEARCHED [illegible] INDEXED [illegible]
SERIALIZED [illegible] FILED [illegible]
OCT 23 1992
FBI - WASH. METRO FIELD OFFICE
[illegible]

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

132-015-000-6542

S> FOR ORG "TRI STAR*1" L ALL-INFO #
STMT= 244272.000 DATE=08/27/92 TIME=15:15 USER=WFIBLJ:WFIBLJ DB=OCIS

ORG: TRI STAR*1
  QUICK-REF: PHONES
  QUICK-REF: PERSON-ORG
CREATED: 06 SEP 1983
LAST-UPDATE: 24 OCT 1986
  ENTERED-BY: MM MW
  ADDR: 01
  STREET: 4505*THIRTY SIXTH ST SW*-
  CITY: FORT LAUDERDALE
  STATE: FL
    PHONE: 305*792*3460
  FO: MM
    ADDR-S: MM*12*523*847 MW*245F*2-U*5

COMPLETED 244272.000 CTIME=15:15 STATUS 1,1

S> #
4β ↑ – 31 #02

PERSONAL ASSOCIATION INFO I> #

P-O: [redacted]*1*TRI STAR*1 b6
CREATED: 30 NOV 1988 b7C
LAST-UPDATE: 30 NOV 1988
  PERSON-RELATIONSHIP: BUSINESS
    PERSON-RELATIONSHIP-S: WF*245F*226*70
  ORG-RELATIONSHIP: BUSINESS
    ORG-RELATIONSHIP-S: WF*245F*226*70
  COMMENTS: 1. [redacted] BROTHERS USED TO RUN TRI STAR GASOLINE
    COMMENTS-S: WF*245F*226*70
  COMMENTS: 2. COMPANY.
    COMMENTS-S: WF*245F*226*70

P-O: [redacted]*1*TRI STAR*1 b6
CREATED: 30 NOV 1988 b7C
LAST-UPDATE: 30 NOV 1988
  PERSON-RELATIONSHIP: BUSINESS
    PERSON-RELATIONSHIP-S: WF*245F*226*70
  ORG-RELATIONSHIP: BUSINESS
    ORG-RELATIONSHIP-S: WF*245F*226*70
4β ↑ – 31 #02

  COMMENTS: 1. [redacted] BROTHERS USED TO OPERATE TRI STAR A b6
    COMMENTS-S: WF*245F*226*70 b7C
  COMMENTS: 2. GASOLINE COMPANY.
    COMMENTS-S: WF*245F*226*70

COMPLETED 244280.000 CTIME=15:15 STATUS 4,2,,,2

COMPANY..... DATABASE.....

TRI STAR CAI*HQ62-118246*2

SAMCO GLOBAL ARMS DOES NOT EXIST IN ALL-IDENT AS SPECIFIED

SAMCO DOES NOT EXIST IN ALL-IDENT AS SPECIFIED

INTERNATIONAL SYSTEMS INC DOES NOT EXIST IN ALL-IDENT AS SPECIFIED

INT SYSTEMS INC DOES NOT EXIST IN ALL-IDENT AS SPECIFIED

ISI DOES NOT EXIST IN ALL-IDENT AS SPECIFIED

TRISTAR DOES NOT EXIST IN ALL-IDENT AS SPECIFIED

TRI STAR CO DOES NOT EXIST IN ALL-IDENT AS SPECIFIED

*** END OF LISTING ***

CAI = Computer Assisted Indexes

[redacted]

b6
b7C

Call HQ - 8071 for more info if need... Mrs. Ext 7450

1325015-000-6550

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date 9-3-92

Requ [redacted] b6 b7C

Ext. 9300 | Squad: 3CC1 | File No. 29B-WF-171994

Subject [redacted]

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☑ All References ☐ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☐ Main Criminal *(if no Main, list all Criminal References)*

☑ [redacted] Searched by [redacted] 8/13/92 Date

☑ ISIS: [redacted] Searched by ☐ NEG ☐ POS 9/3/92 Date

☐ Confidential Indices: ☐ NEG ☐ POS Searched by Date

☑ OCIS: [redacted] Searched by ☐ NEG ☐ POS 8/27/92 Date

☑ ELSUR Indices: ☐ NEG ☐ POS [redacted] Searched by 8/20/92 Date

☑ [redacted] Searched by 8-19-92 Date

☑ [redacted] 8/13/92 Date

☐ [redacted] Searched by Date

☐ REGIONAL: ☐ NEG ☐ POS 8/13/92 Date Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			43442
			29B-WF-171994 Main

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 8 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6551

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 9-3-92

Requ [redacted] b6 b7C

To: Office Services Manager

Ext.	Squad:	File No.
9300	8CC1	29B-WF-171994

Subject [redacted]

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☑ All References ☐ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☐ Main Criminal *(if no Main, list all Criminal References)*

[redacted] Searched by 8/13/92 Date

☑ ISIS: [redacted] Searched by ☐ NEG ☐ POS see attached Date 9/3/92

☐ Confidential Indices: ☐ NEG ☐ POS
Searched by Date

☑ OCIS: [redacted] Searched by ☐ NEG ☐ POS Date 8/27/92

☑ ELSUR Indices: ☐ NEG ☐ POS [redacted] Searched by 8/26 Date

☑ [redacted] ☐ POS see attached
Searched by Date 8-24-92

[redacted] 8/13/92 Date

☐ [redacted] ☐ POS
Searched by Date

[redacted] 8/13/92 Date

☐ REGIONAL: ☐ NEG ☐ POS
Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
see attached			

~~134X3~~
29B-WF-171994 Main

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
OCT [illegible] 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6552

(1) [redacted] hit on Norfolk office database called Township and was determined to be an alias of one of their subjects, [redacted] to rent a P.O. Box. Only one reference to name.

b6
b7C

LST-NAME.....	FIRST-NAME.....	MIDDLE-NAME.	DATA-FILE.....
HALL	J	W	VEGDRUGS*LV245-261*1X4
			VEGDRUGS*LV245-261*1X5
			VEGDRUGS*LV245-261*1X6

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

*** END OF LISTING ***

b6
b7C

in line

LST-NAME.....	FIRST-NAME.....	MIDDLE-NAME.	DATA-FILE.....
HALL	J	W	PAPERSUB*NH206-101 EB*14147
			PAPERSUB*NH206-101 EB*14353
			PAPERSUB*NH206-101 EB*14704R
			PAPERSUB*NH206-101 OD*582

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

*** END OF LISTING ***

b6
b7C

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date 9-3-92

Reque [redacted] b6 b7C

Ext. 9300 | Squad: BCC 1 | File No. 29B-WF-171994

Subject [redacted]

Social Security Account #

Aliases [redacted] MCAI 11513

Address | Birth Date | Birth Place | Race | Sex ☒ Male ☐ Female

☐ Exact Spelling
☒ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☒ [redacted] Searched by:	8/13/92 Date	☒ ISIS: Searched by: [illegible]	☐ NEG ☐ POS Date: 9/3/92
☐ Confidential Indices: ☐ NEG ☐ POS Searched by:	Date	☒ OCIS: Searched by: [illegible]	☐ NEG ☐ POS Date: 9/2/92
☒ ELSUR Indices: ☐ NEG ☐ POS Searched by: [illegible]	9/2/92 Date	☒ IIS: Searched by:	☐ NEG ☐ POS Date
[redacted]	8/13/92 Date	☐ MICRO: Searched by:	☐ NEG ☐ POS Date
[redacted]	8/13/92 Date	☐ REGIONAL: Searched by:	☐ NEG ☐ POS Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
Sl attached			

43444
29B-WF-171994 Main

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED [illegible] INDEXED [illegible]
SERIALIZED [illegible] FILED [illegible]
OCT 22 19[illegible]
FBI - WASH. METRO FIELD OFFICE

1325015-000-6575

FOR P-D WITH NYSIIS-NAME [redacted] AND WITH LN [redacted] AND WITH FN [redacted] LISTSA ALL-INFO # b6
STMT= 280165.000 DATE=09/01/92 TIME=08:31 USER [redacted] DB=OCIS b7C

P-D: [redacted] *1 b6
QUICK-REF: PHONES b7C
QUICK-REF: PERSON-ORG
CREATED: 14 MAY 1984
LAST-UPDATE: 22 NOV 1989
ENTERED-BY: LV
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
PHONE: [redacted]
HOME-ADDR-S: [redacted]
TYPE-PERSON: FLOORMAN
TYPE-PERSON-S: LV*183B*18564*68
PHY-DESC: 01
HT: 510
WT: 178
SEX: M
HAIR: BROWN
EYES: BROWN
RACE: WHITE
PHY-DESC-S: LV*12*265*4
SPECIAL-CHAR: SSAN [redacted] b6
SPECIAL-CHAR-S: LV*12*265*4 b7C
SPECIAL-CHAR: 21 FLOORPERSON
SPECIAL-CHAR-S: LV*183B*18564*68
DOB: [redacted]
AGE: [redacted]
DOB-S: LV*12*265*4
POB: [redacted]
POB-S: LV*12*265*4
ID-NUMBER: SSAN [redacted]
ID-NUMBER-S: LV*183B*18564*68

P-D: [redacted] *2 b6
QUICK-REF: PHONES b7C
QUICK-REF: PERSON-PERSON
CREATED: 05 JUN 1986
LAST-UPDATE: 24 JUN 1986
ENTERED-BY: KC
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
PHONE: [redacted]
ADDR-DATE: 23 APR 1986
HOME-ADDR-S: KC*183A*982-C*15 OM

OCIS
Processed 9/1/92
Initialed BJ

P-D: [redacted] *3 b6
QUICK-REF: PHONES b7C
QUICK-REF: PERSON-PERSON
QUICK-REF: PERSON-ORG
FILE-SER: IP*245C*85*1593
CREATED: 29 JAN 1988
LAST-UPDATE: 11 FEB 1988
ENTERED-BY: IP
ALIAS: [redacted]

This document may not be placed in any file nor given to any non-FBI employee. The information contained in this document may not be disseminated without proper authorization.

ALIAS-S: IP*245C*85*1623
HOME-ADDR: 01
CITY: [redacted] b6
STATE: [redacted] b7C
PHONE: [redacted]
HOME-ADDR-S: IP*245C*85*1593
TYPE-PERSON: BUSINESSMAN
TYPE-PERSON-S: IP*245C*85*1593
TYPE-PERSON: CONSPIRATOR
TYPE-PERSON-S: IP*245C*85*1593
TYPE-PERSON: EXECUTIVE
TYPE-PERSON-S: IP*245C*85*1623
SPECIAL-CHAR: 01 BUSINESS PHONE
SPECIAL-CHAR-S: IP*245C*85*1593

P-D: [redacted] b6
QUICK-REF: VEHICLES b7C
CREATED: 25 APR 1986
LAST-UPDATE: 02 JUN 1986
ENTERED-BY: DE
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
HOME-ADDR-S: DE*245D*136*70

P-D: [redacted] b6
QUICK-REF: PHONES b7C
QUICK-REF: PERSON-ORG
QUICK-REF: PERSON-PERSON
INTV-S: CV*183*689*540
CREATED: 17 APR 1981
LAST-UPDATE: 29 MAY 1983
ENTERED-BY: CV HQ
NAME/TRUE: X
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
PHONE: [redacted]
ADDR-DATE: 27 JAN 1981
HOME-ADDR-S: CV*183*689*540
HOME-ADDR-S: CV*183*895-B*4
TYPE-PERSON: LOANSHARKING VICTIM
TYPE-PERSON-S: CV*183*689*753
PHY-DESC: 01
HT: 510
WT: 190
SEX: M
HAIR: BROWN
EYES: BROWN
RACE: WHITE
PHY-DESC-S: CV*183*689*540
SPECIAL-CHAR: SSAN [redacted]
SPECIAL-CHAR-S: CV*183*689*540
DOB: 03 JUN 1939
AGE: 53
DOB-S: CV*183*689*540

P-D: [redacted] b6
CREATED: 01 MAR 1982 b7C
LAST-UPDATE: 02 MAR 1982
ENTERED-BY: BS

HOME-ADDR: 01
CITY: [redacted]
STATE: [redacted]
ADDR-DATE: 05 FEB 1982
HOME-ADDR-S: BS*12*17*1606
TYPE-PERSON: NARCOTICS DEALER
TYPE-PERSON-S: BS*12*17*1606
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: BS*12*17*1606

P-D: [redacted]*2
QUICK-REF: PHONES
FILE-SER: WF*245B*268-L*16
CREATED: 17 JAN 1989
LAST-UPDATE: 18 JAN 1989
ENTERED-BY: WF
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
PHONE: [redacted]
ADDR-DATE: 07 DEC 1988
HOME-ADDR-S: WF*245B*268-L*16

P-D: [redacted]
QUICK-REF: PERSON-PERSON
FILE-SER: NY*183A*752-A*35 BQ
CREATED: 17 JUL 1990
LAST-UPDATE: 26 JUL 1990
ENTERED-BY: NY
TYPE-PERSON: RAPIST
TYPE-PERSON-S: NY*183A*752-A*35 BQ
TYPE-PERSON: EX-POLICEMAN
TYPE-PERSON-S: NY*183A*752-A*35 BQ

P-D: [redacted]
QUICK-REF: PERSON-PERSON
QUICK-REF: GANG/CARTEL-MEMBERS
CREATED: 08 FEB 1984
LAST-UPDATE: 08 FEB 1984
ENTERED-BY: WF
TYPE-PERSON: NARCOTICS TRAFFICKER
TYPE-PERSON-S: WF*245*2-H*134B
TYPE-PERSON: COURIER
TYPE-PERSON-S: WF*245*2-H*134B
TYPE-PERSON: OTHER ORGANIZED CRIME GROUP MEMBER
TYPE-PERSON-S: WF*245*2-H*134B

P-D: MARTIN*JEROME*-*2
QUICK-REF: MURDER
QUICK-REF: GANG/CARTEL-MEMBERS
QUICK-REF: PERSON-GANG/CARTEL
CREATED: 16 JUL 1986
LAST-UPDATE: 29 JAN 1988
ENTERED-BY: SC
ALIAS: ROCKY
ALIAS-S: SC*183B*704*24
TYPE-PERSON: MURDER VICTIM
TYPE-PERSON-S: SC*183B*704*24
TYPE-PERSON: OTHER ORGANIZED CRIME GROUP MEMBER
TYPE-PERSON-S: SC*183B*704*24
TYPE-PERSON: PRISON INMATE

b6
b7C
b6
b7C
b6
b7C
b6
b7C

TYPE-PERSON-S: SC*183B*704*24
DOB: 23 JAN 1961
DOB-S: SC*183B*704*24
DECEASED: X
DECEASED-S: SC*183B*704*24
DATE-OF-DEATH: 01 JAN 1986
DATE-OF-DEATH-S: SC*183B*704*24
PD-NO: CII A06470956*CA*SACRAMENTO
PD-NO-S: SC*183B*704*24

P-D: [redacted] b6 b7C
QUICK-REF: PHONES
QUICK-REF: PERSON-PERSON
QUICK-REF: PERSON-ORG
INTV-S: NH*12B*377*4
INTV-S: NH*12B*377*10
CREATED: 06 MAY 1987
LAST-UPDATE: 12 AUG 1987
ENTERED-BY: NH
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
PHONE: [redacted]
ADDR-DATE: 22 APR 1987
HOME-ADDR-S: NH*12B*377*1
TYPE-PERSON: NARCOTICS USER
TYPE-PERSON-S: NH*12B*377*1
TYPE-PERSON: EMBEZZLER
TYPE-PERSON-S: NH*12B*377*1
TYPE-PERSON: HOMOSEXUAL
TYPE-PERSON-S: NH*12B*377*10
PHY-DESC: 01
SEX: M
PHY-DESC-S: NH*12B*377*1

P-D: [redacted] b6 b7C
QUICK-REF: PERSON-ORG
QUICK-REF: PERSON-PERSON
CREATED: 31 AUG 1982
LAST-UPDATE: 06 OCT 1982
ENTERED-BY: CG
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
ADDR-DATE: 07 JAN 1982
HOME-ADDR-S: CG*183*1272-C*108
PHY-DESC: 01
SEX: F
PHY-DESC-S: CG*183*1272-C*108

P-D: [redacted] b6 b7C
CREATED: 24 OCT 1985
LAST-UPDATE: 24 OCT 1985
ENTERED-BY: NY
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: [redacted]
ADDR-DATE: 16 SEP 1985
HOME-ADDR-S: NY*12*976-A*64 BQ
DOB: [redacted]

AGE: [redacted] b6
DOB-S: NY*12*976-A*64 BQ b7C

P-D: [redacted] b6
QUICK-REF: PHONES b7C
QUICK-REF: PERSON-PERSON
CREATED: 05 JUN 1986
LAST-UPDATE: 24 JUN 1986
ENTERED-BY: KC
HOME-ADDR: 01
STREET: [redacted]
CITY:
STATE:
PHONE:
HOME-ADDR-S: KC*183A*982-C*15 OM
SPECIAL-CHAR: PHONE 01 DISCONTINUED 7/85
SPECIAL-CHAR-S: KC*183A*982-C*15 OM

P-D: [redacted] b6
QUICK-REF: PHONES b7C
CREATED: 20 JUL 1987
LAST-UPDATE: 22 JUL 1987
ENTERED-BY: NH
HOME-ADDR: 01
STREET: [redacted]
CITY:
STATE:
PHONE:
ADDR-DATE: 17 JUN 1987
HOME-ADDR-S: NH*179A*279*85
PHY-DESC: 01
SEX: M
PHY-DESC-S: NH*179A*279*85

P-D: [redacted] b6
SENS-PER-CONTACT: << SENSITIVE - CONTACT : NO >> b7C
QUICK-REF: PHONES
QUICK-REF: PERSON-PERSON
CREATED: 27 JAN 1983
LAST-UPDATE: 03 MAR 1983
ENTERED-BY: NO
HOME-ADDR: 01
STREET: [redacted]
CITY:
STATE:
PHONE:
ADDR-DATE: 27 DEC 1982
HOME-ADDR-S: NO*12*97-9*1A-34

P-D: [redacted] b6
CREATED: 05 AUG 1987 b7C
LAST-UPDATE: 12 AUG 1987
ENTERED-BY: NY
HOME-ADDR: 01
STREET: [redacted]
CITY:
STATE:
PHONE:
HOME-ADDR-S: NY*183A*3437*135 NY
TYPE-PERSON: NARCOTICS USER
TYPE-PERSON-S: NY*183A*3437*135 NY
PHY-DESC: 01

HT: 511
WT: 165
SEX: M
HAIR: BROWN
EYES: HAZEL
RACE: WHITE
PHY-CHAR: TATTOOS RIGHT FOREARM
PHY-DESC-S: NY*183A*3437*135 NY
PHY-CHAR: TATTOOS LEFT FOREARM
SPECIAL-CHAR: [redacted] b6
SPECIAL-CHAR-S: NY*183A*3437*135 NY b7C
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: NY*183A*3437*135 NY
SPECIAL-CHAR: SSAN [redacted]
SPECIAL-CHAR-S: NY*183A*3437*135 NY
DOB: [redacted]
AGE: [redacted]
DOB-S: NY*183A*3437*135 NY
POB: [redacted]
POB-S: NY*183A*3437*135 NY

P-D: [redacted] b6
QUICK-REF: CRIMINAL-DATA b7C
CREATED: 30 APR 1984
LAST-UPDATE: 15 JUN 1984
ENTERED-BY: KC
PHY-DESC: 01
SEX: M
PHY-DESC-S: KC*12*123*400 KC
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: KC*12*123*400 KC
DOB: [redacted]
AGE: [redacted]
DOB-S: KC*12*123*400 KC

P-D: [redacted] b6
QUICK-REF: PHONES b7C
FILE-SER: CV*245C*170*492
CREATED: 10 FEB 1988
LAST-UPDATE: 11 FEB 1988
ENTERED-BY: CV
HOME-ADDR: 01
STREET [redacted]
CITY: [redacted]
STATE: [redacted]
ZIP: [redacted]
PHONE: [redacted]
ADDR-DATE: 10 DEC 1987
HOME-ADDR-S: CV*245C*170*492

COMPLETED 280165.000 CTIME=08:34 STATUS 3642,19,19,19,3642

E ALL-NAMES-SEARCH#
STMT= 368638.000 DATE=09/01/92 TIME=08:34 USER: [redacted] DB=ISIS b6
*+F b7C
*DE!
!F ,14,- *** ALL-NAMES FILE SEARCH ***
!S2
!F PLACE AN X TO INDICATE SEARCH OF ONLINE,1,OFFLINE/ARCHIVED,1,DATABASES.
!DE*
*F

LST-NAME..... FIRST-NAME..... MIDDLE-NAME. DATA-FILE.....

[redacted]

NYROB*NY91-22662 C*2149
NYROB*NY91-22662 B*4011
NYROB*NY91-22662 B*4054
NYROB*NY91-22662 B*4606
NYROB*WF91-11586*1333

b6
b7C

[redacted] DOES NOT EXIST IN ALL-NAMES AS SPECIFIED

*** END OF LISTING ***

b6
b7C

LST-NAME..... FIRST-NAME..... MIDDLE-NAME. DATA-FILE.....

b6
b7C

SPANCAP*HO250-11 D*1B22E
TANNER*ME182-466*1A329
SPANCAP*HO250-11 D*1B12
SPANCAP*HO250-11 D*1B12E
SPANCAP*HO250-11 D*1B41B
TOUPEE*LS245-112 LOG*1
COBRA*BA92-1754 MA*107
COBRA*BA92-1754 MA*6

70818

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 8-3-92

Requ:

Ext.: 9300 | Squad: 3CC1 | File No.: 29B-WF-171994

Subject: INTERNATIONAL SYSTEMS INC.

Social Security Account #:

Aliases: ISI

Address: 44624

Birth Date	Birth Place	Race	Sex
			☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☒ Searched by	8/13/92 Date	☑ ISIS: ☐ NEG ☐ POS Searched by	9/3/92 Date
☐ Confidential Indices: ☐ NEG ☐ POS Searched by	Date	☑ OCIS: ☐ NEG ☐ POS Searched by	8/28/92 Date
☑ ELSUR Indices: ☐ NEG ☐ POS Searched by	8/6 Date	☑ ☐ POS	8-24-92 Date
☒ Searched by	8/13/92 Date	☐ [illegible] ☐ POS Searched by	Date
☒ Searched by	8/13/92 Date	☐ REGIONAL: ☐ NEG ☐ POS Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			43445 29B-WF-171994 Main

Consolidated by _____ Date _____

Reviewed by _____ Date _____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
OCT 13 1992
FBI - WASH. METRO FIELD OFFICE

b6
b7C

1325015-000-6588

ORG: INTERNATIONAL SYSTEMS*1
  QUICK-REF: PERSON-ORG
CREATED: 05 SEP 1984
LAST-UPDATE: 28 APR 1988
  ENTERED-BY: PH
  ADDR: 01
  CITY: PHILADELPHIA
  STATE: PA
  TYPE-ADDR: BUSINESS
  FO: PH
    ADDR-S: PH*166*1356*3

1325015-000-6593

PERSONAL ASSOCIATION INFO

P-O: [redacted] INTERNATIONAL SYSTEMS*1 b6 b7C
CREATED: 01 OCT 1984
LAST-UPDATE: 01 OCT 1984
  ONGOING-AO: 01 APR 1971
    ONGOING-AO-S: PH*166*1356*3
  PERSON-RELATIONSHIP: EMPLOYEE
    PERSON-RELATIONSHIP-S: PH*166*1356*3
  PERSON-BENEFITS-DERIVED: SALARY
    PERSON-BENEFITS-DERIVED-S: PH*166*1356*3
  ORG-RELATIONSHIP: EMPLOYER
    ORG-RELATIONSHIP-S: PH*166*1356*3

1325015-000-6594

ORG: INTERNATIONAL SYSTEMS*2
QUICK-REF: PHONES
CREATED: 30 DEC 1987
LAST-UPDATE: 12 DEC 1990
ENTERED-BY: NH
ADDR: 01
STREET: -*AVON PARK N*-
CITY: FARMINGTON
STATE: CT
ZIP: 06032
TYPE-ADDR: BUSINESS
PHONE: 203*677*4000
FO: NH
ADDR-S: NH*12A*385-1*4 NH*12A*385-1*7

TELEPHONE INFO

PHONES: 203*677*4000
CREATED: 21 JAN 1988
LAST-UPDATE: 29 APR 1988
QUICK-REF: ORG
ADDR: 01
STREET: -*AVON PARK N*-
CITY: FARMINGTON
STATE: CT
ZIP: 06032
TYPE-ADDR: BUSINESS
FO: NH
ADDR-S: NH*12A*385-1*4 NH*12A*385-1*7
TYPE-PHONE: BUSINESS
TYPE-PHONE-S: NH*12A*385-1*4 NH*12A*385-1*7
ORG-SUBSCRIBER: INTERNATIONAL SYSTEMS*2
ORG-SUBSCRIBER-S: NH*12A*385-1*4

1325015-000-6596

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 9-3-92

Requ [redacted] b6 b7C

To: Office Services Manager

Ext. 9300 | Squad: BCC 1 | File No. 29B-WF-171994

Subject [redacted]

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☑ All References ☐ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☐ Main Criminal *(if no Main, list all Criminal References)*

☑ [redacted] 8/13/92 Date b6 b7C

☑ ISIS: lbw ☐ NEG ☐ POS 9/3/92
Searched by Date

☐ Confidential Indices: ☐ NEG ☐ POS
Searched by Date

☑ OCIS: [illegible] ☑ NEG ☐ POS 8/28/92
Searched by Date

☑ ELSUR Indices: ☑ NEG ☐ POS 8/16
Searched by Date

☑ IIS: [redacted] 8-19-92
Sear Date

☑ [redacted] 8/13/92 Date

☐ MIC
Searched by Date

☑ [redacted] 8/17/92 Date

☐ REGIONAL: ☐ NEG ☐ POS
Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
See attached			
			29B-WF-171994

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED [illegible]

4346

6

1325015-000-6597

[redacted] ~~SENSITIVE~~ b6

NO: 00 b7C

DDN: REC-NO: 001

TRUE:

FO: WF CASE NO: WF-0171994-S CLASS: 029B

NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 010892

MODIFIED:

VIOLATION: FIF SPECIAL:

SERIALS: 73

RACE: U SEX: M ID-NO:

DOB: POB:

STREET NO: NAME:

CITY: ST: COUNTRY: ZIP:

LOC:

MISCELLANEOUS: [redacted] b6 b7C

[redacted]

CLASSIFICATION LEVEL: SN CLASSIFIED BY: DECLASSIFY ON:

<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS

F1 -REQUERY F2 -ALIASES F8 -DELETE F10 -INDEX

SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS

4Ãý NUM á 33

~~SENSITIVE~~

NO: 00 b6
REC-NO: 00 b7C

DDN:
TRUE:
FO: WF CASE NO: WF-0171994-TS CLASS: 029B
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 031292
MODIFIED:
VIOLATION: FIF SPECIAL:
SERIALS: 1P1;

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:
MISCELLANEOUS:

CLASSIFICATION LEVEL: SN CLASSIFIED BY: DECLASSIFY ON:
<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS
F1 -REQUERY F8 -DELETE F10 -INDEX
SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS
4ÃÝ NUM á 33

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8-3-92

Requ [redacted] b6 b7C

To: Office Services Manager

Ext. 9300 | Squad: BCC1 | File No. 29B-WF-171994

Subject [redacted] TCMS1

Social Security Account #

Aliases

Address | Birth Date | Birth Place | Race | Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☑ [redacted] Searched by 8/13/92 Date

☑ ISIS: [redacted] ☐ NEG ☐ POS Searched by 9/3/92 Date

☐ Confidential Indices: ☐ NEG ☐ POS Searched by Date

☑ OCIS: [redacted] ☐ NEG ☐ POS Searched by 8/28/92 Date

☑ ELSUR Indices: ☐ NEG ☐ POS Searched by 8/11/92 Date

☑ [redacted] See attached 8-19-92 Date

☑ [redacted] Searched by 8/13/92 Date

☐ Searched by Date

☑ [redacted] Searched by 8/18/92 Date

☐ REGIONAL: ☐ NEG ☐ POS Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
All attached			

29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

4344
7

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6600

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8-3-92

To: Office Services Manager

Requester

Ext. 9300 | Squad: BCC 1 | File No. 29B-WF-171994

Subject

Aliases

Social Security Account #

Address | Birth Date | Birth Place | Race | Sex ☑ Male ☐ Female

- ☐ Exact Spelling
- ☑ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☐ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

☑	Searched by	8/13/92 Date	
☑	**ISIS:** ☑ NEG ☐ POS — Searched by dlo	9/3/92 Date	
☐	**Confidential Indices:** ☐ NEG ☐ POS — Searched by	Date	
☑	**OCIS:** ☑ NEG ☐ POS — Searched by	8/24/92 Date	
☑	**ELSUR Indices:** ☑ NEG ☐ POS — Searched by	8/16/92 Date	
☑	see attached — Searched by	8-21-92 Date	
☑	Searched by	8/13/92 Date	
☐	Searched by	Date	
☑	Searched by	8/13/92 Date	
☐	**REGIONAL:** ☐ NEG ☐ POS — Searched by	Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
Attached Ref.			
			29B-WF-171994

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6632

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 8-3-92

Reque: [redacted] b6 b7C

Ext.: 9300 | Squad: 3CC1 | File No.: 29B-WF-171994

Subject: FEDERAL MILITARY EQUIPMENT

Social Security Account #:

Aliases:

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☑ [redacted] Searched by	8/13/92 Date	☑ ISIS: ☐ NEG ☐ POS Searched by	9/3/92 Date
☐ Confidential Indices: ☐ NEG ☐ POS Searched by	Date	☑ OCIS: ☐ NEG ☐ POS Searched by	8/27/92 Date
☑ ELSUR Indices: ☐ NEG ☐ POS Searched by	8/16 Date	☑ II: [redacted] S	8-25-92 Date
[redacted] Searched by	8/13/92 Date	☐ M Searched by	Date
[redacted] Searched by	8/13/92 Date	☐ REGIONAL: ☐ NEG ☐ POS Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			29B-WF-171994
			SEARCHED INDEXED SERIALIZED FILED

Consolidated by _____ Date _____

Reviewed by _____ Date _____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6636

ORG: FEDERAL EQUIPMENT*1
QUICK-REF: PHONES
CREATED: 05 JAN 1982
LAST-UPDATE: 05 JAN 1982
ENTERED-BY: BF
ADDR: 01
STREET: 8200*BESSEMER AVE*-
CITY: CLEVELAND
STATE: OH
TYPE-ADDR: BUSINESS
PHONE: 212*271*3500
FO: CV
ADDR-S: BF*183*835-5*56

1325015-000-6637

TELEPHONE INFO

PHONES: 212*271*3500
CREATED: 05 JAN 1982
LAST-UPDATE: 05 JAN 1982
QUICK-REF: ORG
ADDR: 01
STREET: 8200*BESSEMER AVE*-
CITY: CLEVELAND
STATE: OH
TYPE-ADDR: BUSINESS
FO: CV
ADDR-S: BF*183*835-5*56
ORG-SUBSCRIBER: [redacted] b6 b7C
ORG-SUBSCRIBER-S: BF*183*835-5*56
O-SUB-DATE: 04 JAN 1982
ORG-SUBSCRIBER: FEDERAL EQUIPMENT*1
ORG-SUBSCRIBER-S: BF*183*835-5*56
O-SUB-DATE: 04 JAN 1982
ORG-SUBSCRIBER: FEDERAL MACHINERY EQUIPMENT*1
ORG-SUBSCRIBER-S: BF*183*835-5*56
O-SUB-DATE: 04 JAN 1982
ORG-SUBSCRIBER: FEDERAL DISMANTLING*1
ORG-SUBSCRIBER-S: BF*183*835-5*56
O-SUB-DATE: 04 JAN 1982

1325015-000-6638

S> FOR ORG "FEDERAL MACHINERY EQUIPMENT*1" L ALL-INFO #
STMT= 252220.000 DATE=08/28/92 TIME=09:02 USER=[redacted] DB=OCIS b6 b7C

ORG: FEDERAL MACHINERY EQUIPMENT*1
QUICK-REF: PHONES
CREATED: 05 JAN 1982
LAST-UPDATE: 05 JAN 1982
ENTERED-BY: BF
ADDR: 01
STREET: 8200*BESSEMER AVE*-
CITY: CLEVELAND
STATE: OH
TYPE-ADDR: BUSINESS
PHONE: 212*271*3500
FO: CV
ADDR-S: BF*183*835-5*56

COMPLETED 252220.000 CTIME=09:02 STATUS 1,1

S> #
4[redacted] ↑ – 31 #02

1325015-000-6639

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 9-3-92

To: Office Services Manager

Requ [redacted] b6 b7C

Ext. 9300 | Squad: BCC1 | File No. 29B-WF-171994

Subject [redacted]

Social Security Account #

Aliases [redacted]

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☑ [redacted] Searched by	8/13/92 Date	☑ ISIS: ☑ NEG ☐ POS Searched by	9/3/92 Date
☐ Confidential Indices: ☐ NEG ☐ POS Searched by	Date	☑ OCIS: ☑ NEG ☐ POS Searched by	8/28/92 Date
☑ ELSUR Indices: ☐ NEG ☐ POS Searched by	8/11/92 Date	☑ [redacted] ☐ POS Searched by	8-19-92 Date
☑ [redacted] Searched by	8/13/92 Date	☐ [redacted] ☐ POS Searched by	Date
☑ [redacted] Searched by	8/14/92 Date	☐ REGIONAL: ☐ NEG ☐ POS Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

29B-WF-171994-440

Consolidated by Date

Reviewed by Date

SEARCHED INDEXED
SERIALIZED FILED
[illegible] OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6640

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 9-3-92

Requested by: [redacted]

Ext.: 9300 | Squad: BCC1 | File No.: 29B-WF-171994

Subject: [redacted]

Aliases: [redacted]

Social Security Account #:

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

- ☐ Exact Spelling
- ☑ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☐ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

☑ [redacted] Searched by	8/13/92 Date	☑ ISIS: Searched by	☑ NEG ☐ POS 9/3/92 Date
☐ Confidential Indices: ☐ NEG ☐ POS Searched by	Date	☑ OCIS: Searched by	☑ NEG ☐ POS 8/28/92 Date
☑ ELSUR Indices: ☐ NEG ☐ POS Searched by	8/19/92 Date	☑ [redacted] S	8-19-92 Date
☑ [redacted]	8/13/92 Date	☐ M Searched by	Date
☑ [redacted] Searched by	8/13/92 Date	☐ REGIONAL: Searched by	☐ NEG ☐ POS Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
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- ☐ Charlotte
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- ☐ Mobile
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- ☐ Norfolk
- ☐ Quantico
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- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
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Central
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- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
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- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
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- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
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- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
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- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			29B-WF-171994

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____

Consolidated by ____ Date ____

Reviewed by ____ Date ____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6641

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 8-3-92

Requ: [redacted] b6 b7C

Ext. 9300 | Squad: BCC1 | File No. 29B-WF-171994

Subject: MICROTECHNICAL CORP.

Social Security Account #:

Aliases:

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☑ All References ☐ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☐ Main Criminal *(if no Main, list all Criminal References)*

[redacted] Searched by	8/13/92 Date	☑ ISIS: ☑ NEG ☐ POS — Searched by	9/3/92 Date
☐ Confidential Indices: ☐ NEG ☐ POS — Searched by	Date	☑ OCIS: ☐ NEG ☐ POS — Searched by	8/28/92 Date
☑ ELSUR Indices: ☐ NEG ☐ POS — Searched by	8/10 Date	☑ IIS: [redacted] Searched by	8-25-92 Date
[redacted] Searched by	8/13/92 Date	☐ MICRO: ☐ NEG ☐ POS — Searched by	Date
[redacted] Searched by	8/13/92 Date	☐ REGIONAL: ☐ NEG ☐ POS — Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

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- ☐ San Juan
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- ☐ Tampa
- ☐ Washington Field
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- ☐ Detroit
- ☐ El Paso
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- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
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- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
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- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
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- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

29B-WF-171994-4/3/92

SEARCHED INDEXED
SERIALIZED FILED

Consolidated by Date

Reviewed by Date

FBI - [redacted] FIELD OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6642

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8-3-92

Reque[illegible] b6 b7C

To: Office Services Manager

Ext. 9300 | Squad: 3CC1 | File No. 29B-WF-171994

Subject WESTERN PRECISION CORP.
Social Security Account #

Aliases 90387

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☑ All References ☐ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☐ Main Criminal *(if no Main, list all Criminal References)*

[redacted] 8/13/92 Date

☑ ISIS: [illegible] ☐ NEG ☐ POS 9/3/92 Date
Searched by

☐ Confidential Indices: ☐ NEG ☐ POS
Searched by Date

☑ OCIS: BJ ☑ NEG ☐ POS 8/28/92 Date
Searched by

☑ ELSUR Indices: ☐ NEG ☐ POS 8/18 Date
Searched by

☑ IIS [redacted] POS 8-25-92 Date
Se

[redacted] 8/13/92 Date

☐ M[illegible] POS
Searched by Date

[redacted] 8/13/92 Date

☐ REGIONAL: ☐ NEG ☐ POS
Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
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- ☐ Boston
- ☐ London England
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- ☐ New York City
- ☐ Newark
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- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
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- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
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- ☐ Denver
- ☐ Detroit
- ☐ El Paso
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- ☐ Milwaukee
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- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
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Western
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- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
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- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

29B-WF-171994

4344
13

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

[illegible] FBI - [illegible]

1325015-000-6643

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8-3-92

To: Office Services Manager

Requ

Ext. 9300 | Squad: 3CC1 | File No. 29B-WF-171994

b6
b7C

Subject YULECRIS INTERNATIONAL

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☑ General Indices: ☐ NEG ☐ POS	8/13/92 Date	☑ ISIS: ☑ NEG ☐ POS	9/3/92 Date
		Searched by	
☐ Confidential Indices: ☐ NEG ☐ POS		☑ OCIS: ☑ NEG ☐ POS	8/28/92 Date
Searched by	Date	Searched by	
☑ ELSUR Indices: ☐ NEG ☐ POS	8/13/92 Date	☑ II ☐ POS	8-25-92 Date
Searched by		S	
	8/13/92 Date	☐ MICRO: ☐ NEG ☐ POS	
		Searched by	Date
	8/13/92 Date	☐ REGIONAL: ☐ NEG ☐ POS	
Searched by		Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
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- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
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- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

29B-WF-171994 - 43rd
14

SEARCHED ... INDEXED ... FILED ...
SERIALIZED ... FBI ...

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6644

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date: 9-3-92

To: Office Services Manager

Requested by: [redacted] b6 b7C

Ext.: 9300 | Squad: 8CC1 | File No.: 29B-WF-171994

Subject: [redacted]

Social Security Account #:

Aliases: [redacted]

Address	Birth Date	Birth Place	Race	Sex ☑ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☑ **General Indices:** ☑ NEG ☐ POS	[redacted] Searched by	8/13/92 Date	
☑ **ISIS:** ☑ NEG ☐ POS	Searched by	9/3/92 Date	b6 b7C
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☑ **OCIS:** ☑ NEG ☐ POS	Searched by	8/28/92 Date	
☑ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by	8/19/92 Date	
☑ **IIS:** [redacted]	Se	8-19-92 Date	
☑ **FOIMS:** ☐ NEG ☐ POS [redacted]	8/13/92 Date		
☐ **M** [redacted]	Searched by	Date	
☐ **REGIONAL:** ☐ NEG ☐ POS	8/18/92 Date	Searched by	Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
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- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
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- ☐ Milwaukee
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- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
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- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
		ISIS - Bankstop checks — neg	

29B-WF-171994 - 434 - 15

RECEIVED [illegible] 1105

Consolidated by _____ Date _____

Reviewed by _____ Date _____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6645

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 8-3-92

Requester:

Ext.: 9300 | Squad: 3CC1 | File No.: 29B-WF-171994

Subject: SAMCO GLOBAL ARMS

Social Security Account #:

Aliases: SAMCO

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☑ [redacted] — Searched by 8/13/92 Date

☐ Confidential Indices: ☐ NEG ☐ POS — Searched by ____ Date ____

☑ ELSUR Indices: ☒ NEG ☐ POS — Searched by ____ 8/18 Date

[redacted] — Searched by 8/13/92 Date

☑ ISIS: ☑ NEG ☐ POS — Searched by ____ 9/3/92 Date

☑ OCIS: ☐ NEG ☑ POS — Searched by ____ 8/27/92 Date

☑ [redacted] — Searched by ____ 8-19-92 Date

☐ [redacted] — Searched by ____ Date ____

☐ REGIONAL: ☐ NEG ☐ POS — Searched by ____ Date ____

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
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- ☐ All above

Mid-Atlantic
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- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
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Western
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- ☐ Phoenix
- ☐ Portland
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- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			29B-NF-171994-4/3/96

Consolidated by ____ Date ____

Reviewed by ____ Date ____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6646

ORG: SAMCO SALES*1
QUICK-REF: PHONES
QUICK-REF: ORG-ORG
CREATED: 15 NOV 1988
LAST-UPDATE: 15 NOV 1988
FILE-SER: HO*245B*331-9*1A14
ENTERED-BY: HO
ADDR: 01
STREET: 915*CROSSTIMBERS*-
CITY: HOUSTON
STATE: TX
PHONE: 713*697*2773
ADDR-S: HO*245B*331-9*1A14

1325015-000-6651

ORGANIZATION ASSOCIATION INFO

O-O: SAMCO SALES*1*AMCOM*1
CREATED: 15 NOV 1988
LAST-UPDATE: 15 NOV 1988
RELATIONSHIP: PHONE NUMBER HELD BY
RELATIONSHIP-S: HO*245B*331-9*1A14

TELEPHONE INFO

PHONES: 713*697*2773
CREATED: 15 NOV 1988
LAST-UPDATE: 15 NOV 1988
QUICK-REF: ORG
ADDR: 01
STREET: 915*CROSSTIMBERS*-
CITY: HOUSTON
STATE: TX
ADDR-S: HO*245B*331-9*1A14
ORG-SUBSCRIBER: SAMCO SALES*1
ORG-SUBSCRIBER-S: HO*245B*331-9*1A14

1325015-000-6653

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 1
Page 9 ~ b6 - Per USCIS;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

LIST OF NAMES FROM REGISTRATION OWNER FILE

b6 Per USCIS

NAME	DOB	ADDRESS	LIC	VMA

NO MORE RECORDS TO DISPLAY, TO END <CLEAR>

29B-WF-171994-361

SEARCHED ____ INDEXED SU
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MAR 18 1992
FBI - WASH. METRO FIELD OFFICE
SU

1325015-000-6266

UNITED STATES DEPARTMENT OF JUSTICE
IMMIGRATION AND NATURALIZATION SERVICE

OMB No. 1115-0061
Approval expires 4-86

PETITION TO CLASSIFY PREFERENCE STATUS OF ALIEN ON BASIS OF PROFESSION OR OCCUPATION

DATE RECEIVED	FEE STAMP

TO THE SECRETARY OF STATE

Petition was filed on _____

Beneficiary's file number: A_____

Petition is approved for status under section ☐ 203(a)(3). ☐ 203(a)(6)

☐ Sec. 212(a)(14) certification attached.

☐ Blanket Sec. 212(a)(14) certification issued.

DATE OF ACTION
DD

DISTRICT

REMARKS

b6 Per USCIS

RECEIVED	TRANS. IN	RET'D/TRANS OUT	COMPLETED

Form I-140 (Rev. 5-5-83)N

1325015-000-6267

PART II—INFORMATION CONCERNING EMPLOYER AND POSITION

b6 Per USCIS

PART III—CERTIFICATION OF PETITIONER OR AUTHORIZED REPRESENTATIVE

b6 Per USCIS

b6 Per USCIS

b6 Per USCIS

Academic Activities:

b6 Per USCIS

Publications:

b6 Per USCIS

Education:

b6 Per USCIS

Languages:

b6 Per USCIS

b6 Per USCIS

22. Applications require various types of documentation. Please read PART II of the instructions to assure that appropriate supporting documentation is included with your application.

23. EMPLOYER CERTIFICATIONS

By virtue of my signature below, I HEREBY CERTIFY the following conditions of employment.

a. I have enough funds available to pay the wage or salary offered the alien.

b. The wage offered equals or exceeds the prevailing wage and I guarantee that, if a labor certification is granted, the wage paid to the alien when the alien begins work will equal or exceed the prevailing wage which is applicable at the time the alien begins work.

c. The wage offered is not based on commissions, bonuses, or other incentives, unless I guarantee a wage paid on a weekly, bi-weekly or monthly basis.

d. I will be able to place the alien on the payroll on or before the date of the alien's proposed entrance into the United States.

e. The job opportunity does not involve unlawful discrimination by race, creed, color, national origin, age, sex, religion, handicap, or citizenship.

f. The job opportunity is not:

(1) Vacant because the former occupant is on strike or is being locked out in the course of a labor dispute involving a work stoppage.

(2) At issue in a labor dispute involving a work stoppage.

g. The job opportunity's terms, conditions and occupational environment are not contrary to Federal, State or local law.

h. The job opportunity has been and is clearly open to any qualified U.S. worker.

24. DECLARATIONS

DECLARATION OF EMPLOYER ➤ *Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury the foregoing is true and correct.*

b6 Per USCIS

1325015-000-6270

b6 USCIS

PART [redacted] STATEMENT OF QUALIFICATIONS OF AL[redacted]

FOR ADVICE CONCERNING REQUIREMENTS FOR ALIEN EMPLOYMENT CERTIFICATION: *If alien is in the U.S., contact nearest office of Immigration and Naturalization Service. If alien is outside U.S., contact nearest U.S. Consulate.*

IMPORTANT: READ ATTACHED INSTRUCTIONS BEFORE COMPLETING THIS FORM.

Print legibly in ink or use a typewriter. If you need more space to fully answer any questions on this form, use a separate sheet. Identify each answer with the number of the corresponding question. Sign and date each sheet.

Endorsements

DATE REC. DOL

O.T. & C.

(Make no entry in this section — FOR Government Agency USE ONLY)

(Items continued on next page)

b6 Per USCIS

5. WORK EXPERIENCE. *List all jobs held during past three (3) years. Also, list any other jobs related to occupation for which the alien is seeking certification as indicated in item 9.*

16. DECLARATIONS

DECLARATION OF ALIEN ➤ *Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury the foregoing is true and correct.*

DATE

b6 Per USCIS

[redacted] b6 Per USCIS

Place and Date of Birth: [redacted] b6 Per USCIS

Nationality: [redacted]

Marital Status: [redacted]

Professional History:

[redacted] b6 Per USCIS

b6 Per USCIS

OMB Approval No. 44-R1301

U.S. DEPARTMENT OF LABOR
Employment and Training Administration

APPLICATION FOR ALIEN EMPLOYMENT CERTIFICATION

IMPORTANT: READ CAREFULLY BEFORE COMPLETING THIS FORM

PRINT legibly in ink or use a typewriter. If you need more space to answer questions on this form, use a separate sheet. Identify each answer with the number of the corresponding question. SIGN AND DATE each sheet in original signature.

To knowingly furnish any false information in the preparation of this form and any supplement thereto or to aid, abet, or counsel another to do so is a felony punishable by $10,000 fine or 5 years in the penitentiary, or both (18 U.S.C. 1001).

PART A. OFFER OF EMPLOYMENT

ds

Replaces MA 7-50A, B and C (Apr. 1970 edition) which is obsolete.

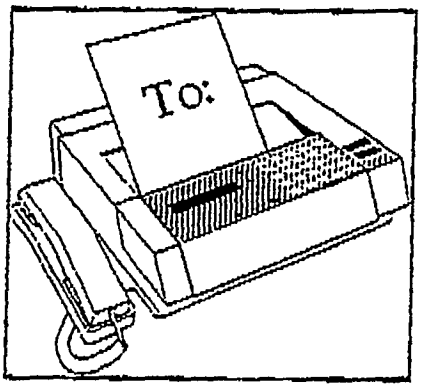
ETA 750 (Oct. 1979)

1325015-000-6269

Rec'd 3-18-92
S.H. 3:40p

U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, D.C.

3-18 , 1992



29B-WF-171994-Main

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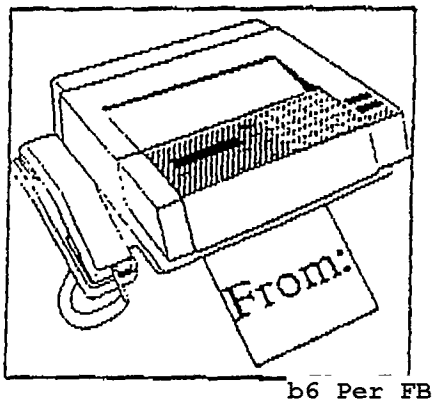
FBI - WASH. METRO FIELD OFFICE



b6 Per FBI
b7C

	Name	
Squad C-5	Receivership	Falcon
	Address	
(202) 324-6426	Fax Number	(202) 504-2247
	Voice Number	(202)

29B-WF-171994-366

Page 1 of 17 Pages

Information requested on Legal + extras

1325015-000-6281

In addition to the foregoing, [redacted] **also known as (aka)** [redacted] another associate of [redacted]s, was [redacted] noted that one of the amounts owed to FALCON is an obligation dated 6/13/88 by **DIAMONDS & DENIMS, INC.**, 220 Norma Lane, Evans, Georgia. The principal listed on that account is [redacted] recalled that [redacted] and that may explain the connection between [redacted] b6 Per FBI b7C

[redacted] has been unable to locate all of the books and records for the company. Presently, the SBA has records through 1987, and will be receiving bank account information in the near future. [redacted] believes that the company's records were moved to a storage facility and subsequently to a hotel at LaGuardia in New York, that was/is owned by [redacted] has been in contact with [redacted] an attorney from New York, that is representing the **NEW YORK SUPERINTENDENT OF BANKING**, in a lawsuit involving [redacted] believes that relevant records have been hidden at the residence of a relative of [redacted]'s who lives at Middle Island, New York. [redacted] has learned that an employee at the LaGuardia hotel recalled delivering several boxes of records to a house at that location. In addition, [redacted] allegedly listed a relative in his Last Will and Testament that resides at Middle Island. [redacted] further advised that a motel slip from LaGuardia disclosed that [redacted] (phonetic), an associate of [redacted]s, resides at [redacted] Middle Island, New York. b6 Per FBI b7C

The SBA has also learned that [redacted] acquired **COX TRAILERS, INC.**, a company that was located in Grifton, North Carolina. Creditors subsequently forced the company into bankruptcy. The SBA is interested in a loan made by FALCON to COX TRAILERS, INC. on 8/4/89 in the amount of $100,000. b6 Per FBI b7C

[redacted] has also learned that [redacted] is affiliated with **PHARMA CONTROLS, INC.** and **MC DOWELL COMPANY.** b6 Per FBI b7C

[redacted] has learned that [redacted] left the United States in December 1991 and is currently residing in [redacted] However, [redacted] believes that [redacted] remained in the United States, and may be residing with relatives in the Houston, Texas. [redacted]s businesses are currently being managed by his close associates and relatives. b6 Per FBI b7C

[redacted] provided a photocopy of a schedule entitled "FALCON CAPITAL CORPORATION, License No. 04/04-0091, Schedule of Portfolio Companies." The schedule contains the names, addresses, principal's names, dates and amounts owed by thirty-one (31) debtors to FALCON which total $1,846,499. Presently, the SBA estimates its loss exposure at $1.2 million. b6 Per FBI b7C

SCHEDULE 13D

This SCHEDULE 13D is filed jointly on behalf of ZURICH CORPORATION, a North Carolina corporation, POLYSTAR CORPORATION, a North Carolina corporation, [redacted] and [redacted] and it relates to their beneficial ownership of 12,000,000 shares of Common Stock, par value $0.10 per share (the "Regal Stock"), of REGAL INTERNATIONAL, INC., a Delaware corporation. b6 Per FBI b7C

Item 1. SECURITY AND ISSUER.

The class of equity securities to which this Schedule 13D relates is the Common Stock, par value $0.10 per share, of Regal International, Inc. ("Regal"), whose address is 256 North Belt East, Houston, Texas 77060-2096.

Item 2. IDENTITY AND BACKGROUND.

Zurich Corporation ("Zurich"), is a North Carolina corporation whose address is 400 West Fifth Street, Greenville, North Carolina 27834. Zurich is a private real estate and investment company. b6 Per FBI b7C

Polystar Corporation ("Polystar"), is a North Carolina corporation whose address is 400 West Fifth Street, Greenville, North Carolina 27834. Polystar is a private investment company.

[redacted] is [redacted] and [redacted] of the issued and outstanding capital stock of Zurich and Polystar. [redacted]'s address is 400 West Fifth Street, Greenville, North Carolina 27834. b6 Per FBI b7C

[redacted] is [redacted] of Zurich and Polystar, and his address is 400 West Fifth Street, Greenville, North Carolina 27834. b6 Per FBI b7C

1325015-000-6283

The business of Zurich and Polystar is managed by its board of directors. The directors and executive officers of Zurich and Polystar, their business addresses, their present principal occupation or employment and their citizenship are set forth below.

Name and Business Address/Occupation	Affiliation with Zurich or Polystar	Citizenship
[redacted] 400 West Fifth Street Greenville, N.C. 27834 Investments and real estate	[redacted] Zurich and Polystar	[redacted] b6 Per FBI b7C
[redacted] 400 West Fifth Street Greenville, N.C. 27834 Management of real estate and hotels	[redacted] of Zurich and Polystar	
[redacted] 400 West Fifth Street Greenville, N.C. 27834 Finance	[redacted] of Zurich and Polystar	

During the past five (5) years, none of the persons identified above has ever been (i) convicted in a criminal proceeding (excluding traffic violations or similar misdemeanors) or (ii) a party to a civil proceeding of a judicial or administrative body of competent jurisdiction as a result of which such corporation or individual was or is a subject to a judgment, decree or final order enjoining future violations of, or prohibiting or mandating activities subject to, federal or state securities laws or finding any violation with respect to such laws.

1325015-000-6284

Item 3. SOURCE AND AMOUNT OF FUNDS OR OTHER CONSIDERATION.

On February 15, 1990, Regal and Zurich entered into a financing agreement (the "Agreement") which provided for Zurich to lend Regal a total of $500,000. Pursuant to the terms of the Agreement, Zurich agreed to lend Regal $300,000 on or before February 27, 1990 to be used by Regal for working capital, and $200,000, upon receipt of final approval from the Environmental Protection Agency, to settle environmental litigation styled United States of America v. Bell Petroleum Services, et. al. Regal's wholly owned subsidiary, Bell Petroleum Services, is a defendant in the environmental litigation.

The Agreement also provided that Zurich would pay First City, Texas-Midland N.A. (the "Bank") an amount sufficient to obtain an option to purchase Regal's indebtedness to the Bank evidenced by a promissory note (the "Regal Note") in the principal amount of $2,144,000. Zurich acquired an option from the Bank to purchase the Regal Note for total consideration of $1,850,000 which included a $250,000 payment by Zurich to the Bank for such option. Pursuant to the terms of the Agreement, Zurich agreed to pass the discount on the amount Zurich paid the Bank for the Regal Note to Regal and to extend the maturity and the terms of the discounted Regal Note for a three year period. On June 20, 1990, Zurich purchased the Regal Note from the Bank for $1,850,000.

On June 20, 1990, in consideration for (i) Zurich's purchase of the Regal Note and the restructure of Regal's the indebtedness thereon, (ii) the $300,000 loan from Zurich to Regal for working capital, and (iii) the $200,000 loan from Zurich to Regal to be used to settle environmental litigation involving Regal's subsidiary, Regal granted Zurich an option to purchase the Regal Stock (the "Option").

The Option to purchase the Regal Stock is exercisable for a period of 360 days from the date of grant and may be repurchased by Regal at specified prices for the first 150 days following the date of grant. The Option provides that it may be exercised at an exercise price of $.25 per share.

Zurich assigned the Option to Polystar. At such time as Polystar exercises the Option to purchase the Regal Stock, Regal would be entitled to receive consideration valued at $3,000,000 or $.25 per share. On June 25, 1990, management of Polystar notified Regal that it intends to exercise the Option to acquire the Regal Stock. The consideration for acquiring the Regal Stock will be cash or forgiveness of debt, or a combination of both.

The source of the funds utilized by Zurich to purchase the debt of Regal owing to the Bank as well as the $300,000 working capital loan and the $200,000 for settlement of the environmental litigation came from working capital funds of Zurich.

Item 4. PURPOSE OF TRANSACTION.

Zurich and its assignee, Polystar, acquired the Option to purchase the Regal Stock for investment and for the purpose of acquiring a significant equity ownership interest in Regal. Polystar intends to periodically review its investment in Regal and may, depending upon its evaluation of Regal's business and prospects and future developments (including, but not limited to, general economic conditions), and subject to federal and state securities laws, determine to acquire additional shares of Regal stock or, subsequent to the exercise of of the Option, sell a portion or all of the Regal Stock.

Management of Polystar is evaluating plans regarding seeking representation on the board of directors of Regal including, but not limited to, proposing one or more nominees for director of Regal at the annual meeting of shareholders, with a view to influencing the business decisions of Regal. The decision of Polystar whether to seek representation on the Regal board is dependent upon an analysis of a number of factors which are presently being analyzed.

Polystar has been negotiating with Bailey International Holdings Limited ("Bailey") and their purported nominees Monmin Holdings ("Monmin") and Excalibur Ventures, Inc. ("Excalibur"), who together control preferred stock of Regal, which upon conversion, will approximate 37.4% of the Common Stock of Regal (provided Polystar has not exercised its Option) and approximately $2,400,000 in promissory notes. Bailey and Monmin with the express support of Excalibur have urged Polystar to

help facilitate the acquisition by Regal of a certain mining transaction as mentioned in the 13D filing of Bailey dated January 31, 1990. As of the date of this Schedule 13D filing, the negotiations have not reached any successful conclusion and further negotiations are continuing. However, there can be no guarantee of a successful outcome and Polystar makes no representations about its support for the Bailey/Menmin/Excalibur proposal. Further, at this time neither Zurich nor Polystar has undertaken any due diligence with regard to the physical or financial aspects of the mining proposal.

Except as set forth in Item 4 to this Schedule 13D, none of Zurich, Polystar, [redacted] or [redacted] has formulated any plans or proposals which would relate to or would result in an extraordinary corporate transaction involving Regal, the sale or transfer of a material amount of Regal's assets, a change in Regal's board of directors or management, any material change in Regal's capitalization or dividend policy, any material change in Regal's business or corporate structure, changes in Regal's charter or by-laws or the delisting or deregistering of Regal's securities. However, it should not be assumed that Zurich, Polystar, [redacted] and [redacted] will not formulate plans and proposals which would relate to or would result in any of the matters enumerated above. Any such plans or proposals may or may not be implemented. b6 Per FBI b7C

Item 5. INTEREST IN SECURITIES OF ISSUER.

The percentage set forth in this Item 5 reflecting the beneficial ownership of Zurich, Polystar, [redacted] and [redacted] in the Common Stock of Regal is based on a total of 26,491,504 shares of Common Stock of Regal outstanding. Such number reflects the 14,491,504 shares of Common Stock of Regal outstanding as reported by Regal in its most recently filed Annual Report on Form 10-K (filed on April 12, 1990 for the fiscal year-ended December 31, 1989), plus the 12,000,000 shares of Regal Stock issuable to Polystar upon its exercise of the Option. b6 Per FBI b7C

As of the date of this Schedule 13D, Polystar has the power to vote or direct the disposition of the Regal Stock to be acquired upon Polystar's exercise of the Option to purchase such stock. The Regal Stock

JUL 02 '92 12:15 SKIER BROWN SHERMAN & PEAKER

underlying Polystar's Option represents approximately 45% of the outstanding Common Stock of Regal. Polystar and [redacted] as [redacted] of Polystar, have the power to vote, or direct the vote, and to dispose, or direct the disposition of, the Regal Stock underlying the Option. [redacted] may be deemed the control person of Polystar. b6 Per FBI b7C

Under Section 13(d) of the Securities Exchange Act of 1934, as amended (the "Act") and the rules and regulations promulgated thereunder, as a result of the relationships and agreements described in this Schedule 13D, Zurich and [redacted] may also be deemed to beneficially own the Regal Stock underlying the Option and to share the power to vote, or to direct the vote, and to dispose, or direct the disposition thereof. However, the filing of this Schedule 13D shall not be construed as an admission that, for the purposes of Section 13(d) or 13(g) of the Act, or for any other purposes, Zurich, [redacted] or [redacted] is the beneficial owner of the Regal Stock. b6 Per FBI b7C

None of the executive officers or directors of Zurich or Polystar own any Common Stock of Regal.

Item 6. CONTRACTS, ARRANGEMENTS, UNDERSTANDINGS OR RELATIONSHIPS WITH RESPECT TO SECURITIES OF THE ISSUER.

To the best knowledge of the persons filing this Schedule 13D, except as described elsewhere in this Schedule 13D, none of Zurich, Polystar, [redacted] or [redacted] is a party to any contract, arrangement, understanding or relationship with respect to any securities of Regal, including but not limited to, any contract, arrangement, understanding or relationship concerning the transfer or the voting of any securities of Regal, finders fees, joint venture, loan or option arrangements, puts or call, guarantees of profits, division of profits, or the giving or withholding of proxies. b6 Per FBI b7C

JUL 22 '93 14:15 BAKER BROWN SHERMAN & FRANCE P.12/29

Item 7. MATERIAL TO BE FILED AS EXHIBITS.

The following documents have been filed as exhibits to this Schedule 13D:

Exhibit A: Joint Agreement to File Schedule 13D.

Exhibit B: Agreement between Regal and Zurich dated February 15, 1990.

Exhibit C: Promissory Note executed by Regal payable to the Bank dated May 13, 1989.

Exhibit D: Letter from the Bank to Zurich dated January 9, 1990.

Exhibit E: Letter from the Bank to Polystar dated June 22, 1990.

Exhibit F: Option Agreement dated June 20, 1990.

0690371.DOC
WP1053
07/02/90-1145a/jg

[redacted] b6 Per FBI b7C

(O) [redacted]

11/89 Regal 80,000

[redacted]

January 7, 1991

Via Facsimile

[redacted]

Regal International, Inc. b6 Per FBI b7C
Oklahoma City, OK

Dear [redacted]

In response to your letter dated January 4, 1991 and our telephone conversation of this morning I would like to point out a number of issues, a summary of which, I feel, should be brought to the attention of the board in a meeting that I have requested to be held on January 9, 1991.

In the first instance, management was well aware of the critical need for financing and in that regard it was imperative that numbers emanating from the office of the CFO be absolutely accurate both in content and format. As it turned out not only were the totals of the format presented to Midlantic Bank inaccurate the whole format was thoroughly unprofessional. I understand that [redacted] was "busy with a number of other tasks" that precluded his furnishing accurate statements. I can't understand what could be more pressing than a need to have integrity in financial reporting. This shoddy presentation resulted in at least one lender not proceeding with financing. b6 Per FBI b7C

The appraisal process only served to underscore the gross inadequacies of operational management. It is preposterous to state that "the strength of the analysis performed in Louisiana" helped obtain a revision of the numbers. Such a statement reflects a lack of understanding of the discussions with the appraiser and this office. [redacted] had obtained an assurance from the appraiser that he would "re-work" the numbers since he told Independent that the numbers were grossly inadequate judging from the book values even if they were to be gauged on a liquidation basis. [redacted] of Independent said that, although he could not view them from the book values standpoint, he certainly would be able to give numbers using disposition under fair market conditions. Nevertheless, as I wrote earlier in my last letter, there was adequate forewarning of the need to obtain the best possible numbers. It is an acknowledged professional fact that b6 Per FBI b7C

appraisal numbers can, upto a point, be improved upon based upon comparative values obtained under differing circumstances. It is only natural that each borrower try to obtain the best possible comparative number and that was what was done by this office.

On another matter, [redacted]s memo was not a directive to [redacted] The word expedite was meant to accelerate the progress of and surely not implement the proposal and was only intended as suggestion to hasten the process. He was absolutely unaware of the competing Fidelity proposal which saves the company about $35,000 and had he known so we certainly would have expected the company to implement the latter. The fact that he wrote to [redacted] with a copy to you clearly indicates that there was no attempt to subvert the management process. b6 Per FBI b7C

I understand the litigation in Delaware was costly to Regal as was the case with all the other legal bills. It was Zurich/Polystar's intention to cut short the litigation upon exercise of the option which resulted in the company's mammoth legal bill being whittled down to manageable numbers. This was contrary to your and [redacted]s position that the company continue to litigate and fight the bancruptcy under section 305. If not for Zurich, the company would have incurred far greater extraordinary losses. b6 Per FBI b7C

As I had indicated in an earlier conversation, I was appalled that a news release of which I was not informed was sent out regarding your move to Oklahoma City in order "to be with your family". I understand that the press release was issued by [redacted] regardless, this caused considerable embarrassment to me as it came up in a meeting with a prospective financier. b6 Per FBI b7C

The issue of insurance has been brought up throughout our close association with Regal starting from August 1990. As one of the biggest line items, it was a natural point of focus in the course of our evaluation of the company's operation. All attempts at obtaining information were only with the motive of effecting savings. Contrary to your belief, I believe we need to save ourselves to profitability before achieving prosperity. I have also specific concerns there in terms of the premia paid. Apparently, AIG was supposed to hike up rates by 50% before Florida Corporate stepped in (although, I am still obtaining written proof of it). Further, there appears to be three ex-employees of Regal who continue to figure in the medical insurance plan.

To reiterate, I feel that the seeming insecurity of personnel at Regal translates into inadequate performance. There appears to have been furor caused by the visit to the plant by [redacted] with [redacted] even though [redacted] informed [redacted] in advance that he was visiting the plant with the gentleman from [redacted] Further, he informed Chris that Frank was a contact of mine. Had there been any attempt at doing this surreptitiously, b6 Per FBI b7C

as has been alleged, I would have precluded [redacted] from identifying the person or the purpose. I also sent [redacted]s resume to you along with a letter from me last week. As it turned out the latter part of the fax did not go through. b6 Per FBI b7C

In the light of the foregoing and other instances I request that the board be apprised of the situation in the meeting on Wednesday at Dallas at 11 AM. I propose to be in Dallas on that day and I think we can come to a final decision on the whole process in terms of management at that time.

Yours sincerely,

[redacted] b6 Per FBI b7C

Regal International, Inc.

JOHN GUNTHER DEAN
AMBASSADOR OF THE UNITED STATES OF AMERICA (RET)

Tel. 45 04 71 94
Fax 45 04 78 37

39, BOULEVARD JULES SANDEAU
75116 PARIS

October 3, 1990

[redacted] b6 Per FBI b7C

The Burton Corporation
400 W Fifth Street
Greenville, North Carolina 27834
Fax: 919 757 0069

Dear [redacted]:

It was good to meet with you again and to see with my own eyes the fantastic progress you have made in refurbishing the hotel opposite La Guardia Airport. It was also a pleasure to reestablish contact with [redacted] b6 Per FBI b7C

Before I get to business I would like you to know that I spoke with the Admission Committee at Harvard College and was told that [redacted] b6 Per FBI b7C is presently at Harvard and that "he is doing well". I was told that [redacted] "has a very nice personality" and that he is not yet living in one of the undergraduate houses since he is a transfer student. I am very pleased that [redacted] was accepted at Harvard, knowing that his acceptance was important to his parents.

Now about the warrants for Regal International, you said that we would handle this issue between us. I would appreciate knowing the number of warrants to be made over to me and how this figure was arrived at. Finally what is the predetermined price of the warrant and the validity of the time period when warrants must be converted into stock.

I also need to know whether you are interested in some investors -- American and foreign -- taking an interest in the stock of Regal International. If so, I might mention the company and prospects for the company in the right places.

Finally, you were interested in having access to some reliable banks in the U.S. In that connection, I gave your secretary the name of a friend in California who might help you on that score. I also gave him your name in the hope that you might explore whether you can help each other.

[redacted] b6 Per FBI b7C

Keep me informed about your pharmaceutical venture. I think I can help you in Europe in that field. Looking forward to hearing from you, I remain

Cordially,

John Gunther Dean

1325015-000-6293

(2)

From: [redacted] b6 Per FBI b7C

Date: September 1, 1990

Re: Regal International and Pharma Control Corporation

Regal: The re-financing for $3.5 million has been completed and the new board has been elected as of August 22, 1990. Please see attached summary sheets on the company. The company has shown two continuous quarters of profits and is expected to have a net income of over $500,000 this year. operationally and will report $1.5 million profit for 1990.

Pharma Control Corporation: This company presents an exciting new opportunity as it is on the verge of launching major new products. Further, by ensuring the addition of [redacted] (please see attached resume) the company is poised to reap enormous financial returns within the next two years as a consequence of the proprietary and unique technology brought to the company through his expertise. b6 Per FBI b7C

I have already invested $500,000 and with the infusion of another $500,000 we are assured of warrants for 10 million shares exercisable at 20 cents a share. The loans are also convertible at 20 cents a share at our discretion. I have already contacted four interested investors who have each agreed to loan $250,000 in return for a million warrants and the ability to convert their loan into equity. That will still leave a majority of the warrants (6 million) in our hands. The company's common stock has previously traded as high as $37 when it made announcements with regard to its soluble aspirin technology (please see attached summary). With the present stabilization of revenues and the future entry into the market place of drugs related to [redacted] s technology the price is expected to go up in the near term to as much as $1. b6 Per FBI b7C

HARTZOG CONGER CASON & HARGIS
A PROFESSIONAL CORPORATION
LAWYERS
1600 BANK OF OKLAHOMA PLAZA
201 ROBERT S. KERR
OKLAHOMA CITY, OKLAHOMA 73102

(405) 235-7000
FACSIMILE (405) 235-7329

April 18, 1991

[redacted] b6 Per FBI b7C
Gadsby & Hannah
125 Summer St.
Boston, Massachusetts 02110

Re: Regal International, Inc.

Dear [redacted]:

As you know, in our letter to you dated April 18, 1991, we described, among other things, certain information which we believe must be included in Regal International, Inc.'s ("Regal") Preliminary Proxy Statement (the "Proxy Statement") in order that the Proxy Statement not be misleading. It has since been brought to our attention that on April 17, 1991, [redacted] wa b6 Per FBI b7C [redacted] Attached is a copy of the Dallas Times Herald article describing the circumstances of [redacted] s [redacted] is [redacted] of Regal.

Given [redacted] s role in certain of the allegations mad b6 Per FBI against [redacted] we believe that [redacted] s indictmen b7C should be disclosed in the Proxy Statement. In order to make an informed decision on the proposal to remove [redacted] the shareholders must be aware of all facts affecting the ability and integrity of the persons making the allegations against [redacted] As a result, we will expect that the Proxy Statement will immediately be revised to include this information.

Very truly yours,

HARTZOG CONGER CASON & HARGIS

[redacted] b6 Per FBI b7C

HARTZOG CONGER CASON & HARGIS

[redacted] b6 Per FBI

cc: [redacted] (with enclosure)
[redacted] (with enclosure)
[redacted] (with enclosure)
[redacted] (with enclosure)
Ambassador John Gunther Dean (with enclosure)
[redacted] with enclosure)
[redacted] (with enclosure)
[redacted] (with enclosure)
[redacted] (with enclosure)
[redacted] (with enclosure)
[redacted] (with enclosure)

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سلطة المنطقة الحرة لجبل علي
Jebel Ali Free Zone Authority

QUESTIONNAIRE

Please complete in English

So that your requirement can be assessed please complete this questionnaire and send it to the Jebel Ali Free Zone Authority

licence required SPECIAL or GENERAL [see page 5]

Your Company's Name: REGAL INT'L INC.

Address: 9400 Ditmars Blvd.
East Elmhurst, NY 11369

Telephone: 718-335-1200 Telex / FAX: 718-458-1239

Company name you wish to use, if different from above: SAME AS ABOVE

When and where was your parent company established?:

Do you have a corporate company outside Dubai? [please supply details]: YES

Present business: RUBBER OIL TOOLS - MANUFACTURING

Business proposed for Jebel Ali: PHARMACEUTICALS & RUBBER TOOLS FOR OIL INDUSTRY

Capital investment proposed for Jebel Ali: $ 3 Million

Number of employees proposed for Jebel Ali: Male 85 Female 15

Are any products hazardous? If YES please specify — Yes ☐ No ☒: - NONE -

b6 Per FBI
b7C

cost $05

What will be your requirements for? Land area: 1 Acre or Warehouse area: 1500 Sq. Mtrs. or Office:

Will you be IMPORTING? raw materials ☒ finished goods ☐ anticipated tonnage:

Will you be EXPORTING? raw materials ☐ finished goods ☒ anticipated tonnage:

What will be yo. Electricity maximum demand: n/a

Water: Gallons per month

Please list two Banks we may ask for references
1 NCNB Bank of Dallas-Corsicana Branch
2 Texas - U.S.A

Resident manager or Contact from whom we may obtain further information — Name: [redacted] b6 Per FBI b7C

Telephone: 404-731-0880 Telex / FAX: 718-458-1239

1325015-000-6297

Date Questionnaire completed: Janurary 4, 1991

Memorandum

To : FBIHQ Date 3/17/92

From : SAC, WMFO (29B-WF-171994 (C-5) (P)

Subject: HIDDEN INTEREST;
MAJOR CASE #38
OO:WMFO

RE: WMFO telcall to Assistant Unit Chief, Voucher Unit [redacted] 3/17/92. b6 Per FBI b7C

REQUEST OF THE BUREAU

In reference to WMFO Memo to FBIHQ dated 2/26/92 and to faxed transmission from FBIHQ to WMFO dated 2/27/92; FBIHQ is requested to approve the reimbursement of actual expenses to be incurred on travel of FA [redacted] to Grand Cayman Islands 3/24/92 - 4/4/92. [redacted] b6 Per FBI b7C b7E

[redacted] FBIHQ indicated that actual expenses for lodging, for FA [redacted] could be approved for this location. FBIHQ is requested to approve actual expenses, for FA [redacted] s official travel, so he may complete the investigation as it relates to the above case. This travel has prior FBIHQ approval for investigative purposes of the captioned matter.

As mentioned in previous memoranda, SA's [redacted] and [redacted] with prior travel approval, will already be in the Cayman Islands and FA [redacted] will be joining them on the 24th of March. b6 Per FBI b7C

3 - FBIHQ
1 - WMFO
SRD/srd
(4)

29B-WF-171994 - Main
-367

Searched
Serialized
Indexed
Filed

1325015-000-6298

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 3/19/92

From : **SA** [redacted] b6 Per FBI b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG;
(OO: WMFO)

Meeting with
U.S. SMALL BUSINESS ADMINISTRATION OFFICIALS
March 10, 1992

Pursuant to captioned investigation, SA [redacted] met with b6 Per FBI b7C officials from the U.S. SMALL BUSINESS ADMINISTRATION (SBA), Washington, D.C. regarding **FALCON CAPITAL CORPORATION (FALCON), ZURICH CORPORATION and** [redacted] The meeting was held at the SBA Receiver's Office located at 666 11th Street, N.W., Washington, D.C. SBA Officials present included the following:

(X)

[redacted] Receiver/Agent b6 Per FBI b7C
U.S. Small Business Administration
666 11th Street, N.W.
Washington, D.C. 20001
Telephone Number: 202/272-3617

[redacted] Trial Attorney, b6 Per FBI b7C
U.S. Small Business Administration
409 Third Street, S.W. 7th Floor
Washington, D.C. 20416
Telephone Number: 202/205-6871

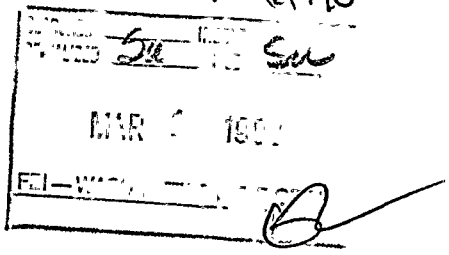
[redacted] Office of Liquidation b6 Per FBI b7C
U.S. Small Business Administration
409 Third Street, S.W. 5th Floor
Washington, D.C. 20416
Telephone Number: 202/205-7493

29B-WF-171994 - 368

MAIN

2 - WMFO (1 - 29B-WF-171994-Main)
(1 - 29B-WF-171994-Sub U)

CWS
(2)



1325015-000-6299

[redacted] Special Agent
Office of Inspector General
U.S. Small Business Administration
409 3rd Street, S.W.
Washington, D.C. 20416
Telephone Number: 202/205-7400 ; FTS 445-7400

b6 Per FBI
b7C

[redacted] advised that he is employed by the SBA as a consultant and serves as a Receiver for claims in which the SBA has an interest. One of his assignments includes a small business investment company known as **FALCON CAPITAL CORPORATION** (FALCON) which is located in Greenville, North Carolina. FALCON is owned by [redacted] believes that [redacted] purchased FALCON from a South Carolina investment group in approximately 1983. [redacted] who obtained his education [redacted] His work experience in North Carolina included working at a local rehabilitation clinic. [redacted] became involved in the acquisition of hotels and real estate, which he would "flip" into a profit by renovating or improving the property and/or its operations , and then selling the hotel to another party. [redacted] is a U.S. Citizen and possess passports issued by the U.S. [redacted]

b6 Per FBI
b7C

[redacted] explained that the SBA guaranteed loans made to FALCON by various financial institutions. As a part of the SBA guarantee, FALCON pledged its assets to the SBA. FALCON's assets consist primarily of notes receivable owed by third party borrowers to FALCON. The total amount of notes receivable are approximately $1.8 million and the SBA guarantees 80% of the total. [redacted] provided a photocopy of a Court Order issued on 12/17/91 by **U.S. DISTRICT COURT JUDGE JAMES C. FOX**, for the Eastern District of North Carolina, which ordered FALCON's assets to be turned over to the SBA as Receiver, in order to satisfy any creditor claims against FALCON. In addition, the order also awarded a judgement in favor of the SBA in the amount of $1,265,590.01 for obligations owed to the it by FALCON. [redacted] advised that negotiations have been ongoing between the SBA and [redacted] via telephone, regarding FALCON's self-liquidation. [redacted]'s attorney is [redacted] 215 Broad Street, New Bern, North Carolina 28563, telephone number 919/633-2700.

b6 Per FBI
b7C

Through his involvement in attempting to collect these third party obligations for the SBA, [redacted] has discovered apparent fraud by [redacted] through FALCON, which consists of insider transactions involving [redacted] and his associates / affiliated entities.

b6 Per FBI
b7C

For example, one of FALCON's notes receivable was from [redacted] Grimesland, NC, dated 5/4/87 in the amount of $100,000. [redacted] contacted [redacted] who advised that [redacted] contacted him in an effort to obtain $100,000 cash. [redacted] asked

b6 Per FBI
b7C

1325015-000-6300

[redacted] if he would allow a lien to be placed on his [redacted]'s) house in order to secure a loan. Apparently, [redacted] agreed to the arrangement and obtained a loan from FALCON, wherein a lien was filed against [redacted]'s house as security. [redacted] told [redacted] that [redacted] gave the money ($100,000) to [redacted] on the same day he received it. [redacted] subsequently returned the lien against [redacted]'s house to him. In this manner, [redacted] apparently served as a straw-borrower or conduit in order for [redacted] to obtain $100,000 from FALCON, without drawing any attention from the SBA. FALCON's records report an outstanding loan to [redacted] in the amount of $100,000, with no record of any payment by [redacted] or anyone else. b6 b7C

[redacted] described another loan dated 1/25/88 made to [redacted] Summit, NJ, in the amount of $75,000. [redacted] has learned that [redacted] is a former **BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI)** Official in New York, and the NEW YORK DISTRICT ATTORNEY'S OFFICE believes that this loan may be a payoff from [redacted] for loans made by BCCI to **ZURICH CORPORATION** and **P.S. INVESTMENT COMPANY**, which were COMPANIES owned by [redacted]. In reviewing the documentation received from FALCON, [redacted] believes that the file had been "sanitized" of pertinent records or correspondence. [redacted] has also heard that [redacted] may have a financial interest in a [redacted] owned hotel located in Raleigh, North Carolina. b6 Per FBI b7C

[redacted] also advised that FALCON's receivables included a loan dated 11/3/89 to **REGAL INTERNATIONAL, INC.** (REGAL), 256 North Belt East, St. 252, Houston, Texas, in the amount of $80,000. The principal name listed in connection with the loan is [redacted] telephonically contacted REGAL and spoke with a young unknown male who was serving as the Chief Financial Officer (CFO). [redacted] attempted to obtain information regarding the alleged forgiveness of debt ($80,000) by FALCON to REGAL. The young CFO would not admit any knowledge of it, and referred [redacted] to his superior. [redacted] confirmed that [redacted] REGAL. b6 Per FBI b7C

In connection with the REGAL loan, [redacted] spoke with [redacted] of REGAL. [redacted] told [redacted] that **POLYSTAR**, a company controlled by [redacted] agreed to invest $3 million of needed capital into REGAL. At the time, REGAL owed $1.8 million to **First City Bank in Midland, Texas**, and POLYSTAR negotiated some type of a settlement with the bank. POLYSTAR subsequently obtained approximately 50% of REGAL's stock in exchange for the $3 million financing arrangement, even though POLYSTAR did not actually provide $3 million in funds. After obtaining control of REGAL, the Board of Directors were replaced by [redacted]'s associates and [redacted] was voted out as President. [redacted] currently resides in Oklahoma City, Oklahoma. [redacted] would be able to furnish additional details regarding the transactions involving [redacted] and his associates. b6 Per FBI b7C

03/18/92 15:26

RECD S.E.C.
JUL 2 1990
FEE 11

SCHEDULE 13D

RECD S.E.C.
JUL 2 1990
66

OMB APPROVAL
OMB Number: 3235-0145
Expires: August 31, 1991
Estimated average burden
hours per response . . . 14.90

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

SCHEDULE 13D

Under the Securities Exchange Act of 1934
(Amendment No. _____)*

REGAL INTERNATIONAL, INC.
(Name of Issuer)

RECEIVED
JUL 5 1990
Bechtel Information Services
Gaithersburg, Maryland

COMMON STOCK
(Title of Class of Securities)

75 8819 106
(CUSIP Number)

[redacted]
400 West Fifth Street
Greenville, North Carolina 27834
(Name, Address and Telephone Number of Person Authorized to Receive Notices and Communications)

b6 Per FBI
b7C

June 20, 1990
(Date of Event which Requires Filing of this Statement)

If the filing person has previously filed a statement on Schedule 13G to report the acquisition which is the subject of this Schedule 13D, and is filing this schedule because of Rule 13d-1(b)(3) or (4), check the following box ☐.

Check the following box if a fee is being paid with the statement ☒. (A fee is not required only if the reporting person: (1) has a previous statement on file reporting beneficial ownership of more than five percent of the class of securities described in Item 1; and (2) has filed no amendment subsequent thereto reporting beneficial ownership of five percent or less of such class.) (See Rule 13d-7.)

Note: Six copies of this statement, including all exhibits, should be filed with the Commission. See Rule 13d-1(a) for other parties to whom copies are to be sent.

*The remainder of this cover page shall be filled out for a reporting person's initial filing on this form with respect to the subject class of securities, and for any subsequent amendment containing information which would alter disclosures provided in a prior cover page.

The information required on the remainder of this cover page shall not be deemed to be "filed" for the purpose of Section 18 of the Securities Exchange Act of 1934 ("Act") or otherwise subject to the liabilities of that section of the Act but shall be subject to all other provisions of the Act (however, see the Notes).

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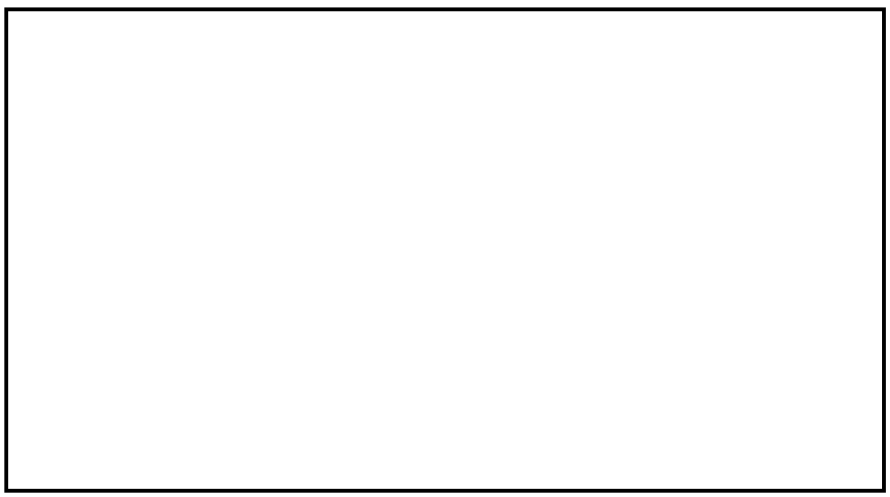
1325015-000-6282



29BWF-171994 Main (X)
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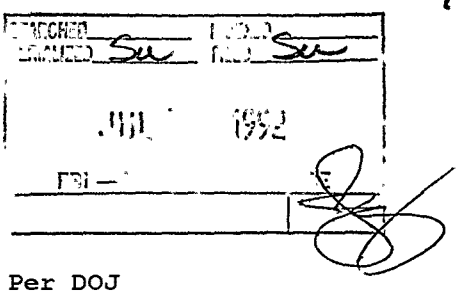

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FOI/PA
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ALL FBI INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

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b7C

Memorandum

~~SECRET~~

To : SAC, WMFO (29B-WF-171994)(P)(CI-7) Date 10/7/91

From : SA [redacted] CI-7

b6
b7C

Subject: CLARK McADAMS CLIFFORD; ET AL
FIF; FAG
OO:WMFO

[redacted]

b3
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b7D

Reference memo of SA [redacted] 8/14/91 with attached report from [redacted]

[redacted] (S)

b1 Per Army
b3
b6

~~SECRET~~
CLASSIFIED BY: 7049
DECLASSIFY ON: OADR

3-WMFO
1- [redacted]
1-

29B-WF-171-994-263

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 08 1991
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RCC:ymm
(3)

[redacted]

b6
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Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 10/10/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38
OO: WMFO

Attached are documents received this date from AUSA [redacted] WDC: b6 b7C b7D

1) Memorandum, dated 10/4/91, captioned, [redacted]

2) Memorandum, dated 10/7/91, captioned, "Meeting re [redacted]

3) Two filings "In the High Court of Justice, Queen's Bench Division, Commercial Court." Case 1991 Folio 1032, styled, "Between: (1) [redacted] (2) KAAD CORPORATION (3) ARABIAN INDUSTRIAL & COMMERCIAL CO. (4) ADHAM CORPORATION LTD (5) JEDDAH HOTELS CO. (6) NORTHWEST PITRA (7) HESKA NORTHWEST INTERNATIONAL, Plaintiffs, and BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., Defendant":

a) Points of Claim; and
b) Amended Writ of Summons.

Also, AUSA [redacted] notified me this date that, by 10/16/91, another [redacted] to the grand jury, and that [redacted] b3 b6 b7C

1-WMFO (Att. 4)

JNR:jnr
(1)

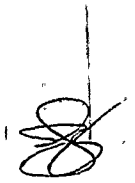
[redacted] b6 b7C

29B-WF-171994-264

1325015-000-5914

29B-WF-171994 main 266

Su Su



CO-180
NEW 1/88

WARRANT FOR ARREST

United States District Court

DISTRICT: DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA
V.
BCCI HOLDINGS, ET AL.

DOCKET NO.: 91CR655-5
MAGISTRATE CASE NO.: G.J. ORIGINAL

NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED:
AGHA HASAN ABEDI
KARACHI, PAKISTAN

WARRANT ISSUED ON THE BASIS OF:
☒ Indictment ☐ Information ☒ Order of Court ☐ Complaint

TO:
U.S. MARSHALL OR ANY AUTHORIZED AGENT

DISTRICT OF ARREST:
CITY:

YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the nearest available magistrate to answer to the charge(s) listed below.

DESCRIPTION OF CHARGES

Copy filed Sub Jug 1

18: 371	Conspiracy
18: 1343	Wire Fraud
18:1962(D)	RACKETEERING CONSPIRACY
18: 2	AIDING AND ABETTING

RECEIVED
NOV 18 10 37 AM '91
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

IN VIOLATION OF | UNITED STATES CODE TITLE 18 | SECTION 371, 1343, 1962(D) 2

BAIL FIXED BY COURT:
OTHER CONDITIONS OF RELEASE:

ORDERED BY: Alan Kay U.S. Magistrate Judge
SIGNATURE (JUDGE[1]/U.S. MAGISTRATE): Alan Kay U.S. Magistrate Judge
DATE: NOV 15 1991

CLERK OF COURT: NANCY MAYER-WHITTINGTON
DATE ISSUED: NOV 15 1991

b6
b7C

This warrant was received and executed with the arrest of the above-named person.

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE EXECUTED		

1325015-000-5931

[1] United States Judge or Judge of a State Court of Record

ZAB-WF-171994 main 267

Su Sec ⊗

WARRANT FOR ARREST

CO-180
NEW 1/88

United States District Court

DISTRICT: DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA
V.

BCCI HOLDINGS, ET AL

DOCKET NO.: 91CR655-6

MAGISTRATE CASE NO.: G.J. ORIGINAL

NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED

b6
b7C

WARRANT ISSUED ON THE BASIS OF:
☒ Order of Court
☒ Indictment ☐ Information ☐ Complaint

TO:
U.S. MARSHALL OR ANY AUTHORIZED AGENT

DISTRICT OF ARREST

CITY

YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the nearest available magistrate to answer to the charge(s) listed below.

DESCRIPTION OF CHARGES

18: 371	Conspiracy
18:1343	Wire Fraud
18:1962(D)	Racketeering Conspiracy
18:2	Aiding and Abetting

Copy filed
Sub Tug 2

RECEIVED
NOV 18 10 37 AM
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

IN VIOLATION OF	UNITED STATES CODE TITLE: 18	SECTION: 371; 1343; 1962(D); 2

BAIL FIXED BY COURT

OTHER CONDITIONS OF RELEASE

ORDERED BY: Alan Kay
U.S. Magistrate Judge

SIGNATURE (JUDGE[1]/U.S. MAGISTRATE): Alan Kay
U.S. Magistrate Judge

DATE: NOV 15 1991

CLERK OF COURT: NANCY MAYER-WHITTINGTON

b6
b7C

DATE ISSUED: NOV 15 1991

This warrant was received and executed with the arrest of the above-named person.

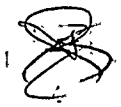
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE EXECUTED		

1325015-000-5933

[1] United States Judge or Judge of a State Court of Record

288-WF-171994 Main 268

See See



CO-180
NEW 1/88

WARRANT FOR ARREST

United States District Court	DISTRICT: DISTRICT OF COLUMBIA
UNITED STATES OF AMERICA V. BCCI HOLDINGS, ET AL	DOCKET NO.: 91CR655-7 ; MAGISTRATE CASE NO.: G.J. ORIGINAL
	NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED: GHAITH PHARAON DOB: 9/7/44 Riyadh Saudi Rabia
WARRANT ISSUED ON THE BASIS OF: ☒ Order of Court ☒ Indictment ☐ Information ☐ Complaint	
TO: U.S. MARSHALL OR ANY AUTHORIZED AGENT	DISTRICT OF ARREST CITY

YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the nearest available magistrate to answer to the charge(s) listed below.

DESCRIPTION OF CHARGES

Copy filed Sat Aug 3

18: 371	Conspiracy
18:1343	Wire Fraud
18:1962(D)	Racketeering Conspiracy
18:2	Aiding and Abetting

RECEIVED
NOV 18 10 37 AM '91
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

IN VIOLATION OF	UNITED STATES CODE TITLE: 18	SECTION: 371,1343,1962(D) 2
BAIL FIXED BY COURT	OTHER CONDITIONS OF RELEASE	
ORDERED BY: Alan Kay U.S. Magistrate Judge	SIGNATURE (JUDGE[1]/U.S. MAGISTRATE): Alan Kay U.S. Magistrate Judge	DATE: NOV 15 1991
CLERK OF COURT: NANCY MAYER-WHITTINGTON		TE ISSUED: NOV 15 1991

b6
b7C

This warrant was received and executed with the arrest of the above-named person.

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE EXECUTED		

[1]United States Judge or Judge of a State Court of Record

1325015-000-5933

CO-180
NEW 1/88

WARRANT FOR ARREST

United States District Court	DISTRICT: DISTRICT OF COLUMBIA
UNITED STATES OF AMERICA V. BCCI HOLDINGS, ET AL	DOCKET NO.: 91CR655-6 / MAGISTRATE CASE NO.: G.J. ORIGINAL
	NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED: [redacted] b6 b7C
WARRANT ISSUED ON THE BASIS OF: ☒ Order of Court ☒ Indictment ☐ Information ☐ Complaint	
TO: U.S. MARSHALL OR ANY AUTHORIZED AGENT	DISTRICT OF ARREST / CITY

YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the nearest available magistrate to answer to the charge(s) listed below.

DESCRIPTION OF CHARGES

18: 371	Conspiracy
18:1343	Wire Fraud
18:1962(D)	Racketeering Conspiracy
18:2	Aiding and Abetting

288-WF-171994 - Main - 269
SEARCHED INDEXED SERIALIZED FILED
NOV 18 10 37 AM
FBI - DISTRICT OF COLUMBIA

IN VIOLATION OF	UNITED STATES CODE TITLE: 18	SECTION: 371, 1343, 1962(D), 2
BAIL FIXED BY COURT	OTHER CONDITIONS OF RELEASE	
ORDERED BY: U.S. Magistrate Judge	SIGNATURE (JUDGE[1]/U.S. MAGISTRATE): Alan Kay, U.S. Magistrate Judge	DATE: NOV 15 1991
CLERK OF COURT: NANCY MAYER-WHITTINGTON	[redacted] b6 b7C	DATE ISSUED: NOV 15 1991

This warrant was received and executed with the arrest of the above-named person.

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE EXECUTED		

1325015-000-5936

[1] United States Judge or Judge of a State Court of Record

CO-180
NEW 1/88

WARRANT FOR ARREST

United States District Court	DISTRICT: DISTRICT OF COLUMBIA
UNITED STATES OF AMERICA V. BCCI HOLDINGS, ET AL.	DOCKET NO.: 91CR655-5 / MAGISTRATE CASE NO.: G.J. ORIGINAL
	NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED: AGHA HASAN ABEDI KARACHI, PAKISTAN
WARRANT ISSUED ON THE BASIS OF: ☒ Order of Court ☒ Indictment ☐ Information ☐ Complaint	
TO: U.S. MARSHALL OR ANY AUTHORIZED AGENT	DISTRICT OF ARREST CITY

YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the nearest available magistrate to answer to the charge(s) listed below.

DESCRIPTION OF CHARGES

18: 371	Conspiracy
18: 1343	Wire Fraud
18:1962(D)	RACKETEERING CONSPIRACY
18: 2	AIDING AND ABETTING

298-WF-171994 - MAIN - 270

Su Su

RECEIVED
NOV 18 10 37 AM
DISTRICT OF COLUMBIA

IN VIOLATION OF	UNITED STATES CODE TITLE: 18	SECTION: 371, 1343, 1962(D), 2
BAIL FIXED BY COURT	OTHER CONDITIONS OF RELEASE	
ORDERED BY: Alan Kay U.S. Magistrate Judge	SIGNATURE (JUDGE[1]/U.S. MAGISTRATE): U.S. Magistrate Judge	DATE: NOV 15 1991
CLERK OF COURT: NANCY MAYER-WHITTINGTON		DATE ISSUED: NOV 15 1991

b6
b7C

This warrant was received and executed with the arrest of the above-named person.

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE EXECUTED		

1325015-000-5937

[1] United States Judge or Judge of a State Court of Record

WARRANT FOR ARREST

CO-180
NEW 1/88

United States District Court	DISTRICT: DISTRICT OF COLUMBIA
UNITED STATES OF AMERICA V. BCCI HOLDINGS, ET AL	DOCKET NO.: 91CR655-7 / MAGISTRATE CASE NO.: G.J. ORIGINAL
	NAME AND ADDRESS OF INDIVIDUAL TO BE ARRESTED: GHAITH PHARAON DOB: 9/7/44 Riyadh Saudi Rabia
WARRANT ISSUED ON THE BASIS OF: ☒ Indictment ☐ Information ☐ Complaint ☒ Order of Court	
TO: U.S. MARSHALL OR ANY AUTHORIZED AGENT	DISTRICT OF ARREST CITY

YOU ARE HEREBY COMMANDED to arrest the above-named person and bring that person before the nearest available magistrate to answer to the charge(s) listed below.

DESCRIPTION OF CHARGES

18: 371	Conspiracy
18:1343	Wire Fraud
18:1962(D)	Racketeering Conspiracy
18:2	Aiding and Abetting

29B-WF-171994-MAIN - 271

NOV 18 10 37 AM '91

IN VIOLATION OF	UNITED STATES CODE TITLE: 18	SECTION: 371,1343,1962(D) 2
BAIL FIXED BY COURT	OTHER CONDITIONS OF RELEASE	
ORDERED BY: Alan Kay U.S. Magistrate Judge	SIGNATURE (JUDGE[1]/U.S. MAGISTRATE)	DATE: NOV 15 1991
CLERK OF COURT: NANCY MAYER-WHITTINGTON		TE ISSUED: NOV 15 1991

b6
b7C

This warrant was received and executed with the arrest of the above-named person.

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE EXECUTED		

1325015-000-5938

[1]United States Judge or Judge of a State Court of Record

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 11/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 11/14/91, the writer developed the following background information for the individuals listed below:

Name: PAUL G. ADAMS
Address: 4514 North 26th St.
Arlington, Va. 22207
DOB: 4/29/17
First American Bank/Washington, D.C.

Name: [redacted] b6 b7C
Address: [redacted] Va. [redacted]
DOB:
SSAN: [redacted]
First American Bank/Virginia

Name: [redacted]
Address: [redacted] Maryland [redacted]
DOB:
SSAN: [redacted]
First American Bank/Virginia

Name: [redacted]
Address: [redacted] New York [redacted]
SSAN: [redacted]
First American Bank/New York

[redacted] b6 b7C

29B-WF-171994 MAIN - 272

SEARCHED ___ INDEXED Su
SERIALIZED Su FILED Su
NOV 22 1991
[redacted] RO FIELD OFFICE

-132501-000-5939

FD-515 (Rev.9-28-90)
Accomplishment Report
(Effective 10/1/90)
(Submit within 30 days from date of accomplishment)
TO: Director, FBI

FROM: SAC, WMFO
SUBJECT:
HIDDEN INTERESTS;
MC #38
FIF; FAG
OO: WMFO

Bureau File Number
29B-WF-171994
Field Office File Number
C-5
Squad or RA Number
Agent's Social Security No.

Date 11/18/91

☐ X if a joint operation with: _____ (identify of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 3 = Helped, substantially
2 = Helped, but only minimally 4 = Absolutely essential

1. Acctg Tech Assistance Rating	8 Eng Sect. Tape Exams Rating	15. Photographic Coverage Rating	22. Telephone Toll Recs Rating
2. Aircraft Assistance	9. Hypnosis Assistance	16. Polygraph Assistance	23. UCO Group I
3. Computer Assistance	10. Ident Div Assistance	17. Search Warrants Executed	24. UCO Group II
4. Consensual Monitoring	11. Informant Information	18. Show Money Usage	25. UCO Other
5. ELSUR FOSA	12. Lab Div Exams	19. Surveil Sqd (SOG) Asst	26. NCAVC/ VI-CAP
6. ELSUR Title III	13. Lab Div Field Support	20. SWAT Team Action	27. Visual Invest - Analysis (VIA)
7. Eng. Sect. Field Support	14. Pen Registers	21. Tech. Agt. or Tech Equip	

b6
b7C

A. Preliminary Judicial Process (Number of subjects)

Complaints	Informations	Indictments
		7

B. Arrests, Locates, Summonses of Subpoenes Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted _____; Armed _____

Subpoenas Served _____
Criminal Summons _____
Local Crim. Summons _____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists _____; All Other Hostage Situations _____
Missing or Kidnaped Children Located _____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions _____ No. of Subj.

Civil Suits Amount of Suit	Government Defendant	Government Plaintiff
	$	$
Settlement of Award	$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1	Subject Description Code* -			Subject 2	Subject Description Code* -		
	Time Frame				Time Frame		
	Years	Months			Years	Months	
☐ Suspension			☐ Permanent	☐ Suspension			☐ Permanent
☐ Debarment				☐ Debarment			

G. Final Judicial Process: Judicial District _____ (District / State) Conviction or Pretrial Div. Date _____ Sentence Date _____ No. of Subjects _____ Acquitted _____ Dismissed _____

Subject 1	Subject Description Code* -								Subject 2	Subject Description Code* -							
	Conviction			Combined Sentence						Conviction			Combined Sentence				
	Title	Section	Counts	In-Jail Yrs.	Mos.	Suspended Yrs.	Mos.	Probation Yrs. Mos.		Title	Section	Counts	In-Jail Yrs.	Mos.	Suspended Yrs.	Mos.	Probation Yrs. Mos.
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation									☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation								
				Total Fines $									Total Fines $				
☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.					☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.				
☐ Pretrial Diversion									☐ Pretrial Diversion								

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

Remarks: (For every subject reported in Sections A, B, E, F, or G above, provide name, DOB, race*, sex, and if available POB and SSAN.) 29B-WF-171994 Main-273

On 11/15/91, the U.S. Grand Jury, Washington, D.C., returned a 3-count indictment, charging BCCI Holdings (Luxembourg) S.A.; Bank of Credit and Commerce International (BCCI) S.A.; BCCI Overseas, Ltd.; International Credit and Investment Company (Overseas) Ltd; AGHA HASAN ABEDI (1/1/21; W/M; POB Mahmudabad, India); SWALEH NAQVI (5/3/33; W/M); and GHAITH RACHAD PHARAON (9/7/41; W/M; POB Riyadh, Saudi Arabia) with violations of RICO (T18, USC, Sec. 1962(d)) Conspiracy (T18, USC, S. 371); Wire Fraud (T18, USC, S. 1343); and Aiding and Abetting (T18, USC, S. 2).

copy filed Sub Jdg 1, 2, 3

CLARIFIED _____ INDEXED _____
SERIALIZED _____ FILED _____
NOV 22 1991
FBI/DOJ

2 - Bureau
2 - Field Office
* See codes on reverse side.

1 - 29B-WF-171994; 1- 66-2178 Sub A; 1 - C-5 Secretary
JNR:jnr (5)

1329UNRECORDED-5940

Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes*

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
23	Counterfeit or Pirated Sound Recordings or Motion Pictures
24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
26	Theft from, or Fraud Against, Government Scheme Aborted
27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

Subject Description Codes*

- Enter Description Code Only When Reporting a Conviction -

Organized Crime Subjects (Include Family Name Or Group):
- 1A Boss, Underboss or Consigliere
- 1B Capodecina or Soldier
- 1C Possible LCN Member or Associate
- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

Instructions

Subject Priorities for FBI Arrest or Locates:

A - Subject wanted for crimes of violence (i.e. murder, manslaughter, forcible rape, robbery and aggravated assault) or convicted of such crimes in the past five years.

B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

Reporting Convictions:

Convictions should not be reported until the sentence has been issued. There are two exceptions to this rule. The conviction information can be submitted by itself if:

1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = White

1325015-000-5941

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 11/26/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;
OO: WMFO.

On 11/26/91, [redacted] b6 b7C
Division of Banking Supervision and Regulation, Board of Governors of the Federal Reserve System, Washington, D.C., contacted writer telephonically and provided the following Social Security numbers:

NAME	SS#
[redacted]	

b6 b7C

1 - WMFO
CH:ch
(1)

Main
29B-WF-171994 -274

[redacted] b6 b7C

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
NOV 2 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-5942

WFO-8 (Rev. 12-15-72)

Expedite C-5

RECORD CHECK REQUEST

ROUTE TO [redacted] AGENCY DATE FILE # 29-WF-171[redacted] b6 b7C

RETURN TO SA [redacted] Squad C-5 DATE CHECKED DEADLINE

NAME LAST Pharaon FIRST Ghaith MIDDLE Rashad

ALIAS

BORN 9/7/41 PLACE Riyadh, Saudi Arabia SEX Male

OTHER DESCRIPTION

CITIZENSHIP NATURALIZED

FOREIGN TRAVEL, INCLUDING DATES

IDENTIFICATION NOS.

ADDRESSES DATES

NO RECORD FOUND AT PASSPORT OFFICE REGARDING SUBJECT. IA [redacted] 12/10/91

[redacted] b6 b7C CA

EMPLOYMENTS AND OCCUPATION DATES

Copy filed Sub Aug 3

IMMEDIATE RELATIVES RELATIONSHIP ADDRESSES

793-WF-171994

-275

SPECIFIC INFORMATION DESIRED Passport Info.

OBTAIN FROM CREDIT BUREAU: ☐ All available including Credit Report ☐ Name, residences, employments ONLY

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 13 1991
FBI - WASH. METRO FIELD OFFICE
[redacted] DOJ

1325015-000-5943

U.S. Department of Justice
Federal Bureau of Investigation
Washington Metropolitan Field Office
November 25, 1991

Return To: IA [redacted]
File No: 29-WF-171994 **EXPEDITE**
Squad: C-5, SA [redacted]

NOV 27 1991

Office of Passport Services
U.S. Department of State
Washington, D.C. 20524

To Whom It May Concern:

In connection with an official investigation being conducted by this Bureau, it is requested the passport file of the following person be made available to a representative of this office for appropriate review:

Name: PHARAON, GHAITH RASHAD

Address: unknown

Date/Place of Birth: 9/7/41 in Saudia Arabia

SSAN: unknown Statute: Criminal

Passport #: unknown Date/Place Issued: unknown

Photo needed: yes

Your cooperation in this matter is sincerely appreciated.

[redacted]

Very Truly Yours,

Robert M. Bryant
Special Agent in Charge

Record of Release Information

As a duly accredited representative of the requesting agency named above, I hereby certify, by my signature, that the review of this file is on behalf of the agency I represent and is for official U.S. Gov't use only. All information extracted or obtained will be handled in accordance with its classification. I further understand that no papers are to be taken from the file without the authorization and consent of the representative of the Office of Passport Services who release this file for review.

Signature of Reviewer:

Date of Review:

1325015-000-5944

U.S. Department of Justice
Federal Bureau of Investigation
Washington Metropolitan Field Office
November 25, 1991

Return To: IA [redacted]
File No: 29-WF-171994 **EXPEDITE**
Squad: C-5, SA [redacted]

b6
b7C

Office of Passport Services
U.S. Department of State
Washington, D.C. 20524

To Whom It May Concern:

In connection with an official investigation being conducted by this Bureau, it is requested the passport file of the following person be made available to a representative of this office for appropriate review:

Name: PHARAON, GHAITH RASHAD

Address: unknown

Date/Place of Birth: 9/7/41 in Saudia Arabia

SSAN: unknown Statute: Criminal

Passport #: unknown Date/Place Issued: unknown

Photo needed: yes

Your cooperation in this matter is sincerely appreciated.

Very Truly Yours,

Robert M. Bryant
Special Agent in Charge

Record of Release Information

As a duly accredited representative of the requesting agency named above, I hereby certify, by my signature, that the review of this file is on behalf of the agency I represent and is for official U.S. Gov't use only. All information extracted or obtained will be handled in accordance with its classification. I further understand that no papers are to be taken from the file without the authorization and consent of the representative of the Office of Passport Services who release this file for review.

Signature of Reviewer:

Date of Review:

1325015-000-5945

WFO-8 (Rev. 12-15-72)

C-5

RECORD CHECK REQUEST

ROUTE TO [redacted] AGENCY DATE FILE # 29-WF-171994 b6 b7C

RETURN TO SA [redacted] ECKED Squad C-5 DEADLINE

NAME LAS[redacted] MIDDLE

ALIAS [redacted]

BOR[redacted] PLACE SEX Male

OTHER DESCRIPTION

CITIZENSHIP Pakistan NATURALIZED

FOREIGN TRAVEL, INCLUDING DATES

IDENTIFICATION NOS.

ADDRESSES

NO RECORD FOUND AT PASSPORT OFFICE REGARDING SUBJECT

DATES

JA[redacted]

b6 b7C

EMPLOYMENTS AND OCCUPATION DATES

Copy filed Sub Jug 2

IMMEDIATE RELATIVES RELATIONSHIP ADDRESSES

29B-WF-171994-276

SEARCHED ___ INDEXED ___
SERIALIZED SC FILED SC
DEC 13 1991
FBI - WASH. METRO FIELD OFFICE
SC

SPECIFIC INFORMATION DESIRED Passport Info

OBTAIN FROM CREDIT BUREAU: ☐ All available including Credit Report ☐ Name, residences, employments ONLY

FBI/DOJ

1325015-000-5946

U.S. Department of Justice
Federal Bureau of Investigation
Washington Metropolitan Field Office
November 25, 1991

Return To: IA [redacted]
File No: 29-WF-171994 EXPEDITE
Squad: C-5, SA [redacted]

NOV 27 1991

NO RECORD 12/6/91

Office of Passport Services
U.S. Department of State
Washington, D.C. 20524

To Whom It May Concern:

In connection with an official investigation being conducted by this Bureau, it is requested the passport file of the following person be made available to a representative of this office for appropriate review:

Name: [redacted]

Address: unknown

Date/Place of Birth [redacted]

SSAN: unknown Statute: Criminal

Passport #: unknown Date/Place Issued: unknown

Photo needed: yes

Your cooperation in this matter is sincerely appreciated.

[redacted]

Very Truly Yours,

Robert M. Bryant
Special Agent in Charge

PJM/INR DMS 11-27-91

Record of Release Information

As a duly accredited representative of the requesting agency named above, I hereby certify, by my signature, that the review of this file is on behalf of the agency I represent and is for official U.S. Gov't use only. All information extracted or obtained will be handled in accordance with its classification. I further understand that no papers are to be taken from the file without the authorization and consent of the representative of the Office of Passport Services who release this file for review.

Signature of Reviewer:

Date of Review:

1325015-000-5947

U.S. Department of Justice
Federal Bureau of Investigation
Washington Metropolitan Field Office
November 25, 1991

Return To: IA [redacted] b6 b7C
File No: 29-WF-171994 **EXPEDITE**
Squad: C-5, SA [redacted]

Office of Passport Services
U.S. Department of State
Washington, D.C. 20524

To Whom It May Concern:

In connection with an official investigation being conducted by this Bureau, it is requested the passport file of the following person be made available to a representative of this office for appropriate review:

Name: [redacted] b6 b7C

Address: unknown

Date/Place of Birth: [redacted]

SSAN: unknown Statute: Criminal

Passport #: unknown Date/Place Issued: unknown

Photo needed: yes

Your cooperation in this matter is sincerely appreciated.

Very Truly Yours,

Robert M. Bryant
Special Agent in Charge

Record of Release Information

As a duly accredited representative of the requesting agency named above, I hereby certify, by my signature, that the review of this file is on behalf of the agency I represent and is for official U.S. Gov't use only. All information extracted or obtained will be handled in accordance with its classification. I further understand that no papers are to be taken from the file without the authorization and consent of the representative of the Office of Passport Services who release this file for review.

Signature of Reviewer:

Date of Review:

FD-6 (Rev. 12-15-72)

C-5

RECORD CHECK REQUEST

ROUTE TO [redacted] AGENCY DATE FILE # 29-WF-171994 b6 b7C

RETURN TO C4 [redacted] DATE CHECKED DEADLINE

Squad C-5

NAME LAST Abedi FIRST Agha MIDDLE Hasan

ALIAS

BORN 1/1/21 PLACE SEX male

OTHER DESCRIPTION

CITIZENSHIP NATURALIZED

FOREIGN TRAVEL, INCLUDING DATES

IDENTIFICATION NOS.

ADDRESSES NO RECORD ON SUBJECT AT THE PASSPORT OFFICE DATES 12/10/91 b6 b7C

IA [redacted]

EMPLOYMENTS AND OCCUPATION DATES

Copy filed Sub Jug 1

IMMEDIATE RELATIVES RELATIONSHIP ADDRESSES

~~29~~ 298-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 13 1991
FBI - WASH. METRO FIELD OFFICE

SPECIFIC INFORMATION DESIRED Passport Info.

OBTAIN FROM CREDIT BUREAU: ☐ All available including Credit Report ☐ Name, residences, employments ONLY

FBI/DOJ

1325015-000-5949

U.S. Department of Justice
Federal Bureau of Investigation
Washington Metropolitan Field Office
November 25, 1991

Return To: IA [redacted] b6 b7C
File No: 29-WF-171994 EXPEDITE NOV 27 1991
Squad: C-5, SA [redacted]

NO RECORD 12/10/91

Office of Passport Services
U.S. Department of State
Washington, D.C. 20524

To Whom It May Concern:

In connection with an official investigation being conducted by this Bureau, it is requested the passport file of the following person be made available to a representative of this office for appropriate review:

Name: ABEDI, AGHA HASAN

Address: unknown

Date/Place of Birth: 1/1/21

SSAN: unknown Statute: Criminal

Passport #: unknown Date/Place Issued: unknown

Photo needed: yes

Your cooperation in this matter is sincerely appreciated.

[redacted] b6 b7C

Very Truly Yours,

Robert M. Bryant
Special Agent in Charge

Record of Release Information

As a duly accredited representative of the requesting agency named above, I hereby certify, by my signature, that the review of this file is on behalf of the agency I represent and is for official U.S. Gov't use only. All information extracted or obtained will be handled in accordance with its classification. I further understand that no papers are to be taken from the file without the authorization and consent of the representative of the Office of Passport Services who release this file for review.

Signature of Reviewer:

Date of Review:

1325015-000-5950

U.S. Department of Justice
Federal Bureau of Investigation
Washington Metropolitan Field Office
November 25, 1991

Return To: IA [redacted]
File No: 29-WF-171994 EXPEDITE
Squad: C-5, SA [redacted]

b6
b7C

Office of Passport Services
U.S. Department of State
Washington, D.C. 20524

To Whom It May Concern:

In connection with an official investigation being conducted by this Bureau, it is requested the passport file of the following person be made available to a representative of this office for appropriate review:

Name: ABEDI, AGHA HASAN

Address: unknown

Date/Place of Birth: 1/1/21

SSAN: unknown Statute: Criminal

Passport #: unknown Date/Place Issued: unknown

Photo needed: yes

Your cooperation in this matter is sincerely appreciated.

Very Truly Yours,

Robert M. Bryant
Special Agent in Charge

Record of Release Information

As a duly accredited representative of the requesting agency named above, I hereby certify, by my signature, that the review of this file is on behalf of the agency I represent and is for official U.S. Gov't use only. All information extracted or obtained will be handled in accordance with its classification. I further understand that no papers are to be taken from the file without the authorization and consent of the representative of the Office of Passport Services who release this file for review.

Signature of Reviewer:

Date of Review:

INVESTIGATIVE ASSISTANT

LEAD REMOVAL CARD FOR IA [redacted]

b6
b7C

Title of Case: ABEDI, AGHA HASAN

Assigned: [redacted] C-5 File# 29B-WF-171994 Serial#

Date Received: 11/22/91 Date Covered: 12/5/91

Nature of Lead: Security Check - USDS

Date of Removal: Rotor'sInitials:

UPON COMPLETION, THE ROTOR IS TO [redacted] WPC, [redacted] RETURN THIS FORM TO AOSM-C FOR FILING PURPOSES.

1325015-000-5952

United States Department of State

Federal Bureau of Investigation
Washington Metropoliton Field Office
Washington, DC 20535
11/22/91

Refer to: [redacted] Security/Visa FILE #: 29B-WF-171994 b6 b7C
Return to: [redacted]

Name: ABEDI, AGHA HASAN

Born: 01/01/21 Place: -0-

Identification Number: -0-

Foreign travel:

-0-

Address:

-0-

Employment and Occupation:

-0-

Specific Information Desired:

Copy filed Sub Seq 1

OFFICE OF SECURITY
DEPARTMENT OF STATE

Main

FBIS - NO RECORD 29B-WF-171994 -298

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
DEC 13 1991
FBI - WASH. METRO FIELD OFFICE

IA [redacted] caused a search to be made of the files of the Office of Security ~~and Visa Office~~, Department of State and was advised on 12/9/91, that (~~additional pertinent information~~) (no record) was found concerning the subject.

1325015-000-5953

b6
b7C

INVESTIGATIVE ASSISTANT

LEAD REMOVAL CARD FOR IA [redacted]

b6
b7C

Title of Case [redacted]

Assigned: [redacted] File# 29B-WF-171994 Serial#

Date Received: 11/22/91 Date Covered: 12/5/91

Nature of Lead: Security Check

Date of Removal: Rotor's Initials:

UPON COMPLETION, THE ROTOR IS TO RETURN THIS FORM TO AOSM-C [redacted] WPC, [redacted], FOR FILING PURPOSES.

1325015-000-5954

United States Department of State

Federal Bureau of Investigation
Washington Metropoliton Field Office
Washington, DC 20535
11/22/91

Refer to: [redacted] Security/Visa FILE #: 29B-WF-171994 b6 b7C
Return to

Name: [redacted] b6 b7C

Born [redacted] Place: -0-

Identification Number: -0-

Foreign travel:

-0-

Address:

-0-

Employment and Occupation:

-0-

Specific Information Desired:

Copy filed Sub Jug 2

FAIS - NO RECORD

Main

29B-WF-171994

-279

NO RECORD IN ALIEN AUTHORITY

[redacted] caused a search to be made of the files of the Office of Security and Visa Office, Department of State and was advised on 10/5/91, that (no additional pertinent information) (no record) was found concerning the subject

b6 b7C

ENCLOSED INDEXED SERIALIZED FILED

DEC 13 1991

FBI - WASH. METRO FIELD OFFICE

1325015-000-5955

United States Department of State

Federal Bureau of Investigation
Washington Metropoliton Field Office
Washington, DC 20535
11/22/91

Refer to:
Return to [redacted]

Security/Visa FILE #: 29B-WF-171994 b6 b7C

Name: ABEDI, AGHA HASAN

Born: J1/01/21 Place: -0-

Identification Number: -0-

Foreign travel:

-0-

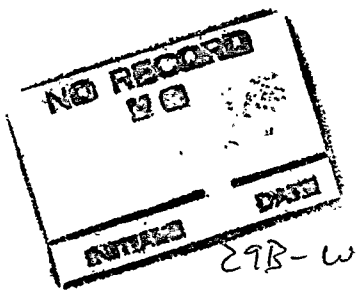
Address:

-0-

Employment and Occupation:

-0-

Specific Information Desired:



Main
29B-WF-171994
-280

[redacted] caused a search to be made of the files of the ~~Office of Security and~~ Visa Office, Department of State and was advised on 12/2/91, that ~~(no additional pertinent information)~~ (no record) was found concerning the Subject

SEARCHED INDEXED
SERIALIZED FILED
DEC 13 1991 b6 b7C
FBI - WASH. METRO FIELD OFFICE

182-HQ-1325015-000-5956

29B-WF-171994 Main
-281

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
DEC 13 1991
FBI - WASH. METRO FIELD OFFICE

United States Department of State

Federal Bureau of Investigation
Washington Metropoliton Field Office
Washington, DC 20535
11/22/91

Refer to: [redacted] Security/Visa FILE #: 29B-WF-171994 b6 b7C
Return to:

Name: [redacted] b6 b7C

Born: [redacted] Place: -0-

Identification Number: -0-

Foreign travel:

-0-

Address:

-0-

Employment and Occupation:

-0-

Specific Information Desired:

NO RECORD
VO
INITIALS DATE

IA [redacted] caused a search to be made of the files of the ~~Office of Security and~~ Visa Office, Department of State and was advised on 11/19/91, that ~~(no additional pertinent information)~~ (no record) was found concerning the subject. b6 b7C

11/25/91

1325015-000-595

Copy filed Sub Jug b6 b7C

INVESTIGATIVE ASSISTANT

LEAD REMOVAL CARD FOR IA [redacted]

Title of Case: Gohaith Rachad Pharaon

Assigned [redacted] C-5 File# 298-WF-171994 Serial#

Date Received: 11-22-91 Date Covered: 12-2-91

Nature of Lead: INS

Date of Removal: Rotor'sInitials:

UPON COMPLETION, THE ROTOR IS TO RETURN THIS FORM TO AOSM-C [redacted] WPC, [redacted] FOR FILING PURPOSES

[redacted] INDEXED FILED

[redacted] FIELD OFFICE

298-WF-171994

1325015-000-5962

-203

FD-9 (Rev. 12-15-72)

RECORD CHECK REQUEST

ROUTE TO | AGENCY | DATE | FILE # 29B-WF-171994

RETURN TO [redacted] C-5 | DATE CHECKED | DEADLINE

b6
b7C

NAME LAST Pharaon FIRST Ghaith MIDDLE Rachad

ALIAS

BORN 9/7/41 PLACE Riyadh, Saudia Arabia SEX male

OTHER DESCRIPTION

CITIZENSHIP Saudi Arabia NATURALIZED

FOREIGN TRAVEL, INCLUDING DATES

IDENTIFICATION NOS.

ADDRESSES DATES

b6
b7C

FA [redacted]

NO IDENTIFIABLE RECORD CENTRAL OFFICE INS
12/2/91

EMPLOYMENTS AND OCCUPATION DATES

IMMEDIATE RELATIVES RELATIONSHIP ADDRESSES

SPECIFIC INFORMATION DESIRED

NOV 22 5 35 PM '91

OBTAIN FROM CREDIT BUREAU: ☐ All available including Credit Report ☐ Name, residences, employments ONLY

FBI/DOJ

1325015-000-5963

Copy filed Sub Files b6 b7C

INVESTIGATIVE ASSISTANT
LEAD REMOVAL CARD FOR IA [redacted]

Title of Case: Agha Hasan Abedi

Assigned: [redacted] C-5 File# 29B-WF-171994 Serial# 5

Date Received: 11-22-91 Date Covered: 12

Nature of Lead: INS

Date of Removal: _____ Rotor'sInitials: _____

SEARCHED INDEXED SERIALIZED FILED
DEC 13 1991
FBI WASH. METRO. FIELD OFFICE

UPON COMPLETION, THE ROTOR IS TO RETURN THIS FORM TO ~~AOSM-C~~ [redacted] WPC, [redacted] FOR FILING PURPOSES. Main

29B-WF-171994
-284

1325015-000-5964

WFO-8 (Rev. 12-15-72)

RECORD CHECK REQUEST

ROUTE TO | AGENCY | DATE | FILE # 29B-WF-171[illegible] b6 b7C

RETURN TO [ ] C-5 | DATE CHECKED | DEADLINE

NAME LAST Abedi FIRST Agha MIDDLE Hasan

ALIAS

BORN 1/1/21 PLACE SEX Male

OTHER DESCRIPTION

CITIZENSHIP NATURALIZED

FOREIGN TRAVEL, INCLUDING DATES

IDENTIFICATION NOS.

ADDRESSES FA [ ] DATES

NO IDENTIFIABLE RECORD CENTRAL OFFICE INS
12/2/91

EMPLOYMENTS AND OCCUPATION DATES

Bank of Credit & Commerce International

IMMEDIATE RELATIVES RELATIONSHIP ADDRESSES

[illegible] INDEX [illegible]

[illegible] FILE [illegible]

SPECIFIC INFORMATION DESIRED

Nov 22 5 3- PM '91

OBTAIN FROM CREDIT BUREAU: ☐ All available including Credit Report ☐ Name, residences, employments ONLY

FBI/DOJ

1325015-000-5965

SEARCHED ____ INDEXED ____
SERIALIZED See FILED See
DEC 13 1994
FBI/DOJ
TED FIELD OFFICE

b6
b7C

INVESTIGATIVE ASSISTANT

LEAD REMOVAL CARD FOR IA [redacted]

Title of Cas [redacted]

Assigne [redacted] C-5 File# 29B-WF-171994 Serial# [redacted]

Date Received: 11-22-94 Date Covered: 12-2-94

Nature of Lead: INS

Date of Removal: _____ Rotor's Initials: _____

Main
29B-WF-171994
285

UPON COMPLETION, THE ROTOR IS TO RETURN THIS FORM TO AOSM-C [redacted] WPC, [redacted] FOR FILING PURPOSES.

1325015-000-5966

WFO-8 (Rev. 12-15-72)

RECORD CHECK REQUEST

ROUTE TO | AGENCY | DATE | FILE # 29B-NF-177901 b6 b7C

RETURN TO | DATE CHECKED | DEADLINE

C-5

NAME LAST | FIRST | MIDDLE

ALIAS

PLACE | SEX Male

CITIZENSHIP Pakistan | NATURALIZED

FOREIGN TRAVEL, INCLUDING DATES

IDENTIFICATION NOS.

ADDRESSES | DATES

NO IDENTIFIABLE RECORD CENTRAL OFFICE INS
12/2/91

copy filed
Sub Aug 2

EMPLOYMENTS AND OCCUPATION | DATES

Bank of Credit & Commerce International

IMMEDIATE RELATIVES | RELATIONSHIP | ADDRESSES

NAME | INDEXED | FILED

NOV 22 5 32 PM 91

SPECIFIC INFORMATION DESIRED

OBTAIN FROM CREDIT BUREAU: ☐ All available including Credit Report ☐ Name, residences, employments ONLY

1325015-000-5967

FBI/DOJ

FD-448 (Rev. 5-23-90)

(1)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE
- ☐ Immediate
- ☐ Priority
- ☒ Routine

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☒ Unclassified

Time Transmitted: 2200 AK. TIME
Sender's Initials: NED
Number of Pages: 3

To: WMFO (Name of Office) Date: 11-14-91

Facsimile number: (202) 324-6426

Attn: SSA [redacted] (202) 324-6404
(Name / Room / Telephone No.)

(2) cc

From: ANCHORAGE AK (Name of Office)

b6
b7C

Subject: BANK OF CREDIT & COMMERCE

Special Handling Instructions: HAND CARRY TO SSA [redacted]

Originator's Name: SA [redacted] Telephone: (907) 276-4441

Originator's Facsimile Number: (907) 276-4441

Approved: JRS/NED

29B-WF-171994
SEARCHED INDEXED SERIALIZED FILED
NOV 14 1991
FBI/DOJ

Main -286

[redacted] cc

1325015-000-5968

(2)

QUALITY SERVICES.

Date NOV 18 1988

Anchorage Daily News

Client No. 225

Quietly buying property

Hong Kong woman shops in Anchorage

225 712 0313 290 450 8470

By SUSAN POSTLEWAITE
Daily News reporter 227

In a deal real estate people hope will be the first of many cash injections into Anchorage's ailing economy, a wealthy Asian woman has quietly bought 20 acres and a house in west Anchorage and has bid on 17 condos and a midtown office building.

The pending purchases, by a woman identified as Maria Chen, could total several million dollars and have roused the real estate community with gossip about a secret "Hong Kong buyer."

The weak dollar combined with the depressed real estate market in Anchorage makes the area ripe for bargain hunting, many real estate people believe. And they hope that once foreign money begins to trickle in, it will breathe life back into the Anchorage real estate market.

And although the pending sales here are not large, Bob Poe, of the state's Office of International Trade, said they could be a "positive sign" for Alaska's depressed real estate market.

It's no secret that investors from Hong Kong, concerned about what will happen to their economy when the Crown Colony returns to Chinese rule in 1997, have been on a real estate buying binge in the Lower 48 and Canada, and lately, have been picking up property in the Pacific Northwest, particularly Vancouver, British Columbia. But until now, there's been no concrete evidence those business people are shopping in Alaska.

"When we look at Alaska and say what are our economic opportunities here, we see lots of potential and a depressed economy and at the moment a sort of reluctance on the part of business people to invest here. So any influx of cash in Alaska is a positive

See Back Page, BUYING

J. K. FANG, PhD
DEPUTY GENERAL MANAGER

BANK OF CREDIT AND COMMERCE HONG KONG LIMITED
23RD FLOOR ADMIRALTY CENTRE TOWER HONG KONG
TEL: 5-8226591 5-8650622 TELEX: 72042 BCCRO HX
FAX: (852) 5-8654320

ANGE Hong Kong woman invests in real estate

Anchorage Daily News/Fran Dum

In an economy where condos aren't selling, there's a prospective buyer for some of thes

According to property records, Chen has so far closed only one property, a house and 20 acres she bought from Anchorage businessman William Pargeter in west Anchorage on Oct. 6. The sale price wasn't disclosed; the property's assessed value is $763,000.

Pargeter said, "We didn't list it, we didn't publicize it. (Marston Real Estate agent Collette LaRose) brought them over a couple of months ago."

"We sold for cash," said Pargeter, who owns the Kayak Seafood Grill and Harry's restaurant in Anchorage. He said he will continue to live in the house on a long-term lease.

Pargeter said that Chen and a companion whom he identified as Joe Fang were here for several days.

He said when he met with them for dinner, they arrived in a limousine and "they were talking about an office building downtown and condominiums. They had about $25 million." He said they planned to head to San Francisco after leaving here.

On the same trip to Anchorage in late September, Chen also made an offer of about $475,000 in cash for 17 foreclosed condos at Alaska Landings, a 102-unit complex near Anchorage International Airport, said Gordon Hazel, who manages the condo association.

The one- and two-bedroom condos, which list at $36,000 and $49,900, are foreclosures owned by Alaska Housing Finance Corp., according to Paul Wilson of ERA Realty, the listing agent.

The offer hasn't been accepted yet. The obstacle, Hazel said, is that Chen, whom he described as a "wealthy woman from Hong Kong," intends to rent the condos.

Alaska Landings is less than half occupied by owners, and 17 more rentals would push the owner-occupancy rate much lower. "They can't rent them out unless the board of directors approves it. That's where this transaction is being held up right now," he said.

Chen's offer represents about 68 percent of the listing price, said Hazel.

The same Hong Kong investor has also made an offer on the former First Interstate Bank building at C Street and 30th Avenue in midtown. It has been for sale since the bank failed last year and the Federal Deposit Insurance Corp. took it over. The FDIC now has its offices there.

The building is considered high quality. With the land around it, the property would be worth $2 million to $4 million at today's depressed prices, according to local appraisers.

Tony Ferelli, spokesman for FDIC, declined to comment. "We don't disclose that information. If you were buying a building you wouldn't want it spread all over town," he said. "It will be public record after the sale closes, if it closes."

But the investor or investors have already met with the president of Transalaska Data Systems Inc., which is negotiating to lease most or all of the 29,000-square-foot FDIC building. Although Transalaska doesn't need all of the space, it could sublease part of it.

John Peacock, president of Transalaska, confirmed he met with the people who want to buy the building. He would not identify them. "This is too, too sensitive," he said.

"We are interested in it and working on it but the purchase has not gone through," said Peacock.

Although real estate agents are buzzing among themselves about the deal, no one working on the transaction wanted to talk about it.

Mark LaRose, of the real estate firm North Tower Associates, who represents the buyer, declined comment.

"They prefer their transaction to be confidential. They don't want publicity," he said.

His mother, Collette L Rose, who helped the buy find the house, also deni any knowledge of the de when asked about it. "I ha no idea what you are talki about," she said.

According to property r cords, Chen has a post offi box in Guam, but people f miliar with the deals said th buyer is from Hong Kon She could not be contacted.

If the purchases are cor pleted, they appear to repr sent the kind of foreign i vestment that some econom specialists believe would hel pull Alaska out of its re estate doldrums.

The U.S. Department Housing and Urban Develo ment has been looking ways to sell its 1,100 for closed houses to Asian buyer next year.

The Chen purchases woul be the first in Anchorage b Asian investors since th Hanjin Group, the paren company of Korean Air bought the Sheraton Anchor age Hotel from troubled Cal ista Corp. in July.

1-374 (Rev. 4-17-89)

C-5

Copies to Offices Checked

☐ Albany	☐ Cleveland	☐ Knoxville	☐ New Orleans	☐ Salt Lake City
☐ Albuquerque	☐ Columbia	☐ Las Vegas	☐ New York City	☐ San Antonio
☐ Anchorage	☐ Dallas	☐ Little Rock	☐ Norfolk	☐ San Diego
☐ Atlanta	☐ Denver	☐ Los Angeles	☐ Oklahoma City	☐ San Francisco
☐ Baltimore	☐ Detroit	☐ Louisville	☐ Omaha	☐ San Juan
☐ Birmingham	☐ El Paso	☐ Memphis	☐ Philadelphia	☐ Savannah
☐ Boston	☐ Honolulu	☐ Miami	☐ Phoenix	☐ Seattle
☐ Buffalo	☐ Houston	☐ Milwaukee	☐ Pittsburgh	☐ Springfield
☐ Butte	☐ Indianapolis	☐ Minneapolis	☐ Portland	☐ Tampa
☐ Charlotte	☐ Jackson	☐ Mobile	☐ Richmond	☒ Washington Field Office
☐ Chicago	☐ Jacksonville	☐ Newark	☐ Sacramento	
☐ Cincinnati	☐ Kansas City	☐ New Haven	☐ St. Louis	

☐ ASAC, New Rochelle (MRA)
☐ ASAC, Brooklyn-Queens (MRA)

Bufile

Urfile 29B 171994

RE: [redacted] FUGITIVE

b6
b7C

[redacted]

Date 12/4/91

☐ Enclosed is subject's identification record. FBI# _____.

☐ FBI Wanted Person entry in NCIC #W _____, does not contain a FBI number; therefore, only a name stop has been placed in the Identification Division (ID) Automated Name Index File. Check the Interstate Identification Index (III) via NCIC using all available descriptors to retrieve identification records possibly identical with your fugitive. If record located positively identifiable with your fugitive, modify your NCIC entry to include his/her FBI number. This will result in an ID stop placed in fugitive's fingerprint record. If no record located through III; however fingerprints of fugitive are available, forward fingerprints via airtel to the Correspondence and Special Services Section, ID for placement of a positive fingerprint stop.

☒ A search of the ID's Automated Name Index File did not disclose a fingerprint record for the above-named fugitive. Endeavor to develop any additional data that will identify this individual with a fingerprint record.

☐ A name stop has been placed in the ID Automated Name Index File in your behalf. Enclosed is a laminated copy of a civil fingerprint card which may be identical with your fugitive. Your office should determine if these fingerprints are identical with your fugitive and resubmit via airtel within 30 days to Correspondence and Special Services Section, ID for placement of a positive fingerprint stop.

☐ Enclosed is information extracted from identification record FBI# _____ as requested in urlet _____.

☐ Photographs and negatives transmitted herewith. ☐ No photograph available.

Copy filed Sub 2 Enc 2

☐ Photograph may be obtained from _____

☐ Original photograph from _____ on microfilm and will be furnished upon request.

☐ FBI number _____ pertains to one _____. Modify NCIC record.

☐ A name search based on descriptive data from FBI warrant entered into NCIC #W _____, discloses a manual identification record, which may be identical with your fugitive. Inasmuch as this record cannot be obtained through III, a copy of this record is attached for your review. Determine if this identification record is identical with your fugitive. If identical modify NCIC to include FBI number and send appropriate communcation to FBI headquarters within 30 days advising of same. A name stop only has been posted on your behalf.

287

29 B-171994-Main

☐ Modify NCIC Wanted Persons entry #W _____, to include FBI number _____

NCIC Classification:

Fingerprint Classification:

Enc.

SEARCHED _____ INDEXED _____
SERIALIZED SU FILED SU
DEC - 6 1991
FBI - WASH. METRO FIELD OFFICE

Correspondence and Special Services Section /ART

Identification Division

Retain Permanently in [redacted]

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b7C

[redacted]

FBI/DOJ

15-000-5971

1-374 (Rev. 4-17-89)

b6
b7C

Copies to Offices Checked

UCFN ☐ Pos ☐ Neg

GENERAL INVESTIGATIVE:

☐ Albany	☐ Cleveland	☐ Knoxville	☐ New Orleans	☐ Salt Lake City	
☐ Albuquerque	☐ Columbia	☐ Las Vegas	☐ New York City	☐ San Antonio	
☐ Anchorage	☐ Dallas	☐ Little Rock	☐ Norfolk	☐ San Diego	
☐ Atlanta	☐ Denver	☐ Los Angeles	☐ Oklahoma City	☐ San Francisco	
☐ Baltimore	☐ Detroit	☐ Louisville	☐ Omaha	☐ San Juan	
☐ Birmingham	☐ El Paso	☐ Memphis	☐ Philadelphia	☐ Savannah	
☐ Boston	☐ Honolulu	☐ Miami	☐ Phoenix	☐ Seattle	
☐ Buffalo	☐ Houston	☐ Milwaukee	☐ Pittsburgh	☐ Springfield	
☐ Butte	☐ Indianapolis	☐ Minneapolis	☐ Portland	☐ Tampa	
☐ Charlotte	☐ Jackson	☐ Mobile	☐ Richmond	☒ Washington Field Office	
☐ Chicago	☐ Jacksonville	☐ Newark	☐ Sacramento		
☐ Cincinnati	☐ Kansas City	☐ New Haven	☐ St. Louis		

☐ ASAC, New Rocthelle (MRA)
☐ ASAC, Brooklyn-Queens (MRA)

Bufile

Urfile 29B-17/994

Date 12-4-91

RE: ABHA HASAN ABEDI, FUGITIVE
FRAUD/RICO/FBW/Conspiracy/AIDING
AND ABETTING

☐ Enclosed is subject's identification record. FBI# _____.

☐ FBI Wanted Person entry in NCIC #W _____, does not contain a FBI number; therefore, only a name stop has been placed in the Identification Division (ID) Automated Name Index File. Check the Interstate Identification Index (III) via NCIC using all available descriptors to retrieve identification records possibly identical with your fugitive. If record located positively identifiable with your fugitive, modify your NCIC entry to include his/her FBI number. This will result in an ID stop placed in fugitive's fingerprint record. If no record located through III; however fingerprints of fugitive are available, forward fingerprints via airtel to the Correspondence and Special Services Section, ID for placement of a positive fingerprint stop.

☒ A search of the ID's Automated Name Index File did not disclose a fingerprint record for the above-named fugitive. Endeavor to develop any additional data that will identify this individual with a fingerprint record.

☐ A name stop has been placed in the ID Automated Name Index File in your behalf. Enclosed is a laminated copy of a civil fingerprint card which may be identical with your fugitive. Your office should determine if these fingerprints are identical with your fugitive and resubmit via airtel within 30 days to Correspondence and Special Services Section, ID for placement of a positive fingerprint stop.

☐ Enclosed is information extracted from identification record FBI# _____as requested in urlet _____.

☐ Photographs and negatives transmitted herewith. ☐ No photograph available.

copy filed Sub Fug 1

☐ Photograph may be obtained from _____

☐ Original photograph from _____ on microfilm and will be furnished upon request.

☐ FBI number _____ pertains to one _____. Modify NCIC record.

☐ A name search based on descriptive data from FBI warrant entered into NCIC #W _____, discloses a manual identification record, which may be identical with your fugitive. Inasmuch as this record cannot be obtained through III, a copy of this record is attached for your review. Determine if this identification record is identical with your fugitive. If identical modify NCIC to include FBI number and send appropriate communcation to FBI headquarters within 30 days advising of same. A name stop only has been posted on your behalf.

292

29B-WF-171994

☐ Modify NCIC Wanted Persons entry #W _____, to include FBI number _____

NCIC Classification:

Fingerprint Classification:

Enc.

Correspondence and Special Services Section
Identification Division

DEC 20 1991

b6
b7C

FBI/DOJ

1325015-000-5983

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 12/18/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 12/18/91, the writer was contacted by Trial Attorney (TA) [redacted] Fraud Section, DOJ. Discussed were interviews scheduled for January, 1992. Such include: b6 b7C

1/03/92
1/09/92
1/10/92
1/30/92
1/31/92

[redacted]

It should be noted that the [redacted] interviews have been scheduled in New York City. It was agreed that the writer would attempt to schedule additional interviews in New York for the same time period. Such should include [redacted] b6 b7C

[redacted] we need to make sure these interviews are covered.

I'm good for 1/30 + 1/31.

[redacted]

29B-WF-171994 Main -293

DECLASSIFIED BY 5a ON 5a
DEC 20 [illegible]
FBI—WASHINGTON FIELD OFFICE

-294

29B-WF-171994 MAIN

SEARCHED ___ INDEXED ___
SERIALIZED Su FILED Su

DEC 5 1991

[redacted] FIELD OFFICE

b6
b7C

ISH

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 12/18/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 11/18/91, during the course of a meeting with AUSAS [redacted] the subject of correspondence within Manufacturers Hanover Trust Company (MHT) was discussed. AUSA [redacted] requested that the writer contact MHT and set up interviews with the appropriate personnel. b6 b7C

On 11/19/91, the writer contacted AUSA [redacted] The writer requested copies of the pertinent MHT correspondence. Such would be reviewed prior to contact with MHT. AUSA [redacted] sent the writer copies via facsimile. Said copies were reviewed by the writer. b6 b7C

On 11/22/91, the writer attempted to contact [redacted] MHT. Said attempt met with negative results. b6 b7C

On 11/25/91, the writer contacted [redacted] After introductory comments, [redacted] MHT. His direct telephone number was [redacted] He was located at [redacted] NY. [redacted] advised that prior to consenting to an interview he had to contact MHT'S Legal Counsel. b6 b7C

On that same date, the writer was contacted by [redacted] MHT. This matter was discussed in detail. [redacted] advised that MHT would cooperate. Interviews with [redacted] were set up for 12/5/91. [redacted] would arrange for the interview of [redacted] for mid-December, 1991. [redacted] was stationed in Bahrain but would be returning to the United States in December. b6 b7C

On [redacted] the above mentioned interviews were conducted. (Refer to the appropriate FD-302's). On that same date, the writer served a FGJ Subpoena [redacted] b3 b6 b7C

[redacted]

[redacted] b3 b6 b7C

On that same date, the writer contacted AUSA [redacted] b6 b7C The interviews and subpoena service was discussed.

On 12/9/91, while at a meeting at FBIHQ, the writer discussed the MHT interviews and the scheduled interview of [redacted] Miami Division, expressed an interest in attending the interview. SA [redacted] has been working on the Centrust bank failure. b6 b7C

On 12/12/91, the writer was contacted by [redacted] b6 b7C Discussed in detail were MHT employees having been involved with Redec/PHARAON. It was agreed upon that the writer would determine which employees should be interviewed and that [redacted] would arrange same. It was determined that two additional MHT had direct contact with PHARAON and questioned his ties with BCCI. They were [redacted] advised that there may be one other MHT official to interview. His name was [redacted] was located in the Middle East. [redacted] stated he would contact [redacted] and determine his involvement with PHARAON. He would provide the writer with additional information on 12/19/91. (Refer to the appropriate FD-302 for information concerning MHT'S policy not to deal with BCCI).

On 12/17/91, the writer confirmed the [redacted] b6 b7C interview with [redacted]

1325015-000-5987

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 12/19/91

From : SA [redacted] b6 b7C

Subject: CHANGED
HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

Title marked "Changed" to indicate deletion of [redacted] b6 b7C as subjects of captioned investigation.

[redacted] are being deleted as main subjects due b6 b7C to present lack of inculpatory evidence against them, and the unlikelihood that such evidence will be found. Indices should be amended to show them as references.

1-WMFO

JNR:jnr
(1)

[redacted] b6 b7C

Main
29B-WF-171994-295
Su Su

1325015-000-5988

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 12/20/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

Attached document was received 12/19/91 from FBIHQ FIFU

SSA [redacted] b6 b7C

1-WMFO (Att.1)

JNR:jnr
(1)

29B-WF-171994 Main -296

DEC 30 1991
FBI—WASH. METROPOLITAN FIELD OFFICE

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 12/31/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
OO: WMFO

The following is a summary of the meeting I had with DOJ Fraud Section Principal Deputy Chief (PDC) [redacted] b6 b7C on 12/30/91.

In response to notification from the Minority staffers from the U.S. House of Representatives, PDC [redacted] had dispatched Trial Attorney (T/A) [redacted] b6 b7C to review records supposedly relating to congressmen who had been involved in transactions with CenTrust Savings Bank. (We sent SAs [redacted] to secure our interests after PDC [redacted] told me in an earlier conversation that an AUSA and "an agent" [type unknown] from the Middle District of Florida were coming to the meeting to look at he documents.) The staffers reportedly received the documents from various sources, e.g., the Fed, OTS, and RTC, and said they included some of the Price Waterhouse work papers. Some 20-30 boxes of material were involved.

At 10:00 a.m. Friday, 1/3/92, per T/A [redacted] b6 b7C there will be a similar meeting with the House Majority staffers. (SAs [redacted] have been assigned to cover this meeting also.)

Possibly/probably during the week of 1/5/92, [redacted] b6 b7C will be transported from New York to the WDC area, where he will be housed in the Alexandria Jail. [redacted] is scheduled to be here for two weeks, during which he will be interviewed and brought before the grand jury.

On 1/5/92, PDC [redacted] and several AUSAs are scheduled b6 b7C to meet with DAG Robert Mueller to develop a proposal for working with the New York District Attorney's Office (NYDAO) for the

1-WMFO

JNR:jnr
(1)

29B-WF-171994 Main -297

SERIALIZED SU SU
DEC 31 1991

1325015-000-5992

remainder of the investigation. On 1/6/92, DAG Mueller, PDC [redacted] et al, are to meet with [redacted] and others from the NYDAO to come to some sort of a cooperation agreement. b6 b7C

Also during the week of 1/5/92, PDC [redacted] and I are to meet for an informal but in-depth case review, with the goal of mapping strategy for future investigative efforts. PDC [redacted] said it is his desire to have the FBI proceed in a number of areas, both known and unknown, developing cases in the traditional manner and bringing DOJ the results or requests for assistance. We agreed that, up to this point, the FBI had been relegated to following the DOJ's leads, rather than its own. b6 b7C

The investigative areas mentioned by PDC [redacted] were: b6 b7C

1.) Pursuing the recent, classified information about the overheard conversation between the Saudi official and the unidentified male about how the latter was relieved at not having been indicted;

2.) Completion of the leads to interview [redacted] and acquire the BCCI records in possession of the Western District of Washington;

3.) Determining whether/what further investigation is required in re Capcock Savings Bank in Dallas, TX, particularly as it concerns [redacted] and Coolidge Bank in Boston, MA, particularly as it concerns any BCCI interest (DOJ T/A [redacted] is assigned to the Coolidge matter and is aware of need to be alert for indications of BCCI involvement);

4.) Continuation/completion of the CenTrust [redacted] matter. On this topic, PDC [redacted] said his goal is to achieve cooperation between DOJ and the USAO in Miami concerning the prosecution of [redacted] intends to proceed toward an indictment of [redacted] in WDC, and is trying to get AUSA [redacted] to understand that DOJ is going ahead on the theory that, if [redacted] finds himself facing charges in several districts, he may acquiesce. As PDC [redacted] sees it, indicting [redacted] in WDC on the "sub debt" transaction is not intended to, nor will it, jeopardize Miami's perquisites/misapplication case against [redacted]

PDC [redacted] intends to call a general status/-strategy/planning/coordination meeting of all DOJ attorneys, AUSAs, FBI SAs, NYDAO, and other interested agencies, to occur in WDC during the week of 1/12/92. b6 b7C

1325015-000-5993

NOV 22

UNITED STATES DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON FIELD OFFICE
WASHINGTON, D. C.
11/21/91

See att

REFER TO: [redacted] INS FILE #: 298 - 171994 b6 b7C

RETURN TO: [redacted] /C-5 /WF DEADLINE: -0-

LAST NAME	FIRST NAME	MIDDLE
ABEDI	AGHA	HASAN
ALIAS		
-0-	-0-	-0-
-0-	-0-	-0-

BORN: 01/01/21 PLACE: -0-

CITIZENSHIP: -0- NATURALIZED: -0-

Try Prints

IDENTIFICATION NUMBERS:

INS #: -0-
CERTIF #: -0-

ARRIVAL DATE: -0- DEPARTURE DATE: -0-

EMPLOYMENT: -0-

ADDRESS: -0-
-0- -0 -0-

DO NOT FORWARD TO FIELD

Route to ALIEN FILES UNIT - Room 234
CENTRAL OFFICE - 1213

SPECIFIC INFORMATION DESIRED
ALL AVAILABLE INFORMATION
-0-

Copy filed Sub Reg 1

INS file # A 18871455 pertaining to Abedi, changed to INS, Miami. pertaining to Agha Abedi

INS file # [redacted]

to INS, Lincoln, Nebraska

IA [redacted]

REQUESTING AUTHORITY

b6 b7C

ROBERT M. BRYANT
SPECIAL AGENT IN CHARGE

29B-WF-171994 -298

SEARCHED — INDEXED
SERIALIZED — FILED
JAN 10 1992
FBI - WASHINGTON FIELD OFFICE

[redacted]

0035994

NONIMMIGRANT INFORMATION SYSTEM DATE: 12/06/91
MAP: NIXOBAS BASIC DATA DISPLAY TIME: 14:30:37

LAST NAME:	ABEDI	FIRST NAME:	AGHAARSHAK
ADMISSION NUMBER:	44054105402	DATE OF BIRTH:	010121
COUNTRY OF CITIZEN:	IRAN	COUNTRY OF RESID:	IRAN
CLASS OF ADM:	B2	DATE ADMITTED:	041791
PORT OF ENTRY:	LOS	DATE ADM TO:	101691
CURR CLASS:	B2	CLASS DATE:	
NUMBER OF EXT:		EXT ADM TO:	
SPECIAL STATUS:	A	WAIVER:	
ALIEN NUMBER:		GENDER:	M
TRAVEL MODE:	AIR	BOND FLAG:	
VISA ISSUE POST:	ABU DHABI	VISA ISSUE DATE:	040891
PORT OF DEP:		DEP DATE:	
ADDRESS - STREET:	500 S CHEVY CHASE 1	CITY STATE:	LOS ANGELES CA
ITINERARY:			
NOTATIONS:		CONTROL OFC CODE:	
ARR CARRIER:	AZ	ARR FLT NO:	00620
PASSPORT NUMBER:	3768383	INSPECTOR:	C22942

CLEAR: LOGOFF PF4: RETURN TO ROSTER PF6: MENU PF7: INQUIRY

1325015-000-5995

CIMIDN IMMIGRATION AND NATURALIZATION SERVICE 12/06/91

CENTRAL INDEX SYSTEM - ID # SEARCH/DISPLAY 14:27:38

ID # (A/AA/C/DA/DL): [redacted] [redacted] DOB [redacted]

(FB/FP/I/PF/SS/TN)

LAST: [redacted]

FIRST:

MIDDLE:

ALIASES:

NATZ DATE:

COURT:

LOCATION:

b6
b7C

SEX: M POE: STL COB: IRAN DOE: 060287

FCO: LIN COA: IR0 COC: FTC: 051789 FATHER: [redacted]

PFCO: STL SFCO: DFO: 032387 BIN: MOTHER:

SSN: [redacted] CONSOLIDATED A-NOS --OTHER INFORMATION--

I-94 ADM #: CARD-X

PASSPORT #:

FBI #:

DRIVER LIC:

FINGER CD#:

OVER-KEY ID NUMBER TO DISPLAY NEW PERSON. PRESS ENTER.

CLEAR EXIT PF3 REFRESH PF4 RETURN PF5 HELP PF6 MAIN MENU PF8 VIEW HISTORY

PF9 VIEW EAD

b6
b7C

CIMDHI IMMIGRATION AND NATURALIZATION SERVICE 12/06/91
CENTRAL INDEX SYSTEM - STATUTORY DATA 14:23:49

A#: [redacted] DOB [redacted]

ACTION	LOC	ACTION DATE	ST	REASON/COURT#	MISC	KEYED DATE
STATUS CHANGE						
STATUS CHANGE						

CLEAR EXIT PF4 RETURN PF5 HELP PF6 MENU

```
CIMIDN                IMMIGRATION AND NATURALIZATION SERVICE          12/06/91
                    CENTRAL INDEX SYSTEM - ID # SEARCH/DISPLAY        14:22:48
ID # (A/AA/C/DA/DL):
   (FB/FP/I/PP/SS/TD)
     LAST:                                                                  b6
    FIRST:                                          NATZ DATE:              b7C
   MIDDLE:                                             COURT:
  ALIASES:                                          LOCATION:

   SEX:        POE: WAS  COB: INDIA   DOE: 091271
  FCO: MIA     COA: J1   COC:                      FATHER:
 PFCO: MIA    SFCO:      DFO: 092271  BIN:          MOTHER:
        SSN:                          CONSOLIDATED A-NOS    --OTHER INFORMATION--
 I-94 ADM #:
 PASSPORT #:
      FBI #:
 DRIVER LIC:
 FINGER CD#:
            OVER-KEY ID NUMBER TO DISPLAY NEW PERSON.  PRESS ENTER.
CLEAR EXIT  PF3 REFRESH  PF4 RETURN  PF5 HELP  PF6 MAIN MENU  PF8 VIEW HISTORY
                                                             PF9 VIEW EAD
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CIMDHI IMMIGRATION AND NATURALIZATION SERVICE 12/06/91
CENTRAL INDEX SYSTEM - STATUS/HISTORY DATA 14:23:07

A#:

ACTION	LOC	ACTION-DATE	ST	REASON/COURT#	MISC	KEYED-DATE
STATUS CHANGE	MIA	00/00/00		J1		00/00/00

CLEAR EXIT PF4 RETURN PF5 HELP PF6 MENU

b6
b7C

1325015-000-5999

NOV 22

Print
A21710537

UNITED STATES DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON FIELD OFFICE
WASHINGTON, D. C.
11/21/91

REFER TO: [redacted] INS FILE #: 298 -171994 b6 b7C

RETURN TO: [redacted] /C-5 /WF DEADLINE: -0-

LAST NAME	FIRST NAME	MIDDLE
PHARAON	GHAITH	RASHAD
ALIAS		
-0-	-0-	-0-
-0-	-0-	-0-

BORN: 09/07/41 PLACE: SAUDIA ARABIA

CITIZENSHIP: -0- NATURALIZED: -0-

IDENTIFICATION NUMBERS:

INS #: -0-
CERTIF #: -0-

ARRIVAL DATE: -0- DEPARTURE DATE: -0-

EMPLOYMENT: -0-

ADDRESS: -0-
-0- -0- -0-

DO NOT FORWARD TO FIELD

SPECIFIC INFORMATION DESIRED
ALL AVAILABLE INFORYATION
-0-

Route to ALIEN FILES UNIT - Room 234
CENTRAL OFFICE - I&NS

INS file # A21710537 changed to INS, Providence, Rhode Island.

copy filed Sub Pag 3

REQUESTING AUTHORITY

ID [redacted] 12/10/91

b6 b7C

ROBERT M. BRYANT
SPECIAL AGENT IN CHARGE

298-WF-171994-299

SEARCHED ___ INDEXED Su
SERIALIZED Su FILED Su
JAN 10 1992
[redacted] LD OFFICE

5015-000-6000

CIMSIN IMMIGRATION AND NATURALIZATION SERVICE 11/29/91
CENTRAL INDEX SYSTEM - DETAILED SEARCH DISPLAY 19:58:27
A#: 921710537 NAME: PHARON ,GHAITH DOB: 090740
LAST: PHARON
FIRST: GHAITH NATZ DATE:
MIDDLE: COURT:
ALIASES: LOCATION:
SEX: POE: PRO COB: SAUDI DOE: 072377
FCO: PRO COA: COC: FATHER:
PFCO: PRO SFCO: DFO: 072577 BIN: MOTHER:
SSN: CONSOLIDATED A-NOS --OTHER INFORMATION--
I-94 ADM #:
PASSPORT #:
FBI #:
DRIVER LIC:
FINGER CD#:
CLEAR EXIT PF4 RETURN PF5 HELP PF6 CIS MAIN MENU
PF7 NEXT SEARCH PF8 VIEW HISTORY PF9 VIEW EAD

CIMDHI IMMIGRATION AND NATURALIZATION SERVICE 11/29/91
CENTRAL INDEX SYSTEM - STATUS/HISTORY DATA 19:58:31
A#: 021710537 NAME: PHARON ,GHAITH DOB: 090740

ACTION	LOC	ACTION-DATE	ST	REASON/COURT#	MISC	KEYED-DATE

NO TRANSACTION HISTORY INFORMATION ON FILE FOR THIS PERSON.

CLEAR EXIT PF4 RETURN PF5 HELP PF6 MENU

NONIMMIGRANT INFORMATION SYSTEM — DATE: 12/04/91

MAP: NIXOBAS — BASIC DATA DISPLAY — TIME: 20:37:07

LAST NAME:	PHARAON	FIRST NAME	GHAITH
ADMISSION NUMBER:	23428962402	DATE OF BIRTH:	090740
COUNTRY OF CITIZEN:	SAUDI	COUNTRY OF RESID:	SAUDI
CLASS OF ADM:	B2	DATE ADMITTED:	031691
PORT OF ENTRY:	SAJ	DATE ADM TO:	091591
CURR CLASS:	B2	CLASS DATE:	
NUMBER OF EXT:		EXT ADM TO:	
SPECIAL STATUS:	A 0	WAIVER:	
ALIEN NUMBER:		GENDER:	M
TRAVEL MODE:	AIR	BOND FLAG	
VISA ISSUE POST:	PARIS	VISA ISSUE DATE:	121090
PORT OF DEP:		DEP DATE:	
ADDRESS - STREET:	YACHT LE PHARAON	CITY STATE:	SAN JUAN PR
ITINERARY:	BAY MARINA		
NOTATIONS:		CONTROL OFC CODE:	
ARR CARRIER:	BA	ARR FLT NO:	00253
PASSPORT NUMBER:	Z50067	INSPECTOR:	113

CLEAR: LOGOFF PF4: RETURN TO ROSTER PF6: MENU PF7: INQUIRY

1325015-000-6003

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 11/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 10/4/91, DOJ Trial Attorney (TA) [redacted] b6 b7C requested that the writer contact [redacted] and arrange for an interview of [redacted]

On that same date, attempts to contact [redacted] at his residence and his business telephone numbers, in New York City. Said attempts met with negative results. it was noted that the business number had been disconnected. b6 b7C

On 10/6/91, 10/16/91, 10/21/91 and 10/31/91, respectively, the writer attempted to contact [redacted] Said contact met with negative results. TA [redacted] were apprised of the above facts. b6 b7C

On 11/12/91, TA [redacted] advised that he was in New York City. TA [redacted] requested that the writer attempt to contact [redacted] and set up an interview for him on that same date. The writer was successful in contacting [redacted] wife at their New York residence. She advised that [redacted] was out of town and would not divulge where he was. She stated that she would let him know that the writer wanted to speak with him. b6 b7C

On that same date, T [redacted] was apprised of the above facts. b6 b7C

On 11/15/91, [redacted] attempted to contact the writer at the NVMRA. Said contact met with negative results. [redacted] left a message that he was in Karachi, Pakistan and that he would contact the writer within the next week. [redacted] declined to leave a number that he could be contacted at. b6 b7C

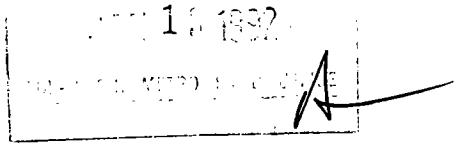
29B-WF-171994 MAIN — 301

SL SL SL

1325015-000-6008

29B WF 171994 MAIN-
302

Sec
Sec Sec



Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 11/19/91

From SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 11/12/91, the writer was contacted by SA [redacted] b3 b6 b7C
[redacted] LA Division. SA [redacted] advised he was travelling to [redacted] Federal Grand Jury (FGJ) [redacted]

On 11/13/91, the writer was contacted by DOJ Trial Attorney (TA) [redacted] requested that the writer travel with him to Atlanta to interview [redacted] TA [redacted] advised that he was travelling to New York to participate in the [redacted] interview and further requested that the writer arrange the [redacted] interview. b6 b7C

On that same date, The writer was contacted by AUSA [redacted] District of Columbia. AUSA [redacted] requested that the writer advise the other agents working on his team that he wanted to have a staff meeting on 11/18/91. The writer and AUSA [redacted] discussed the status of this aspect of the investigation at length. b6 b7C

On that same date, the writer picked up SA [redacted] at Dulles Airport. SA [redacted] and the writer thereafter met at the NVMRA. The Independence and FAB aspects of captioned case were discussed at length. The writer provided SA [redacted] with documents pertinent to his inquiry and likewise, SA [redacted] furnished the writer with documents germane to FAB. Attached hereto is a listing of interview conducted by the Federal Reserve, that were provided to SA [redacted] Said documents and other documents will be reviewed in detail by the writer and will be appropriately filed thereafter. b6 b7C

On 11/15/91, the writer contacted [redacted] Atlanta with respect to [redacted] was not aware of who [redacted] attorney was. He suggested that the writer contact [redacted] at FAB regarding [redacted] b6 b7C b7E

After several negative attempts to contact [redacted], [redacted] contacted the writer on 11/19/91. [redacted] was not aware of b6 b7C

the requested information. He stated he would attempt to ascertain same and that he would re-contact the writer.

On that same date, the writer apprised TA [redacted] of the above facts. b6 b7C

On 11/20/91, [redacted] contacted the writer. He advised that [redacted] added that according to his sources, [redacted] is currently in Europe.

On the above date, this information was relayed to TA [redacted]

1325015-000-6011

10/3/91

Interviews

Interviewee	Date of Interview
	3/19/91
	3/20/91
	3/7/91
	5/21/91
	5/7/91
	7/19/91
	3/7/91
	4/22/91
	2/15/91
	4/29/91
	2/4/91
	6/6/91
	9/6/91
	8/20/91
	2/15/91
	2/28/91
	5/20/91
	2/6/91
	4/9/91
	8/29/91
	3/19/91
	5/22/91
	3/20/91
	2/14-15/91
	3/22/91

b6
b7C

[redacted]

7/17-19/91

3/22/91

8/14/91

5/9-10/91

7/19/91

8/7/91

6/11/91

3/19/91

5/21/91

7/31/91

8/28/91

2/28/91

3/4/91

2/12/91

2/28/91

4/17/91

2/14/91

2/25/91

8/29/91

8/1/91

5/10/91

2/11/91

5/17/91

2/12/91

8/27/91

b6
b7C

*Securities Investment Bd

[redacted]

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 11/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 10/25/91, the writer attended a meeting at FBIHQ. The purpose of the meeting was to discuss the joint DOJ/FBI office space. In attendance from the FBI were SSA [redacted] b6 b7C FIFU, [redacted] Space Management Unit and the writer. In attendance from DOJ were [redacted] Also in attendance was [redacted] from the USAO, WDC. [redacted] presented a blue print for the office space. All attendees were in agreement as to the office set up. It was anticipated that the space would be available in early January, 1992.

SSA [redacted] requested that the writer, through SSA [redacted] b6 b7C bring the blue print to the attention of the SAC and ASAC.

On that same date, the writer provided SSA [redacted] with ⊗ b6 b7C said blue print and apprised SS [redacted] of SSA [redacted] request. Subsequently, SSA [redacted] briefed the ASAC and SAC.

On 11/8/91, 11/12/91 and 11/18/91, respectively, [redacted] b6 b7C contacted the writer with questions concerning the FBI space. On each occasion, [redacted] was referred to SSA [redacted]

On 11/20/90 [redacted] b6 b7C again contacted the writer. He was referred to SSA [redacted]

29B WF-171994 MAIN – 303
Su Su

1325015-000-6014

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 11/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 10/30/91, the writer was contacted by DOJ Trial Attorney (TA) [redacted] requested that the writer accompany him to San Francisco some time during the week of 11/11/91, to interview [redacted] TA [redacted] added that TA [redacted] would participate in the [redacted] interview. In addition, TA [redacted] stated that he was in the process of preparing a prosecutive memo for the First American Bank (FAB) aspect of the case. b6 b7C

On that same date, the writer contacted SA [redacted] to discuss the above interview. SA [redacted] advised that he has been investigating the Independence Bank matter. b6 b7C

On 11/6/91, TA [redacted] contacted the writer and advised that he set up the above interviews for 11/8/91. b6 b7C

On that same date, the writer contacted SA [redacted] to coordinate the interviews. b6 b7C

On 11/7/91, TA [redacted] advised the writer that he would not be able to travel to conduct the above interviews. He had to attend a DOJ meeting on 11/9/91 with AAG MUELLER. The writer stated that there was no point in travelling to San Francisco and that SA [redacted] would be contacted to conduct the interview of [redacted] by himself. The writer advised that he would contact [redacted] directly and did so that same date. (Refer to the appropriate FD-302). b6 b7C

On the above date and 11/8/91, the writer discussed this matter at length with SA [redacted] in order to assist SA [redacted] prepare for the aforementioned interview. b6 b7C

29B WF-171994 MAIN - 304

SU SU SU

A 1325015-000-6015

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 12/18/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;
FAG;
(OO: WMFO)

On 12/2/91, SSA [redacted] advised the writer that Principle Deputy Chief (PDC [redacted] Fraud Section, DOJ, requested that the writer interview Senator ORRIN G. HATCH concerning media accounts of the Senator's relationship with BCCI and individuals close to BCCI. Said interview would be coordinated with PDC [redacted] b6 b7C

On 12/3/91, the writer contacted PDC [redacted] It was agreed that PDC [redacted] would be present for the interview and that the interview would be arranged by the writer. b6 b7C

On that same date, the writer contacted SSA [redacted] Congressional Affairs, FBIHQ. The writer received authority to contact Senator HATCH and to schedule the interview. b6 b7C

On that same date, the writer contacted Senator HATCH'S [redacted] An appointment was scheduled for 12/11/91 to interview Senator HATCH in his Senate office. b6 b7C

On that same date, the writer advised PDC [redacted] of the scheduled interview. It was agreed that the writer and PDC [redacted] should meet prior to the interview to plan the interview. b6 b7C

On 12/10/91, the writer was twice contacted by [redacted] The first contact was to re-schedule the interview for 12/12/91. The second contact was to move the interview back to 12/11/91, as originally scheduled. b6 b7C

On that same date, the writer had three contacts with PDC [redacted] concerning the above. b6 b7C

29B-WF-171994 Main -305

See See

[redacted] b6 b7C

1325015-000-6016

On 12/11/91, prior to the interview, the writer met with PDC [redacted] to plan the interview. Subsequent thereto the interview was conducted. (Refer to the appropriate FD-302). b6 b7C

On 12/16/91, the writer met with [redacted] Senator HATCH. They provided the writer with two folders marked [redacted] The writer reviewed said folders and marked documents that the writer wanted copies of. b6 b7C

It should be noted that the majority of the documents described [redacted] business interests and plans. Said documents were not relevant to this matter. Those records that were deemed relevant to this matter were copied and will be inventoried separately. It should also be noted that an FD-302 was prepared describing [redacted] Senator HATCH'S Trust with [redacted] b6 b7C

On 12/18/91, the writer picked up those records copied. Such were picked up at Senator HATCH'S office.

1325015-000-6017

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/10/92

From : SA [redacted] (C-5)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO:WMFO)

Between 7/31/91 and 12/31/91, the writer went on the following trips, in furtherance of captioned investigation:

7/31 - 8/02	New York
8/08 - 8/09	New York
8/16	New York
8/21	New York
8/28 - 8/30	New York
9/03 - 9/07	Atlanta
10/21 -10/24	New York
12/03 -12/06	New York
12/19	New York

It should be noted that the writer scheduled the interviews/investigation conducted for said trips. Same took a considerable amount of time and resulted in numerous telephone contacts with Prosecutors, Witnesses and Defense Attorneys.

29B-WF-171994-306

Sec Sec

1325015-000-6018

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/13/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 1/13/92, the writer was contacted by SA [redacted] b6 b7C
[redacted] Norfolk. SA [redacted] advised that [redacted] was arrested on 1/10/92 at the residence [redacted] Va., [redacted] The arrest took place without incident. SA [redacted] stated that [redacted] was arraigned on 1/13/92 and was ordered to be immediately transported back to Washington, D.C. SA [redacted] added that there was considerable media coverage at the arraignment.

SA [redacted] stated that he has [redacted] passport. The writer requested that SA [redacted] send same to WMFO via Federal Express. b6 b7C

29B-WF-171994 -307

Su Su

1325015-000-6019

29B-WF-171994 – 310

SEARCHED ____ INDEXED ____
SERIALIZED Su FILED Su
JAN 1 - 1992
[redacted] FIELD OFFICE

b6
b7C

DEPARTMENT JUSTICE
FEDERAL BUREAU OF INVESTIGATION
INTERNAL ROUTING/ACTION SLIP

TO	TL #	ROOM	NAME/TITLE
	235	7116	[redacted]
	233	5012	
	231	3012	
	231	3823	
X			
	231	3835	[redacted] WMP
	231	3841	FINANCIAL INSTITUTION FRAUD UNIT

TO	TL #	ROOM	NAME/TITLE
	231	3849	PUBLIC CORRUPTION UNIT
			[redacted]
	231	3865	GOVERNMENTAL FRAUD UNIT
			[redacted]
	233	5161	ECONOMIC CRIMES UNIT
			[redacted]
	245	7240	CONGRESSIONAL AFFAIRS OFFICE
	244	6226	CORRESPONDENCE UNIT
	213	7326	LEGAL RESEARCH UNIT, LCD
	152	1B-327	MAIL ROOM
	233	5129	RUFU/ATTN:
	213	7659	PRESS OFFICE
	244	6248	READING ROOM
	233	5078	SPECIAL ASSISTANTS/CID
			ATTN:
	244	6247	TELETYPE ROOM
	231	3117	USOU
	153	1262	VOUCHER UNIT

[redacted]

Please note attached ltr for your files.

Thanks

29B-WF-171994 – 309

SEARCHED ____ INDEXED Su
SERIALIZED Su FILED Su
JAN 1 - 1992
FBI [redacted]

b6
b7C

- ☐ Call Me
- ☐ See Me
- ☐ Approp. Action
- ☐ Initial
- ☐ Per Inquiry
- ☒ For Your Info.
- ☐ Prepare Response
- ☐ Prepare Addendum
- ☐ For Your Approval
- ☐ Status/Facts

FROM: [redacted]

FINANCIAL INSTITUTION FRAUD UNIT
WHITE-COLLAR CRIMES SECTION
CRIMINAL INVESTIGATIVE DIVISION

Room	TL #	Phone	Date
3839/3841	231	5594/5658	1/8/92

FBI/DOJ

1325015-000-6025

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE: GRAND JURY INVESTIGATION : Misc. No.
(UNDER SEAL)

GOVERNMENT'S APPLICATION FOR
MATERIAL WITNESS WARRANT

The United States of America, through the United States Attorney for the District of Columbia, respectfully requests that the Court issue a warrant, pursuant to 18 U.S.C. §3144, for the arrest of [redacted] b3 b6 b7C

In support of its application, the government refers the Court to the attached affidavit by FBI Special Agent [redacted] b6 b7C

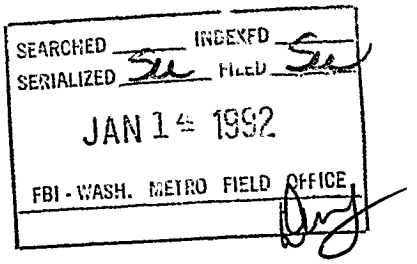
Respectfully Submitted,

JAY B. STEPHENS
UNITED STATES ATTORNEY

By: [redacted] b6 b7C
Assistant United States Attorney
555 4th Street, N.W.
Washington, D.C. 20001
[redacted]

1325015-000-6026

29B-WF-171994-311



AO 442 (Rev. 12/85) Warrant for Arrest

United States District Court

DISTRICT OF

UNITED STATES OF AMERICA
V.

WARRANT FOR ARREST

In Re: Grand Jury Investigation

CASE NUMBER:

To: The United States Marshal
and any Authorized United States Officer

(UNDER SEAL)

YOU ARE HEREBY COMMANDED to arrest [redacted] b6 b7C
Name

and bring him or her forthwith to the nearest magistrate to answer a(n)

☐ Indictment ☐ Information ☐ Complaint ☒ Order of court ☐ Violation Notice ☐ Probation Violation Petition

~~charging him or her with~~ (brief description of offense)
compelling his attendance at the grand jury investigation.

~~in violation of~~ Title 18 United States Code, Section(s) 3144

Audrey G. Fleissig
Name of Issuing Officer

Chief Judge U.S. District Court
Title of Issuing Officer

Audrey G. Fleissig
Signature of Issuing Officer

January 10, 1997 District of Columbia
Date and Location

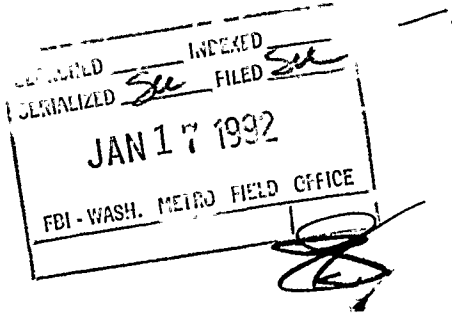
Bail fixed at $ _____ by _____
Name of Judicial Officer

RETURN		
This warrant was received and executed with the arrest of the above-named defendant at _____		
DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

1325015-000-6030

29B-WF-171994 Main (X)

-313



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 91-0655 (JHG)
	)	
BCCI HOLDINGS (LUXEMBOURG), S.A.	)	
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.	)	
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED	)	
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED,	)	
Defendants.	)	

FILED

JAN 09 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER

This action commenced with the November 15, 1991 filing of an indictment against four corporations and three individuals. Arrest warrants were issued that date and remain outstanding and unexecuted as of today.

Approximately one month later, that is, on December 19, 1991, a superseding information was filed against the four corporate defendants (collectively, "BCCI"). This was accompanied by the memorandum of intent and a plea agreement executed the 19th of December.

On December 30th this Court confirmed by Order that the arraignment and the offer of the plea would be made today and the parties, through counsel, have assembled here for this purpose.

Accordingly, today, the Court will hear the offer of the plea and make appropriate inquiries of the defendants and the government. Today, the Court will neither accept nor reject the plea agreement, but will defer its decision as to the acceptance

1325015-000-6092

or rejection of the plea agreement until there has been opportunity to consider relevant matters concerning this plea agreement.

The Court is not unaware of the public interest in this criminal proceeding. Expressions of interest from other parties and/or entities have been communicated to the Court through submission of papers, letters, briefs, and copies of briefs filed in other jurisdictions. Some of these communications request intervention through alleged standing, amicus curiae status and general importuning to the Court in its consideration of whether to accept the plea agreement, which includes a proposed disposition of the case, or to reject the plea agreement.

In furtherance of the public interest and in the effective administration of justice, the Court will consider the filings of relevant materials by persons and/or entities who are not parties to these criminal proceedings. In order to be considered, those filings must be made in accordance with both the Federal Rules of Criminal Procedure and the Local Rules of this Court, and must be filed no later than 12:00 noon EST, January 15, 1992. A master file in the Clerk's Office has been established to accommodate these filings. The caption of any such pleadings shall be **"Miscellaneous BCCI File - Misc. No. 92-06."** All submissions previously tendered the Court, including Misc. No. 92-05, are hereby made a part of this file. Allowance of these filings in no way confers standing or any other status on any person or entity making any such submission.

1325015-000-6093

Should the government and/or the defendants seek to respond to any of those submissions, that response must be filed no later than 12:00 noon EST, January 21, 1992.

On January 24, 1992, at 10:00 a.m., the Court will announce in open Court its decision: acceptance of the plea agreement with its proposed disposition or its rejection of the plea agreement with its proposed disposition.

The parties, through counsel, are required to be present.

The Clerk of the Court shall place a copy of this Order in Misc. No. 92-06.

IT IS SO ORDERED.

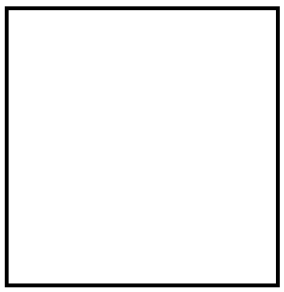
JOYCE HENS GREEN
United States District Judge

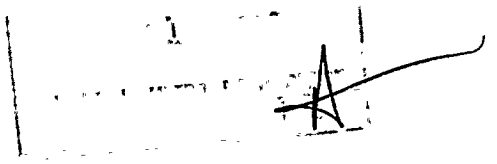
January 9, 1992

1325015-000-6094

29B-WF-171994-314

b6
b7C





Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/13/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 1/10/92, AUSA [redacted] District of Columbia, b6 b7C contacted SA [redacted] advised that he had been contacted by ADA [redacted] Manhattan District Attorney's Office. ADA [redacted] requested that the USAO, District of Columbia assist his office. The Manhattan DA'S office had developed source information to indicate that [redacted] BCCI/Washington Representative Office, had returned to the Washington, D.C. area and was due to return to Pakistan in the next few days. ADA [redacted] requested that the USAO obtain an arrest warrant for [redacted] and to execute same. AUSA [redacted] requested that SA [redacted] come to his office and assist in the preparation of an affidavit and to swear to same in U.S. District Court, District of Columbia.

On the above date, SA [redacted] obtained the b6 b7C aforementioned arrest warrant for [redacted]

On that same date, the writer contacted Detective [redacted] Manhattan DA'S office and SA [redacted] GAO, b6 b7C Office of Special Investigations. Via said contacts, the writer determined that the Manhattan DA'S office had developed source information to indicate that [redacted] came into the U.S. on 12/27/91 and was scheduled to depart the U.S. and return to Pakistan in the next few days. [redacted] had come to the U.S. to visit friends and to sell property he owned in Bethesda, Maryland. Detective [redacted] advised that early in their investigation, while [redacted] was still residing in the Washington, D.C. area, his office contacted [redacted] about coming to New York and cooperating with the Manhattan investigation. It was agreed that [redacted] would go to New York two days later. Instead of going to New York, [redacted] fled to Pakistan.

On the above date, the writer contacted [redacted] b6 b7C at the New York Banking Department (formerly the New York BCCI office). [redacted] advised that if [redacted] was in the Washington, D.C. area he would likely have made contact with [redacted] believed that [redacted] would not have driven himself and would have travelled with a

chauffeur. [redacted] would likely also contact [redacted] BCCI/Washington Representative Office, [redacted] b6 b7C

Based on contacts with GAO, the Manhattan DA'S office and a review of available records from the BCCI Washington Representative Office the following information was developed by SA [redacted] and the writer:

1) Addresses for former BCCI/Washington officials who [redacted] would likely contact in the Washington, D.C. area: b6 b7C

[redacted] D.C. [redacted]

[redacted] Maryland [redacted]

[redacted] Maryland [redacted]

[redacted] Maryland [redacted]

2) [redacted] Maryland:

[redacted] Maryland

It should be noted that [redacted] has been renting this residence to the Nicaraguan Ambassador. The sale of the property was being handled by [redacted] Maryland [redacted] b6 b7C

3) It has been determined that [redacted] Virginia area. His name was [redacted] Econo Lodge Hotels, with telephone numbers (804)874-9244 and (804)229-7564. The (804)874-9244 number was located at 15237 Warwick Blvd., Newport News, Virginia. A DMV check disclosed the following information: b6 b7C

1325015-000-6097

Name
Address

Va.

DOB
SSAN
Height 5'6"
Weight 140

b6
b7C

4) Background information for

Name
AKA
DOB
SSAN
POB India
Citizen U.S. and Pakistan
Passport Pakistan
U.S.

On 1/10/91, the writer contacted SA b6 b7C Norfolk and subsequently SA Peninsula R.A. The arrest of was coordinated with said Agents. SA sent the arrest warrant to Norfolk, via facsimile. On that same date, Norfolk SA'S executed the arrest warrant by apprehending at the Nicholas Court address.

On 1/11/92, Detective was advised of the arrest b6 b7C of

On 1/13/92, GAO, SA was advised of the arrest of

1325015-000-6098

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/14/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Between 11/15/91 and 12/19/91, numerous attempts were made to contact [redacted] Said attempts met with negative results. On 12/19/91, it was determined that [redacted] telephone had been disconnected. The writer set forth a lead for the New York Office to determine if [redacted] still maintained his New York residence. Subsequently the writer was contacted on 1/6/92, by NYO SA [redacted] advised that he checked [redacted] Bronxville address and determined that [redacted] still maintained a residence there. SA [redacted] left a message for [redacted] to contact the writer. b6 b7C

On 1/6/92, the writer was contacted by [redacted] She advised that her husband was out of the country and was scheduled to return during the week of 1/14/92. [redacted] stated that she could be contacted at telephone # [redacted] b6 b7C

On that same date, the writer apprised Trial Attorney (TA) [redacted] Fraud Section, DOJ of the above information. It should be noted that the writer has kept TA [redacted] apprised of all attempted [redacted] contacts. b6 b7C

On that same date, the writer was contacted by SA [redacted] Atlanta. SA [redacted] was apprised of the above information pertaining to [redacted] The writer advised that once contact was made with [redacted] he would contact SA [redacted] b6 b7C

29B-WF-171994 Main
Sec Sec -315

1325015-000-6099

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 1/15/92

To: [redacted] Washington, D.C. b6 b7C
(Name and Address of USA)

From: ROBERT M. BRYANT
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: "HIDDEN INTERESTS"
(Name of Subject) Age Sex

You are hereby advised of action authorized by AUSA [redacted]
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] on 1/15/92
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344.

Synopsis of case: As requested by AUSA [redacted] accompanying this document are five pieces of documentation prepared by SA's [redacted] listing items located in Grand Cayman that are requested to be copied and returned to DOJ/FBI for further analyses. b6 b7C

29B-WF-171994 Main -316

Searched
Serialized SW
Indexed
Filed SW

1325015-000-6100

4

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/16/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 1/14/92, the writer was contacted by Trial Attorney (TA) [redacted] Fraud Section, DOJ. TA [redacted] requested that the writer interview [redacted] on 1/15/92. In addition, TA [redacted] requested that the writer review [redacted] records concerning his representation of CCAH. Same were maintained at the law offices of Milbank Tweed, 1825 Eye St., N.W., Washington, D.C. b6 b7C

On that same date, the writer contacted [redacted] Arrangements were made for the FBI to review the aforementioned records. [redacted] stated that the records were available and that the review should be coordinated with [redacted] Milbank Tweed, telephone [redacted] b6 b7C

On that same date, SA'S [redacted] and the writer conducted a cursory review of the above referenced documents. Said records were identified as follows: b6 b7C

6 boxes labelled CCAH
1 box labelled Annual Reports
7 boxes labelled NBG
12 boxes labelled original acquisition

Certain documents were tagged for copying. Such documents will be provided to the FBI by Milbank Tweed.

29B-WF-171994 Main
SW SW 317

WM

1325015-000-6101

29B-WF-171994 Main

Ste Sec - 318

WM

1325015-000-6102

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/16/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO:WMFO)

On 1/13/92, the writer spoke with the [redacted] b6 b7C was scheduled to return to the United States on 1/15/92. She added that she would have him contact the writer upon his return.

On 1/13/92 and 1/15/92, respectively, this matter was discussed with Trial Attorney [redacted] Fraud Section, DOJ. b6 b7C

On 1/16/92, the writer was contacted by [redacted] b3 b6 b7C

[redacted]

On that same date, the writer contacted TA [redacted] and advised him of the above contact. Following a discussion with Principle Deputy Chief (PDC) [redacted] Fraud Section, DOJ, TA [redacted] made the following requests:

1. That the writer re-contact [redacted] and determine if he could stay in [redacted] b3 b6 b7C

2. Determine [redacted] travel schedule for the near future.

3. That the writer or another Agent travel to [redacted] on 1/20/92, with TA [redacted] in order to participate in the interview of [redacted]

On that same date, the writer re-contacted [redacted] b3 b6 b7C

[redacted]

On that same date, TA [redacted] was apprised of the above facts. b6 b7C

1325015-000-6104

FD-65 (Rev. 1-13-86)

Federal Bureau of Investigation

AIRTEL

To: Director, FBI
Att: Criminal Investigative Division
Fugitive Unit

Date: 1-10-92

INSTRUCTIONS - Reverse Side
NOTE: Priority "A" and "B" Fugitives - With initial submission, set forth a synopsis of crime on reverse side.

From: SAC, 29B-WF-171994

Subject:

- [X] III Inquiry
- [X] Initial Submission
- [ ] Initial Submission - Parental Kidnaping
- [ ] Supplements FD-65 dated _____

b3 b6 b7C

Indicate Fugitive Priority
- [ ] A
- [ ] B
- [X] C
- [ ] D (Parental Kidnaping)

00: WMFO

Caution ☐ MKE			NAM	Sex SEX: M	Race RAC: W	
Place of Birth: II - INDIA		Date of Emancipation DOE: —	Height HGT: 5'6"	Weight WGT: 150		
Eye Color EYE: BRO	Hair Color: BLK		FBI	Skin Tone SKN: MED		
Scars, Marks, Tattoos, and Other Characteristics SMT: —						
NCIC Fingerprint Classification FPC: —		Other Identifying Number MN: —				
Operator's License Number OLN: —		Operator's License State OL: —				
Offense Charged: 5099 OFF						
U. S. Code, Title and Section:						
Warrant Issued By: _____ on 01.10.92 DOW		F.O. File # 29B-WF-171994 OCA				
Miscellaneous Including IS)						

b3 b6 b7C

Out

LICENSE PLATE AND VEHICLE INFORMATION

License Plate Number LIC	State LIS	Year Expires LIY	License Plate Type LIT
—	—	—	—

Vehicle Identification # VIN	Year VYR	Make VMA	Model VMO	Style VST	Color VCO
—	—	—	—	—	—

Aliases

Additional Identifiers 29B-WF-171994 - MAIN -319

NCIC	SUPR.	OPR.	AGENT
ENTER ☒	GLM		
MODIFY ☐			
CLEAR ☒	GLM		
CANCEL ☐			
LOCATE ☐	1/10/92	W672342684	
DATE 1-10-92	NCIC #		

Clear

29B-WF-171994

NIC

b7E

PRIORITY "A" and "B" FUGITIVES - Synopsis of Crime.

INSTRUCTIONS

1. **Caution (MKE) -** Insert "C" in block if caution statement indicated. Basis for caution statement must appear in Miscellaneous block, e.g., armed and dangerous.
2. **Name (NAM) -** Place name in this block. Aliases are not to be entered in this block but are to be placed in Aliases block.
3. **Sex (SEX) -** Sex will be designated by one letter, M (male) or F (female).
4. **Race (RAC) -** Race will be described by one letter, A (Asian or Pacific Islander), I (American Indian or Alaskan Native), B (Black), W (White), U (Unknown).
5. **Place of Birth (POB) -** Indicate city and state or, if foreign born, city and country. Where multiple birthplaces are reported, list verified birthplace or that which appears most logical in this block.
6. **Birth Date (DOB) -** Enter as month, day and year. Where multiple birth dates are reported, enter verified birth date or that which appears most logical in this block. Place other dates of birth in Additional Identifiers block.
7. **Date of Emancipation (DOE) -** Must be filled in if individual is a juvenile. Otherwise leave blank.
8. **Height (HGT) -** Express in feet and inches, e.g., 6'0". Round off fractions to nearest inch.
9. **Weight (WGT) -** Express in pounds. Omit fractions.
10. **Eye Color (EYE) -** Use appropriate three-character symbol.
11. **Hair Color (HAI) -** Use appropriate three-character symbol.
12. **Skin Tone (SKN) -** Use appropriate three-character symbol.
13. **Scars, Marks, Tattoos, (SMT), and Other Characteristics -** Place in this block only appropriate NCIC coding for scars, marks, tattoos, birthmarks, deformities, missing body parts and artificial body parts as defined in NCIC Code Manual. If more than one SMT is to be entered, use Additional Identifiers block for additional appropriately coded items. Use Miscellaneous block to describe all scars, marks, tattoos, and other characteristics, which are not defined in the NCIC Code Manual and to more fully describe SMT's which have been entered in SMT block. For example, an appendectomy scar, not being readily visible, would be described in the Miscellaneous block. A tattoo on right arm, shown as TAT R ARM in block, might be further described in Miscellaneous block as a rose tattoo on inside of lower right arm.
14. **NCIC Fingerprint Classification (FPC) -** Enter NCIC fingerprint classification.
15. **Other Identifying Number (MNU) -** Miscellaneous numbers may be entered with appropriate identifiers (prefixes). For first miscellaneous identifying number, use MNU block. When military service number is in fact Social Security Account Number, the number should be entered in both MNU and SOC blocks. Additional identifying numbers are placed in Additional Identifiers block. The identifier (prefix) should precede the number and be separated from the number by use of a hyphen.
16. **Social Security Number (SOC) -** Place subject's Social Security Account Number in this block.
17. **Operator's License Number -** Place subject's operator's license number in OLN block. Also show licensing state (OLS) and year license expires (OLY).
18. **Warrant Issued By-On-(DOW) -** Enter date warrant issued in DOW block. For juvenile offenders, enter the date of violation.
19. **Miscellaneous (MIS) -** Enter additional pertinent information in this block. If caution statement used, basis for statement must be set forth as first item in this block.
20. **License Plate and Vehicle Information -** Place information concerning license plate and/or vehicle known to be in the possession of subject in appropriate blocks under License Plate and Vehicle Information heading.
21. **Additional Identifiers -** Enter information concerning additional license plates (number, state, year expires, and where applicable, type); Social Security Numbers; operator's license number, state and year expires; vehicle information (VIN, VYR, VMA, VMO, VST, VCO); MNU's (see list in item 14 above); visible scars, marks, tattoos, and other characteristics; and dates of birth. Clearly identify what data is being set forth; e.g., Social Security # 423-56-3294; Michigan operator's license 234567, expires 1987; DOB's 4/5/32, 5/3/32; etc.
22. By making an III inquiry, the entering agency may become knowledgeable of additional DOBs, AKAs, and other significant information which may aid in the location and/or apprehension of wanted persons.
23. Changes and deletions should be so indicated in the appropriate blocks.

cic.cw. [redacted] nam [redacted]
NCIC UPDATE NUMBER 11463 INITIATED
FBBD 11463 NCIC
[redacted]
CLEAR NAM [redacted]

b6
b7C
b7E

29B-WF-171994

[redacted] cbt

b6
b7C

cic.zw [redacted]
NCIC INQUIRY NUMBER 01533 INITIATED
FB8D 01533 NCIC
[redacted]
MKE/LOCATED WANTED PERSON
ORI [redacted] SEX/M RAC/W POB/II DOB [redacted] HGT/506
WGT/150 EYE/BRO HAI/BLK SKN/MED
SOC [redacted] OFF/OBSTRUCT SEE MIS DOW [redacted]
MIS [redacted]
[redacted]

b6
b7C
b7E

cic.zw [redacted]
NCIC INQUIRY NUMBER 80196 INITIATED
FB8D 80196 NCIC
[redacted]
MKE/WANTED PERSON
ORI/[redacted] SEX/M RAC/W POB/II DOB [redacted] HGT/506
WGT/150 EYE/BRO HAI/BLK SKN/MED
SOC/[redacted] OFF/OBSTRUCT SEE MIS DOW [redacted]
MIS/[redacted]
[redacted]

b6
b7C
b7E

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 1/16/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
OO:WMFO

Attached to this memorandum is an inventory of documents provided by the [redacted] b3 b6 b7C

[redacted]

These documents were delivered to [redacted] USAO, WDC, on 1/13/92. b3 b6 b7C

2-WMFO
CMA:cma
(2)

[redacted]

29B-WF-171994-320
SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 2[illegible] 1992
FBI - WASH. METRO FIELD OFFICE
b6 b7C

1325015-000-6110

29BWF-171994-Mun

WARNING: GRAND JURY MATERIAL: DISSEMINATE ONLY PURSUANT TO
RULE 6 (E), FEDERAL RULES OF CRIMINAL PROCEDURES.

b3
b6
b7C

rec'd 1/17 KLH 325

U.S. Department of Justice

United States Attorney

District of Columbia

Judiciary Center
555 Fourth St. N.W.
Washington, DC 20001

January 17, 1991

By Fax: 324-6426

C-5

TO: S/A [redacted] FBI b6 b7C

FROM: MERRICK GARLAND, AUSA

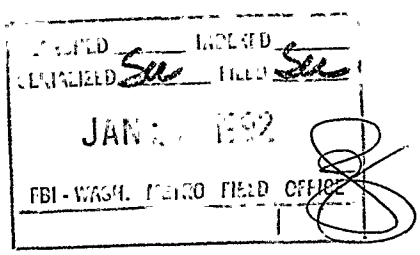
RE: Rule 6(e) Notifications in BCCI Matter

Per our telephone conversation, please ensure that the FBI personnel on the following list receive the attached USAO notification of their obligations of secrecy under Rule 6(e). A copy of the standard notification is also attached.

[redacted] b6 b7C

(X)

29B-WF-D1996 Main - 321



U.S. Department of Justice

United States Attorney

District of Columbia

Judiciary Center
555 Fourth St. N.W.
Washington, DC 20001

ADVICE AS TO GRAND JURY SECRECY

BCCI

(Name of Case)

See attached list

(Name of Agent to Whom Disclosure Made)

1. Your name has been disclosed to the United States District Court for the District of Columbia as a person who has been or will be given access to materials, including documentary and testimonial evidence, obtained through the powers of a federal grand jury inquiring into possible federal criminal violations.

2. In accordance with Rule 6(e)(3)(A)(ii), you are being given access to those materials for the sole purpose of assisting the government attorneys involved in the grand jury investigation in the performance of their duties to enforce federal criminal law.

3. The grand jury investigation is criminal in nature, and grand jury proceedings are secret. The unauthorized disclosure of grand jury matters is punishable by contempt proceedings. Grand jury matters include the identities of witnesses, their testimony, and the nature and content of documents and physical evidence obtained through the grand jury investigation.

4. No grand jury material may be disclosed or used for any civil or administrative purpose, or for any purpose other than for the grand jury investigation, except by order of the Court.

5. Rule 6(e)(3)(B) of the Federal Rules of Criminal Procedure, states that you may "not utilize grand jury material for any purpose other than assisting the attorney for the government in the performance of such attorney's duty to enforce federal criminal law."

1325015-000-6132

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 1/21/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
OO:WMFO

On instant date the writer spoke to [redacted] at telephone number [redacted] b6 b7C b3

[redacted] BCCI [redacted] He commenced his employment in London, England, [redacted] b6 b7C b3

[redacted] advised that [redacted] BCCI [redacted] b6 b7C b3

[redacted] advised that [redacted] b6 b7C b3

[redacted] advised that he [redacted] b6 b7C b3

2-WMFO
CMA:cma
(2)

[redacted] b6 b7C

JAN 1992
FBI - WASH. METRO FIELD OFFICE

322

1325015-000-6133

29B-WF 171994-Main

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 1/27/92

From SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE #38
FIF; FAG;
OO:WMFO

On 1/24/92, SSA [redacted] telephonically advised the writer that the existing lease for the rental of nine vehicles for use in conjunction with captioned case will be extended through 4/30/92. After 4/30/92, it is likely that the further use of rentals will not be authorized and WMFO will be required to furnish the necessary vehicles from its existing fleet. b6 b7C

With SSA [redacted] approval, SA [redacted] phoned THRIFTY CAR RENTAL and advised [redacted] of the lease extension and that [redacted] would furnish [redacted] with a new purchase order number and any other necessary information. b6 b7C

[redacted] b6 b7C

29B-WF-171994 MAIN-324

SEARCHED SERIALIZED INDEXED FILED
JAN 27 1992
FBI — WMFO

1325015-000-6163

FD-515 (Rev. 7-19-91)
Accomplishment Report
(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, WMFO
SUBJECT:
HIDDEN INTERESTS
MC #38
FIF; FAG;
00:WMFO

(page 1 of 2)

Bureau File Number
29B-WF-171994
Field Office File Number
C-5
Squad or RA Number
Agent's Social Security No.

☐ X if a joint operation with: _____ (identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 1/24/92

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.
1 = Used, but did not help 2 = Helped, but only minimally 3 = Helped, substantially 4 = Absolutely essential

1. Acctg Tech Assistance	Rating	8. Eng. Sect. Tape Exams	Rating	15. Photographic Coverage	Rating	22 Telephone Toll Recs	Rating
2. Aircraft Assistance		9. Hypnosis Assistance		16. Polygraph Assistance		23. UCO Group I	
3. Computer Assistance		10 Ident Div Assistance		17. Search Warrants Executed		24. UCO Group II	
4. Consensual Monitoring		11. Informant Information		18. Show Money Usage		25. UCO Other	
5. ELSUR FISC		12. Lab Div Exams		19. Surveil Sqd (SOG) Asst		26. NCAVC/ VI-CAP	
6. ELSUR Title III		13. Lab Div Field Support		20. SWAT Team Action		27. Visual Invest - Analysis (VIA)	
7. Eng. Sect. Field Support		14. Pen Registers		21. Tech. Agt. or Tech Equip			

b6
b7C

A. Preliminary Judicial Process (Number of subjects) — Complaints | Indictments

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____
Criminal Summons_____
Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____
Missing or Kidnaped Children Located:_____

G. Final Judicial Process: Judicial District DC (District / State)

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

		Government Defendant	Government Plaintiff
RICO - Civil Convictions	Civil Suits Amount of Suit	$	$
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

b7E
b7E

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
BCCI HOLDINGS (Luxembourg) S.A.	N/A	–	–	----------	----------
BCCI, S.A.	N/A	–	–	----------	----------
BCCI (Overseas), LTD.	N/A	–	–	----------	----------
ICIC (Overseas), LTD.	N/A	–	–	----------	----------

Explanation of accomplishment claimed:

On 11/15/91, the U.S. District Court Grand Jury, Washington, D.C., indicted above subjects and others for Conspiracy (18USC 371); Wire Fraud (18 USC 1343); Racketeering Conspiracy (18 USC 1962(d)); and Aiding and Abetting (18 USC 2). — 325

29B-WF-171994-MAIN

On 12/19/91, a superseding information was filed against the four named subjects, re-alleging violations of 18 USC 1962(d) and 18 USC 2, and including a forfeiture provision under T18 USC 1963.

On 1/24/92, through counsel, the four subjects pled guilty to the superseding information, including the forfeiture provision. After accepting the plea, Judge Joyce Hens Green imposed the forfeiture of all BCCI-held assets and money in the U.S., and a fine of $50.00/count.

2 - Bureau
2 - Field Office
* See codes on reverse side.

(1) - 29B-WF-171994; 1 - 66-2178 Sub A; 1 - C-5 Secretary

1325015-000-6164

Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes*

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
23	Counterfeit or Pirated Sound Recordings or Motion Pictures
24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
26	Theft from, or Fraud Against, Government Scheme Aborted
27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

Subject Description Codes*

- Enter Description Code Only When Reporting a Conviction -

Organized Crime Subjects (Include Family Name Or Group):
- 1A Boss, Underboss or Consigliere
- 1B Capodecina or Soldier
- 1C Possible LCN Member or Associate
- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

Instructions

Subject Priorities for FBI Arrest or Locates:

A - Subject wanted for crimes of violence (i.e. murder, manslaughter, forcible rape, robbery and aggravated assault) or convicted of such crimes in the past five years.

B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

Reporting Convictions:

Convictions should not be reported until the sentence has been issued. There are two exceptions to this rule. The conviction information can be submitted by itself if:

1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = White

1325015-000-6165
FBI/DOJ

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, WMFO (P)

SUBJECT:

Bureau File Number
29B-WF-171994
Field Office File Number
C-5
Agent's Social Security No.

☐ X if a joint operation with: _____ (identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 1/24/92

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 2 = Helped, but only minimally 3 = Helped, substantially 4 = Absolutely essential

1. Acctg Tech Assistance Rating	8. Eng. Sect. Tape Exams Rating	15. Photographic Coverage Rating	22. Telephone Toll Recs Rating
2. Aircraft Assistance	9. Hypnosis Assistance	16. Polygraph Assistance	23. UCO Group I
3. Computer Assistance	10. Ident Div Assistance	17. Search Warrants Executed	24. UCO Group II
4. Consensual Monitoring	11. Informant Information	18. Show Money Usage	25. UCO Other
5. ELSUR FISC	12 Lab Div Exams	19. Surveil Sqd (SOG) Asst	26. NCAVC/ VI-CAP
6. ELSUR Title III	13. Lab Div Field Support	20. SWAT Team Action	27. Visual Invest - Analysis (VIA)
7. Eng. Sect. Field Support	14. Pen Registers	21. Tech. Agt. or Tech Equip	

b6
b7C

(page 2 of 2)

A. Preliminary Judicial Process (Number of subjects)

Complaints	Informations	Indictments

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

		Government Defendant	Government Plaintiff
RICO -Civil Convictions	Civil Suits Amount of Suit	$	$
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

F. Administrative Sanctions b7E

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District _____ / _____ (District / State) Conviction or Pretrial Div. Date _____ Sentence Date _____ No. of Subjects _____ Acquitted _____ Dismissed _____

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)

Explanation of accomplishment claimed:

2 - Bureau
2 - Field Office
* See codes on reverse side.

1325015-000-6166

Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes*

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
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24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
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27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

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- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

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B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

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1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the *plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.*

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = White

Memorandum

To : SAC, WMFO (29B-171994) (P) Date 1/30/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
OO:WMFO

On or about January 27, 1992, [redacted] b6 b7C [redacted] D.C., telephonically contacted the United States Attorney's office alleging that funds were stolen or moved from the Voice Of America (VOA) via First American Bank. [redacted] also advised that he had communicated this information to FBI Agent [redacted] who is currently assigned to the Iran Contra investigation.

On January 30, 1992, the writer contacted SA [redacted] b6 b7C concerning the above information. SA [redacted] advised that he has been speaking with [redacted] for approximately the last two months. [redacted] advised that [redacted] has been providing information to the Iran Contra office for approximately one year. [redacted] has also specifically talked to [redacted] concerning the VOA matter.

SA [redacted] advised that none of the information provided by [redacted] has proven to be credible. SA [redacted] described [redacted] as being "paranoid". According to SA [redacted] may be bitter over his recent job dismissal. b6 b7C

Based on the above information, the writer will not contact [redacted] b6 b7C

2-WMFO
CMA:cma
(2)

29B-WF-171994 Main -326

Sec Sec Sec

FEB 03 1992

FBI - ... METRO FIELD OFFICE

132501-000-6168

[redacted]

[redacted]

[redacted]

Claims to have also communicated with FBI Agent [redacted] -- working out of Judge Walsh's Office. [redacted] b6 b7C

May have information concerning possibility that funds were stolen or moved from VOA via First American.

Raised possibility that something wrong in Congress also. Concerned about safety of family.

[redacted]

[redacted]

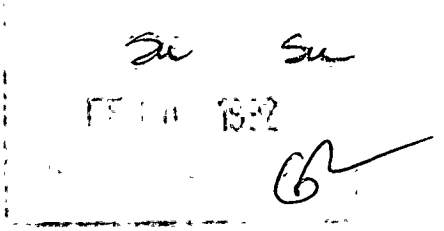
[redacted]

[redacted]

[redacted]

[redacted]

29BWF-171994 - 329



Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/5/92

From : [redacted] (C-5)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

The purpose of this memorandum is to address the items listed below. They focus on records of the Bank of Credit and Commerce International (BCCI). The records are in the custody of the New York State Banking Department (NYSBD). Said records are maintained at the former office of BCCI, 530 5th Avenue, New York, New York. They were seized by the NYSBD when BCCI was closed down on 7/5/91. The items addressed herein include:

1. Records located at BCCI/New York (NY).
2. Records reviewed as part of captioned investigation.
3. Records reviewed by other agencies/interests.
4. Records to be reviewed at BCCI/NY.

1. Records located at BCCI/NY:

The records located at BCCI/NY include those of the NY Rep Office, NY Agency, U.S. Region, Houston Rep Office, Washington Rep Office, and Miami Agency. Said records are voluminous. The NYSBD has reviewed all records and compiled a comprehensive file inventory. The inventory was assigned a series of numbers according to department the records were located in. The NYSBD inventory was broken up as follows:

Credit Agency	5000
Platform Services	6000
Loan Administration	7000
FX	8000
Collection/Bookkeeping	8500
Accounts/Reports	9000
Paying/Receiving	10000
Computer Runs	11000
Communications	12000
Personnel	13000
(Available)	14000
Import/Export Lcs	15000
Loan Recovery	16000
ICD/Compliance	17000
Financial	18000
US Regional/General Administration	19000
NYSBD	20000*

*Contains attorney/Houston Rep/Washington Rep/Miami Agency files.

2. Records reviewed as part of captioned investigation:

On 7/31/91, BCCI Washington Rep Office records in the possession of the law firm Morvillo, Abramowitz, Grand, Iason, Silberberg were turned over to the NYSBD, at the BCCI/NY location. The NYSBD listed these records as the 20200 series. Pursuant to media accounts, it was reported that said records contained evidence of payoffs to Public Officials.

As of 7/31/91, the writer established close liaison with representatives of the NYSBD. At that time, the focus of the investigation was on the FAB/BCCI relationship and allegations of Political Corruption. Members of the First American Bank (FAB) investigative team travelled to New York in the subsequent weeks and reviewed the 20200 series. During the review process, representatives of the NYSBD recommended that the entire 20000 series be reviewed. Such records contained correspondence and other documents dealing with the relationship between FAB and BCCI.

As of 8/29/92, the entire 20000 series had been reviewed and numerous documents tagged to be photocopied. All photocopying was completed by 9/12/91. The records copied were forwarded to the FBI/WMFO. They were then more thoroughly reviewed.

As the investigation expanded, it was determined through contacts with the NYSBD that additional records would probably contain useful background information. To date, the NYSBD inventory lists for the following series' have been reviewed:

Loan Recovery	16000
Financial	18000
US Regional/General Administrative	19000

In addition, selective records in series 13000, i.e., Personnel records, have been reviewed.

It should be noted that no evidence of payoffs to Public Officials was disclosed through review of the 20000 series. It should be further noted that, as yet, based on liaison contacts with the NYSBD and the continuing review of the documents, the BCCI records at New York do not appear to contain specific evidence of criminal activity, but rather contain background and corroborative information.

3. Records reviewed by other agencies/interests:

Since 7/91, the Manhattan District Attorney's Office (MDAO) and the Federal Reserve Board (FRB) have devoted considerable time/resources to the review of the aforementioned records. It appeared that the primary focus for each agency was on the 20000 series. It also appeared that the MDAO and the FED have reviewed all records at BCCI/NY.

1325015-000-6172

Since 9/91, the General Accounting Office (GAO) has dedicated considerable resources to the review of records at BCCI/NY. It appears that the primary focus of their review has been on records relating to the BCCI/Washington Rep Office. It appears that GAO has worked closely with the MDAO. A representative of the NYSBD has advised that GAO has tracked funds in and out of the BCCI/Washington Rep Office. Initially it was believed that GAO was acting at the request of Senator JOHN KERRY and was focused on Public Corruption. Such has not been confirmed.

Senator KERRY has had Investigators from the Senate Banking Committee review BCCI/NY records on at least four occasions. It is not certain what the focus of said reviews has been.

The House Banking Committee has had Investigators review records at BCCI/NY on at least one occasion. It is not certain what the focus of said reviews has been.

In 1/92, Rep. JOHN SCHUMER sent Investigators from the House Judiciary Committee on Crime and Criminal Justice to review records at BCCI/NY. The review was led by [redacted] The Investigators reviewed a considerable number of records and photocopied a lot of documents. They were assisted by [redacted] from GAO. Their focus appeared to be on gun running. b6 b7C

4. Records to be reviewed at BCCI/NY:

Documents noted as relevant to captioned investigation, based on the review of inventory lists in the 16000, 18000 and 19000 series' will be reviewed in the near future. Photocopies of same will be made as needed.

A review of the inventory listings for the remaining documents will follow. Further reviews/photocopying will be contingent on results of said inventory reviews.

1325015-000-6173

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

b6 b7C

C-5 Pending

TO: Director, FBI

FROM: SAC, NORFOLK (C)

SUBJECT:

HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG
OO: WMFO

Bureau File Number
29B-WF-171994
Field Office File Number
5164
Squad or RA Number

Date 1/30/92

☐ X if a joint operation with: _____ (identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

NO

1 = Used, but did not help
2 = Helped, but only minimally
3 = Helped, substantially
4 = Absolutely essential

1. Acctg Tech Assistance Rating	8. Eng. Sect. Tape Exams Rating	15. Photographic Coverage Rating	22 Telephone Toll Recs Rating
2. Aircraft Assistance	9. Hypnosis Assistance	16 Polygraph Assistance	23. UCO Group I
3. Computer Assistance	10. Ident Div Assistance	17. Search Warrants Executed	24 UCO Group II
4. Consensual Monitoring	11 Informant Information	18. Show Money Usage	25. UCO Other
5. ELSUR FISC	12. Lab Div Exams	19. Surveil Sqd (SOG) Asst	26. NCAVC/ VI-CAP
6. ELSUR Title III	13. Lab Div Field Support	20. SWAT Team Action	27. Visual Invest - Analysis (VIA)
7. Eng. Sect. Field Support	14. Pen Registers	21. Tech. Agt or Tech Equip	

A. Preliminary Judicial Process (Number of subjects)

Complaints	Informations	Indictments

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			1
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____ : Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions _____ No. of Subj.

Civil Suits Amount of Suit

Settlement of Award

Government Defendant	Government Plaintiff
$	$
$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years* Months. ☐ Permanent

G. Final Judicial Process: Judicial District _____ / _____ District State

Conviction or Pretrial Div Date _____ Sentence Date _____ No. of Subjects _____ Acquitted _____ Dismissed _____

Subject 1 Subject Description Code* -	Conviction Title	Section	Counts	Combined Sentence In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion				Total Fines $ / Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		

Subject 2 Subject Description Code* -	Conviction Title	Section	Counts	Combined Sentence In-Jail Yrs. Mos.	Suspended Yrs. Mos	Probation Yrs. Mos.
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion				Total Fines $ / Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
[redacted]					

b6 b7C

Explanation of accomplishment claimed: UCFN

by FBI Agents of the Norfolk Division on a material witness warrant obtained by WMFO on 1/10/92.

GENERAL INDICES:

☐ Automated Search

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

☐ Manual Search

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

On 1/13/92, [redacted] by court order, was transported to the custody of the U.S. Marshal's Service, Washington, D.C.

29B-WF-171994 - Main 328

SEARCHED INDEXED SERIALIZED FILED

FEB 05 1992

FBI/DOJ

(1) - WMFO)
2 - Bureau
2 - Field Office (29B-WF-171994) (OSM)
• See codes on reverse side.

JHK:dlm (3)

62-25015-000-6174

[redacted]

Dr FBIHQ aware?

[redacted]

Yes - by fax 2/6/92.

29B WF 171994 -329

b6
b7C

[redacted]

FEB 1992

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/6/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 1/27/92, the writer was at the former Bank of Credit and Commerce International (BCCI) office, located at 530 5th Avenue, New York, New York. Said office is in the custody of the New York State Banking Department (NYSBD). [redacted] b6 b7C b7D

[redacted]

On 2/4/92, the writer contacted the above [redacted] b6 b7C b7D b7E

[redacted]

[redacted] b7D

On 2/5/92 [redacted] b7D

[redacted]

Administrative:

[redacted] (protect identity) [redacted] b6 b7C b7D

[redacted]

The above information is singular in nature and has not been corroborated.

1325015-000-6177

FD-36 (Rev. 8-26-82)

C-5

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 2/3/92

TO: DIRECTOR FBI
(ATTN: SSA [redacted] WCCS)

b6
b7C

FROM: LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38
FIF;
FAG
OO: WMFO

Enclosed for WMFO and FBIHQ please find a letter dated January 20, 1992, from [redacted] responding to a request by the Department of Justice (DOJ) in captioned matter.

b6
b7C
b7D

[redacted] however, the origin of these documents has not yet been determined.

b7D

4 - Bureau
(2 - WMFO) (Enc)
1 - London
EJK/bt
(5)

29B-WF-171994 Main — 331

FEB 4 1992

Approved: _____ Transmitted _____ (Number) (Time)

[redacted]

b6
b7C

015-000-6188

Memorandum

To : FBIHQ Date 2/7/92

From : SAC, WMFO (29B-WF-171994) (C-5) (P)

Subject: HIDDEN INTEREST;
MAJOR CASE #38;
OO:WMFO

RE: WMFO telcall to Assistant Unit Chief, Voucher Unit [redacted] 2/7/92.

b6
b7C

REQUEST OF THE BUREAU

FBIHQ is requested to approve the reimbursement of actual expenses to be incurred on travel of SA [redacted] to Grand Cayman Islands 2/16/92-2/19/92. The per diem for this area is $138/$58 for a total of $196. SA [redacted] has contacted several hotels and was only able to obtain lodging at a rate of $208.80 per night. FBIHQ indicated that this lodging, for actual expenses, for SA [redacted] could be approved for this location. FBIHQ is requested to approve actual expenses, for SA [redacted] official travel, so he can complete the investigation as it relates to the above case. This travel has prior FBIHQ approval for investigative purposes of the captioned matter.

b6
b7C

2-FBIHQ
1-WMFO

RHM:rhm
(3)

29B-WF-171994
-332

Searched
Serialized Su
Indexed
Filed Su

1325015-000-6189

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 2/10/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38
FIF; FAG
(OO: WMFO)

The purpose of this memorandum is to report on a meeting which SA [redacted] and I attended at DOJ on 2/7/92. Also present during the meeting were: [redacted] New York District Attorney's Office (NYDAO); and for at least part of the meeting: AUSAs [redacted] Trial Attorneys (T/As) [redacted] b6 b7C

The meeting was called to discuss whether and in what ways the NYDAO and the DOJ could assist and cooperate with each other in their parallel "BCCI" investigations. It was immediately agreed that, given the similar aims of the parties--e.g., to discover if there exists, or is likely to be found, sufficient evidence to indict and prosecute such subjects as CLARK CLIFFORD [redacted]-it would be of benefit to both to share information already acquired, to the extent allowed by such things as grand jury disclosure rules. b6 b7C

2-4

There followed what primarily was a chronological recitation/comparison, beginning in about 1975, of the information and documents which the NYDAO and, to some extent, DOJ, have acquired, relating mainly to CLIFFORD [redacted] When the meeting ended, the chronology had reached the end of 1980, although some other events which occurred outside the period of 1975-80 were discussed. All present agreed that the exercise was a valuable one, and that it should and would be continued at a later date. b6 b7C

Several noteworthy items were mentioned during the discussion, not the least of which being that, thus far in its investigation, the NYDAO has not found any documentation or other evidence to verify or refute allusions to or allegations of BCCI

29B-WF-171994 -333

1-WMFO
JNR:jnr
(1)

[redacted] b6 b7C

FEB 1 1992

FBI—WASH. METRO FIELD OFFICE

1325015-000-6190

paying off or otherwise corrupting any U.S. officials.

Another noteworthy item was Assistant District Attorney (ADA) [redacted] reporting that NYDAO has received indications that [redacted] is willing to cooperate. Supposedly, according to [redacted] counsel, [redacted] CLARK CLIFFORD's idea for BCCI to use nominees to purchase U.S. banks. b6 b7C

[redacted] identified another [redacted] as having knowledge about the use of nominees by BCCI in the purchasing of FAB. Reportedly, [redacted] was asked by ABEDI to be a nominee for BCCI. Although [redacted] declined, both were sent to meet with CLIFFORD, ostensibly to furnish intelligence information on the Shah of Iran, but also for [redacted] to give CLIFFORD background information on himself for presentation to the regulators. b6 b7C

On 2/6/92, NYDAO received a copy of a ten-page report by an OCC examiner in 2/1978, about his review of documents at the BANK OF AMERICA (BOA) in London. In the report, the examiner opines that BOA was not being well served by its association with BCCI. It was apparently based on this report that SKADDEN & ARPS, representing FGB in the suit it filed to prevent the takeover, subpoenaed documents from BOA. Pursuant to the subpoena [redacted] brought a large volume of documents to the hearings. [redacted] protested the production of these records, and ultimately persuaded the WDC District Court magistrate, who reviewed the records in camera, to bar them from the proceedings. S&A attorney [redacted] was able to examine but not copy the records. He subsequently produced an affidavit about his recollections of the documents, which, he claimed, showed evidence that BCCI used nominees and paid bribes in the FGB takeover. Witnesses to these events/documents are [redacted] Currently, the NYDAO is attempting to reconstruct the documents through [redacted] at BOA. b6 b7C

On the issue of whether the various regulators (OCC; BGFRS) understood what BCCI's role was and would be with regard to the takeover and capitalization of FGB, the NYDAO has:

--a letter from OCC's [redacted] to the BGFRS, stating [redacted] b6 b7C

--a memorandum to a NYSBD file, written by [redacted] after a 12/20/80 meeting with CLIFFORD, stating that, [redacted] This is at distinct odds with CLIFFORD's b6 b7C

1325015-000-6191

later, published statements that NYSBD knew BCCI would have an advisory and financial role in FAB/NY, because he told [redacted] so during that meeting. b6 b7C

Another disclosure by the NYDAO was that, when they interviewed [redacted] he produced a large stack of BCCI documents (gesturing with his hands, ADA [redacted] indicated the stack had been about a foot high) which he called his "insurance policy." It should be noted that, on the four occasions when we interviewed [redacted] -whose story has been, at best, unconvincing-- the only documents which appeared were ones we showed him. b6 b7C

Reportedly, [redacted] also told the NYDAO that, in the summer of 1990, [redacted] Washington Post [redacted] who wanted to interview him about such things as whether BCCI had any role in FABS' decision to acquire 33 upstate New York branches of BANKERS TRUST. [redacted] about the contact and was called to a meeting in WDC about it. Part of the discussion at the meeting, which was attended by [redacted] CLIFFORD, [redacted] CLIFFORD's [redacted] denying that they had conferred with ABEDI [redacted] about whether to buy the branches. [redacted] told the NYDAO he had declared to the others at the meeting that his recollection did not comport with theirs, but was told in no uncertain terms that it had better do so. b6 b7C

NYDAO reportedly has a source who says [redacted] BGFRS [redacted] THE SECURA GROUP (1155 21st St., NW, WDC; [redacted] GHAITH PHARAON. b6 b7C b7D

According to another NYDAO source, [redacted] CLIFFORD [redacted] Later, when asked by the NYDAO, [redacted] b6 b7C b7D

Yet another NYDAO confidential source disclosed that, [redacted] (Baltimore Division has been queried.) b6 b7C b7D

1325015-000-6192

As far as the NYDAO has been able to determine, there is no list of U.S. political-payoff recipients as the media have reported. Initially, [redacted] of the Fed said they saw such a list in Abu Dhabi. Later [redacted] recanted, and [redacted] said he had seen some names of some Americans on some file jackets among the records in Abu Dhabi. b6 b7C

NYDAO has interviewed [redacted] b7D

[redacted] WHITE & CASE, [redacted] BCCI in 1986 for unknown reasons. b6 b7C

After the NYDAO attorneys departed, a discussion ensued about whether a "prosecutive status memorandum" should be done with regard to the case against CLIFFORD [redacted] and if such a document was being sought to serve as the basis on which someone was going to decide whether to proceed with the investigation. It was agreed that AUSA [redacted] and I would advance the opinion to PDC [redacted] that it was premature to create such a document. b6 b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/11/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Re: London IV

The scheduling of interviews and liaison contact responsibilities for London IV (2/23 - 2/29/92) will be as follows:

[redacted] b6 b7C

BCCI Officials

[redacted]

BAII

[redacted]

Others

[redacted]

Liaison Contacts

-BCCI Liquidators > [redacted]

-Bank of England > [redacted]

29B-WF-171994 - 334

Sec Sec

[redacted]

182015-000-6194

b6
b7C
b7D

[redacted]

BAII and/or BCCI Directors

[redacted]

PW

[redacted]

MHT

[redacted]

Liaison Contacts

-PW Attorneys

[redacted]

-U.S. Customs

[redacted]

1325015-000-6195

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 2/11/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

At about 4:45 p.m. this date, I received an unsolicited call from a male, who identified himself as [redacted] b6 b7C
[redacted] CA, [redacted] He further identified himself as the [redacted] "Star News." [redacted] himself, [redacted] "Star News," regarding BCCI.

[redacted] believed that, on 12/13/91, he had come across information in the home of his next-door neighbor which would be of interest to the government. [redacted] had mentioned to him--on about 12/1/91--that she was "in charge of liquidating the BCCI." On the evening of 12/13/91, [redacted] noticed that [redacted] house "looked strange: there were no lights on." Feeling "called to check it out," [redacted] residence, despite the fact she was not at home. While inside, he noticed some documents on a table, one of which was "a bill of lading," on the letterhead of "the BANK OF COMMERCE AND CREDIT INTERNATIONAL" (sic), written in French, [redacted] Other handwritten notes referred to such messages as [redacted]

[redacted] residence and went elsewhere, but returned later that evening to find her house still dark. He entered the [redacted]

As he was telling the foregoing story, [redacted] also made [redacted]

No further action is recommended.

1-WMFO
JNR:jnr
(1)

335

29B-WF-171994 Mail Sec

FEB -3 1992

FBI—WASH. METRO FIELD OFFICE

62-345015-000-6196

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/11/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Re: London IV

Set forth below is the travel itinerary for SA's [redacted] and the writer. b6 b7C

Depart Dulles International Airport on Saturday, February 22, 1992, at 6:45PM, on United Airlines flight 918. Arrive London, Heathrow Airport, Sunday, February 23, 1992, at 6:40AM.

Lodging at Hotel Britannia from Sunday, February 23, 1992, until Saturday February 29, 1992.

Contact point, [redacted] U.S. Embassy, London. b6 b7C

Depart London, Heathrow Airport on Saturday, February 29, 1992, at 1:30PM, on United Airlines flight 903. Arrive Dulles International Airport at 7:40PM.

[redacted] b6 b7C

29B-WF-171994 -336

1325015-000-6197

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 2/12/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

Attached memorandum received from AUSA [redacted] on 2/10/92, who requested action as deemed appropriate. b6 b7C

1-WMFO (Att. 1)

JNR:jnr
(1)

29B-WF-171994 Main - 338

FEB .. 1992
FBI - WASH. [illegible] FIELD OFFICE

1325015-000-6199

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/14/92

From : [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Re: London IV & V

Set forth below is the revised travel itinerary for SA's [redacted] and the writer. Such has been necessitated by the change in travel plans. b6 b7C

Depart Dulles International Airport on Saturday, February 29, 1992, at 6:45PM, on United Airlines flight 918. Arrive London, Heathrow Airport, Sunday, March 1, 1992, at 6:40AM.

Lodging at Hotel Britannia from Sunday, February 29, 1992, until Saturday March 7, 1992.

Contact point, [redacted] U.S. Embassy, London. b6 b7C

Depart London, Heathrow Airport on Saturday, March 7, 1992, at 11:00AM, on United Airlines. Arrive Dulles International Airport at 2:20PM.

SA's [redacted] will return to London on March 14,1992. Set forth are the travel plans: b6 b7C

Depart Dulles International Airport on Saturday, March 14, 1992, at 6:45PM, on United Airlines flight 918. Arrive London, Heathrow Airport, Sunday, March 15, 1992, at 6:40AM.

Lodging and contact point will be as listed above.

Depart London, Heathrow Airport on Saturday, March 21, 1992, at 11:00AM, on United Airlines. Arrive Dulles International Airport at 2:20PM.

29B-WF-171994 - 339

MAIN

SERIALIZED SW INDEXED SW

FEB 1992

FBI—WASHINGTON FIELD OFFICE

1325015-000-6200

MEMORANDUM 2/18/92

TO: SAC, WMFO (29B-WF-17194)

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38
OO:WMFO

On instant date the writer attempted to contact [redacted] Washington, D.C. (WDC) BCCI [redacted] The writer spoke to [redacted] who advised [redacted] b6 b7C

[redacted] advised that [redacted] She advised that it is very hard to contact her [redacted] advised that she is sending him a federal express package and that she will provide him with my telephone numbers and ask him to contact me. b6 b7C

2-WMFO
(2)

CMA:cma

[redacted]

29B-WF-171994 - 340

FILED INDEXED
SERIALIZED FILED

FEB 1 , 1992

FBI - WASH. METRO FIELD OFFICE

b6 b7C

1325015-000-6201

29B WF 171994-main -

MEMORANDUM 2/18/92

TO: SAC, WMFO (29B-WF-17194)

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE #38
OO:WMFO

On instant date the writer attempted to contact [redacted] Washington, D.C. (WDC) BCCI [redacted] b6 b7C The writer spoke to [redacted] who advised [redacted]

[redacted] advised that [redacted] b6 b7C She advised that it is very hard to contact her [redacted] advised that she is sending him a federal express package and that she will provide him with my telephone numbers and ask him to contact me.

2-WMFO

CMA:cma
(2)

-340

1325015-000-6202

29B-WF-171994

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 2/10/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38
FIF; FAG
(OO: WMFO)

The purpose of this memorandum is to report on a meeting which SA [redacted] and I attended at DOJ on 2/7/92. Also present during the meeting were: [redacted] b6 b7C New York District Attorney's Office (NYDAO); and for at least part of the meeting: AUSAs [redacted] Trial Attorneys (T/As) [redacted]

The meeting was called to discuss whether and in what ways the NYDAO and the DOJ could assist and cooperate with each other in their parallel "BCCI" investigations. It was immediately agreed that, given the similar aims of the parties--e.g., to discover if there exists, or is likely to be found, sufficient evidence to indict and prosecute such subjects as CLARK CLIFFORD [redacted] -it would be of benefit to both to share information already acquired, to the extent allowed by such things as grand jury disclosure rules. b6 b7C

There followed what primarily was a chronological recitation/comparison, beginning in about 1975, of the information and documents which the NYDAO and, to some extent, DOJ, have acquired, relating mainly to CLIFFORD [redacted] When the meeting ended, the chronology had reached the end of 1980, although some other events which occurred outside the period of 1975-80 were discussed. All present agreed that the exercise was a valuable one, and that it should and would be continued at a later date. b6 b7C

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Several noteworthy items were mentioned during the discussion, not the least of which being that, thus far in its investigation, the NYDAO has not found any documentation or other evidence to verify or refute allusions to or allegations of BCCI

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1-WMFO
JNR:jnr
(1)

[redacted] b6 b7C

FEB 10 1992

FBI—WMFO FIELD OFFICE

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paying off or otherwise corrupting any U.S. officials.

Another noteworthy item was Assistant District Attorney (ADA) [redacted] reporting that NYDAO has received indications that [redacted] is willing to cooperate. Supposedly, according to [redacted] counsel, [redacted] CLARK CLIFFORD's idea for BCCI to use nominees to purchase U.S. banks. b6 b7C

[redacted] identified another [redacted] as having knowledge about the use of nominees by BCCI in the purchasing of FAB. Reportedly, [redacted] was asked by ABEDI to be a nominee for BCCI. Although [redacted] declined, both were sent to meet with CLIFFORD, ostensibly to furnish intelligence information on the Shah of Iran, but also for [redacted] to give CLIFFORD background information on himself for presentation to the regulators. b6 b7C

On 2/6/92, NYDAO received a copy of a ten-page report by an OCC examiner in 2/1978, about his review of documents at the BANK OF AMERICA (BOA) in London. In the report, the examiner opines that BOA was not being well served by its association with BCCI. It was apparently based on this report that SKADDEN & ARPS, representing FGB in the suit it filed to prevent the takeover, subpoenaed documents from BOA. Pursuant to the subpoena, [redacted] brought a large volume of documents to the hearings. [redacted] protested the production of these records, and ultimately persuaded the WDC District Court magistrate, who reviewed the records in camera, to bar them from the proceedings. S&A attorney [redacted] was able to examine but not copy the records. He subsequently produced an affidavit about his recollections of the documents, which, he claimed, showed evidence that BCCI used nominees and paid bribes in the FGB takeover. Witnesses to these events/documents are [redacted] Currently, the NYDAO is attempting to reconstruct the documents through [redacted] at BOA. b6 b7C

On the issue of whether the various regulators (OCC; BGFRS) understood what BCCI's role was and would be with regard to the takeover and capitalization of FGB, the NYDAO has:

--a letter from OCC's [redacted] to the BGFRS, stating [redacted] b6 b7C

--a memorandum to a NYSBD file, written by [redacted] after a 12/20/80 meeting with CLIFFORD, stating that [redacted] This is at distinct odds with CLIFFORD's b6 b7C

New York State Banking Dept.

1325015-000-6204

later, published statements that NYSBD knew BCCI would have an advisory and financial role in FAB/NY, because he told [redacted] so during that meeting. b6 b7C

Another disclosure by the NYDAO was that, when they interviewed [redacted] he produced a large stack of BCCI documents (gesturing with his hands, ADA [redacted] indicated the stack had been about a foot high) which he called his "insurance policy." It should be noted that, on the four occasions when we interviewed [redacted] --whose story has been, at best, unconvincing-- the only documents which appeared were ones we showed him. b6 b7C

Reportedly, [redacted] also told the NYDAO that, in the summer of 1990, he was called by a Washington Post [redacted] who wanted to interview him about such things as whether BCCI had any role in FABS' decision to acquire 33 upstate New York branches of BANKERS TRUST. [redacted] about the contact and was called to a meeting in WDC about it. Part of the discussion at the meeting, which was attended by [redacted] CLIFFORD, [redacted] CLIFFORD's [redacted] denying that they had conferred with ABEDI [redacted] about whether to buy the branches. [redacted] told the NYDAO he had declared to the others at the meeting that his recollection did not comport with theirs, but was told in no uncertain terms that it had better do so. b6 b7C

NYDAO reportedly has a source who says [redacted] BGFRS [redacted] THE SECURA GROUP (1155 21st St., NW, WDC; [redacted] GHAITH PHARAON. b6 b7C b7D

According to another NYDAO source [redacted] CLIFFORD [redacted] Later, when asked by the NYDAO, [redacted] b6 b7C b7D

Yet another NYDAO confidential source disclosed that, [redacted] (Baltimore Division has been queried.) b6 b7C b7D

1325015-000-6205

As far as the NYDAO has been able to determine, there is no list of U.S. political-payoff recipients as the media have reported. Initially, [redacted] of the Fed said they saw such a list in Abu Dhabi. Later, [redacted] recanted, and [redacted] said he had seen some names of some Americans on some file jackets among the records in Abu Dhabi. b6 b7C

NYDAO has interviewed [redacted] b7D

[redacted] WHITE & CASE, [redacted] BCCI in 1986 for unknown reasons. b6 b7C

After the NYDAO attorneys departed, a discussion ensued about whether a "prosecutive status memorandum" should be done with regard to the case against CLIFFORD [redacted] and if such a document was being sought to serve as the basis on which someone was going to decide whether to proceed with the investigation. It was agreed that AUSA [redacted] and I would advance the opinion to PDC [redacted] that it would be premature to create such a document at this point. b6 b7C

1325015-000-6206

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/11/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Re: London IV

The scheduling of interviews and liaison contact responsibilities for London IV (2/23 - 2/29/92) will be as follows:

[redacted] b6 b7C

BCCI Officials

[redacted]

BAII

[redacted]

Others

[redacted]

Liaison Contacts
-BCCI Liquidators > [redacted]
-Bank of England >

29B-WF-171994-342

[redacted]

FEB [redacted] 1992

FBI [redacted] FIELD OFFICE

1325015-000-6207

[redacted]

b6
b7C
b7D

BAII and/or BCCI Directors

[redacted]

PW

[redacted]

MHT

[redacted]

Liaison Contacts

-PW Attorneys [redacted]

-U.S. Customs [redacted]

1325015-000-6208

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/19/92

From SA [redacted] (C-5)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

It should be noted that the writer travelled to New York, New York during the following periods for investigative purposes:

1. 1/27/92 - 1/31/92

2. 2/12/92 - 2/13/92

The writer dedicated a considerable amount of time to the planning of said trips. Such included numerous contacts with Witnesses, Prosecutors and Defense Attorneys to set up/conduct interviews/records reviews.

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SEARCHED INDEXED
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FEB 1 1992
FBI - WASH. METRO FIELD OFFICE

1325015000-6209

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
February 19, 1992

[redacted] b6 b7C

Touche Ross
100 Leadenhall Street
London, England EC 3

ATTN: [redacted]

Re: Telephone conversation
between [redacted]
Special Agent [redacted]
[redacted] FBI, Washington,
D.C. on 2/19/92.

Dear [redacted] b6 b7C

During the week of March 1, 1992, Special Agents of the FBI and prosecutors from the Department of Justice will be in London to conduct interviews relating to the BCCI investigation. Set forth below is a list of individuals to be interviewed:

[redacted]

Your office is requested to assist in the locating of these individuals by providing any information as to their whereabouts, including addresses, and/or telephone numbers.

If you have additional questions, please contact Special Agent [redacted] FBI #(202) 324-6357. b6 b7C

Sincerely,

Robert M. Bryant
Special Agent in Charge

By: [redacted] b6 b7C
Supervisory Special Agent

1 - Addressee
1 - WMFO
CMA:das(2)
[redacted]

29B WF 171994-344

Searched [redacted] b6 b7C
Indexed [redacted]
Filed [redacted]

62-326015-000-6210

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/24/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
OO:WMFO

On instant date, the writer contacted [redacted] b6 b7C
Office of General Counsel, Office of the Comptroller of the Currency, (OCC) [redacted] in order to arrange an interview of [redacted] OCC. [redacted]

[redacted] advised that [redacted] b6 b7C
[redacted] OCC and would be available for interview when requested.

[redacted] advised that the article in the Washington Post b6 b7C
was misleading. He then provided the following background information concerning the OCC, BCCI, and the [redacted]

[redacted] advised that in 1978 ROBERT BENCH, Deputy b6 b7C
Director in charge of the International Division, requested that [redacted] check into BCCI. According to [redacted] BENCH could not recall why he made this request. [redacted] said that as a result of the request, [redacted] Bank of America (BOA) which had a 25%-35% interest in BCCI. After talking with BOA officials, [redacted] reported that BOA was uncomfortable with their investment in BCCI because of the credit nature of their loans. [redacted] advised that [redacted] did not know about any "extraordinary examples" of BCCI troubled loans as reported in the Washington Post.

29B-WF-171994-345

2-WMFO
CMA:cma

[redacted] b6 b7C

Main Sec
FED Sec
FEB 21 1992
FBI—WASH METRO FIELD OFFICE

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[redacted] speculated that the OCC's original interest in BCCI in 1978 was due to attempts by foreign investors and BCCI to purchase Financial General Bankshares (FGB). [redacted] recalled that at the time, there was an application before the Federal Reserve Board (FED) for the purchase of FGB and that the OCC had been requested to comment on the application. b6 b7C

[redacted] also recalled that around this time period the OCC and the SEC were investigating [redacted] acquisition of the National Bank of Georgia (NBG). [redacted] advised that [redacted] NBG through the First Chicago Bank. [redacted] advised that [redacted] allegedly gave all of the NBG correspondence accounts to the First Chicago Bank as a result of this transaction. [redacted] further advised that [redacted] subsequently paid off the First Chicago loan with a loan from BCCI and/or AGHA HASSAN ABEDI. [redacted] subsequently sold his shares in NBG to GHAITH PHARAON. [redacted] recalled that PHARAON was interviewed by the SEC and OCC about this transaction but that he did not have a copy of the interview report. b6 b7C

A tentative meeting was set up with [redacted] to discuss OCC'S involvement with BCCI over the years and to arrange an interview of [redacted] b6 b7C

1325015-000-6212

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/24/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
OO:WMFO

On instant date, the writer contacted [redacted] b6 b7C
Office of General Counsel, Office of the Comptroller of the Currency, (OCC) [redacted] in order to arrange an interview of [redacted]

[redacted] advised that [redacted] OCC and would be available for interview when requested. b6 b7C

[redacted] advised that the article in the Washington Post was misleading. He then provided the following background information concerning the OCC, BCCI, and the [redacted] b6 b7C

[redacted] advised that in 1978 ROBERT BENCH, Deputy Director in charge of the International Division, requested that [redacted] check into BCCI. According to [redacted] BENCH could not recall why he made this request. [redacted] said that as a result of the request, [redacted] Bank of America (BOA) which had a 25%-35% interest in BCCI. After talking with BOA officials, [redacted] reported that BOA was uncomfortable with their investment in BCCI because of the credit nature of their loans. [redacted] advised that [redacted] did not know about any "extraordinary examples" of BCCI troubled loans as reported in the Washington Post. b6 b7C

2-WMFO
CMA:cma

1,2

1325015-000-6213
29B-WF-171994-545

[redacted] speculated that the OCC's original interest in BCCI in 1978 was due to attempts by foreign investors and BCCI to purchase Financial General Bankshares (FGB). [redacted] recalled that at the time, there was an application before the Federal Reserve Board (FED) for the purchase of FGB and that the OCC had been requested to comment on the application. b6 b7C

[redacted] also recalled that around this time period the OCC and the SEC were investigating [redacted] acquisition of the National Bank of Georgia (NBG). [redacted] advised that [redacted] NBG through the First Chicago Bank. [redacted] advised that [redacted] allegedly gave all of the NBG correspondence accounts to the First Chicago Bank as a result of this transaction. [redacted] further advised that [redacted] subsequently paid off the First Chicago loan with a loan from BCCI and/or AGHA HASSAN ABEDI. [redacted] subsequently sold his shares in NBG to GHAITH PHARAON. [redacted] recalled that PHARAON was interviewed by the SEC and OCC about this transaction but that he did not have a copy of the interview report. b6 b7C

A tentative meeting was set up with [redacted] to discuss OCC'S involvement with BCCI over the years and to arrange an interview of [redacted] b6 b7C

1325015-000-6214

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/26/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Re: London IV & V

Set forth below is the third revision to the travel itinerary for the trip to London. Such is for the travel of SA's [redacted] and the writer. b6 b7C

Depart Dulles International A/P on Sunday, March 8, 1992, at 6:45PM, on United Airlines flight 918, arriving London, Heathrow A/P, Monday, March 9, 1992, at 6:40AM.

Lodging at the Churchill Hotel.

Contact point [redacted] U.S. Embassy, London. b6 b7C

SA's [redacted] will depart London, Heathrow A/P, Saturday, March 14, 1992, at 1:30PM, on United Airlines flight 903, arriving at Dulles International A/P, at 7:39PM, that same date. b6 b7C

SA [redacted] and the writer will depart London, Heathrow A/P, Saturday, March 21, 1992, at 1:30PM, on United Airlines flight 903, arriving at Dulles International A/P, at 7:39PM, that same date. b6 b7C

It should be noted that DOJ Trial Attorney (TA) [redacted] will be in London with the above group from March 9, through March 14, 1992. In addition, TA [redacted] will accompany Los Angeles SA's [redacted] to London. They will be there from March 15, through March 24, 1992. b6 b7C

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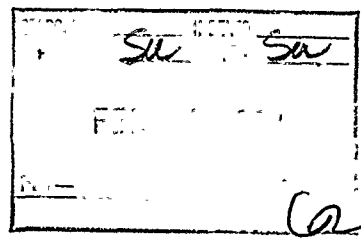
cc to SA named above
& to SA [redacted] b6 b7C



1325015-000-6215

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/26/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Set forth are travel itineraries for trips to New York and London. such will be taken during March, 1992.

3/1 - 3/4/92 > New York > SA [redacted] b6 b7C
SA
3/2 - 3/4/92 > New York > SA
SA
SA
SA
Analyst [redacted]

3/8 - 3/14/92 > London > SA [redacted]
SA
3/8 - 3/21/92 > London > SA
SA

3/25 - 3/27/92 > New York > SA [redacted]
SA
SA

1-cc to SA [redacted] b6 b7C

29B-WF-171994-347

FEB 26 1992

1325015-000-6216

NOV 22

UNITED STATES DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON FIELD OFFICE
WASHINGTON, D. C.
11/21/91

REFER TO: [redacted] See Att INS FILE #: 29B -171994

RETURN TO: [redacted] /C-5 /WF DEADLINE: -0-

b6
b7C

LAST NAME [redacted] FIRST NAME MIDDLE -0-

ALIAS
-0- -0- -0-
-0- -0- -0-

BORN: [redacted] PLACE: -0-

CITIZENSHIP: -0- NATURALIZED: -0-

IA [redacted]

IDENTIFICATION NUMBERS:

INS #: -0-
CERTIF #: -0-

NO IDENTIFIABLE RECORD CENTRAL OFFICE INS
2/14/92

(2)

ARRIVAL DATE: -0- DEPARTURE DATE: -0-

EMPLOYMENT: -0-

ADDRESS: -0-
-0- -0 -0-

DO NOT FORWARD TO FIELD

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Route to ALIEN FILES UNIT - Room 234
CENTRAL OFFICE - I&NS

SPECIFIC INFORMATION DESIRED
ALL AVAILABLE INFORMATION
-0-

REQUESTING AUTHORITY

348

ROBERT M. BRYANT
SPECIAL AGENT IN CHARGE

29B-WF-171994

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW
FEB 28 1992
FBI - WASH. METRO FIELD OFFICE

184 mi

1995010000-6217

NONIMMIGRANT INFORMATION SYSTEM — DATE: 02/06/92

MAP: NIXOBAS — BASIC DATA DISPLAY — TIME: 15:08:00

LAST NAME:	[redacted]	FIRST NAME:	[redacted] b6 b7C
ADMISSION NUMBER:		DATE OF BIRTH:	
COUNTRY OF CITIZEN:	PAKIS	COUNTRY OF RESID:	UK
CLASS OF ADM:	B1	DATE ADMITTED:	042585
PORT OF ENTRY:	NYC	DATE ADM TO:	052485
CURR CLASS:	B1	CLASS DATE:	
NUMBER OF EXT:		EXT ADM TO:	
SPECIAL STATUS:	A O	WAIVER:	
ALIEN NUMBER:		GENDER:	
TRAVEL MODE:	AIR	BOND FLAG:	
VISA ISSUE POST:	LONDON	VISA ISSUE DATE:	
PORT OF DEP:		DEP DATE:	
ADDRESS - STREET:	[redacted]	CITY STATE:	[redacted] NY
ITINERARY:	X1638		
NOTATIONS:		CONTROL OFC CODE:	
ARR CARRIER:		ARR FLT NO:	
PASSPORT NUMBER:		INSPECTOR:	

CLEAR: LOGOFF PF4: RETURN TO ROSTER PF6: MENU PF7: INQUIRY

FD-329 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 2/28/92

To: Laurence A. Urgenson, Chief, Fraud Sect., Criminal Div., DOJ
(Name and Address of USA)

From: Robert M. Bryant, WMFO
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by Principal Deputy Chief [redacted] b6 b7C
(Name of USA or AUSA)

on information submitted by Special Agent SA [redacted] 2/28/92
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1341; 1343; 1344; 1962(d)

Synopsis of case: In accordance with the request of PDC [redacted] attached is a document, captioned, "Allegations Relating to BCCI Being Investigated by the FBI." b6 b7C

-349

29B-WF-171994 Main

2-Addressee (att. 1)
1-WMFO

JNR:jnr
(3)

Searched [illegible] Ser
[illegible] Ser

1325015-000-6219
4

2/28/92

ALLEGATIONS RELATING TO
BCCI
BEING INVESTIGATED BY
THE FBI

The following is a synopsis of the captioned allegations, divided into three categories: Direct; Tangential; and General/"Media". Also shown are the agents investigating these matters.

The Direct allegations, i.e., those received via criminal referral form or derived from investigation, are further divided into subcategories:

(1) BCCI/FIRST AMERICAN BANK (DC):

(A) BCCI secretly acquired ownership of and control over FAB through nominees.
(B) False statements were made by the nominees and by CLARK CLIFFORD [redacted] to the U.S. Government both to enable and cover up BCCI's acquistion/control of FAB.
(C) CLIFFORD, [redacted] AGHA HASAN ABEDI, [redacted] and BCCI [redacted] GHAITH RACHAD PHARAON participated in a racketeering conspiracy with BCCI.

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b7C

---->Assigned are:
SA [redacted] /WMFO
SA [redacted] /WMFO
SA [redacted] /WMFO
SA [redacted] /WMFO
SA [redacted] /WMFO
SA [redacted] /WMFO

b6
b7C

(2) BCCI/NATIONAL BANK OF GEORGIA (ATLANTA):

(A) GHAITH PHARAON acted as a nominee for BCCI in the acquisition of NBG from [redacted]
(B) BCCI excercised management and control over NBG.
(C) BCCI, through PHARAON, illegally acquired ownership of and control over 25 percent of NBG's voting shares by 1985, and concealed that ownership from the Fed.
(D) BCCI ordered and arranged the sale of NBG to CCAH.
(E) PHARAON falsified reports to the Fed regarding such things as capital contributions to his holding companies to improve financial ratios.

b6
b7C

---->Assigned to matters (A) through (E) are:
SA [redacted] WMFO

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b7C

SA [redacted]/Atlanta

b6
b7C
b7E

(F) [redacted] participated in a racketeering conspiracy with BCCI, et al, to acquire banks in the U.S.

---->Assigned to (F) is SA [redacted]/WMFO.

(G) Certain members of the Georgia State Legislature were bribed by, or received gratuities from, BCCI to change the laws governing ownership of Georgia banks.

---->Assigned to (G) are:
SA [redacted]/Atlanta
[redacted]/Atlanta)

(H) GHAITH PHARAON and his holding companies defrauded NBG and were enriched in a land development deal known as "River Edge."

---->Assigned to (H) is SA [redacted]/WMFO.

(3) BCCI/CENTRUST/PHARAON:

(A) BCCI, GHAITH PHARAON, [redacted] CENTRUST illegally parked $25 million of CENTRUST subordinated debentures.

b6
b7C

---->Assigned to (A) are:
SA [redacted]/WMFO
SA [redacted]WMFO
SA [redacted]/Miami
SA [redacted]Miami

(B) BCCI, its nominee, PHARAON, and his holding company, INTERREDEC, participated in a racketeering conspiracy to acquire an ownership interest in CENTRUST.

---->Assigned to (B) are:
SA [redacted]/WMFO
SA [redacted]/WMFO

(C) BCCI, through its nominee, PHARAON, acquired interests in METROBANK in Florida.

---->Assigned to (C) is SA [redacted]/WMFO.

(4) INDEPENDENCE BANK:

(A) BCCI, through its nominee, GHAITH PHARAON, and its [redacted] illegally acquired ownership of

b6
b7C

1325015-000-6221

and control over IB.
(B) Fraud was involved in the failure of IB.
(C) [redacted] misapplied IB funds in joint ventures with developers. b6 b7C
(D) BCCI may have had some involvement or interest in the joint ventures.
(E) BCCI, PHARAON and [redacted] participated in a racketeering conspiracy.

---->Assigned are:
SA [redacted] /LA
SA [redacted] /LA
SA /LA
SA /LA
SA [redacted] /WMFO

(5) ASSET FORFEITURE MATTERS:

BCCI and ICIC(O) have forfeitable U.S. assets in addition to those disclosed in the plea agreement.

---->Assigned is SA [redacted] /WMFO b6 b7C b7E

The "Tangential" allegations relate to the inquiries into the the money-laundering activities of CAPCOM:

(1) "C-CHASE II":

Narcotics profits were laundered through CAPCOM.

---->Assigned (assisting U.S. Customs and the [redacted] is SA [redacted] Tampa.

(2) TELE-COMMUNICATIONS, INC. OF DENVER:

[redacted] CAPCOM, [redacted] TCI, [redacted] TCI and CAPCOM.

---->Assigned to:
(SSA [redacted] /Denver is attempting to determine from the USA, District of Colorado, whether the FBI has an interest in this matter)
[redacted] /Denver)

The "General/'Media'" allegations, i.e., those derived from citizens, other law enforcement inquiries and media reports, relate to:

(1) U.S. SENATOR ORRIN HATCH:

1325015-000-6222

Senator Hatch publically spoke out for BCCI on behalf [redacted] BCCI [redacted]

----->Assigned to SA [redacted]/WMFO

(2) BILL CLINTON:

Presidential candidate BILL CLINTON received financial and verbal support from [redacted] BCCI's takeover of NBG and FINANCIAL GENERAL BANKSHARES (FGB), ergo, CLINTON has ties to BCCI.

b6
b7C
b7E

----->Assigned to SA [redacted]/WMFO

(3) DANIEL CASALARO:

Deceased investigative journalist DANIEL CASALARO was murdered because he was investigating BCCI's role in money laundering and terrorism.

----->Assigned to SA [redacted]/WMFO

(4) [redacted] BCCI [redacted] involved in BCCI's initial attempt to acquire FGB.

----->Assigned to SA [redacted] WMFO

(5) POLITICAL PAYOFFS/CORRUPTION:

(A) BCCI's Washington, D.C., representative office was a conduit for political payoffs, made both in D.C. and elsewhere.

----->Assigned to SA [redacted]/WMFO

(B) Sometime in the late-70's, in return for quashing an investigation, former U.S. attorneys JOSEPH DIGENOVA (D.C.) and BRECKENRIDGE WILLCOX (MD), along with former presidential advisor, currently co-manager of the campaign to re-elect George Bush [redacted] MD, controlled by BCCI and administrated by CLIFFORD & WARNKE.

----->Assigned to SA [redacted] Baltimore

1325015-000-6223

(6) [redacted]

(A) [redacted] BCCI's [redacted]

(B) [redacted] BCCI [redacted]

(C) With BCCI [redacted] CAPROCK SAVINGS BANK, Dallas, TX, [redacted] CAPROCK [redacted] "Thriftcon" case).

(D) With BCCI associates, was involved in the bust-out of HAMILTON TAFT, INC., a California tax-service firm.

b6
b7C

----->Assigned to:
SA [redacted] /WMFO
SA [redacted] WMFO

(7) [redacted]

Former BCCI employee, now federal prisoner, [redacted] was involved in money laundering through a corporation [redacted] SMALL BUSINESS ADMINISTRATION, who had a role in SBA decisions relating to the same corporation.

----->Assigned to SA [redacted] /WMFO

(8) TERRORISM/NUCLEAR PROLIFERATION:

(A) BCCI funded and encouraged Pakistan's development of an "Islamic bomb," and the nuclear development of other Third World countries.

(B) BCCI funded and encouraged weapons sales to, and terrorism by Islamic factions in the Third World.

----->Assigned to:
SA [redacted] /WMFO
SA [redacted] /WMFO

With regard to most, if not all, of the allegations in this document, a "boiler-plate" list of questions was developed. All BCCI interviews now include these questions:

STANDARD QUESTIONS TO BE ASKED
OF ALL BCCI-RELATED INTERVIEWEES

--DO YOU HAVE ANY INFORMATION, KNOWLEDGE OR DOCUMENTS WHICH YOU BELIEVE INDICATE THAT "BCCI," OR ITS SUBSIDIARIES OR AFFILIATES, EITHER DIRECTLY OR INDIRECTLY:

--OPERATED OR FINANCED A SO-CALLED "BLACK NETWORK" (I.E., A PARAMILITARY GROUP UTILIZING SPY EQUIPMENT AND TECHNIQUES,

BRIBERY, EXTORTION, KIDNAPPING AND/OR MURDER TO CARRY OUT BCCI'S AIMS THROUGHOUT THE WORLD)?

--FINANCED OR PARTICIPATED IN ILLEGAL ARMS TRANSACTIONS AND/OR TECHNOLOGY TRANSFERS?

--HAD ANY ROLE IN THE SO-CALLED "IRAN-CONTRA AFFAIR?"

--FINANCED THE DEVELOPMENT OF THE NUCLEAR CAPABILITIES OF ANY THIRD-WORLD COUNTRY, E.G., IRAQ OR PAKISTAN?

--OPERATED THROUGH A NETWORK OF FRONT COMPANIES IN EUROPE, THE U.S.A., OR ELSEWHERE, TO CARRY OUT ANY OF ITS OBJECTIVES?

--BRIBED OR OTHERWISE SOUGHT TO CORRUPT:

--ANY U.S. OFFICIALS?

--ANY FOREIGN OFFICIALS?

--PARTICIPATED IN THE LAUNDERING OF MONEY?

--FINANCED OR PARTICIPATED IN ANY NARCOTICS TRAFFICKING?

--ILLEGALLY ACQUIRED OWNERSHIP OF OR CONTROL OVER ANY U.S. OR FOREIGN ENTITIES, OTHER THAN THOSE ABOUT WHICH YOU HAVE LEARNED FROM THE MEDIA?

NOTE: IN ASKING THE FOLLOWING QUESTION(S), ENSURE THAT THE INTERVIEWEES UNDERSTAND YOU ARE NOT ASKING THEM TO DISCLOSE ANY GRAND JURY QUESTIONS OR TESTIMONY.

--HAVE YOU BEEN INTERVIEWED ABOUT BCCI-RELATED MATTERS BY ANY OTHER LAW ENFORCEMENT ORGANIZATION OR BY ANY REGULATORY ORGANIZATION?

--IF "YES": WERE YOU QUESTIONED ABOUT ANY BCCI-RELATED TOPIC THAT HAS NOT BEEN COVERED IN OUR INTERVIEW OF YOU?

--IF "YES": WHAT WAS THAT TOPIC?

1325015-000-6225

2/28/92

ALLEGATIONS RELATING TO
BCCI
BEING INVESTIGATED BY
THE FBI

The following is a synopsis of the captioned allegations, divided into three categories: Direct; Tangential; and General/"Media". Also shown are the agents investigating these matters.

The Direct allegations, i.e., those received via criminal referral form or derived from investigation, are further divided into subcategories:

(1) BCCI/FIRST AMERICAN BANK (DC):

(A) BCCI secretly acquired ownership of and control over FAB through nominees.
(B) False statements were made by the nominees and by CLARK CLIFFORD [redacted] to the U.S. Government both to enable and cover up BCCI's acquistion/control of FAB.
(C) CLIFFORD, [redacted] AGHA HASAN ABEDI, [redacted] and BCCI [redacted] GHAITH RACHAD PHARAON participated in a racketeering conspiracy with BCCI.

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----->Assigned are:
SA [redacted] /WMFO
SA [redacted] WMFO
SA [redacted] WMFO
SA [redacted] /WMFO
SA [redacted] /WMFO
SA [redacted] /WMFO

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(2) BCCI/NATIONAL BANK OF GEORGIA (ATLANTA):

(A) GHAITH PHARAON acted as a nominee for BCCI in the acquisition of NBG from [redacted]
(B) BCCI excercised management and control over NBG.
(C) BCCI, through PHARAON, illegally acquired ownership of and control over 25 percent of NBG's voting shares by 1985, and concealed that ownership from the Fed.
(D) BCCI ordered and arranged the sale of NBG to CCAH.
(E) PHARAON falsified reports to the Fed regarding such things as capital contributions to his holding companies to improve financial ratios.

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----->Assigned to matters (A) through (E) are:
SA [redacted] /WMFO

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SEARCHED INDEXED
SERIALIZED FILED
FEB 28 1992
FBI - WASH. METRO FIELD OFFICE

29B-WF-171924

350

1325015-000-6226

SA [redacted] Atlanta

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b7E

(F) [redacted] participated in a racketeering conspiracy with BCCI, et al, to acquire banks in the U.S.

----->Assigned to (F) is SA [redacted] WMFO.

(G) Certain members of the Georgia State Legislature were bribed by, or received gratuities from, BCCI to change the laws governing ownership of Georgia banks.

----->Assigned to (G) are:
SA [redacted] Atlanta
[redacted] Atlanta)

(H) GHAITH PHARAON and his holding companies defrauded NBG and were enriched in a land development deal known as "River Edge."

----->Assigned to (H) is SA [redacted] WMFO.

(3) BCCI/CENTRUST/PHARAON:

(A) BCCI, GHAITH PHARAON, [redacted] CENTRUST illegally parked $25 million of CENTRUST subordinated debentures.

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----->Assigned to (A) are:
SA [redacted] WMFO
SA [redacted] WMFO
SA [redacted] Miami
SA [redacted] Miami

(B) BCCI, its nominee, PHARAON, and his holding company, INTERREDEC, participated in a racketeering conspiracy to acquire an ownership interest in CENTRUST.

----->Assigned to (B) are:
SA [redacted] WMFO
SA [redacted] WMFO

(C) BCCI, through its nominee, PHARAON, acquired interests in METROBANK in Florida.

----->Assigned to (C) is SA [redacted] WMFO.

(4) INDEPENDENCE BANK:

(A) BCCI, through its nominee, GHAITH PHARAON, and its [redacted] illegally acquired ownership of

b6
b7C

and control over IB.
(B) Fraud was involved in the failure of IB.
(C) [redacted] misapplied IB funds in joint ventures with developers. b6 b7C
(D) BCCI may have had some involvement or interest in the joint ventures.
(E) BCCI, PHARAON and [redacted] participated in a racketeering conspiracy.

---->Assigned are:
SA [redacted] /LA
SA [redacted] /LA
SA /LA
SA /LA
SA [redacted] /WMFO

(5) ASSET FORFEITURE MATTERS:

BCCI and ICIC(O) have forfeitable U.S. assets in addition to those disclosed in the plea agreement.

---->Assigned is SA [redacted] /WMFO b6 b7C b7E

The "Tangential" allegations relate to the inquiries into the the money-laundering activities of CAPCOM:

(1) "C-CHASE II":

Narcotics profits were laundered through CAPCOM.

---->Assigned (assisting U.S. Customs and the [redacted] is SA [redacted] /Tampa.

(2) TELE-COMMUNICATIONS, INC. OF DENVER:

[redacted] CAPCOM. [redacted] TCI, [redacted] TCI and CAPCOM.

---->Assigned to:
(SSA [redacted] Denver is attempting to determine from the USA, District of Colorado, whether the FBI has an interest in this matter)
[redacted] /Denver)

The "General/'Media'" allegations, i.e., those derived from citizens, other law enforcement inquiries and media reports, relate to:

(1) U.S. SENATOR ORRIN HATCH:

1325015-000-6228

Senator Hatch publically spoke out for BCCI on behalf [redacted] (a BCCI [redacted]

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b7C
b7E

---->Assigned to SA [redacted] /WMFO

(2) BILL CLINTON:

Presidential candidate BILL CLINTON received financial and verbal support from [redacted] BCCI's takeover of NBG and FINANCIAL GENERAL BANKSHARES (FGB), ergo, CLINTON has ties to BCCI.

---->Assigned to SA [redacted] /WMFO

(3) DANIEL CASALARO:

Deceased investigative journalist DANIEL CASALARO was murdered because he was investigating BCCI's role in money laundering and terrorism.

---->Assigned to SA [redacted] WMFO

(4) [redacted]

[redacted] BCCI [redacted] nvolved in BCCI's initial attempt to acquire FGB.

---->Assigned to SA [redacted] /WMFO

(5) POLITICAL PAYOFFS/CORRUPTION:

(A) BCCI's Washington, D.C., representative office was a conduit for political payoffs, made both in D.C. and elsewhere.

---->Assigned to SA [redacted] /WMFO

(B) Sometime in the late-70's, in return for quashing an investigation, former U.S. attorneys JOSEPH DIGENOVA (D.C.) and BRECKENRIDGE WILLCOX (MD), along with former presidential advisor, currently co-manager of the campaign to re-elect George Bush, [redacted] MD, controlled by BCCI and administrated by CLIFFORD & WARNKE.

---->Assigned to SA [redacted] Baltimore

1325015-000-6229

(6) [redacted]

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(A) [redacted] BCCI's [redacted]

(B) [redacted] BCCI [redacted] laundering.

(C) With BCCI [redacted] provided [redacted] CAPROCK SAVINGS BANK, Dallas, TX, [redacted] CAPROCK [redacted] "Thriftcon" case).

(D) With BCCI associates, was involved in the bust-out of HAMILTON TAFT, INC., a California tax-service firm.

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SA [redacted]
SA [redacted]

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Former BCCI employee, now federal prisoner, [redacted] was involved in money laundering through a corporation, [redacted] SMALL BUSINESS ADMINISTRATION, who had a role in SBA decisions relating to the same corporation.

---->Assigned to SA [redacted] /WMFO

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(A) BCCI funded and encouraged Pakistan's development of an "Islamic bomb," and the nuclear development of other Third World countries.

(B) BCCI funded and encouraged weapons sales to, and terrorism by Islamic factions in the Third World.

---->Assigned to:
SA [redacted] /WMFO
SA [redacted] /WMFO

With regard to most, if not all, of the allegations in this document, a "boiler-plate" list of questions was developed. All BCCI interviews now include these questions:

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1325015-000-6230

BRIBERY, EXTORTION, KIDNAPPING AND/OR MURDER TO CARRY OUT BCCI'S AIMS THROUGHOUT THE WORLD)?

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--ANY FOREIGN OFFICIALS?

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--IF "YES": WHAT WAS THAT TOPIC?

1325015-000-6231

Memorandum

To : SAC, WMFO 29B-WF-171994 (P) Date 2/13/92

From : SA [redacted] C-5)
SA (C-5)

b6
b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
OO:WMFO

On 2/12/92, FBI, WMFO SA's [redacted]

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b7D
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[redacted]

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[redacted]

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b7D

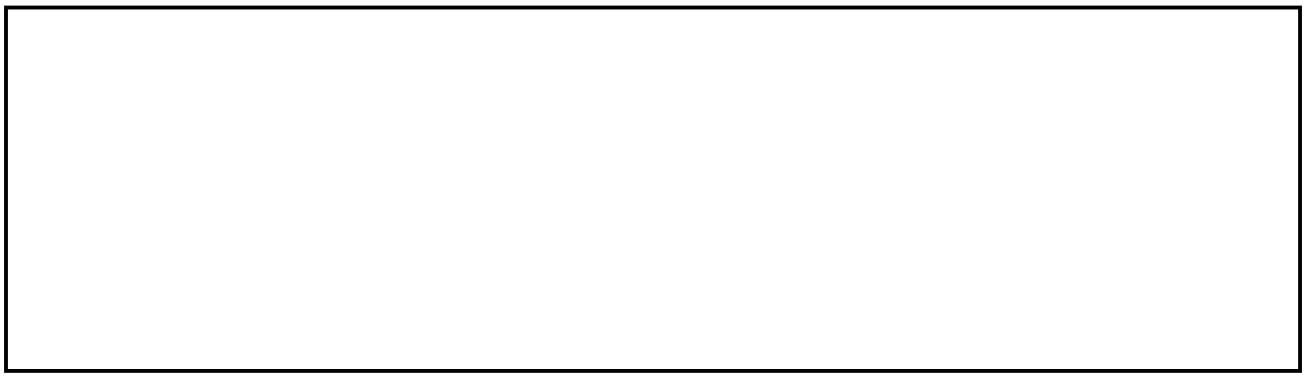
351

29B-WF-171994 Indexed

1-WMFO
JPF:MTU.

FBI - WASH. METRO FIELD OFFICE

1325015-000-6232



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Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/27/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 2/24/92, the writer was contacted by Trial Attorney (TA) [redacted] Fraud Section, DOJ. TA [redacted] requested that the writer determine if there were a bank in the U.S. with the name Saudi National Commercial Bank. b6 b7C

On that same date, the writer checked the appropriate banking directories and determined that The National Commercial Bank of Saudi Arabia had a branch located in New York, New York. The branch was located at 245 Park Avenue, New York, New York, telephone (212)490-0044 and (212)916-9000. [redacted] [redacted] b6 b7C

On that same date, the above information was furnished to TA [redacted] Based on a media article, TA [redacted] planned to issue a subpoena for certain records at the above bank. b6 b7C

29B WF 171994 main
-352

FBI—WASHINGTON FIELD 1325015-000-6234

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 3/4/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

Re: BCCI/NY Records Review

The records review at BCCI/NY was thoroughly addressed in my memo date 2/5/92. The purpose of this memo is to update the status of said review.

As previously articulated the most pertinent records located at BCCI/NY are the NYSBD, 20000 series. These records have been totally reviewed. There are 254 boxes of records in this series.

A comprehensive review of NYSBD Inventory Sheets for records in the 9000 series through the 20000 series has been completed by the writer. As noted above, all boxes in the 20000 series have been reviewed. Based on the Inventory Sheet review, a selective list of boxes in the 9000 series through the 190000 series has been compiled for review.

On 3/2, 3/3 and 3/4/92, records selected from the 13000 series and 19000 series were reviewed. The review was conducted by SA's [redacted] b6 b7C

The writer will be in New York between 3/25 and 3/27/92. At that time, the Inventory Sheet review for the 5000 series through the 8500 will be completed. There are no records below the 5000 series. In addition additional records as selected will be reviewed. At the end of this period, a determination will be made as to the time/resource commitment needed to complete the record review at BCCI/NY.

It should be noted that there are 4,576 boxes of records at BCCI/NY.

[redacted]

29B-WF-171994-353

[redacted] b6 b7C

SEARCHED SERIALIZED
MAR X 1992
FBI—WASHINGTON FIELD

62-125015-000-6235

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 2/27/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

In reviewing BCCI/NY records the attached telephone listing was found. It is not known how dated/accurate said listing is. Set forth below is a revised lead/contact listing.

SA [redacted] b6 b7C

Liaison responsibility
-Bank of England

SA [redacted] b6 b7C

Liaison responsibility
-BCCI Liquidator (Touche Ross)*

[redacted]

29B-WF-171994 Main 355

b6 b7C

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MAR 1 1992

FBI - WASH. METRO FIELD OFFICE

1325015-000-6241

SA [redacted] b6 b7C

Liaison responsibility
-PW Attorney*

SA [redacted] b6 b7C

Liaison responsibility
-U.K. Customs* [redacted] b7D
-U.S. Customs
-U.S. DOJ
-Legat London

Attached hereto are lists containing possible telephone numbers for above named individuals. It is anticipated that additional names/lists will be forth coming through Legat London.

1325015-000-6242

PROPOSED AGENDA BCCI LONDON TRIP FEBRUARY, 1992

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b7C

Memorandum

To : SAC, WMFO [redacted] (P) (C-5) Date 3/2/92

b3
b7E

From : SA [redacted]

b6
b7C

Subject: PHARAON GHAITH R. S/DENUNCIA
FPC - INTERPOL
OO:FBIHQ

2, 3
5, 8, 10
1, 12

On 2/20/92, at the request of the writer, DOJ Fraud Section [redacted] provided the attached thirteen pages of documents relating to a search for any references to Brazil from the records in the [redacted] at DOJ.

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1-WMFO

MRM:mm
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29B-WF-171994

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SERIALIZED Su FILED Su

MAR 11 1992

FBI - WASH METRO FIELD

(1)

1325015-000-6246

PACE UNIVERSITY
NEW YORK • WESTCHESTER

LUBIN SCHOOLS OF BUSINESS
GRADUATE SCHOOL OF BUSINESS
SCHOOL OF BUSINESS ADMINISTRATION

55 CHURCH STREET
WHITE PLAINS, N.Y. 10601
(914) 682-7000

November 2, 1982

[redacted] b6 b7C
Bank of Credit and Commerce S.A.
375 Park Avenue
New York, NY 10022

Dear [redacted]

Thank you again for a most fascinating and enlightening story and an excellent presentation on October 27.

I have forwarded your speech to our Center for Applied Research to be processed as a working paper in International Banking. You and your colleagues, especially [redacted] b6 b7C put a lot of work into the paper and I am very thankful to you for that.

The luncheon was, we hope, an excellent beginning of a mutually productive association between BCCI and the Institute.

I am currently working on finalizing the program for the proposed conference in Spring 1983. I shall forward you an advance copy towards the end of this month. Please let me know when it would be convenient for us to have another meeting to discuss further plans.

With best regards,

Sincerely,

Surendra K. Kaushik

Surendra K. Kaushik, Ph.D.
Director, Institute of
International Banking.
Pace University

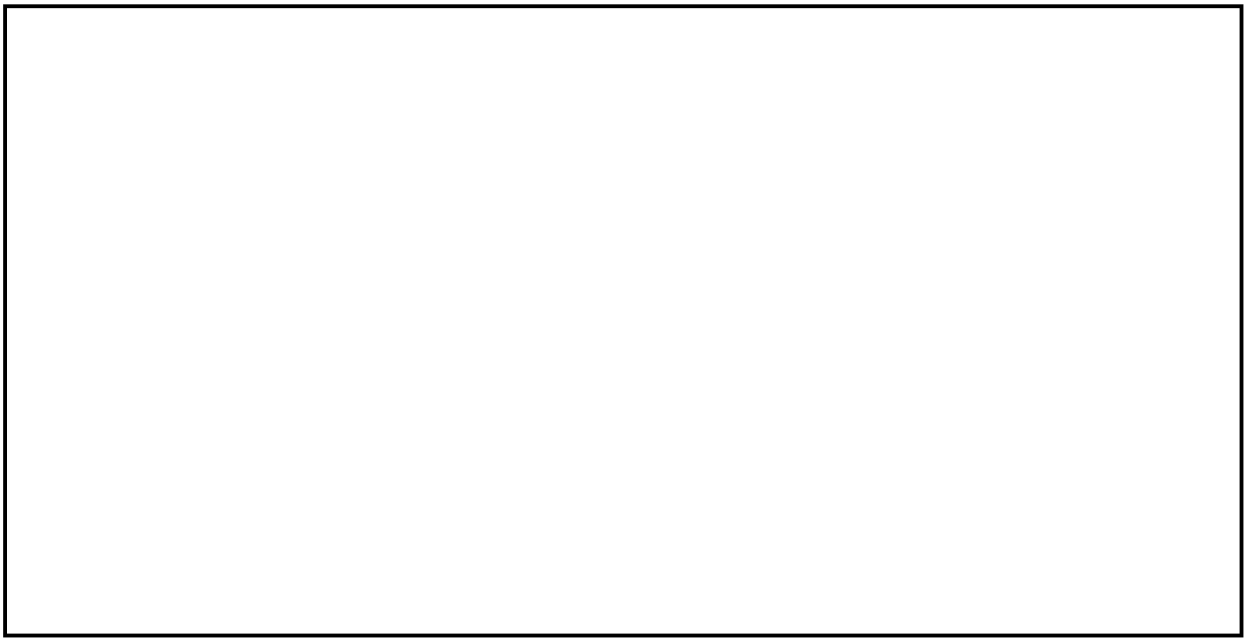
SKK:dr

BCCI0000392

DC 000381

1325015-000-6247

LIST OF PEOPLE WHOM SPEECH WAS SENT:



b6
b7C

BCC0000395 F

DC 000384

36

BCC ANNUAL CONFERENCE 1985

(2ND - 3RD MARCH)

LIST OF PARTICIPANTS

			HILTON/ INTERCON
BOARD OF DIRECTORS			
ABEDI, Agha Hasan	-	President	-
HARTMANN, Dr. Alfred	-	Director	I
KANDIAH, Peter	-	Director	I
LAMARCHE, Y.	-	Director	I
TWITCHIN, P.C.	-	Director	IMPERIAL
VAN OENEN, J.D.	-	Director	I
GUESTS			
Attock Oil			
BAQI, M.A.			I
KHAN, Afzal			I
LODHI, T.A.T.			I
SALIM, M.			I
Auditors			
FEAR, R.	-	Price Waterhouse	I
HARRIS, R.	-	Price Waterhouse	I
HAY, K.	-	Ernst & Whinney	I
HEATH, R.	-	Ernst & Whinney	I
STONE, T.	-	Ernst & Whinney	I
WHITE, R.	-	Price Waterhouse	I
BCC Foundation			
ALI, Abid			I
SAEED, Afzal			I
Credit & Commerce Insurance			
AHMED, Sultan			I
BHIMJEE, R			I
KHAN, Aziz			I
KHAN, Ishaq			I

BOARD OF GOVERNORS
FEDERAL RESERVE SYSTEM
EXHIBIT
13

3831

AMERICAS REGION

Canada

GALBRAITH, W.
HUSSAIN, Munawar
ISFAHANI, Suroosh
JAFFERI, Abbas
RAJA, A.D.
RICHARD, Raymond
ZUBERI, Anis K.

CARIBBEAN & MIAMI

Barbados

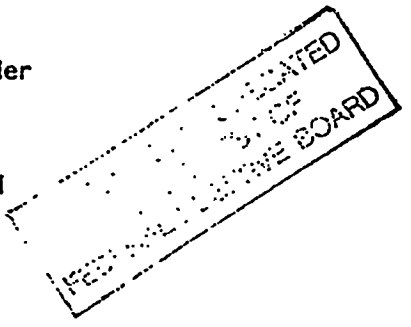
JAWAID, S.

Houston

BAWKHER, Iskander

Jamaica

AKHTAR, Maqsood
AKHTAR, S.M.



Miami

ASHRAF, Iqbal
HANCOCK, M.
HASSAN, Nadeem
JINDANI, Amin
LYNCH, P.
PERVEZ, Hasan
REHMAN, M.U.
SAKHIA, A.R.
SAKRANI, S.
USMANI,

LATIN AMERICA

Regional Office

AKBAR, S.M.
BILGRAMI, Akbar
GHOSH, U.K.
HASAN, Bande
SHAFI, S.M.

Brazil

PRUD'HOMME, Eric

AD0007612

1325015-000-6250

Colombia

AVILA, Eduardo
DEANE, Feroze
LOZANO, Eduardo
MURTAZA, Shahid
PAWAR, Ronen
ZARATE, Dr. Eduardo

Grand Cayman

HASSAN, Sharaful

Panama

MAHMUD, Raihan

Paraguay

SIDDIQUI, Waseem

Uruguay

SHABBIR, S.A.

Venezuela

ANEZ, Dr. Luis E.

NEW YORK

ALAM, Khurshid
KHAN, Shafiqur Rehman
NAQVI, Nadeem
PATAUDI, Mehriyar
RAZZAQUI, Javed Ahmed
SHARIH, Khalid
SIDDIQUI, Saeed

WASHINGTON

AHMAD, Sani
AWAN, Amjad

WESTERN AMERICA & PACIFIC

Regional Office

LALWANI, K.J.
SAUBOLLE, Louis E.
SUTLIFF, Ronald

AU0007613

1325015-000-6251

57

BOARD OF GOVERNORS
FEDERAL RESERVE SYSTEM
EXHIBIT
12

ANNUAL CONFERENCE LUXEMBOURG 1986

MAY 2ND & 3RD 1986

LIST OF PARTICIPANTS

	INTERCON/ SHERATON
BOARD OF DIRECTORS	
ABEDI, Agha Hasan	I
AL-MAZRUI, Ghanim Faris	I
HARTMANN, Dr. Alfred	I
KANDIAH, Peter	I
LAMARCHE, Y.C.	I
TWITCHIN, P.C.	I
VAN OENEN, J.D.	I
ADVISORS	
PIRBHAI, M.R.	I
YUNUS, Dr. M.	I
AUDITORS	
COWAN, Christopher	I
HARRIS, Richard	I
HAY, Ken	I
STONE, T.	I
GUESTS	
AFRIDI, Aijaz	I
ALTMAN, Robert	I
BATISTINI, W.W.	I
CARLSON, R.P.M.	I
ELLEY, K.K.	I

COPY
FEDERAL RESERVE BOARD

3813

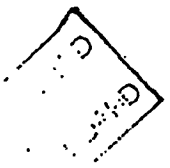
47

Jamaica

AHMED, Haseem I
RIZVI, Ghalib I

Miami

IQBAL, Ashraf I



LATIN AMERICA REGION

Regional Office

AKBAR, S.M. I
BILGRAMI, Akbar I
CALVO, Dr. A. I
JAN, Tariq Nasim I
JENSEN, Brian I
SHAFI, S.M. I

Argentina

GHOSH, U.K. I
HIRANI, Naushad I

Brazil

SHAH, Jahangir I

Colombia

AHUJA, Sasha I
DEANE, Feroze I
MONTALVO, J.J. I
MURTAZA, Shahid I
PAWAR, Ronen I
RESTREPO, Ismail I
SINTES, Gustavo I
ZUBERI, M.H. I

3823

AU0007629

1325018-000-6253

BANK OF CREDIT AND COMMERCE
INTERNATIONAL, S.A.
NEW YORK REPRESENTATIVE OFFICE
320 PARK AVENUE
NEW YORK, NY 10022

554

1-616/260

APRIL 15, 1985

PAY TO THE ORDER OF CITIBANK [redacted] $: 2,386.00

TWO THOUSAND THREE HUNDRED EIGHTYSIX ONLY..... DOLLARS

1ST AMERICAN
FIRST AMERICAN BANK OF NEW YORK
350 Park Ave., New York City, N.Y. 10022

FOR RE: HOTEL EXP.

⑈000554⑈ ⑆026006169⑆ 550 00 4019⑈

b6
b7C

To: [redacted]

From: [redacted] Date: April 12, 1985

b6
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Enclosed are hotel bills and a covering statement from [redacted] with respect to the recent visit to Brazil made by [redacted] and I.

Would you kindly remit the total amount of $2,386 (Dollars Two thousand three hundred and eighty six) to the bank account detailed in [redacted] statement.

As the expenses were incurred a month ago, your urgent attention to this matter would be appreciated.

cc: [redacted]

[redacted]

APPROVED

BCC0000274F

DC 000265

I #9 Rec'd 10/30/89

DORMANT ACCOUNT LIST

DATE DORMANT m/d/y	ACCOUNT NO.	ACCOUNT NAME	COUNTRY
09/07/89	01000344	[redacted]	U.K
08/31/89	01000491	[redacted]	El Salvador
08/31/89	01000946	[redacted]	Zambia
08/31/89	01001414	[redacted]	Barbados
08/31/89	01002142	[redacted]	Barbados
08/31/89	01002460	[redacted]	Barbados
08/31/89	01002711	[redacted]	Jamaica
08/31/89	01003165	[redacted]	Honduras
08/31/89	01003552	[redacted]	Nigeria
10/24/89	01008262	[redacted]	Panama
08/31/89	01009898	[redacted]	Colombia
10/24/89	01010584	[redacted]	China
11/18/87	01010664	[redacted]	Cayman Isl.
10/24/89	01010846	[redacted]	Uruguay
08/31/89	01050446	[redacted]	France
09/07/89	01050491	[redacted]	Singapore
08/31/89	01052142	[redacted]	Brazil
08/31/89	01053132	[redacted]	Colombia
08/31/89	01053234	[redacted]	Brazil
08/31/89	01053701	[redacted]	Colombia
08/31/89	01054586	[redacted]	Colombia
08/31/89	01054906	[redacted]	Colombia
08/31/89	01055281	[redacted]	Colombia
08/31/89	01055292	[redacted]	Colombia
08/31/89	01055305	[redacted]	Trinidad & T
10/24/89	01055689	[redacted]	Colombia
08/31/89	01055736	[redacted]	Colombia
10/24/89	01055985	[redacted]	Guyana
10/24/89	01056055	[redacted]	Venezuela
09/07/89	01056759	[redacted]	Colombia
06/21/89	01058897	[redacted]	Colombia
06/21/89	01058944	[redacted]	Colombia
06/21/89	01059014	[redacted]	Venezuela

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NBG FRA 1017796

1325015-000-6255

DORMANT ACCOUNT LIST

DATE DORMANT m/d/y	ACCOUNT NO.	ACCOUNT NAME	COUNTRY
09/07/89	02000244	[redacted]	Venezuela
08/31/89	02001541		Colombia
09/07/89	02002531		Canada
09/07/89	02003587		Egypt
08/31/89	02003667		Colombia
08/31/89	02003792		Colombia
08/31/89	02004419		Uruguay
08/31/89	02004806		Colombia
08/31/89	02004840		Colombia
08/31/89	02005976		Colombia
08/31/89	02007161		Paraguay
08/31/89	02007490		Colombia
09/06/89	02007730		Uruguay
09/07/89	02007821		Colombia
09/07/89	02008140		Venezuela
09/07/89	02008297		Panama
08/31/89	02008593		Colombia
08/31/89	02009436		Colombia
08/31/89	02009981		Colombia
08/31/89	02010451		Colombia
08/31/89	02011441		Paraguay
09/07/89	02011838		Pakistan
08/31/89	02013807		Trinidad & T
06/21/89	02019552		Colombia
06/21/89	02019596		Venezuela
06/21/89	02019632		Colombia
06/21/89	02019814		Germany
10/24/89	03000655		
09/29/89	80211069	Bills Payable Dormant Account	U.S.A.

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NBG FRA 1017797L

1325015-000-6256

LIST OF MANAGERS OF ALL LOCATIONS IN LACRO.

1. ARGENTINA

2. BAHAMAS

3. BARBADOS

4. BRAZIL

5. COLOMBIA

6. JAMAICA

   New Kingston

   King Street

   Montego Bay

7. PANAMA

   Panama

   Colon Free Zon

8. PARAGUAY

9. TRINIDAD

10. URUGUAY

11. VENEZUELA

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1017994

Details of Listed Transfer Risk

Description and Comments	Cat[1]	Amount
BRAZIL	P	14,318M
Non-related exposures represent bank credit/placements to private commercial banks, 14,318M.		
Real GDP was unchanged in 1988, after growing 2.9 percent in 1987. In 1988, strong growth in exports and agriculture was able to offset a 3.2 percent decline in industrial production. Consumer price inflation accelerated to 934 percent, after reaching 366 percent in 1987. In 1988, the trade surplus surpassed $19 billion and was the largest ever. President Sarney announced new economic measures on January 15 including price controls, the elimination of the price indexation mechanism for wages, some privatization measures, public employment cuts, and controls and targets for the fiscal budget. The Brazilian Congress has approved some of these measures, but others, such as employment cuts and the privatization measures, may not be fully enacted. Since mid-January, authorities have held overnight interest rates at 25 to 30 percent monthly. Brazilian authorities are aiming to reduce the operational public sector budget deficit to zero in 1989. In June 1988, a term sheet was agreed to between Brazil and commercial bank creditors that rescheduled $62 billion in debt over 20 years, provided for $5.2 billion in new money, maintained $15.5 billion in short-term credit lines and included a menu of financing options including relending, new money bonds, and exit bonds. After a "critical mass" of bank commitments to the financing package was achieved, the IMF Executive Board approved an SDR 1.1 billion standby arrangement in late August 1988. The first (SDR 365 million) standby tranche was disbursed at that time, but Brazil will require a waiver to receive the next (SDR 31 million) tranche. The signing of the commercial bank refinancing package in late September and the November disbursement of $4 billion of the $5.2 billion new money package allowed Brazil to regularize payments and relations with bank creditors. At the end of July 1988, the Paris Club rescheduled $3.9 billion in		

1. Cat: S-Substandard
I-Value Impaired
L-Loss
P-Other Transfer Risk Problems

NBG FRA 1016932

1325015-000-6258

FFIEC D

Details of Listed Transfer Risk

Description and Comments	Cat[1]	Amount
principal, both arrears and upcoming amortizations, and $1.1 billion in future scheduled interest payments. Brazil is current on its interest payments to banks. Both the debt-equity and relending programs were suspended in January 1989.		

1. Cat: S-Substandard
I-Value Impaired
L-Loss
P-Other Transfer Risk Problems

NBG FRA 1016933

1325015-000-6259

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 3/12/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO: WMFO)

During the week of 3/2-6/92, 9 of 11 boxes of documents were received from Legat London, and on 3/11/92, the final 2 boxes arrived. The documents therein had been requested from the [redacted] by DOJ attorneys, who selected them from an index the [redacted] has provided relating to its evidence. The requests for the documents were handled through DOJ's Office of International Affairs attorney [redacted] who directed that the [redacted] response be made through London ALAT [redacted] b6 b7C b7D

I assigned three SAs and one FA to review the records prior to turning them over to DOJ, believing that to be the most efficient way to determine if additional investigation was possible or neccesary based on the contents of the records. The FA, in particular, was assigned to schedule out financial information appearing in a large group of memoranda already found in one of the boxes. At present the review is incomplete, due to prior travel commitments of the assigned SAs and FA. However, it now must be suspended indefinitely.

On this date I received a call from [redacted] at DOJ, who, along with [redacted] is coordinating, among other things, requests from Fraud Section attorneys and other USAOs for [redacted] records. ([redacted] was aware, from conversations I have had with her during the last few days, that we were trying to review these records prior to sending them to DOJ. She had even faxed me a copy of all requests made to the [redacted] thus far, for comparison with our copy of the [redacted] index.) In her call to me, [redacted] announced that she had spoken with DOJ Fraud Section Principal Deputy Chief [redacted] about our review. PDC [redacted] she reported, had told her he understood the procedure to be that the documents would be sent directly to DOJ, not the FBI, for inclusion in the "Aspen" system, and for her to ask me to bring the documents to her. b6 b7C

29B-WF-171994-357

1-WMFO

JNR:jnr
(1)

Main
Su Su

1325015-000-6260

Therefore, I will deliver all boxes to [redacted] at DOJ today, and apparently will be unable to review their contents until the "Aspen" people are done with them.

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1325015-000-6261

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 3/17/92

From : SA [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

On 3/16/92, [redacted] U.S. SMALL BUSINESS ADMINISTRATION, OFFICE OF INSPECTOR GENERAL (SBA-OIG) Washington, D.C. (202/205-7400), telephonically advised that his office will refer their investigative interest in [redacted] FALCON CAPITAL CORPORATION (FALCON), to their Atlanta, Georgia Office, inasmuch as FALCON is located in North Carolina and falls within Atlanta's SBA-OIG territory. b6 b7C

29B-WF-171994 - 358

Main

SEARCHED [redacted] SERIALIZED [redacted]

MAR [redacted]

FBI—WMFO [redacted]

2 - WMFO
(1 - 29B-WF-171994 -Main)
(1 - 29B-WF-171994 -Sub U)
CWS
(2)

1325015-000-6262

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
March 10, 1992

U.S. Small Business Administration
Office of Inspector General
Deputy Inspector General/Counsel
Mail Stop 4110
409 3rd Street S.W.
Washington, D.C. 20416

Re: Falcon Capital Corporation, Zurich Corporation,
P.S. Investment Company, [redacted] b6 b7C

Dear Sir/Madame:

Pursuant to an ongoing investigation, the Washington Metropolitan Field Office of the Federal Bureau of Investigation requests access to your agency's files regarding the above referenced entities/individual, as well as any known affiliated companies or individuals. Information obtained from your office will not be disseminated outside of the U.S. Department of Justice.

Sincerely,

Robert M. Bryant
Special Agent In Charge

By: [redacted] b6 b7C
Supervisory Special Agent

cc: [redacted] Trial Attorney
U.S. Small Business Administration

2 - Addressees
2 - 29B-WF-171994 (1 - 29B-WF-171994-Main)
(1 - 29B-WF-171994-Sub U)

CWS
(4)

29B-WF-171994-359

Searched ____
Serialized ____
Indexed ____
Filed ____

1325015-000-6263

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 3/17/92

From : SA [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

PURPOSE

The purpose of this memo is to create a new sub-file (Sub-File U) for captioned case in order to maintain investigative results regarding [redacted] and his associates and various business affiliations. b6 b7C

JUSTIFICATION

[redacted] b6 b7C
the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI)-United States (New York) Division. Through his dealings with BCCI-NY, [redacted]
BCCI officials. [redacted]
of [redacted]

In addition, officials from the U.S. SMALL BUSINESS ADMINISTRATION (SBA) have reported that [redacted] b6 b7C
[redacted] FALCON CAPITAL CORPORATION (FCC), [redacted]
[redacted]

29B-WF-171994-360

2 - WMFO
(1 - 29B-WF-171994 -Main)
(1 - 29B-WF-171994 -Sub U)

CWS
(2)

SEARCHED ... SERIALIZED ... FILED ... FBI—WMFO

Potential Violations

Based on the investigation to-date, it appears [redacted] and his associates may have committed or conspired to commit the following federal offenses in addition to the reported Fraud Against the Government charges by the SBA:

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b7C

18 USC Section 2 - Aiding and Abetting
18 USC Section 371 - Conspiracy
18 USC Section 1006 - False Entries (Caprock S&L)
18 USC Section 1341 - Mail Fraud
18 USC Section 1343 - Fraud by Wire
18 USC Section 2314 - Interstate Transportation of Stolen Property (ITSP)

Presently, the venue for the alleged offenses appeared to be based in the following states:

New York	Florida
North Carolina	Georgia
Tennessee	Texas

1325015-000-6265

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

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U.S. Department of Justice

United States Attorney

District of Columbia

rec'd 1/17
KLH 1250

Judiciary Center
555 Fourth St. N.W.
Washington, DC 20001

CRIMINAL DIVISION

FACSIMILE TRANSMISSION COVER SHEET

DATE: 1-17-92

TIME: 12:10 pm

C-5

TO: [redacted]

Federal Bureau of Investigation

OFFICE NO.: [redacted] b6 Per FBI b7C

FAX NO.: 324-6426

FROM: [redacted]

AUSA, Public Corruption

OFFICE NO.: [redacted] b6 Per EOUSA

FAX NO.: [redacted]

TYPE OF DOCUMENT: Letters/Index

NUMBER OF PAGES 27 (INCLUDING COVER SHEET)

REMARKS:

1325015-000-6135

JAN 17 '92 13:11 FROM USAO-DC/CRIMINAL DIV PAGE.001

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 1/23/92

From : SA [redacted] (C-5) b6 Per FBI
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
OO:WMFO

Attached to this memorandum are copies of documents provided to the writer by [redacted]

[redacted] b5 Per EOUSA
b6
b7C

[redacted] b6 Per FBI
b7C

2-WMFO
CMA:cma
(2)

FBI - WASH. METRO FIELD OFFICE

1325015-000-6134

323

29B-WF-171994-Main

29B-WF-171994 Main

-282-

SEARCHED SL INDEXED SL
SERIALIZED SL FILED SL
DEC 13 1991
FBI - LOS ANGELES FIELD OFFICE
SL

[redacted]

b3 Per DOS
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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/20/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTEREST;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

This memorandum addresses the review/reproduction of the BCCI/Washington, D.C. Representative Office records. Said records are in the custody of the New York State Banking Department (NYSBD), located at the former New York office of BCCI, 530 Fifth Avenue, New York, New York. b6 b7C

On 7/31/91, 42 boxes of the above mentioned records were moved from the law office of Cleary Gottlieb to the NYSBD. The move was coordinated by the writer with NYO Squad C-2 SSA [redacted] and AUSA [redacted] District of Columbia.

On 8/2/91, the records were briefly reviewed by AUSA [redacted] SA [redacted] and the writer. Two boxes marked "privileged documents" were copied by NYO SA [redacted]. Such was done after AUSA [redacted] discussed this with NYSBD Attorneys. SA [redacted] completed the copying on 8/5/91. b6 b7C

On 8/7/91, the copying of all the records was discussed with AUSA'S [redacted] AUSA [redacted] advised that he wanted all records copied. The writer strongly disagreed and stated that only those records germane to the investigation should be copied. AUSA [redacted] concurred after the writer added that he would insure all the records were reviewed to determine which records should be copied. b6 b7C

On that same date, the writer contacted numerous copy machine vendors in order to arrange for a rental machine to be placed at the NYSBD. This was coordinated through FBIHQ.

On that same date, the writer contacted Deputy Superintendent [redacted] NYSBD and SSA [redacted] to coordinate the review/copying project. b6 b7C

29B-WF-171994-211

[redacted]

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SERIALIZED FILED
AUG 30 1991
FBI - WASHINGTON FIELD OFFICE

b6 b7C

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On 8/8/91 and 8/9/91, respectively, SA [redacted] and the writer reviewed the aforementioned records. In addition, the NYSBD Examiners recommended that other boxes should be reviewed, which were probably relevant to this matter. b6 b7C

On 8/8/91, the writer had numerous contacts with AUSA'S [redacted] and [redacted] Said AUSA'S were making arrangements with the Manhattan District Attorney to have the above records transported to the NYO to be copied. Ultimately an agreement was reached. The agreement only permitted records to be transported/copied in the presence of a representative of the DA'S office and only between the hours of 8:00AM and 4:00PM. It should be noted that the NYO was prepared to work around the clock to complete this project. The limitations placed on this project have seriously delayed completion of the copying. It should be further noted that the Manhattan DA'S office has been non-responsive to SSA [redacted] b6 b7C

On 8/9/91, 20 boxes of records were transported to the NYO and copying was begun.

On 8/13/91, SSA [redacted] provided the writer with the copies of the documents copied by SA [redacted] on 8/5/91. b6 b7C

On 8/16/91, SA [redacted] and the writer completed the review of the records. The writer was provided with copies of inventory sheets for all pertinent boxes of records and for all records listed in the 20,000 series by the NYSBD. Such records may also be pertinent to this matter. All inventory sheets have been reviewed and additional records will be reviewed/copied as a result thereof. b6 b7C

On 8/20/91, the writer made final arrangements with Delson Systems to rent a photocopy machine in furtherance of the reproduction of the records. The machine will be delivered on 8/21/91 to the office of the NYSBD.

It should be noted that the writer has maintained daily contact with the USAO and the NYO concerning coordination of the photocopy project. Set forth on the next page is a list of the box inventory numbers for records that have been moved to the NYO, records at the NYSBD that need to be copied and boxes that will not be copied.

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29B-WF-171994

As of 8/20/91, 51 boxes of records have been reviewed at the New York State Banking Department (NYSBD) office located at the former BCCI office. Said location is 530 Fifth Avenue, New York, New York.

1. Boxes taken to the NYO on 8/9/91: (20)

20005	20045	20218	20233
20006	20057	20219	20234
20008	20209	20229	20235
20014	20210	20230	20238
20023	20211	20232	20242

2. Boxes remaining at the NYSBD that will be copied: (16)

20069	20217	20227	20241
20213	20221	20231	
20214	20223	20236	
20215	20225	20237	
20216	20226	20239	

3. Boxes not to be copied: (15)

20060	20205	20220
20201	20206	20222
20202	20207	20224
20203	20208	20228
20204	20212	20240

It should be noted that additional inventory sheets for BCCI records have been reviewed. Based on this review more records will be analyzed and a determination made as to additional photocopying.

1325015-000-7369

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 8/21/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MC #38
FIF; FAG
(OO: WMFO)

On this date, DOJ [redacted] b6 b7C informed me that, on 8/19/91, a meeting occurred at the DOJ Fraud Section, conducted by [redacted] relating to the computerization of the document-universe in the BCCI cases. [redacted], who was the only person there associated with the captioned matter and who only found out about the meeting by accident, five minutes before it occurred, learned that DOJ's plan is possibly to "image" every document in every location associated with BCCI (i.e., in Miami, Tampa, the Cayman Islands, Washington, D.C., New York, London.....). The implementation of this plan is imminent, but the methodology is still to be ironed out. Apparently, DOJ is considering dispatching two-person, "case agent/prosecutor" teams to each location to "triage" (sic) the documents, dividing them by priorities for imaging.

Yet to be determined, apparently, is the source(s) of the "case agents."

I reminded [redacted] of our upcoming plan to move the documents from his office to the NVMRA, beginning Friday, 8/23/91, to begin the process of cataloguing and reviewing them. He expressed several concerns (which did not change our plans): how he and the [redacted] could get here to continue their own cataloguing/review process (in which we have not participated or even been consulted); how a newly-formed group of agents would be able to assimilate enough knowledge to meaningfully and efficiently review and catalogue the records, given the "extreme learning curve" involved. I assured [redacted] that the continuity of the records would be maintained and that sufficient facilities, background material and guidance would be given the reviewers to enable them to do their job. I also told [redacted] we expect all the attorneys involved in the case to be intimately involved in the review process. b6 b7C

1-WMFO

JNR:jnr
(1)

29B-WF 171994-Main

1325015-000-7370

Complaint Form
FD-71 (Rev. 2-13-86)

NOTE: Hand print names legibly; handwriting satisfactory for remainder.
Indices: ☐ Negative ☐ See below

Squad C-5 29B-171994

Subject's name and aliases	Character of case
BCCI INVESTIGATION	BFE
	Complainant ☐ Protect Source MR. [redacted] b6 b7C
	Complaint received ☐ Personal ☒ Telephonic Date 8/7/91 Time 1:11 PM
Address of subject	Complainant's address and telephone number (202) 429-5314

Race	Sex	Height	Hair	Build	Birth date and Birthplace
UNKNOWN	☒ Male	UNKNOWN	UNKNOWN	UNKNOWN	UNKNOWN
Age	☐ Female	**Weight**	**Eyes**	**Complexion**	**Social Security Number**
UNKNOWN		UNKNOWN	UNKNOWN	UNKNOWN	UNKNOWN

Scars, marks or other data
UNKNOWN

Facts of complaint

On 8/7/91 at 1:11 pm, MR. [redacted] called wanting to speak to the agent handling the BCCI investigation. He feels he has important information to be given regarding this investigation and was not satisfied with speaking to anyone other than the agent investigating the case. He left his phone number and asked that someone get in touch with him. b6 b7C

main 213

29B-WF-171994

Any Being assigned as lead to TOY agent.

(Complaint received by)

Do not write in this space

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED Su FILED Su
[illegible] 1991
FBI - WASH. METRO FIELD OFFICE

BLOCK-STAMP

b6 b7C

1329015-000-7371

Memorandum

To : SAC, MEMO (29B-WF-171994) (P) Date 9/15/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MC #38
(OO:WMFO)

On 9/16/91, SA [redacted], Tampa Division, notified me that the trip to Abu Dhabi and Pakistan by U.S. government representatives is going forward. Currently, those slated to go (per Tampa U.S. Customs SA [redacted] are Tampa [redacted] SA [redacted] Miami AUSA [redacted] someone from DOJ Office of International Affairs and someone from the FBI. b6 b7C b7E

SA [redacted] asked if I was aware that about 4,000 boxes of BCCI/Miami and BCCI/Tampa representative offices records were taken into custody some time ago (at least prior to or about the time of the money laundering trial) by the Federal Reserve and stored somewhere in the Miami area. About 60 boxes of records were reviewed, catalogued and used by the [redacted] USCS in the [redacted] trial and portions of another 110 were also reviewed, with some of those documents used in the trial as well. (The latter 170 boxes may have been seized when BCCI/Miami was searched in 1988.) b6 b7C b7E

According to SA [redacted] the Tampa [redacted] and USCS plan at some point in the near future to return to the 4,000 boxes documents. SA [redacted] will attempt to determine more about the nature, number and location of these records. b6 b7C b7E

An apparently-related piece of information came from AUSA [redacted] Washington, D.C., on 9/17/91, when he reported having heard that some 400-500 boxes of BCCI records exist somewhere in Florida, but are supposedly subject to the New York District Attorney's court order. This indicates that probably the Federal Reserve has or had the records and disclosed their existence to the New York District Attorney. b6 b7C

(1) WMFO

JNR: das

(1)

29B-WF-171994-214

SEP 18 1991

FBI

1325015-000-7372

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/19/91

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE 38
FIF; FAG;
OO:WMFO

On 9/17/91, SA [redacted] reviewed the FD-302 of [redacted] b6 b7C dated 9/5/91 [redacted] states that PRICE WATERHOUSE (PW) [redacted] was removed from the London audit engagement at the request of BCCI management because she had begun asking questions indicating that she had uncovered the relationship between BCCI and GHAITH PHARAON.

On 9/18/91, SA [redacted] contacted [redacted] at PW, Boston, MA, [redacted] and requested an interview. [redacted] advised that she would need to research her ethical responsibilities to her client as well as discuss the matter with the Partner-in-Charge of the Boston office. [redacted] advised that she would contact SA [redacted] later that day. b6 b7C

As promised, [redacted] recontacted SA [redacted] later that afternoon and advised that she had been referred to the firm's legal counsel in New York and London and that she had so far been unable to discuss the matter with counsel. [redacted] expressed concern that the U.K.'s bank secrecy laws as well as her professional/ethical responsibilities to her client may prevent her from discussing BCCI. [redacted] advised that she would recontact SA [redacted] as soon as she has an opportunity to discuss the matter with PW attorneys. b6 b7C

(1-WMFO)

29B-WF-171994-Main -215

MTU:mtu

SEP 2[illegible] 1991

b6 b7C

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b6
b7C

BCCI AND ITS ACTIVITIES IN THE UNITED STATES

INDEF

Pg	4	5	6	16	17	18	19	20	47
#	1	1	1	1	1	2	1	1	2

HOUSE BANKING COMMITTEE MINORITY STAFF REPORT

SEPTEMBER 10, 1991

Copy filed
Sub-Jug 1, 2, 3, 4

298-WF-171994-MAIN - 216

SEARCHED See INDEXED See
SERIALIZED See FILED See
SEP 23 1991
FBI - WASH. METRO FIELD OFFICE

EXECUTIVE SUMMARY

The following represents key points in the Minority staff report related to the September 11th hearing dealing with the activities of Clark Clifford and Robert Altman at First American Bank and their relationship with BCCI:

1.) **BCCI Account Activity at FAB** - FAB maintained an extensive correspondent banking relationship with BCCI. A total of 47 BCCI branches or affiliates maintained accounts at FAB. An internal FAB memo indicates that from 1986 to 1990, 71% of incoming wire transfers to FAB were from BCCI-Panama. Also, FAB held an account code-named "Gloria" that was involved in curious wire transfer activity from South America.

2.) **Telex from Sami to Naqvi** - Telex concerning BCCI's interest in acquiring Financial General. Telex states "for presentation of the holding company application to FED our friend (believed to be Bert Lance) advised that we may retain Mr. Clifford as Chief Counsel ... Accordingly, I met Mr. Clark Clifford and explained to him our strategy and our goal. He was happy to know the details and has blessed the acquisition." Clifford denies meeting took place. However, there is absolutely no reason whatsoever to question the credibility of the telex and the facts contained therein.

3.) **Clifford and Altman's memo to Abedi concerning NBG** - Clifford and Altman both sent Abedi a memo highlighting the legal difficulties of BCCI's involvement with the National Bank of Georgia deal. The memo states in one portion: " A bigger problem, however, arising from BCCI's involvement in the transaction is that it might focus closer attention on the relationship between BCCI and CCAH." Clifford denies that he ever read the memo before sending it.

4.) **BCCI's Americas Coordinating Committee** - Meeting headed by FABNY employee where statements were made concerning BCCI's control of the First American group of banks. Altman attended the meetings at BCCI expense.

5.) **Employment practices** - As a matter of course all applicants for senior positions at First American were required to be interviewed by BCCI officials. This appears to be highly unusual.

6.) **Ryback Letters** - Exchange of letters between FED supervisory official William Ryback and Altman. FED letter inquires if BCCI has ever financed stock purchases in CCAH. Altman indicates that correspondence with BCCI shows that no financing provided to the original investors. Altman declines to mention $15M in loans to himself and Clifford to purchase CCAH stock. Stock later resold at $9.8M profit to Clifford and Altman. FED believes Altman misrepresented facts to Ryback.

7.) **Clifford and Altman's stock deals** - Clifford and Altman used a $15M loan from BCCI to purchase stock in CCAH beginning in 1987. Clifford and Altman bought the stock at $2216 per share and sold the stock in 1988 for $6800 per share. This price is the single highest price ever recorded for a share of stock in the annals of the FED. An independent valuation of the stock indicates a price of $3400 per share would have been reasonable. Clifford and Altman made $9.8M on the deal financed by BCCI.

8.) **Certificates of Deposits** - FAB held several CDs with BCCI or its affiliate ICIC. It is unclear why it would place funds in an offshore bank with BCCI's reputation

9.) **BCCI Oversight of FAB Operations** - Significant documentary evidence exists that BCCI exercised direct oversight over FAB operations. BCCI gave direction as to the choice of accountants and approved their billings. BCCI regularly reviewed FAB's operations. Clifford and Altman regularly traveled to London to confer with BCCI regarding FAB operations. For U.S. planning purposes BCCI appears to have considered FAB as a U.S. affiliate.

10.) **BCCI International Conferences** - Altman attended BCCI's annual conferences with top executives for several years running.

11.) **Clifford letter to Abedi** - Clifford sent a letter to BCCI head Aga Hasan Abedi indicating a desire to continue to pursue our "joint efforts." This appears to reference First American.

12.) **Conflicts of Interests** - Clifford and Altman regularly represented all parties in transactions involving First American. The law firm of Clifford & Warnke were counsel to BCCI, CCAH, CCAI, FAB, and each individual shareholder of CCAH. Also, Clifford and Altman were on the boards of all of these entities except BCCI. It is questionable whether independent legal judgement could have been exercised in these transactions.

13.) **BAII Loan Application** - Documents reviewed by Federal investigators at BAII in France appear to indicate that BCCI was acting as an agent for Clifford and Altman in soliciting loans to finance their CCAH stock purchases. BCCI had previously used BAII as a nominee for a loan granted to CCAH.

14.) **Roundtrip of Funds** - Altman sold his stock in CCAH to an Arab investor who paid out of a BCCI Grand Cayman account. Altman repaid his personal loan from BCCI to a Grand Cayman account of the bank. Federal investigators have called this a "roundtrip" of funds and have cause to believe that this may have been a sham transaction to erase BCCI debt while giving Altman the profits from his stock deal.

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15.) **Loan from Adham** - Beginning in 1983 Sheik Kamal Adham loaned First American $20M. However, internal BCCI documents indicate that CCAH had requested the loan directly and BCCI structured the loan through Adham as a nominee. It would appear that Clifford and Altman should have had direct knowledge of any CCAH loan request.

16.) **Investigative Interviews** - Certain interviews done by Federal investigators indicate a belief that Clifford and Altman knew of the BCCI link with FAB. For example, a memorandum of interview with one witness states: "When we discussed the FED's theory that BCCI took control of FG through nominees he (the witness) said 'your're right ... but how are you going to prove it.'"

17.) **Subordinated Debt Issue** - Documents housed at BCCI's Abu Dhabi office indicate that BCCI conceived a 1988 subordinated debt offering by CCAH. The FED was seeking new capital for FAB and Altman urgently called BCCI for an injection of capital. BCCI responded with a telex outlining a subordinated debt offering to be structured through a BCCI subsidiary.

18.) **Historical statements** - Clifford and Altman made a variety of statements pursuant to CCAH's 1980 application to acquire FAB concerning the investors. Regulators are examining these statements to determine if they involved intentional misrepresentations.

19.) **NBG Transaction** - Documents obtained from BCCI's Abu Dhabi office indicate that Altman may have directed a legal strategy related to FAB's NBG acquisition to evade FED scrutiny of BCCI's role in the transaction. Memos indicate that Altman designed the deal so that FAB's option to acquire NBG would not be linked with a loan from BCCI and be considered an "integrated transaction" that would have to be disclosed to the FED.

20.) **Centrust** - BCCI had significant Centrust ties through the relationship of BCCI front man Ghaith Pharaon and David Paul. Pharaon bought the National Bank of Georgia from Bert Lance in the late 1970s and sold it to Clifford and Altman in 1986. Both transactions were financed entirely by BCCI. Pharaon and Paul had a meeting with Robert Altman on June 24, 1988 immediately before the two met with the FHLBB Chairman to seek regulatory relief for Centrust. Later it appears that Centrust and First American may have jointly conducted a due diligence concerning an acquisition of Lincoln Savings from Charles Keating. Finally, at a meeting with BCCI on October 2, 1989, Clifford indicated that Centrust was an acquisition candidate for First American. The Centrust-BCCI-First American link should be probed more deeply by the Committee.

21.) **Moneylaundering Case** - Undercover tape recordings of BCCI employees indicate that Altman was acting as their legal advisor and recommending that they leave the country to avoid service of process concerning the moneylaundering investigation. The tapes also state that BCCI owned FAB.

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22.) **BCCI Legal Defense Fund** - Clifford and Altman managed a $30M defense fund for BCCI. Checks were processed through FAB and it is clear from BCCI Board minutes that Altman was involved in BCCI's legal strategy.

23.) **Bert Lance** - The role of Bert Lance in originally representing BCCI should be probed. BCCI bought the National Bank of Georgia from Lance and it appears that Lance was centrally involved in the BCCI plan to take over Financial General.

1325015-000-7378

Introduction

On July 5, 1991 the offices of Bank of Credit and Commerce International (BCCI) were seized in Europe, the United States and a number of other countries. On July 29, 1991, the Federal Reserve Board commenced enforcement proceedings against BCCI Holdings (Luxembourg), two subsidiary banks of BCCI in Luxembourg and the Cayman Islands and a Cayman Islands bank related to BCCI, for violations of U.S. banking laws. The Federal Reserve is seeking a $200 million civil money penalty and will act to permanently bar nine individuals from any involvement with U.S. banking organizations in the future. A New York County grand jury has also returned an indictment against BCCI, its related entities and two of its founders. The charges include defrauding BCCI depositors, falsifying bank records to hide illegal money laundering and various larcenies totaling more than $30 million.

The Federal Reserve's enforcement proceeding is based on evidence that BCCI illegally obtained control over several U.S. banking organizations through the use of "nominee" shareholders. The banks controlled by BCCI include First American Bankshares, Washington, D.C., the National Bank of Georgia, CenTrust Savings Bank, Miami, Florida and Independence Bank, Encino, California.

On September 5, 1991 the Tampa United States Attorney unsealed a second round of indictments against BCCI related

parties. Capcom Financial Services, LTD., a BCCI subsidiary, is charged, as part of the BCCI international banking group, as being a Racketeering Enterprise under the RICO Act, 18 U.S.C. 1957, 1952. Swaleh Naqvi, Dildar Rizvi, Bashir Shaikh, Wilfredo Glasse and S.Z.A. Akbar who are all current or former BCCI officers, are charged with the commission of a pattern of racketeering activity involving money laundering through the use of foreign and domestic branches of BCCI. The indictment also alleges that Akbar used BCCI branches to hide and transfer approximately $23 million controlled by Manuel Antonio Noriega and his family. These acts occurred after Noriega was indicted for narcotics trafficking in the U.S.

This report will chronicle the history of BCCI and the means by which BCCI gained control of American banks and assess the activities of federal banking and law enforcement agencies.

The Origins of BCCI

In 1972 a Pakistani banker, Agha Hasan Abedi, fearing the imminent nationalization of Pakistan's banks, established the Bank of Credit and Commerce International in Luxembourg. Bank of America, desirous of increasing its banking ties in the Middle East, had a 30% stake in the venture. A BCCI subsidiary bank was established in the Cayman Islands while the bank's main operations were run out of the London branch. BCCI began an aggressive growth campaign and established branches throughout

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the Middle East, Africa, Latin America and Asia. By 1990, BCCI had more than $20 billion in assets, over 14,000 employees, and 417 offices in 73 countries.

In Pakistan, BCCI became part of the ruling establishment, acting as banker for influential officials and even lending to the government to overcome balance of payments problems. Under Abedi's direction, BCCI made loans to senior civil servants, offered scholarships and jobs to their children and gave a number of government officials jobs at BCCI. Pakistan's President, Ghulam Ishaq Khan, runs the BCCI Foundation, nominally a charity to benefit humanitarian projects in Pakistan. It has been reported that only a small portion of the Foundation's funds are used for humanitarian purposes and that it is mainly a cloak for Abedi's illicit activities.

BCCI's activities in Pakistan are illustrative of what the bank was able to accomplish in a number of other countries. In Peru, former President Alan Garcia is being investigated on charges of the improper use of Treasury funds with BCCI's assistance. Members of Argentine President Carlos Menem's family have been charged with laundering drug money through BCCI offices. The BCCI pattern of befriending public officials and promoting charities while engaging in shady banking practices has been discovered in a number of other countries, including the United States.

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One of the main reasons BCCI was able to carry out its business undiscovered for so many years was the fact that it was so minimally regulated. Luxembourg and the Cayman Islands are known tax havens with extremely obliging bank supervisors. The BCCI corporate structure was specifically designed to circumvent the proper regulatory oversight of its activities. No central bank was involved. There were no consolidated examinations or audits.

Abedi's grand ambitions for his bank included establishing a foothold in the United States. In 1975, an attempt by BCCI to purchase Chelsea National Bank in New York was rejected by the regulators. BCCI was turned down because of perceived weaknesses in management and in their regulatory structure. Abedi, however, was undaunted and was quoted in 1978 as saying that Financial General Bankshares (FGB) would be an ideal place to establish operations in the U.S. (FGB was a multibank holding company with subsidiary banks in Washington, D.C., Maryland, New York, Tennessee and Virginia.) In the early 1980's, a senior BCCI official was informed by counsel that BCCI could not obtain Federal Reserve Board approval to acquire U.S. banks. Until 1990, Federal bank regulators assumed that BCCI was not involved in the ownership or operations of any American banks. Unfortunately, recent revelations have shown that BCCI has controlled a number of institutions in this country since at least 1982.

BCCI's Expansion into the U.S.

BCCI Acquisition of FGB

On November 9, 1977, at the suggestion of Bert Lance, Abdus Sami, a senior BCCI official, met with Jackson Stephens, an investment banker from Arkansas, to discuss the BCCI purchase of the National Bank of Georgia (NGB). Lance owned 12% of NBG. At that meeting, Stephens suggested to Sami that Financial General Bankshares might be a good investment for BCCI. From December of 1977 through February of 1978, four Middle Eastern investors, acting through Abedi and Sami, purchased almost 20% of the voting shares of FGB. The investors were Kamal Adham, a former Saudi intelligence chief, Faisal Saud Al-Fulaij, a Kuwaiti businessman, Abdullah Darwaish (as a representative of Sheikh Mohammed bin Zayed al Nahyan), and Sheikh Sultan bin Zayed al Nahyan (both Mohammed and Sultan are in the Abu Dhabi royal family).

On January 30, 1978, Sami sent a telex to Abedi regarding the acquisition of FGB. Sami referred to "BCCI's intention to acquire control" of FGB.[1] He states that "we have to be careful that our name does not appear as financier to most of them for this acquisition." Sami noted the need to keep each individual shareholder's stake under 5%, presumably in order to avoid SEC

[1] Federal Reserve document. Telex to Abedi in Karachi, Pakistan.

filing requirements and Bank Holding Company Act requirements. He also mentioned that, at the suggestion of Lance, he had retained Clark Clifford. "I met with Mr. Clark Clifford and explained to him our strategy and our goal.... He was happy to know the details and has blessed the acquisition."[2]

On February 17, 1978, Financial General filed suit in federal court against BCCI, Abedi, Lance and others, alleging violations of the Securities and Exchange Act by failing to make the required filings. On March 17, 1978 the SEC filed a separate suit against the same defendants. On that same day each defendant agreed to a consent judgement that included an injunction prohibiting any further SEC violations. As part of the consent order the four investors and ICIC Overseas (a BCCI subsidiary in the Cayman Islands) agreed to make a tender offer for all FGB shares, subject to regulatory approval.

On April 27, 1978 the federal district court in the FGB action issued a preliminary injunction against BCCI, Abedi and the other defendants. The court ordered the defendants, before buying any additional FGB shares, to rescind the prior purchases.

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[2] Ibid.

The court made the following findings:

1) The four BCCI clients relied heavily, if not exclusively, on the recommendations of Abedi and BCCI in deciding to purchase FGB shares;

2) Abedi, Sami, and other BCCI agents were actively involved in the purchase of FGB shares from existing shareholders;

3) In December 1977, BCCI's agents sought to purchase a percentage of FGB shares substantially in excess of any amount for which they had purchasers;

4) Abedi and BCCI recommended the purchase of FGB shares only to the four clients who later made purchases;

5) Two clients, Adham and Darwaish, gave BCCI broad authority, including the right to vote the shares; and,

6) Abedi, BCCI, their agents and the BCCI clients agreed to pool the voting power of the shares owned by the four BCCI clients with the voting power of FGB shares controlled by BCCI's agents to exert significant influence on the management of FGB.

In July and August of 1978, Credit and Commerce American Holdings (CCAH), Netherland Antilles, and Credit and Commerce American Investments (CCAI), Netherlands, were established as

vehicles for acquiring shares in Financial General. CCAH and CCAI are essentially shell holding companies established to purchase FGB and to minimize taxes. In SEC filings, BCCI, Abedi and the four investors stated that BCCI would have no interest in CCAH. However, ICIC would own less than 5% of CCAH shares.

Also in July of 1978, Robert Altman, the attorney representing BCCI, Abedi and the investors, in a key maneuver effectively blocked opposing counsel in the FGB suit from gaining possession of Bank of America documents relating to BCCI. These records indicated that the relationships between BCCI and the four investors involved substantial existing loans to two of the investors and BCCI stock ownership by all of the investors. Additionally, one of the investors, Adham, was suspected of receiving large payments from the Boeing Corporation in order to obtain contracts in the Middle East.[3] This type of behavior led to the passage of the Foreign Corrupt Trade Practices Act.

On October 19, 1978 CCAH and CCAI filed an application with the Federal Reserve Board for prior approval under the BHC Act to purchase all of the voting shares of FGB. The 1978 application stated that approximately $70 million would be required to make the tender offer. That money was to be obtained from a limited number of investors in return for shares of CCAH. The

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[3] Affidavit filed by Douglas M. Kraus, attorney for Financial General, FGB v Lance, BCCI et al

application stated that the proposed individual investors have "substantial personal funds... the funds to be used by each of them to purchase the equity interest in CCAH will be provided from their personal funds and possibly personal borrowings... from one or more financial institutions (which would be unaffiliated with BCCI or any of its affiliates)... if personal borrowings are made, FGB shares will not serve as collateral for such borrowings." Robert Altman, as counsel, in a letter to the Federal Reserve stated that "neither BCCI nor any other organization related to BCCI contemplates owning any equity interest in CCAH." The CCAH shareholders were to be ICIC Overseas (4.5%), Adham (24%), Darwaish (24%), Fulaij (24%) and several other Middle Eastern entities.[4]

On February 16, 1979 the Federal Reserve Board rejected the application on the grounds that the hostile acquisition of FGB's Maryland subsidiary bank would violate Maryland law. The Maryland Attorney General issued an opinion stating that it was unlawful for a Maryland bank to have an affiliation to which the bank had not consented.

In April of 1980, Adham solicited proxies from FGB shareholders for the 1980 shareholders' meeting urging support for a resolution favoring a proposed tender offer by CCAH. The proposal was narrowly defeated. However, shortly thereafter,

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[4] Federal Reserve Board Notice of Charges, p. 18.

FGB management resolved its differences with the BCCI backed group and on July 25, 1980 an agreement was reached permitting a tender offer at $25 per share. Thus clearing the way for the group to buy FGB.

On November 25, 1980 CCAH again filed an application with the Federal Reserve Board. It stated that the $180 million needed to complete the acquisition would come from three sources:

1) Equity contributions to CCAH from Adham, Fulaij and Darwaish;
2) The sale of CCAH shares to three BCCI clients and other investors; and,
3) A $50 million loan from an institution not related to BCCI.[5]

The application stated that "no [CCAH] principal will retain any personal indebtedness in connection with this transaction ... funds to purchase their equity interest in CCAH will be provided from their personal funds." All applicants assured the Federal Reserve that there was no relationship between CCAH and BCCI, other than BCCI acting as investment advisor to Adham and Fulaij. Altman wrote to the Board stating: "[w]ith regard to the stockholders of CCAH, all holdings constitute personal

[5] Ibid, p. 20.

investments. None are held as an unidentified agent for another individual or organization."[6]

In a March 12, 1981 letter from the Office of the Comptroller of the Currency, the OCC cited the representation of applicant's counsel that BCCI would not be involved in the financing or management of Financial General. The OCC letter said: "[t]his commitment is critical, both now and in the future, since such relationship with another financial institution would be a significant factor in appraising this application ... [A]ny enhanced direct or indirect affiliation or relationship between BCCI and Financial General would take on even greater significance in light of the fact that BCCI is not subject to regulation or supervision on a consolidated basis by a single bank supervisory authority."

On April 23, 1981 a hearing was held at the Federal Reserve. Adham stated: "There is ... no understanding or arrangement regarding any future relationship or proposed transactions between Financial General and BCCI ... I would like to assure you that each one [investor] on his own rights will not accept in any way to be a cover for somebody else ... We are doing it for ourselves." Altman said: "there is no connection between those entities [CCAH and CCAI] and BCCI in terms of ownership or other relationship." Clifford added: "There is no function of any

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[6] Ibid, p. 20.

kind on the part of BCCI ... I know of no present relationship, I know of no planned future relationships that exist ... "[7]

On August 25, 1981, the Federal Reserve, based on the representations of the applicants and their shareholders, issued an order approving the acquisition of FGB. On March 2, 1982, the New York State Banking Board approved CCAH's application to acquire FGB after CCAH agreed to divest FGB's New York subsidiary, the Bank of Commerce. On March 2, 1982 a CCAH tender offer of $33.80 per share was accepted. The purchase was final on April 16, 1982. Clifford became a managing director of CCAH and Chairman of the renamed First American Bank (FAB). Altman was also named a director of First American Bank and president of its direct parent company, First American Corporation (FAC). Clifford and Altman continued to act as attorneys for First American, FAC, CCAI, CCAH and BCCI.

The only regulator to urge that the CCAH application be denied was Sidney Bailey, Commissioner of Financial Institutions for Virginia. On December 31, 1980, Bailey sent a letter to the Federal Reserve stating that "[T]he application generates but leaves unanswered a number of concerns and questions including but not limited to, the ultimate source and nature of policies controlling the activity and operation of the banks involved, the

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[7] Transcript of Federal Reserve Board hearing, April 23, 1981.

soundness of such policies, and their consequences upon the continued soundness of the bank and the accessibility and responsibility of those finally responsible for making policy." [8]

BCCI's Nominee Arrangements

In December 1990, the Federal Reserve discovered that BCCI had controlled shares in CCAH since as early as 1982. The documents reflecting BCCI's control had been concealed from U.S. regulatory authorities and were maintained in BCCI's overseas offices, sometimes in the private offices of Abedi and Naqvi. At the time of the 1982 acquisition of FGB, BCCI controlled, by means of nominee arrangements, 25% or more of the voting shares of CCAH. The failure to disclose this ownership is a violation of the Bank Holding Company Act. BCCI had started financing these stock purchases in late 1977. BCCI's arrangements with the nominees included the following: loans to the individuals to purchase CCAH shares, in which the nominees were not liable for servicing or repayment of the loans; presigned, blank share transfer deeds; agreements with the nominees under which BCCI was authorized to sell shares and retain the profits for itself; agreements by BCCI to indemnify the nominees against any loss they might sustain in their investments; memoranda of deposit granting BCCI the power to vote the pledged shares; and,

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[8] Virginia Commissioner of Financial Institutions letter to Federal Reserve, December 31, 1980.

agreements to provide the payment of fixed profits and fees to shareholders for their services. After 1982, BCCI made a number of additional acquisitions through arrangements with the nominees. BCCI currently controls 60% of CCAH shares.

The transactions involving Sheikh Adham provide a good example of a nominee arrangement. On March 2, 1982, Adham acquired 19,050 shares of the new entity, CCAH, by trading in his existing FGB shares and paying an additional $13,110,118 in cash. Despite his prior representation before the Federal Reserve about the use of his own funds, Adham borrowed the $13,110,118 from BCCI.

On December 21, 1982, BCCI acquired 15,050 shares from Adham for $27,090,000, but kept them registered in Adham's name. The 15,050 shares were available to be sold by BCCI to selected buyers. BCCI booked the $27,090,000 as a loan to Adham from ICIC overseas and used the proceeds to discharge Adham's loan accounts at BCCI. In June of 1983, BCCI extended two loans to Adham to discharge the $27,090,000 loan from ICIC Overseas. These loans have never been serviced or repaid.

In 1983, BCCI purchased additional CCAH shares in the name of Adham in rights offerings and related transactions. At the end of 1983, BCCI controlled 26,319 CCAH shares in the name of Adham, 16.86% of CCAH shares. In 1986, BCCI acquired an

additional 8,544 shares in a rights offering through Adham. BCCI (Caymans) advanced the $18,933,504 purchase price for the acquisition of the shares and pledged the shares to secure the loan. On August 2, 1987, ICIC wrote to Adham assuring him that his loans would be repaid from the sale of the pledged shares and that Adham would carry no personal liability for the loans.[9]

In 1987 and 1989 rights offerings, BCCI again acquired more shares in Adham's name. BCCI made the loans and the loans were collateralized with the shares themselves. In April of 1988, Adham granted ICIC full authority to obtain additional shares of CCAH in Adham's name. In return, ICIC agreed to indemnify Adham for any claims relating to outstanding loans and agreed that its only source of repayment would be the sale of the shares. None of the loans extended to purchase shares in the name of Adham has been repaid or serviced except through other loans from BCCI or ICIC.

A condition of the original approval of the sale of FGB was the injection of additional capital to be obtained from an institution not related to BCCI. An Arab-owned French investment bank, Banque Arabe et Internationale d'Investissement (BAII), loaned $50 million to CCAH, secured by a deposit from Adham. Adham concealed from the Federal Reserve the fact that BCCI was indirectly funding his deposit and thereby the BAII loan. In

[9] Federal Reserve Notice of Charges, p. 30.

addition to the profit Adham realized in the 1982 sale of his shares to BCCI, he was paid $200,000 by BCCI for acting as its nominee. Through the use of Adham as a nominee, BCCI was able to control between 12% and 19% of CCAH shares. BCCI used similar nominee arrangements with Faisal Saud Al-Fulaij, A.R. Khalil, Sayed Jawhary and several companies controlled by the ruling families of the United Arab Emirates.

BCCI Involvement in First American Management

In 1983, in order to expand its banking presence in New York, First American acquired two branches from Bankers Trust in Manhattan that were added to the recently acquired bank, renamed the First American Bank, New York (FABNY). BCCI participated in the purchase of these branches.[10] Khusro Elley was in charge of the BCCI representative office in New York. He initially met with Bankers Trust representatives to purchase the branches for BCCI. He then negotiated on behalf of First American while still working as a BCCI employee. During the course of the negotiations, Elley told the Bankers Trust representative that if a higher bid price was required, his management in London might reconsider whether to bid at all.[11] At the time of his statement, First American had no office or representatives in London.

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[10] Federal Reserve Notice of Charges.

[11] Ibid.

It is also apparent that BCCI, in violation of representations made in the Fed-approved application, participated in the selection of FABNY officers. Elley was hired in 1983 as FABNY's senior vice president. Prior to contacting Elley, Altman had discussed the position with BCCI President Naqvi who suggested that Elley be hired by FABNY.[12] Federal investigators allege Elley continued to receive financial benefit from BCCI while employed at FABNY. Federal Reserve investigators found that Elley was still on the BCCI pay roll. Aijaz Afridi, a long-time BCCI employee, was also hired by FABNY as executive vice president. During his tenure at FABNY, from July 1983 through May 1987, Afridi kept in close contact with BCCI, speaking almost daily with BCCI's London office. Afridi left FABNY when Abedi asked him to manage BCCI's operations in Spain. Additionally, Afridi and Elley, while working for FABNY, attended several of BCCI's annual conferences where BCCI senior management were brought together from all over the world. A number of other individuals who were seeking jobs or who were placed in FABNY had to be approved by Abedi and Naqvi.

BCCI monitored the operations of First American and other banks through its "Americas Coordinating Committee." Abedi ordered the establishment of the Committee in 1985 and its first meeting was held in New York on April 24, 1985. This meeting was attended by Afridi and Elley, FABNY employees. Afridi chaired

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[12] Ibid.

the first meeting and described the Committee's purpose as "coordinat[ing] the efforts of different locations of BCCI and other institutions so that the President's [Abedi's] desire to have a totality in approach is achieved."[13] Officials representing each BCCI office participating gave summaries of their banks' business; Elley did so with respect to FABNY. Elley told the participants that "in America we are sitting on $7 billion dollars in assets and this is just the beginning."[14] Robert Altman also attended this meeting. At that time BCCI's U.S. agencies only held $800 million in assets. The inclusion of the assets of First American and National Bank of Georgia would have totaled $7 billion.

The second meeting of BCCI's "Americas Coordinating Committee" occurred in Miami on June 2, 1985. Afridi and Elley again attended. Mansoor Shafi, FABNY vice president, was designated as the contact person for any BCCI managers wanting to contact First American. In response to a request from the head of BCCI's Latin American region, Afredi said he would have two latin officers at FABNY forward the list of their contacts.

Additionally, Abedi acknowledged control of First American in April of 1987 in an address to BCCI's Far East Region Senior

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[13] Federal Reserve enforcement proceeding, p. 64.

[14] Ibid, p. 65.

Executives in Hong Kong. He stated that "[y]ou are now within the First American Group of banks...."[15]

BCCI Accounts and Other Transactions at First American

A total of 47 branches, subsidiaries and affiliates of BCCI maintained U.S. dollar accounts at First American Bank of New York. FABNY also advised, confirmed and negotiated letters of credit originated by BCCI banks. An internal First American document dated August 9, 1990 revealed that the First American Banks, excluding New York and Georgia, showed hundreds of wire transfers to and from BCCI entities over the five year period from 1985 through 1990. A June 20, 1990, First American memorandum reviewing wire transfer activity from Panama during the period from February 1986 through February 1990 revealed that there were 687 incoming transfers totalling $46,126,971.00 and 361 outgoing transfers totalling $31,901,23.00. Seventy one percent of the incoming transfers were from BCCI-Panama. BCCI was indicted in Florida in October of 1988 for using the Panama branch and a number of other branches to facilitate the laundering of drug money. BCCI pleaded guilty to money laundering in February of 1990.

Additionally, the Minority staff uncovered the existence of an account by the code name "Gloria" in Argentina. According to internal bank documents, the account was allegedly for a foreign

[15] Ibid, p. 66.

exchange house in Argentina. However, an internal audit showed that the mailing address for Gloria was in Montevideo, Uruguay and was not a legally registered entity in Argentina. The First American audit indicated that "Gloria" was used to cash U.S. checks for U.S. dollars in Argentina. The checks were then sent to the FABNY for deposit in the "Gloria" account, and then funds were subsequently wired to other U.S. banks and foreign banks. Significantly, unexplained wire transfers came from Panama into the "Gloria" account. Although the internal auditor concluded that "Gloria" was not being used to launder money, the minority staff will continue to investigate the true nature of the "Gloria" enterprise.

Clark Clifford and Robert Altman:

Knowledge of and Involvement in the BCCI Control of First American Bank

Despite Clifford and Altman's insistence they were duped along with the regulators, an examination of the documentary evidence available to the Committee strongly suggests that these two sophisticated Washington attornies should have known about BCCI's involvement in First American:

1) **Sami Telex** - Abdus Sami, a BCCI senior executive in 1977 and 1978, indicated in a telex to Abedi that each shareholder's stake must be kept under 5% to avoid reporting requirements and that BCCI must not appear as financier in the acquisition. He also mentioned that

Clark Clifford had been hired to represent BCCI shareholders. "I met with Mr. Clark Clifford and explained to him our strategy and our goal.... He was happy to know the details and has blessed the acquisition." The 1978 application failed, but, Clifford and Altman remained counsels for the second attempt in 1980, when the attorneys assured the Federal Reserve that BCCI was not the financier and would play no role in the future operations of the bank.

2) **Information on the Middle Eastern Investors** - In July of 1978, Altman, as BCCI counsel blocked opposing counsel in the case of FGB v Lance, BCCI, et al from obtaining documents in London in the possession of Bank of America. Bank of America held a 30% interest in BCCI and was involved in its management up until 1980 when B of A sold its interest. The B of A records show that BCCI was involved with the Middle Eastern FGB investors in a manner that indicated that BCCI was far more than an investment advisor. Two investors, Adham and Fulaij, had substantial loans outstanding to BCCI. Additionally, Adham was suspected of receiving large payments from the Boeing Corporation in order to expedite contracts in the Middle East. It has been reported that Fulaij also received $300,000 from Boeing for obtaining a contract with the government of Kuwait.) These allegations did not deter Clifford from

stating at the April 1981 hearing at the Federal Reserve: "I have the deepest respect for Sheikh Adham's character, reputation, honor and integrity. I am proud to be an associate of his... [t]hese men (the investors) because of the reputation they have in their business careers have already demonstrated a willingness to abide by U.S. law."[16]

3) **Legal Strategy to Avoid FED Scrutiny** - On May 8, 1986 Altman sent a letter to Naqvi along with a legal memorandum concerning the potential acquisition of National Bank of Georgia. In the memo, one particular option is discouraged because the application process might disclose the relationship between CCAH (First American's holding company) and BCCI. Also in the same letter, despite representations made in 1980 and 1981 by Clifford, Altman and the applicants that BCCI would not be a lender, Altman suggests that "[I]t would be appropriate if BCCI itself wished to consider being a lender" [so that First American could acquire NBG.][17] On June 17, 1986, it appears that Clifford sent the same legal memorandum to Abedi.

4) **Legal Fees** - BCCI paid all of the Clifford and Warnke billings for First American, CCAH, CCAI and BCCI. In

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[16] Transcript of Federal Reserve Board hearing.

[17] Federal Reserve records, letter from Altman to Naqvi, May 8, 1986.

response to a November 1981 letter from Clifford to Abedi, BCCI sent a check for $485,000 for legal fees related to the purchase of Financial General [March 19, 1981 to August 30, 1981]. In a February 5, 1986 letter from Altman to Naqvi, the legal bill owed for 1985 regarding First American and BCCI matters totaled $324,613.77. BCCI sent a check for that amount.

5) **Americas Coordinating Committee** - As part of the 1985 billings, BCCI was charged for legal preparation for and Altman's attendance at an international BCCI managers' conference in New York, on April 24, 1985. At that meeting, called the Americas Coordinating Committee, the acting chair was Afridi, at that time FABNY's executive vice president. Afridi described the purpose of the meeting as "coordinating the efforts of different locations of BCCI and other institutions so that the President's [Abedi's] desire to have a totality of approach is achieved." Afridi said that "our major task in the U.S. should be to build market share" for BCCI. An official representing each BCCI office gave a summary of that office's business. Elley did so regarding FABNY.

Also at the April 24, 1985 meeting, Elley told the BCCI managers that "in America we are sitting on $7 billion dollar assets and this is just the beginning." In

April of 1985 BCCI's U.S. agencies held $800 million in assets. The assets of First American and National Bank of Georgia would have had to be added to reach the $7 billion figure. Statements by BCCI officers describing the relationship between BCCI and First American were also made at a number of other BCCI conferences and meetings which were attended by Altman. As First American officers and BCCI counsel, it would have been difficult for Clifford and Altman not to have been aware of these representations.

6) **Employment Practices** - It appears that Clifford and Altman were aware that BCCI violated representations made in 1980 and 1981 that BCCI would have no relationship with CCAH other than as an investment advisor to certain shareholders. BCCI, with Altman's knowledge, participated in the selection of officers for First American Bank of New York. Elley, a long-time BCCI employee, was hired to be FABNY senior vice president. Elley was hired at Naqvi's suggestion. In 1983, Afridi, the executive vice president and also a long term BCCI employee, was hired by Abedi during Fed interviews with former FABNY employees reveal that Afridi's tenure at FABNY, from 1983 through 1987, he was in contact with BCCI (London) almost daily. Before other senior officers were hired they had to go through two sets of interviews, one with Elley and Altman, and

the other in London with Abedi, Afridi and Naqvi.

7) **Ryback Letters** - On December 13, 1989, William A. Ryback of the Federal Reserve Board wrote to Altman and asked him to "provide information on any loans extended to the original or subsequent investors [in Financial General/First American], either directly or indirectly, by BCCI or any of its affiliated organizations." Documents retained by BCCI in Abu Dhabi indicate that the Ryback correspondence was actively discussed by senior BCCI officials.

Altman responded on February 5, 1990 and stated that "we do not have access here to information regarding any financial arrangements that might exist between shareholders of [CCAH] and other financial institutions, including [BCCI]." What Altman failed to disclose and what is arguably a misrepresentation of a material fact was that Altman and Clifford borrowed $15 million from BCCI (Caymans) in 1986 and purchased 6742 shares of CCAH. In 1987 Clifford and Altman borrowed $3.45 million, again from BCCI (Caymans), and purchased another 1426 shares. The shares were purchased at book value in a rights offering. In 1988 they sold 4800 of the shares to another nominee shareholder for $32,640,000, a profit of $9.8 million after deducting

interest and commission expenses.[18] Federal Reserve officials informed the Committee that Altman "unequivocally" should have reported all BCCI-financed CCAH purchases, including those of Clifford and Altman.

Altman wrote a second letter to Ryback on December 20, 1990, indicating that M.M. Hammoud may have pledged his CCAH stock to BCCI as collateral for BCCI loans. Altman again neglected to inform the Fed that he and Clifford obtained non-recourse loans from BCCI to purchase CCAH stock. Their stock was also pledged as collateral for their loans.

8) **Stock purchases** - The facts surrounding the Clifford-Altman stock purchases indicate that factors other tha "arms length transactions" and "market prices" may have been involved. The loans from BCCI were at the LIBOR rate, over two percentage points below prime. Altman and Clifford purchased their shares pursuant to the 1986 rights offerings at book value, approximately $2,200 per share, which was substantially below what the shares had been selling for. For a non-shareholder to purchase shares in a rights offering, existing shareholders have to waive their rights to participate. In the 1986 purchase, Clifford and Altman took the

[18] Federal Reserve records, Price Waterhouse audits, Hill and Knowlton report.

rights offering of a shareholder that had purchased stock at the full price the day before. For that shareholder not to take advantage of the rights offering just does not make sense. Finally, the stock was sold by Clifford and Altman at a price of $6,800 per share after 18 months. According to the Federal Reserve this is the highest price per share ever paid for a bank stock. A Price Waterhouse audit subsequently valued the shares at less than half of the value paid to Clifford and Altman. [19]

9) **Investments with BCCI** - In the mid-1980s BCCI began experiencing cash flow problems due to poor underwriting and non-payments. In 1986, the bank experienced a $150 million trading loss in government securities. Some believe that this loss may have beer as high as $450 million. Yet, in 1986 and 1987, First American and CCAH, under the direction of Clifford and Altman, purchased at least $74 million of CDs from BCCI's Cayman Islands affiliates. These CDs were uninsured and BCCI was not protected by the safety net of a central bank.

Even after BCCI was convicted of money laundering in February of 1990, First American and CCAH continued purchasing CDs from BCCI's Cayman Islands affiliates.

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[19] Federal Reserve Records, Price Waterhouse audit.

In April of 1990, CCAH invested $444,000 in BCCI CDs and rolled over $2.5 million in maturing CDs. Similarly, in July of 1990, CCAH invested $447,000 with BCCI and rolled over an additional $1.75 million.

10) **BCCI Financial Review** - A memo obtained by Federal investigators from BCCI's Abu Dhabi office indicates that BCCI reviewed FAB's financial performance on a periodic basis. A memo from Shamid Jamil to S. Naqvi and K. Shoaib is entitled "Half Yearly Review of FAB." The memo begins, "Please find enclosed a review of First American Bank shares for the half year ended June 1984. The Bank has achieved the budgeted figure for deposits and exceeded that for loans." The memo then discusses certain financial information and closes by stating, "It is, therefore, apparent that First American Bank shares have failed to achieve their budget for the half year ended 30th June 1984, by US$ 1.56M. Perhaps Mr. Altman may require some assistance and guidance in enabling him to reach the budgeted income figures in the second half of 1984..." At the bottom of the memo is a hand written note, "Agha Saheb [Abedi] - I have since discussed the half-yearly result of FAB, with Mr. Altman to draw his attention to the area in which the group's income is falling behind budget, on a pre-tax income basis." Correspondence files held in Abu Dhabi indicate that Altman regularly

submitted financial information to BCCI in order to evaluate FAB performance. This form of review by BCCI appears to demonstrate the level of control that they exercised over FAB and Altman. Also, it appears that Clifford and/or Altman were flying to London on a frequent basis to confer with BCCI officials on FAB operations.

11) **BCCI Oversight of Operations** - Memoranda retained in BCCI's Abu Dhabi office indicate that BCCI was intimately involved in directing Mr. Altman on many of the details concerning FAB's ongoing business. A memo dated July 7, 1982 from Shahid Jamil to Agha Hasan Abedi memorializes "Meeting with Mr. R. Altman and other tax lawyers in New York - 24-27 June 1982." The memo describes Jamil and Altman's meeting concerning BCCI's requirements for independent audits of CCAH and CCAI. It describes discussions concerning a wide variety of topics including litigation, office leasing, problem real estate and accounting matters. The memo states, "I discussed the budget of FGB with Mr. Altman and pointed out that the budget for the year 198[illegible] of $31.8 million barely exceeded the results for the previous year of $30.6 million. After discussing the need for leadership and vision in the operation and the need for FGB to earn enough profits to service its debt, Mr. Altman agreed that he would set about

motivating the management of FGB ..." Jamil concludes the memo by indicating that he was "developing a simple system for monitoring monthly financial performance of the main FGB banks so that I can keep you informed of their progress." Other memoranda found in Abu Dhabi indicate that for U.S. planing purposes BCCI officials considered FAB as a BCCI affiliate.

12) **Ernst and Whinney Relationship** - Based presumably on Jamil's meeting with Altman discussed above, Ernst and Whinney was retained to audit CCAH and CCAI. However, Ernst & Whinney sent an engagement letter dated August 13, 1982 concerning the independent audit to BCCI directly and not to CCAH. The engagement letter references recent phone conversations with BCCI and appears to imply that the auditors considered that BCCI was the client as CCAH's parent. Additionally, several communications were reveiwed from CCAH files indicating that BCCI directly supervised the payments to E&W as well as to other professionals related to CCAH's Dutch registry.

13) **Clifford Letter to Abedi** - Clifford sent a letter dated March 4, 1983 to BCCI head Aga Hasan Abedi after back surgery indicating a desire to "again resume our joint efforts." This further evidences the close relationship between BCCI and FAB officials.

14) **Conflicts of Interests** - Clifford and Altman regularly

represented all parties in transactions involving First American. The law firm of Clifford & Warnke were counsel to BCCI, CCAH, CCAI, FAC, FAB, and each individual shareholder of CCAH. Also, Clifford and Altman were on the boards of all of these entities, except BCCI. It is questionable whether independent legal judgement could have been exercised in these transactions. It should be noted that one of the more interesting documents reviewed during the Committee's investigation was a letter dated June 9, 1989 from Robert Altman, CCAH Managing Director to Robert Altman, shareholder! Moreover, inquiry should be made as to whether certain knowledge could be imputed to Clifford and Altman about their clients through this multiple representation and whether as directors of CCAH and FAB they had a duty to investigate the role of BCCI.

15) **BAII Loan Applications** - Federal investigators have been permitted to review certain files of BAII related to BCCI and its affiliates. One file reviewed entitled "1st American 1985" contained "Memo re loan to Clifford & Altman 12/29/85." The Investigator noted the contents of the file as:

"Other details requested by BCCI:"

1. No external lawyers in preparation of documentation.
2. Transfer of one borrower's debt to surviving borrower on death of the former.
3. No syndication of the loan.
4. No participation by BCCI in loan.

5. No put available from other shareholders.

Notes that security is illiquid but that market value if buyer found is twice book. Presumably the borrowers anticipate sale within 5 years.

Clifford and Altman initially went to BAII to finance their purchases of CCAH stock and this memo would seem to reflect this request. BAII never granted the loan to Clifford and Altman and the financing was instead provided by BCCI. This document appears to indicate that BCCI was acting as an agent for Clifford and Altman in obtaining these loans.

16) **1983 CCAH Share Subscription** - A telex contained in BCCI's Abu Dhabi files dated November 1, 1983 from Imran Iman of BCCI to Mr. K.K. Elley of FABNY seems to indicate that BCCI was directly supplying $75 million in capital to CCAH. The text of the telex indicates that BCCI was going to provide the $75 million directly to CCAH and details regarding how these funds would be attributed to nominee shareholders would be worked out later by Altman. The telex states:

REFERENCE OUR TELEPHONE CONVERSATION OF YESTERDAY(.)

Amount totalling US$75,009,375.- is being credited value today to your account no 01020071 with State Bank of Albany ABA No. 0213-0001-9

I have discussed the matter at length with Mr Lesher(.) Mr Altman is concerned that the injection of capital should not take place prior to his discussion relating to change, if any, in the snareholders of CCAH(.)

It is, therefore, suggested that the above funds may kindly be received in an account to be called "CCAH"

share subscription account" to accrue interest as on call deposits(.) At a later date of 10th or 15th November (to be determined by you and Mr Altman the funds may then be transferred into the account of CCAH(.) During the interim period (prior to the injection of capital into CCAH) Mr Altman will be able to resolve various matters relating to the shareholders(.)

You may like to discuss the above matter with Mr Naqvi(.)

17) **Roundtrip of Funds** - To finance his acquisition of CCAH shares, Altman personally borrowed approximately $6M from BCCI in 1986 and 1987 through non-recourse loans. In 1988, Altman sold his stock in CCAH to an Arab investor who funded the transaction through a BCCI loan wired to Altman from a BCCI Grand Cayman account. Altman immediately repaid these personal loans from BCCI with interest and commissions to a BCCI Grand Cayman account. Federal investigators have called this a "roundtrip" of funds and indicate that the transaction may be considered a sham transaction to extinguish Altman's indebtedness to BCCI on his stock loans. Federal officials believe that Altman's non-recourse loans from BCCI and the roundtrip of funds enabled Altman to acquire the profits of his stock deal with no risk.

18) **Loan from Adham** - Beginning in 1983, Sheik Kamal Adham loaned First American $20 million. However, internal BCCI documents indicate that CCAH had requested the

loan directly and BCCI structured the loan through Adham as a nominee. A memo retained at BCCI's Abu Dhabi office states "Under the arrangement with his excellency Sheikh Kamal Adham, a major shareholder of CCAH, a short term loan of US$ 20 million was disbursed to CCAH by BCCI (Overseas) ltd, Grand Cayman." It would appear that Clifford and Altman should have had direct knowledge of any CCAH loan request.

19) **Investigative Interviews** - Pursuant to its order of investigation, Federal Reserve investigators have conducted a wide variety of interviews. One of the most telling may have been with a former FGB insider who was intimately involved with the 1982 takeover of FGB by CCAH. The memorandum of interview completed by Federal Reserve Board investigators stated, "When we discussed the FED's theory that BCCI took control of FG through nominees he (the interviewee) said 'you're right ... but how are you going to prove it.'"

20) **Subordinated Debt** - Telephone messages retained in BCCI's Abu Dhabi offices indicate that in mid 1988 the Federal Reserve was requiring that between $15 and $20 million of capital be injected into FAB. A May 10, 1988 phone message states: "Mr. Altman suggests that CCAH borrows the above amount ($15-$20M) from its shareholder(s) or from BCCI ..." Further a June 20, 1988 phone message to Naqvi states: "Mr. Robert Altman

telephoned, he has to raise $15M before 30th June 1988, he wishes to speak to you, today if possible." Several days later Imran Iman of BCCI responds with a fax which states: "Reference our recent telephone conversation. The mode suggested is along the following lines: CCAH could issue floating rate notes (FRN) for 10 years, for an initial amount of US$ 15 million. The coupon rate is to be 2% above three months Libor (SIC). Initially, the entire issue would be purchased by Credit and Finance Corporation (one of our subsidiaries) for a period of one year." On June 28, 1988, CCAH issued $20 million in subordinated debt the entire issue of which was bought by Credit and Finance Corporation.

21) **Management Direction from BCCI to CCAH** -- Contrary to assertions from Altman and Clifford that BCCI did not direct board members of CCAH, staff discovered documents which indicate that BCCI officials were involved with the affairs of CCAH even to the extent that BCCI would draft letters from CCAH to independent auditors. A January 22, 1987 memo from Imran Imam (of BCCI's central office) to Mr. J.G. Lesher (of Clifford and Warnke) stated, "Enclosed are copies of the letter received from ADIA [Abu Dabi Investment Authority], and a draft reply to the letter. I shall appreciate if you would have the draft typed on CCAH letter-head after consulting Mr. Altman, and courier the letter to me to

be sent by hand to ADIA."

The draft letter referenced above was dated "January, 1987," and it was addressed to Ernst & Whinney, Abu Dhabi, U.A.E. The final copy of a virtually identical letter was later sent on CCAH letterhead to Ernst and Whinney (Abu Dhabi), dated January 27, 1987, and it was signed by Robert Altman.

Several documents show BCCI's direction of CCAH affairs. For example, on September 21, 1984 Imran Imam sent a telex from London to Mr. G. Lesher, representing CCAI, stating, "Kindly arrange for CCAI to pay the sum of USDLRS 25,573.- to the investors and advise Mr. De Raaff to pass the appropriate entry in the sundry creditors account of CCAI."

Also, on April 30, 1984 Mr. Imran Imam sent a letter to Mr. Kees DeRaaff, Equity Trust Company, The Netherlands, stating, "I refer to my telex of 27th April and request you to forward all future invoices to Mr. G. Lesher of Clifford and Warnke in Washington, with relevant copies to the undersigned. I would be thankful if future invoices carry complete narration of the expenses that are incurred by the two Companies, irrespective of whether the invoices [SIC] from Ernst & Whinney or Equity Trust." A copy of the letter was

sent to Mr. Lesher with a handwritten note from Mr. Imam: "This has reference to our conversation. Regards, Imran Imam." This appears to demonstrate direct BCCI control over CCAH's affairs.

22) **Historical statements** - Clifford and Altman as well as the Arab investors made a variety of statements pursuant to CCAH's 1980 application to acquire Financial General concerning the commitment that the Mid-east investors would be passive investors. Regulators are re-examining these statements to determine if they involved intentional misrepresentations. Such statements include:

a. Board hearing of April 23, 1981; statement of Clark Clifford:

"This investment on the part of these gentlemen can best be described as a passive investment. They do not intend to interfere with the operation of this property. They do not intend to sit on the Board of Directors. They do not intend to instruct the managers of Financial General or of the bank, how to conduct their business. They think it is an excellent investment. These investors are not bankers. They are businessmen. They do not feel qualified to operate banks or to give instructions as to how banks are to be operated. What they do wish to do, and what their plan is, to get the right people in to operate the property."

b. Board hearing of April 23, 1981; statement of Kamal Adham:

"I am aware that the staff of the Federal Reserve has generally questioned what managerial philosophy and approach we envision for Financial General and its subsidiaries if our tender offer is successful. Let me be clear on this point. The other members of the investor group and I have no intention of operating Financial General ourselves, setting policy for the company, or sitting on its Board of Directors. We consider this company to offer an attractive investment opportunity, but it is regarded entirely as a passive investment."

c. Board hearing of April 23, 1981; statement of Abdul Khalil:

"As Mr. Clifford and Sheikh Adham have advised you, I have no intention of taking any active part in operating this property, setting banking policies, or becoming a member of Financial General's Board of Directors."

d. Board hearing of April 23, 1981; statement of Sayed Jawhary:

"As Sheikh Adham has made clear about the intentions of our investor group, I do not intend to be involved in the affairs of Financial General personally. Instead, I shall rely on the expertise and judgment of the new management team and the new Board."

e. Board hearing of April 23, 1981; colloquy between Mannion and Clifford:

"Mr. Mannion: You do not envision Senator Symington being subject to opposing pressures by the individual investors whereby 50 percent would ask that he vote one way and 50 percent ask that he vote another way or some other proportional holding?"

"Mr. Clifford: It is inconceivable to me because of the understanding and even commitment that we have with the shareholders as to the manner in which they intend to treat the investment. They have informed us. We have proceeded on that assumption. They have abided by it. But [sic] they remain the passive investor, and that we will continue on with our task, replacing certain persons on the Board."

f. Letter of May 1, 1981 from Altman to Mannion, responding to questions submitted by Sidney Bailey, Virginia Commissioner of Financial Institutions:

"Question No. 21: It is assumed that the investors will retain control, directly or indirectly, over major policy-making functions. Should such policies as may be adopted prove detrimental in some respect to FGB and its subsidiaries, under what circumstances and to what extent will the sources of policy be accessible and amenable to regulatory agencies?"

"Answer No. 21: The question proceeds from an erroneous assumption. The Investors do not intend to direct policymaking or to establish major policies within Financial General, or its subsidiaries, after the acquisition has been completed. The sources of bank policy are to be the Boards of Directors and the management of each of the subsidiary banks with supervision by the management and the Board of Financial General."

g. Letter of May 11, 1981 from Altman to Mannion, responding to questions submitted by New York State Senator Manfred Ohrenstein:

"Question No. 7: What guarantees do the depositors and borrowers of Financial General Bankshares' two New York banks (Bank of Commerce and Community State Bank) have that this foreign cartel will exercise the same sound fiduciary judgment they have been accustomed to in dealing with these banks?"

"Answer No. 7: There is no 'foreign cartel' involved in this transaction. There is merely a group of investors who believe that the acquisition of Financial General is a sound investment. They do not intend to sit of the Board of Directors of Financial General or its subsidiaries, or to establish bank policies, or otherwise to operate the Company. The Financial General Board of Directors is to consist of able and distinguished Americans, and the new President and Chief Executive Officer of Financial General will be an outstanding and experienced commercial banker."

National Bank of Georgia

BCCI orchestrated the purchase of the National Bank of Georgia by a BCCI nominee from Bert Lance and arranged for its subsequent sale to CCAH/First American through a complex

transaction designed to hide BCCI's interest from Federal Reserve scrutiny.

In 1977 due to severe financial problems Bert Lance sought to sell his interest in NBG. BCCI President Aga Hasan Abedi arranged for Lance to be bought out of NBG by BCCI shareholder and nominee Ghaith R. Pharaon. Pharaon paid double the market price for the stock and bought 60% of Lance's shares.[20] Abedi also arranged a $3.5 million credit line for Lance to repay other Lance debts. The affairs of NBG became completely dominated by BCCI over the next several years.

In 1986, Pharaon himself was experiencing financial difficulties. Federal investigators believe that BCCI made a decision that NBG had to be taken out of Pharaon's hands so that the franchise would not be attached by Pharaon's creditors. At this time FAB expressed interest in purchasing NBG.

Because Georgia interstate banking laws would not have legally permitted FAB's acquisition of NBG, it was necessary to structure a complex series of financial arrangements in order to complete the sale. As discussed above, Clifford and Altman both sent memos to BCCI indicating that the transaction should be structured so as not to invite unwarranted federal scrutiny of the link between BCCI and CCAH. The transaction began with a CCAH rights offering which was funded by loans to the investors

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[20] Regardies, May, 1990.

from BCCI. CCAH ended up with $154 million which was then transferred to an account at BCCI's Grand Cayman branch.

An agreement was then reached whereby Pharaon would receive $220 million for the sale of NBG. [This money would presumably be used to pay off Pharaon's creditors, including BCCI] The $220 million was funded through a series of complicated transactions.

On December 18, 1986 CCAH paid Pharaon $80 million for an option to buy NBG that expired June 20, 1988. [CCAH could not directly acquire NBG due to Georgia law] Later on January 19, 1987, BCCI granted Pharaon a $140 million loan presumably to provide the remaining portion of the $220 million purchase price. The loan matured on the date that CCAH exercised its option at a price of $140 million. Pharaon secured the BCCI loan and the CCAH option agreement by pledging his NBG shares. BCCI held the shares as pledge agent.

BCCI documents retained in Abu Dhabi indicate that concerns were raised that the transaction could cause Federal Reserve scrutiny if it were presented as an "integrated" transaction. It appears that Altman wanted the NBG shares pledged to both BCCI and CCAH as a device to evade Federal Reserve review. A December 4, 1986 memo from S. Malik, BCCI legal division to S. Naqvi states:

> The reason for having two Pledge Agreements is that Mr. R. Altman feels that in the previous Pledge Agreement, the references to 'Loan Agreement' would have given the Federal Reserve cause to see the 'Loan Agreement'and

possibly decide that an "intergrated transaction" was being entered into. Whereas now, with the two Pledge Agreements, the Federal Reserve will only see the Option Pledge, which contains no references to the Loan Agreement.

Further, a memo dated December 23, 1986 from Saleem Malik of the BCCI Legal Division to Swaleh Naqvi states that: "After consultation with Mr. Altman and Millbank Tweed, they advised that the Loan agreement be signed and dated in mid-January or early February 1987, as by then a reasonable period will have elapsed since signing the Option and the "integrated transaction" argument would not be successful. Accordingly, I hope to return to New York next year and have the Loan and Pledge Agreements executed ..."

Subsequently, the documents were executed, as described in the December 23, 1986 Malik memo, and Georgia law was modified through the efforts of lobbyists on the NBG payroll to permit CCAH to acquire NBG. CCAH used the monies obtained from the BCCI-funded 1986 subscription to purchase NBG in August, 1987. Pharaon paid off his loans to BCCI and NBG was safe from his creditors.

BCCI's Links with Centrust Savings

BCCI had significant Centrust ties through the relationship of BCCI front man Ghaith Pharaon and David Paul. Pharaon in 1986 sought to purchase securities of Centrust that would have given him a 28% ownership interest in the thrift. However, Pharaon reduced his purchase to slightly under 25% so as to avoid a

presumption of control. Documents discovered in London by BCCI auditors indicate that BCCI financed this acquisition of Centrust shares.

Paul and Pharaon began a business and personal relationship some time in the mid-1980's and records indicate that the two acted as virtual partners. Examples of Pharaon's links to Centrust include:

1.) Intervention with the Federal Home Loan bank Board on Centrust's behalf. Pharaon had meetings with the Chairman of the FHLBB as well as senior regulatory officials in Washington concerning Centrust. Pharaon was seeking favorable treatment for the thrift from the regulators. Additionally, Pharaon or his attorney, Charles Jones had at least four meetings with regulatory staff of the Federal Home loan Bank of Atlanta. Also, Charles Jones attended meetings with Atlanta officials to discuss Centrust examination findings. This appears to be highly unusual behavior for an individual that is supposed to be a passive shareholder. Moreover, in one meeting with Atlanta officials Pharaon gave the 1986 National Bank of Georgia sale to FAB as an example of how he had the resources to recapitalize an institution. The implication appears to have been that Pharaon either had the personal resources or the ability to find a buyer for Centrust to bring fresh capital to the institution. It should be noted that regulators now believe that BCCI provided the capital to FAB for the NBG acquisition.

2.) Pharaon in conjunction with BCCI participated in a scheme with Centrust whereby $25 million of Centrust junk bonds were "parked" with BCCI subject to a buy-back arrangement. The junk bonds were part of a $150 million offering underwritten by Drexel Burnham Lambert. This transaction permitted Centrust to present a more favorable capital position to regulators during the 1988 examination. This "parking" scheme has been referred by the regulators to the Department of Justice for possible criminal prosecution.

3.) Documents indicate that at one time Paul and Pharaon had an agreement where Centrust would acquire 50% of Pharaon's insurance company. Paul and Pharaon appear to have had a definitive signed agreement but ultimately had to withdraw from the deal because regulators would not approve the transaction. It is interesting to note that certain correspondance between Pharaon and Paul are copied to BCCI. It is unclear why this was done.

4.) Paul and Pharaon jointly looked at several Florida and Georgia based banks and thrifts. Pharaon had additional meetings with regulatory officials in Atlanta concerning these acquisitions. This was over a time period that documents recovered from Abu Dhabi indicate that BCCI was actively looking for acquisitions in Florida.

5.) Based on CenTrust records, Paul and Pharaon appear to have been in personal or phone contact on an almost daily basis beginning in 1986. The amount of contact involved appears highly unusual for a "passive" shareholder. The two businessmen regularly vacationed with each other and were jointly pursuing several business deals around the world.

6.) The FHLBB examiners also believed that Pharaon had submitted phony offers on certain real estate held by Centrust with the intent of reducing the accounting losses that Centrust faced on the properties. Correspondence also indicates that at one time Pharaon was negotiating for the Centrust Tower, although it remains unclear if these negotiations were serious.

7.) A joint real estate project that Paul and Pharaon were considering that they called the "LA Soap Company land deal" indicates potential Centrust ties with BCCI affiliate Independence Bank. A February 9, 1988 memo from Pharaon employee Farid Djouhri to David Paul discussing the real estate project closes with the sentence, "Please note that Independence Bank said it wants to participate in this transaction."

Additionally, links exist between CenTrust and First American. Documents indicate that David Paul and Ghaith Pharaon met with Robert Altman at First American Bank directly before meeting with the FHLBB Chairman on June 24, 1988. Paul and Pharaon met with the FHLBB Chairman to seek regulatory

forbearance for CenTrust. Paul had previously met with NBG personnel who continued working for the bank after it became FAB of Georgia. Interestingly, it appears that either Paul hired certain FAB employees or Centrust was using FAB to conduct a due diligence investigation of Charles Keating's Lincoln Savings. Pursuant to the due diligence, a decision was made that Lincoln was not an attractive acquisition candidate.

Finally, documents retained at BCCI's Abu Dhabi office reflect minutes of a meeting that occurred October 2, 1989 between BCCI personnel and members of the law firm of Clifford & Warnke including Clifford and Altman. The minutes indicate that Clifford listed Centrust as one of several institutions "who have expressed their interest in the merger with FAB." No indication exists that FAB went any further in this interest, but it should be noted that documents indicate that FAB and BCCI had been looking for Florida acquisitions since 1986.

BCCI acquisition of Independence Bank

The Fed alleges that BCCI, through Ghaith Pharaon, a major shareholder and customer, secretly acquired the $400 million Independence Bank of Encino, California. In 1985, Pharaon purchased the California bank for $23 million. Based on telexes, regulators believe that BCCI funded the acquisition and then went to considerable length to conceal its involvement. One telex

reveals that BCCI transferred $8 million for the acquisition to Pharaon's account in Lamarche's BAII.[21]

Once the bank was acquired, BCCI took an active role in selecting Independence Bank's new management. Kemal Shoaib, a longtime BCCI employee, was appointed Chairman. While serving as Chairman, Shoaib continued to receive pension benefits and a subsidized mortgage from BCCI. Under his direction, deposits increased from $250 million to $1 billion. This growth was fueled by a heavy reliance on brokered deposits. The bank, in turn, invested heavily in real estate development. After receiving approval from California regulators, Independence Bank undertook numerous direct investment projects. Regulators now believe that the bank's investments went well beyond its legal limits.

Also, it is apparent that BCCI believed that Indpendence Bank was part of its banking family. In a letter to Abedi from Louis E. Saubolle, a BCCI employee in BCCI's California office, Saubolle discusses the potential acquisition of American Asian Bank. The letter states that "this bank (American Asian) and its network is a perfect compliment to the Independence Bank and the two will give us a base for future expansion throughout California as well as into Western American states."[22]

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[21] Federal Reserve Notice of Charges.

[22] Letter from Louis E. Saubolle to Agha Hasan Abedi, October 22, 1985.

BCCI Money Laundering in Florida

In 1987, during the course of an undercover operation investigating narcotics trafficking and money laundering, Customs agents were directed to three BCCI offices in Florida: Tampa, Boca Raton and Miami. These BCCI offices laundered millions of dollars for the agents up until arrests were made and indictments were handed down in October of 1988. In September of 1988 in a taped conversation between Amjad Awan, a BCCI-Miami bank officer, and an undercover Customs agent, Awan made the following statements:

> "Last Friday, I was told that, ah, our lawyers, Mr. Altman was there, and he suggested to the bank that I should be immediately transferred from the U.S. to Paris. So, they duly transferred me on Friday to Paris." [In response to an attempt by a Senate Committee to subpoena Awan]
>
> "Our attorneys, are, they're heavyweights, I mean Clark Clifford is, is sort of the Godfather to the Democratic Party. Uh, you know, he's been the Secretary of State [sic], he's been Secretary of Defense. He's been in the White House since the time of Truman. He was Truman's legal counsel. He's like 80 years old, but he's all there. That's a very heavyweight firm."
>
> "We own a bank in Washington, its called First American. The holding company is in Washington, and there are 5 banks actually. First American of New York, D.C., Virginia,

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Maryland, Tennessee and Georgia. There's 6 banks, 6 large banks, they are $10 billion dollar banks. Bought out by BCCI about 8 years ago. Ostensibly in the name of some Arabs, who also happen to be our chairmen. And, BCCI was acting as our advisor to them, but truth of the matter is that the bank belongs to BCCI. Those guys are just nominee shareholders." [23]

The indictments in the BCCI case led to the conviction of five BCCI employees in Florida and two in the U.K. One individual has been extradited from England and is awaiting trial in Florida. BCCI also had to forfeit $14 million seized in Florida. To date, this is the largest forfeiture or fine obtained against a financial institution.

All of the legal fees for the defense of BCCI and its employees were paid out of a Clifford & Warnke firm account at First American Bank. Wire transfer and account records from FAB indicate that over $22 million was sent to the Clifford & Warnke account to pay for BCCI's legal defense in the money laundering case. It is estimated that over $30 million was spent by BCCI to defend the bank and its employees. Altman flew to Paris in 1990 to inform the BCCI Board of Directors about the BCCI (Florida) plea bargain and a cease and desist order included in that agreement.

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[23] Justice Department transcript of conversation between Robert Musella, Customs undercover agent, and Amjad Awan, BCCI employee employee, September 9, 1988, Miami, Florida.

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Political/Charitable Activities of BCCI

BCCI's practice of gaining legitimacy through political contacts and charitable contributions was also applied in the United States. Shortly after leaving his post as U.S. Ambassador to the U.N., Andrew Young was approached by BCCI to provide names of potential customers in southern Africa and Central America. In return, BCCI promised to give Young's trading company, Andrew Young Associates, an annual retainer of $50,000. In the early 1980's, the firm took out a $74,000 term loan and a $125,000 line of credit with NBG. An October 1983 internal loan review of the two credits reveals:

> Andrew Young Associates, Inc. is a small illiquid, unprofitable, infinitely leveraged company which has not yet achieved the revenues levels [sic] that it had expected. As a result of the aforementioned and NBG's under-collateralized position, the analyst believes that unwarranted credit risk may have been undertaken in extending credit to the company.

In August of 1985, the credits were put on NBG's past due list. Shortly after this, BCCI took over the firm's line of credit and increased it to $175,000. In early 1989, the outstanding balance of $160,000 was forgiven by BCCI. Mr. Young's partner, Stoney Cooks, contends that BCCI had not paid the trading company its annual retainer and that forgiving the loan was payment for past services.

State politicians also benefitted from BCCI's largesse. In 1987, BCCI wanted to purchase the National Bank of Georgia from Pharaon. The acquisition was prohibited by a Georgia reciprocal banking law that did not include Maryland and Washington D.C.,

where First American operated. BCCI paid two Georgia lobbyists, one being Pharoan's lawyer, $1.25 million to get the state law changed. The legislature subsequently voted to include Maryland and D.C. The U.S. Attorney in Atlanta is currently investigating allegations that Georgia legislators accepted favors in return for voting for the bill.

In 1982, Bert Lance introduced Abedi to former President Jimmy Carter. After this meeting, Carter's world charity organization, Global 2000, would receive $8 million from BCCI and $2.5 million from the Abu Dhabi Investment Authority which controls BCCI. The Carter Center at Emory University also received $800,000 from Abedi. In 1986, Carter and Young traveled on Abedi's personal 727 on a five day tour of Africa. Furthermore, Carter and Young knew Abedi personally and were invited to his elaborate parties on his estate outside of Savannah.

Involvement of the Federal Agencies

BCCI was able to circumvent Federal Reserve Board restrictions involving the purchase of a number of American banks and was able to disguise its ownership for over 10 years. The bank fraudulently hid huge losses and even outwitted a multinational group of regulators that was organized several years ago to try to get a clearer picture of the bank's activities. BCCI was not shut down until July 5, 1991. At the time of the bank's closing, the Bank of England stated that "the

culture of the bank is criminal." Questions arise as to why U.S. regulatory and law enforcement agencies did not act sooner.

The Federal Reserve

The 1978 application and the subsequent litigation involving the purchase of Financial General revealed that the investors owned BCCI stock, relied on Agha Hason Abedi for guidance and had outstanding loans to BCCI. Internal Bank of America documents entered into evidence in the 1978 SEC case alleged that BCCI made millions of dollars in high risk loans to insiders. The SEC was also aware that Adham and Fulaij had received bribes to facilitate aircraft purchases in the Middle East. A Pakistani government document from the 1978 SEC case detailed cash payments by Abedi of more than $2 million to Pakistan's Prime Minister. BCCI's reputation was sufficiently tarnished by the late 1970s such that B of A sold its 30% share in the bank and most major European banks refused to do business with BCCI. Also in the late 1970s, the Bank of England refused to grant BCCI a full-service banking license (because the bank officials would not produce records justifying rapid growth) and the New York bank superintendent blocked efforts to acquire the Chelsea bank.

The Fed approved the Arab investor group's second application in 1981 after an extensive investigation and a hearing. It had not changed markedly from the 1978 application except for the promise that BCCI would not be the financier for any Financial General shares and the personal assurances of

Clifford and Altman that the investors were men of high integrity and were not fronts for BCCI. Federal Reserve officials maintain that there was nothing concrete that would have justified denying the application. They maintain that although there was not a requirement that the investors had to be certified as persons of good character, the standard was that they had to find that the applicants were not disreputable. A major factor in the approval of the application appears to be the assertions of Clifford and Altman that BCCI would have no role in the financing or the management of the bank.

The first time that the Federal Reserve became aware of possible illegal activity in BCCI was on April 22, 1987 during an examination by the Atlanta Reserve Bank of BCCI's Miami agency. On May 15, 1987, the Atlanta Reserve Bank made a criminal referral to the U.S. Attorney in Tampa and the FBI concerning money laundering at BCCI's Florida agencies. On June 5, 1987, the Federal Reserve Board staff sent the May 15 criminal referal to the IRS.

In September of 1988, the Board staff was asked to provide assistance to a Tampa IRS agent investigating money laundering in BCCI's agencies. The agent declined to do the paperwork to obtain a detailed Fed employee because of the workload associated with the planned arrest and indictment of the BCCI suspects in early October. After the BCCI indictment on October 9, 1988, Federal Reserve and State authorities coordinated the examination

of all of BCCI's U.S. agencies. The Atlanta and New York Reserve Banks found evidence of money laundering in BCCI's New York and Boca Raton agencies.

On October 19, 1988 the Fed staff discussed the BCCI indictment with the Bank of England. Regulators in Hong Kong and the Cayman Islands were also contacted. Fed staff also met with BCCI representatives regarding the asset seizure and the indictment on October 20. On October 25 the Atlanta Reserve Bank discovered additional evidence of money laundering in the Boca Raton agency and made a criminal referral to the U.S. Attorney for Miami. On October 31, 1988, the New York Reserve Bank and the New York State banking regulator made criminal referrals regarding BCCI to the U.S. Attorney in New York and Tampa.

In November of 1988 the New York Reserve Bank sent a letter to the Miami U.S. Attorney regarding money laundering in BCCI's Boca Raton office. The New York Reserve Bank also briefed Assistant U.S. Attorneys, FBI agents and IRS agents in the Southern District of New York concerning BCCI money laundering. The Reserve Banks subsequently reported the findings of the coordinated examinations to the Federal Reserve Board staff, which then began drafting cease and desist orders against BCCI for violations of the Bank Secrecy Act.

During the late 1980s, because of perceived irregularities in the European branches of BCCI, a "college of supervisors" was

created to try to gain a more accurate picture of BCCI operations. The college consisted of bank regulators from England, the Cayman Islands, Luxembourg and several other European countries. The college attempted to create a consolidated picture of BCCI. Because BCCI's American operations were thought to be limited to several non-deposit-taking agencies, the Federal Reserve did not participate in the college.

The question of the possible control of First American by BCCI was first raised on December 27, 1988. An IRS agent in Tampa, David Burris, contacted a Fed staff member, William Ryback, for information on the 1980 CCAH application and hearing. Burris also asked Ryback a hypothetical question as to what the Fed would do if four or five witnesses would testify that they heard from BCCI officials that BCCI owned First American Bank. Ryback responded that documentary evidence would probably be needed before the Fed could act. On December, 29, 1988, a Richmond Federal Reserve staff member received a call from a reporter inquiring about the ownership of First American. The reporter referred to an affidavit filed by an FBI agent that quoted a BCCI employee.

In January of 1989, the Richmond Reserve Bank conducted a special investigation of BCCI and CCAH. All of the First American Banks were asked to report on transactions with BCCI. CCAH management was also questioned on BCCI links. The Richmond

Reserve Bank filed a report one month later stating that no evidence was found of irregular or significant contacts between BCCI and First American. The report also found no evidence that CCAH failed to adhere to its commitments.

On May 2, 1989, the Tampa U.S. Attorney subpoenaed the records relating to BCCI and CCAH. On May 31, Board staff met with Tampa prosecutors. The prosecutors did not divulge any of the content of the transcripts involved in the then pending BCCI prosecution. The Fed staff agreed to return to Tampa when the criminal investigation was completed.

On June 2, 1989 the Federal Reserve Board asked the Reserve Banks to conduct coordinated safety and soundness examinations of all BCCI offices.

On June 12, 1989, the Tampa U.S. Attorney subpoenaed records involving BCCI, CCAH, NBG, First American and Independence Bank from the Reserve Banks at Richmond, Atlanta and San Francisco.

On August 17, 1989, an Assistant District Attorney from New York County told the New York Reserve Bank about an unnamed informant's report that BCCI controlled First American and that BCCI was inadequately capitalized. The Assistant D.A. did not provide any further information. In August and September, the New York Reserve Bank investigated the allegations involving First American and BCCI.

On October 5, 1989 at a meeting in Switzerland, a Fed staff member asked the Luxembourg bank regulator about BCCI and CCAH. The Luxembourg supervisor responded that there had been BCCI loans to CCAH shareholders since 1985. Following upon this, on December 13, 1989, William Ryback wrote to Altman and requested information on any BCCI loans to the original or subsequent investors in CCAH. Altman responded on February 5, 1990, stating that he did not have access to the requested information and attached a Naqvi letter stating that no CCAH shareholder had borrowed from BCCI or used CCAH stock as collateral.

On January 16, 1990 the Tampa prosecutors sent a copy of the BCCI plea bargain to the Federal Reserve. The Fed was not sent earlier drafts or given an opportunity to comment. BCCI pleaded guilty in Tampa on February 5, 1990.

On February 7, 1990, Fed staff and New York Reserve Bank staff met with IRS investigators in Tampa. The IRS agents state that they believed that CCAH and BCCI were part of the same corporate family. The agents also stated that the BCCI employees that supplied this evidence may be of questionable veracity. During March and April of 1990 Fed staff attempted to contact an IRS informant but was unsuccessful.

First American continued to maintain its independence from BCCI. On March 15, 1990, a letter from Kamal Adham to Altman is

forwarded to the Fed. The letter states that Adham's shares were not financed by BCCI. On May 8, 1990, Fed staff met with Altman. Altman again denied any tie between BCCI and CCAH. Continuing the investigation, on May 11th the Cayman Islands regulator was contacted about BCCI and CCAH shareholders. The Cayman supervisor stated that he did not have any records indicating a relationship between CCAH and BCCI.

On June 6, 1990, the Fed received Price Waterhouse BCCI audits from the Bank of England. This is the first credible source that indicates that nominee arrangements might exist.

On June 11, 1990, BCCI sent a letter to the Federal Reserve Board stating that it intended to close all U.S. BCCI offices except New York. On June 12th the New York Reserve Bank suggested BCCI cease all operations in the U.S. On July 11th BCCI was instructed not to shift any assets to the New York agency without prior notice.

On June 27, 1990, the Federal Reserve and the New York County DA's office reached an agreement on the sharing of information regarding BCCI. From August 1990 until the present Federal Reserve staff has been meeting with New York State prosecutors. (The New York D.A. indicted BCCI on July 29, 1991, and also charged Abedi and Naqvi.)

From August 1990 through November 1990, the Federal Reserve

continued its efforts to obtain documents from BCCI and from Luxembourg regarding CCAH shareholders. In late October, the Fed was told by the New York D.A. that a confidential Price Waterhouse report confirmed BCCI control of First American. On November 26, 1990, during a meeting with the Fed, BCCI counsel objected to the sharing of the Price Waterhouse report.

However, on December 10, 1990, a Fed staff member was able to review the Price Waterhouse report in London. The report indicated that there were a number of outstanding, non-performing loans made to CCAH shareholders. The report also stated that BCCI held the CCAH stock as collateral. On December 21, 1990, Fed staff met with BCCI counsel. The Fed was informed that investors in Abu Dhabi had purchased 77% of CCAH stock and that BCCI counsel discovered that substantial amounts of CCAH stock have been pledged to BCCI as collateral for non-performing loans. Also on December 21, the Fed received a letter from Altman clarifying his response to the December 13, 1989 letter from Ryback. Altman stated that he became aware that in 1986 M. Hammoud used CCAH shares as collateral for BCCI borrowings. Altman again neglected to mention his and Clifford's borrowings from BCCI.

In early January of 1991, the Fed obtained information from BCCI counsel that eight CCAH shareholders had outstanding loans of $1.7 billion, secured by the CCAH stock. The Federal Reserve Board ordered a formal investigation on January 2, 1991. On

January 10 the Fed staff met with Justice Department officials concerning BCCI. On January 14, all CCAH records in the U.S. were subpoenaed by the Fed. BCCI counsel met with the Fed staff to describe documentary material in BCCI's files relevant to the nominee arrangements. On January 22nd, the Fed sent a proposed cease and desist order to BCCI and made criminal referrals to the Justice Department.

During late January of 1991 the Fed staff met with the Justice Department and the federal and state bank regulators to brief them on the BCCI. During February and March witnesses were interviewed and deposed. On March 4, 1991 the Fed and the New York Banking Department issued an order requiring BCCI to divest its interest in CCAH.

From March 14 - 21, 1991, Fed staff interviewed witnesses and obtained documents in Abu Dhabi. On March 27, the Richmond Reserve Bank notified First American Bank of New York that its relationship with BCCI must be terminated by the end of 1991.

On April 3, 1991, the Fed sent a proposed cease and desist order to Independence Bank. Discussions were held with the FDIC San Francisco office regarding relationships between Independence Bank and BCCI. On May 7, 1991, the Fed and the California Banking Superintendent issued an order requiring the divestiture of Independence Bank. The Fed also made criminal referrals to the Justice Department regarding the National Bank of Georgia and

Independence Bank.

On July 5, 1991, all BCCI offices in the U.S. were seized. On July 12th, the Fed issued a notice against four individuals associated with the acquisition of Independence Bank by Pharoan. The D.C. U.S. Attorney requested a deferral of civil money penalty action against the individuals. On July 25, 1991 the Fed staff met with Justice officials and the D.C. U.S. Attorney. On July 29, 1991, the Fed issued a notice against BCCI and nine individuals to prohibit them from engaging in the practice of banking in the U.S.

The Federal Reserve appears to have acted in a timely manner to investigate suspicious activity starting in 1987. Could the Fed have done a better job ten years ago investigating the investors in Financial General? Did it simply rely on the assurances of Clifford and Altman? The circumstances surrounding the 1980 application indicate that the Fed examined the financial statements of the investors, but did not consider other relevant information. One of the weaknesses of the application process is that the Fed does not have the direct access to certain information, especially intelligence data, that is routinely available to other federal agencies. It should be noted that the nominee arrangements for the ownership of First American were kept hidden by Abedi and Naqvi until the records were seized pursuant to a search warrant by the Bank of England. Still, a retrospective analysis of the 1980 application indicates that the Fed may have placed too much reliance on the assertions of

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Clifford and Altman.

The Treasury Department/Customs Service

The former Customs Commissioner, William von Raab, has alleged that the BCCI plea bargain was too weak and that BCCI escaped further scrutiny after the 1988 Florida money laundering indictment because if its "influence team working up and down the Eastern seaboard." Robert Mazur, the former Customs agent who taped conversations with Amjad Awan, is said to have urged his superiors in Customs to pursue the allegations of BCCI control of First American. Mazur has since left Customs and joined the DEA.

A Minority staff investigation in Tampa, Florida, did not uncover any evidence to substantiate these allegations. The Assistant U.S. Attorney that handled the BCCI plea bargain appeared to have obtained the best possible deal for the government. Because of the court in which the case was pending, if the case had gone to trial a much smaller fine than $14.7 million was likely. Additionally, the first count in the indictment, the conspiracy to traffic in narcotics, was likely to be dismissed by the judge because the only evidence to prove that count was money laundering. (In the later trials of the six BCCI employees, the same conspiracy counts were dismissed by the court.) Officials in Florida stated that there was no evidence of influence peddling and that Clifford and Altman were not part of the plea negations or the court appearances. Furthermore, Customs officials deny that Mazur ever requested an additional investigation of BCCI or that there were inadequate resources to

investigate BCCI. Customs officials indicated that the First American ownership question was referred to the Federal Reserve as the proper federal authority to conduct the investigation. One dissenting voice found in Tampa was the former U.S. Attorney, Robert W. Merkle. Merkle had left office prior to the BCCI indictment but he indicated that he would have pursued BCCI more aggressively, possibly indicting the bank under RICO.

Conclusion

This preliminary report summarizes BCCI's activities in the United States, and specifically focuses on the actions of Mr. Clifford and Mr. Altman vis a vis First American Bank and BCCI. Having reviewed thousands of documents related to First American and BCCI, the minority staff is dismayed that Mr. Clifford and Mr. Altman were unable to discern BCCI's ownership of First American. The report notes BCCI was clearly a bank which engaged in massive deception of U.S. regulatory authorities in a number of areas, such as ownership, money laundering, etc. Yet many questions during this investigation remain unanswered. Unquestionably, future hearings and further investigation of BCCI are warranted.

SUBCOMMITTEE STAFF REPORT

REGARDING FEDERAL LAW ENFORCEMENT'S HANDLING OF ALLEGATIONS INVOLVING THE BANK OF CREDIT AND COMMERCE INTERNATIONAL

SEPTEMBER 5, 1991[1]

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MAIN

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SERIALIZED Su FILED Su
SEP 19 1991
FBI - WASH. METRO FIELD OFFICE

[1] Chairman Charles E. Schumer of the House Judiciary Committee's Subcommittee on Crime and Criminal Justice directed the Subcommittee staff to prepare this report. This report has not been reviewed or approved by other Members of the Subcommittee.

drug trafficking, Noriega money laundering, the activities of a BCCI-related company named Capcom Financial Services, and BCCI's possible stealth ownership of other financial or non-financial institutions. But the Subcommittee staff is also troubled by the 1991 concerns raised most vividly by the lead Assistant U.S. Attorney in Tampa and the Agent who resigned from Customs. Every possible lead -- not just the most blatant -- should be pursued.

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evidence needed to effectively prosecute law violators, state banking regulators have a need to know about criminal activities that can undermine the safety and soundness of financial institutions licensed to operate in their communities.

ONGOING INVESTIGATIONS

Based on Assistant Attorney General Mueller's briefing to Chairman Schumer in late July, there are now far more people and resources being assigned to the continuing BCCI-related investigations in four separate U.S. Attorney's offices. It is clear that investigations are now active where Federal authorities can apply what they have learned from their mistakes with BCCI in the past. BCCI itself is making referrals as part of its continuing obligation under the Tampa plea agreement. The IRS alone, for example, has received more than 70 referrals on BCCI customers following the plea. The DEA is pursuing leads on hundreds of suspected BCCI customers abroad through the voluntary cooperation of seven countries. The DEA has also been able to seize approximately $90 million in BCCI accounts overseas, New York and Miami, reflecting money tried to Medellin drug kingpin Rodriguez Gacha.

The information obtained by Federal authorities is wide-ranging, involving BCCI customers, other BCCI officials, global

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On February 16, the Chief wrote back declining a meeting but apologizing if his letter of February 13 was misunderstood and stated:

> "The Department ... is not requesting that you permit BCCI to be licensed. The sole purpose of my letter was to indicate that, if you allow BCCI to continue in business, there may be occasions where the Department of Justice may request BCCI ... to make or continue a banking relationship with customers who are subjects of criminal investigations."

The Chief did inform the Subcommittee staff that he had called the New York and California regulators to clear up the possible confusion. Without access to the relevant documentation, which has been requested, it is not possible to tell what decisions, if any, concerning BCCI branches in New York and California may have been made in response to these directives from Justice.

What is clear is that the coordination between components within Justice, let alone with state regulators, was poor at best. The Customs supervisor in Tampa even felt compelled to alert the Tampa U.S. Attorney to the meddling by the Justice officials in Washington. While there is a clear need to protect the integrity of undercover investigative operations and preserve

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copies of the February 13 letter to Lewis, requesting the same reprieve for BCCI in those states. All three letters were apparently written after the Chief met with counsel, who sought to keep BCCI's various branches open. Like the Florida Comptroller, New York and California regulators were initially confused about the mixed signals from Justice.

The Florida Comptroller sought a clarification from the Chief because his request stood in direct contradiction to statements to the banking commissioner from the U.S. Attorney in Tampa. The prosecutor had made it clear to the Comptroller that the plea agreement did not preclude regulatory action by the State of Florida. The U.S. Attorney's Office was unaware of the Chief's letter, a copy of which was sent to BCCI's lawyer but not to the U.S. Attorney.

The Florida Comptroller wrote to the Chief on February 14 requesting a meeting to resolve the conflicting recommendations he received from the Chief and the Florida prosecutor. The Florida Comptroller Lewis pointed out that Florida law requires banks to have complied with all requirements of the law, and that the renewal of a banking license not be detrimental to the public interest.

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case. The Subcommittee staff has been told by one law enforcement official that BCCI has "dug in its heels" on producing documentation.

MIXED SIGNALS TO STATE REGULATORS

Certain puzzling communications between the Justice Department and state banking regulators show Federal law enforcement agencies must do more in the way of sharing information and coordinating enforcement activities. The informal task force overseeing Justice's multi-pronged attacked on BCCI could be the vehicle for such coordination.

The continued lack of coordination was illustrated when the Florida Banking Commissioner's attempt to close BCCI in Florida and was briefly delayed when Chief of Justice's Narcotics and Dangerous Drugs Section chief, wrote a letter dates February 13, 1990 to the Comptroller saying:

> "There may be customer accounts at BCCI which the Department of Justice would to like to open or maintain. We are therefore requesting that BCCI be permitted to operate in your jurisdiction."

Equally disturbing is that Justice's Narcotics Section Chief also sent to New York and California banking regulators verbatim

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Racketeering Section in the Criminal Division of the Justice Department. In the meeting, the defense attorneys requested that he not approve any attempt by the prosecutors to charge a violation of RICO in a superseding indictment. Apart from the stigma that accompanies a racketeering charge, RICO includes sweeping forfeiture provisions, which arguably could have been used by the prosecutors to put BCCI out of business.

The Tampa prosecutors have said that the RICO decision was made in Tampa and concurred with by Washington. Addition of the RICO count would have added another layer of complexity to an already massive case, and the indictment already alleged a drug conspiracy, entitling the prosecutors to criminal forfeiture of all seized assets. On the other hand, a RICO count conceivably could have pressured BCCI in plea negotiations by threatening forfeiture of assets from the entire BCCI enterprise.

To some extent, the government's gains from accepting the plea agreement cannot yet be fully evaluated. Provisions of the plea agreement require BCCI's continuing cooperation in other criminal investigations. The degree to which BCCI's assistance has aided thus far the prosecution of Manuel Noriega and other ongoing criminal cases and investigations cannot be determined. If the cooperation has not been as substantial as contemplated at the time of the plea agreement, questions should again be raised about the wisdom of permitting BCCI to plead out of the Tampa

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suggestion that the Justice Department had sold its case against BCCI "down the river" evidences a misperception about the actual terms of the plea agreement and little, if any, knowledge of Judge Hodges' prior opinion and ultimate ruling in the individual defendants' trial. On the other hand, a justifiable concern may exist as to the extent of information in the possession of the prosecutors at the time of the plea; further inquiries by the Subcommittee will focus on whether, given sufficient resources, a broader case against BCCI might have been able to be made. Clearly, as the AUSA's 1991 memorandum makes clear, there was still the need even then to properly review all the seized documentation.

If there is a clear criticism now of the Tampa prosecution, it would be the decision not to charge BCCI with violating federal racketeering laws. BCCI's money laundering activities would appear to have been legally sufficient to support such charges. Had charges been brought under the Racketeering Influenced and Corrupt Organizations Act (RICO), BCCI may have faced forfeiture of the operations of its subsidiaries; regardless of whether such a forfeiture would actually have been imposed, the threat of such a penalty might have had a powerful effect on the terms of a plea agreement.

Prior to the issuance of the second superseding indictment, attorneys for BCCI approached the head of the Organized Crime and

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office in Tampa was controlled or directed by any higher-level Department of Justice officials in negotiating the plea with BCCI or in accepting the approximately $15 million forfeiture (the amount of the seized assets plus accrued interest). Although the Senior Deputy Assistant Attorney General for the Criminal Division in the Department of Justice approved of the plea's terms before its acceptance by the United States Attorney in Tampa, the plea appears to have been wholly the product of negotiations between the First Assistant United States Attorney in Tampa, the Chief of the Criminal Division in that office, and attorneys for BCCI. The front-line Customs and IRS agents who had expended enormous efforts and, in some cases, taken on great risk to bring BCCI to justice, ultimately approved of the agreement entered into by the prosecutors.

There appears to be little merit to the charge that the plea agreement insulated BCCI from further prosecution by the Justice Department and its United State Attorneys offices. The plea agreement plainly binds only the United States Attorney's office for the Middle District of Florida, and that office only with respect to further prosecution of the convicted BCCI subsidiaries based on information known to the United States Attorney's office at the time. Indeed, a Miami lawyer defending BCCI in another case expressed frustration that the Tampa defense lawyers had not secured a global prohibition on future prosecutions against BCCI. In other words, the Subcommittee staff believes that the

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cases. That is not atypical, for often the government is outnumbered by defense counsel. The paucity of resources allocated by Customs probably played a far greater role in what the Tampa prosecutors were able to develop for trial. Ultimately, however, the prosecutors in Tampa accomplished their primary mission of obtaining convictions of BCCI's two leading subsidiaries and six individual defendants.

Questions have also been raised about why the United States Attorney's office in Tampa could not have built a case similar to that which has been recently indicted by the District Attorney for New York County, Robert Morgenthau. The leads upon which that indictment was based, however, were developed over the course of more than two years through the commitment of substantial resources, and primarily by working in conjunction with the Federal Reserve Board. Serious constraints on the resources available to the Tampa prosecutors made it impracticable to attempt to expand the scope of their investigation in 1989 beyond the already wide-ranging charges they had brought against BCCI, ten of its officers, and several related individuals and entities. There is reason to believe that those resource concerns were eventually addressed and now may lead to further BCCI-related prosecutions.

The Subcommittee staff has found no credible evidence to date to support the theory that the United States Attorney's

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impose a fine of $28 million appeared minimal to the prosecutors under the circumstances: the largest fine previously imposed in a money laundering case had been $5 million, and the court's prior rulings indicated that it was unlikely to impose such a harsh fine on BCCI. Although BCCI arguably presented a unique case in that the prosecutors possessed evidence of a high-level corporate policy of accepting deposits of drug proceeds, the prosecutors' eagerness to try an international bank was tempered by Judge Hodges's reputation for moderation in sentencing white collar defendants.

Recent criticisms that the plea agreement was unduly lenient would appear to be inaccurate. In fact, the Subcommittee believes that the prosecutors negotiating the plea showed admirable resolve under the circumstances in refusing to return to BCCI any of the over-$14 million seized at the outset. On balance, the staff believes that the Tampa prosecutors did a creditable job in view of the resources they had available. While the bulk of the requested documents have yet to be produced, no evidence has yet been uncovered that would indicate that so-called "influence peddling" affected the outcome in Tampa, although the overwhelming effect of the numerous attorneys hired by BCCI -- over 50 lawyers from 20 different firms reportedly played a role in the case, incurring fees of approximately $35 million -- may well have prevented a fuller development of evidence that could have been used in related

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notice" that it would not be able to convict BCCI as a drug conspirator "solely by evidence adduced at trial that defendants may have laundered drug proceeds." The Court acknowledged that a substantial body of legal precedent would have supported a drug conspiracy conviction based on such evidence, but ruled that when Congress made money laundering a separate crime in 1986, it effectively precluded convictions for both money laundering and drug trafficking when those charges are based on the same evidence. Later, during the trial of the individuals, Judge Hodges did indeed dismiss the drug conspiracy count against each defendant.

In effect, the Court's ruling created considerable doubt as to the amount of any fine that the government could succeed in imposing on BCCI had it gone to trial. BCCI's money laundering activities all predated the effective date of the enactment of laws permitting the forfeiture of assets used in a money laundering operation; as initially enacted, the penalty provisions were interpreted as permitting only the forfeiture of the gross receipts from money laundering activities, which in this case was approximately 1.5 % of the money laundered, or approximately $250,000. Hence, the maximum criminal penalty that BCCI would have faced had it been convicted after trial would not have been a forfeiture, but a fine of approximately $28 million--twice the amount of money laundered through BCCI during Operation C-Chase. The prospects of actually persuading the court to

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trafficking conspiracy, the seized assets were subject to criminal forfeiture, and the prosecutors were confident that they could sustain a drug conspiracy conviction against BCCI. Accordingly, they rejected defense proposals under which BCCI would have agreed to pay fines of substantially less than the amount seized and plead guilty to charges of conspiracy to launder money and evade taxes and to substantive money laundering charges.

In essence, based on interviews conducted to date, the dispute between the defense attorneys and the prosecutors, which became heated at times, centered on whether BCCI was properly characterized as a drug trafficker, as opposed to a institution guilty of an arguably more technical, regulatory, "white-collar" money laundering offense. While the defense attorneys were anxious that BCCI not be stigmatized as a "drug dealer," the strong view of the prosecutors was that such a characterization was entirely justified in view of BCCI's role in facilitating international drug trafficking. BCCI's refusal to plead guilty to the drug conspiracy charge effectively deadlocked the plea negotiations in late 1989.

A December 5, 1989 ruling by presiding U.S. District Judge W. Terrell Hodges, however, had an apparently dramatic effect on the relative bargaining position of the government and BCCI's defense lawyers. The Court stated that "the Government is put on

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remember that many of the seized records were reviewed approximately six to eight months after the October, 1988 arrests. (Again probably after the filing of the final indictment.)

The Subcommittee staff believes that the Tampa prosecutors and the Agent, in conjunction with other dedicated Customs and IRS agents, managed under adverse circumstances to review the evidence thoroughly for the purposes of trial. The failure to use the evidence for other law enforcement purposes, and perhaps to broaden the case against BCCI, appears to have principally been the product of internal strife which resulted in inadequate resources, unreviewed evidence and an ill-timed determination on when to conclude C-Chase.

EVALUATION OF PLEA AGREEMENT

Attorneys for BCCI first seriously approached the prosecutors in Tampa about a possible plea agreement in the late fall of 1989. The negotiations focused principally on whether BCCI would plead to a drug conspiracy and on the amount of a fine or forfeiture that BCCI would agree to pay; over $14 million--the amount of money directly laundered through BCCI--had been seized when the indictments were unsealed in October 1988, and the prosecutors were not inclined to return any of those assets. Because BCCI had been charged with one count of a drug

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him unfairly and continuously, including threatened transfers. (The supervisor in Tampa disagrees with all of the above points.)

These problems were also reflected in "a road-map" memorandum that the lead prosecutor wrote on January 30, 1991 to other Justice colleagues on how to continue the investigations arising from the Tampa cases. The copy of the memorandum provided the Subcommittee staff is largely redacted but is telling nonetheless. The AUSA noted the following concerns: first, whether Customs would support the investigation; second, the need for additional resources was still critical because of the past inadequate review of evidence, and third, the record review should be undertaken immediately by the most knowledgeable agents because there had yet to be a thorough examination of the records seized in October 1988.

Although it is not atypical for there to be less than adequate resources in law enforcement cases, we are troubled by this persistent pattern. Whether this was in fact a "personality clash" between the Agent and the supervisor in Tampa or the consequence of decisions by other higher-level Customs officials is unclear at this point.

We do know that the former Assistant Customs Commissioner for Law Enforcement denies ever knowing of the repeated requests for resources by the Agent or the Tampa prosecutors. He does

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"affect[ed] future prosecutions." It is important to note that there were two superseding indictments (the second indictment was on May 5, 1989) following the initial indictment in early October 1988. Accordingly, evidence reviewed after May 1989 was outside the scope of the final indictment. The AUSA does feel that the document review improved in the summer of 1989 when a new IRS agent was put on the case.

Ultimately, the Customs Agent, a highly respected individual who has received numerous awards including two letters of Commendation from former Customs Commissioner von Raab and current Customs Commissioner Hallet in 1989 and 1990, resigned from Customs because of his great concerns.

The Agent sent his resignation notification letter to Customs Commissioner Hallet on April 3, 1991. The letter was provided to the Subcommittee staff with minor deletions. The Agent noted the following concerns: first, the change in the Customs supervisors in Tampa dramatically affected the C-Chase Operation; second, more defendants and seizures of drug proceeds could have occurred had more resources and priority been given to the case; third, the Agent and others made numerous requests over three years to the SAC Tampa to no avail; fourth, the concerns raised by the Agent had been misunderstood to such a degree that the Tampa Customs supervisor felt he was attacking her personally; and fifth, the supervisor had responded by harassing

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point, the Government was threatened with sanctions by both the federal judge and magistrate handling the case.

- The Agent who led the undercover operation and who testified for some 54 days during the trial of the BCCI officials "repeatedly requested" in writing more support, citing the "dramatic need for additional resources," but was repeatedly rebuffed by the Customs Supervisor in Tampa. This internal warfare unfortunately continued until this year and is clearly documented in two redacted documents provided to the Subcommittee staff. The Customs supervisor in Tampa, however, while acknowledging that transcription was "a major problem" felt that she had asked for more resources and that there was adequate coverage in general.

- The records seized in October 1988 following the arrest of BCCI officials were not thoroughly reviewed. The records were estimated by the AUSA to consist of almost "60 small banker boxes," "2 large lateral files," and "4-5 large banker boxes." These boxes contained much information and further leads but much was, in the Agent's word, "at best glanced at." The AUSA stated that "there was not a satisfactory review of evidence" nor was there "a detailed review of records other than their utility at trial." The Agent stated that "potentially important boxes" were not reviewed and that "certain documents," if adequately examined, could "have broadened the scope at trial" as well as

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first place. (Their view is not universal. Both the Tampa supervisor and the former Assistant Customs Commissioner for Law Enforcement felt it was appropriate "to maximize the publicity for Customs.")

Both the Agent and the AUSA cited the following examples of ways in which their work was hampered by lack of sufficient resources:

- Hundreds and hundreds of numerous invaluable undercover tapes were made during C-Chase, but were not transcribed in a timely fashion. Soon after the arrests, it became apparent that the "transcription process" was not "proceeding apace," according to the AUSA, and became "a real problem." Given the "thousands" of recorded phone conversations and "over a hundred" meeting tapes (the Government's opening statement in the BCCI officials' trial refers to "148 face-to-face meetings" and "about 2,000 telephone calls"), this delay significantly affected both the undercover operation and the trial preparation.

- There was an additional problem of translating conversations from Spanish and various dialects of Urdu into English. In fact, many tapes were not transcribed until well after the indictment and virtually on the very eve of the discovery deadlines for production to defense counsel mandated by the court. At one

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The Agent was also frustrated by the nature in which the timing of the takedown decision had been made without adequate input from the undercover team. The timing decision is usually a collective decision arrived at after a full traditional review committee examination.

The Customs supervisor does not recall exactly when the decision had been made to close down the operation. She does recall the timing decision being "kicked around" prior to February 1988 but said that the final decision was not made until the summer of 1988. At that time problems arose in a number of the seven cities participating in C-Chase which raised strong concerns about the possible public disclosure of the undercover operation.

As planned, C-Chase culminated in the October 1988 arrests of BCCI officers and other money launderers nationwide. The Tampa arrests of the officers occurred at a sting "bachelor party," complete with network T.V. cameras. In addition to BCCI officers, two leading subsidiaries of BCCI were indicted for drug, tax, and money laundering conspiracies, and over $14 million of their assets were frozen.

Both the AUSA and the Agent felt that officials at Customs had put more effort into showcasing the arrests than they had into ensuring that the operation had the needed resources in the

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Realizing the implications of these developments, the AUSA overseeing the case began in January 1988 to devote a substantial portion of his time to preparing the first-ever money laundering indictment against an international bank. The Customs Agent was not surprised that a bank had entered the C-Chase picture and regarded BCCI's involvement as "no accident." Shortly after his meetings with BCCI banking officials in Miami in January 1988, the Agent realized that BCCI was "too highly polished" in its illegal scheming.

Ironically, almost concurrent with the realization on the part of the Customs Agent and AUSA that criminal activity may have been BCCI "corporate policy," decisions were already being taken to prematurely conclude the undercover operation. Both the AUSA and the Customs Agent recall hearing as early as February 1988 (only one month after the Agent had first met with high-level BCCI officials) that the supervisor of the Customs office in Tampa had decided to "takedown" and close out the C-Chase operation in the fall. The Agent remembers being told "October." The Agent felt that the October deadline affected his ability to "get" more high-level traffickers and BCCI officials. For example, he was particularly interested in meeting with two representatives who were close to Pablo Escobar, the head of the Medellin cartel. He had also scheduled a separate meeting with BCCI's chief executive officer. Neither meeting took place because of the established deadline.

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officials did not allocate adequate resources to the investigation and imposed a prematurely determined deadline on when the investigation would be concluded. Customs bears principal responsibility for this lack of resources because it headed the multi-agency team in Tampa. Justice, however, also could have done more to demand more support. If there is any "conspiracy" that would necessarily have to be confirmed by witnesses or documents not yet made available to the Subcommittee staff.

Over a year into the undercover operation, the agents and prosecutors conducting C-Chase began to sense that a strong criminal case could be developed not only against individual money launderers but against a major international bank. In late 1987, BCCI began to emerge not merely as the bank of choice of the money launderers and drug traffickers, but as an active and eager participant in a scheme to facilitate drug trafficking. Over the next several months, the agents increasingly gathered most alarming evidence of a policy at the highest levels of BCCI to take in deposits with, at best, indifference to whether they might constitute the proceeds of illegal activities. Most shockingly, high-level bank officers began to counsel the undercover agents on sophisticated means of making the source of their deposits untraceable.

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received substantial prison sentences. The indicted BCCI subsidiaries pleaded guilty several weeks before the trial of the officers and agreed to forfeit approximately $15 million, to cooperate with the government in the upcoming trials and other investigations, and to conduct themselves under terms of probation tied to a June 1989 Federal Reserve consent order.

Critics of Operation C-Chase and the subsequent prosecutions have questioned the apparent failure of the prosecutors to build a more formidable case against BCCI and to pursue higher level officers. Particular criticism has been leveled at the plea agreement, as inadequate to punish and deter BCCI's corporate policy to act as a full-service bank for international criminals and miscreants.

In-depth interviews with both the Assistant U.S. Attorney (AUSA) in charge of the Tampa cases and the lead undercover Customs Agent on Operation C-Chase provided many examples of ways in which inadequate resources from Customs impeded the undercover operation, and the prosecutions.

Our interviews with key personnel involved in both C-Chase and the subsequent prosecutions indicate that the failure to realize the full potential of this investigation was attributable not to an amorphous "conspiracy," nor to shortcomings of the prosecutors, but rather to the fact that Customs management

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channel" for further money laundering. Justice rejected this request because it did not want to jeopardize its prior indictment of BCCI in the Tampa case, which occurred in October, 1988.

INADEQUATE RESOURCES DEVOTED TO OPERATION C-CHASE

Thus far, the only major criminal cases brought against BCCI in the United States are the so-called "Tampa Cases" brought by the United States Attorney's office for the Middle District of Florida.

The Tampa prosecutions of two of BCCI's main subsidiaries and five bank officers grew out of Operation C-Chase, an over two-year Customs undercover operation formulated in principal part in the summer of 1986 by the Customs agent who was to become the head undercover agent in the operation. As originally planned, C-Chase was to be a nationwide effort to track the flow of drug proceeds from collection points in various United States cities, through suspected Colombian money laundering organizations, and, ultimately, into the hands of major drug traffickers.

The cases ended with the conviction of five BCCI officers and several money launderers and individuals with close ties to the Medellin cartel. Some were tried; others pleaded guilty; all

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Because India did not have a tax-sharing treaty agreement with the United States, India's allegations were handled as a "request for law enforcement assistance" but not pursued, and there was no further follow-up.

- In Washington, the IRS National Office and the Manhattan district of the North Atlantic Region received a criminal referral from the Federal Reserve on June 5, 1987, concerning suspect cash transactions and irregular activities in BCCI Miami and Atlanta accounts.

- In St. Louis, IRS in 1988 worked on a money laundering investigation of Jerry Lee Harvey. The government established that Harvey had utilized BCCI accounts in Panama and the Cayman Islands as part of his massive illegal scheming estimated at over $60 million.

- In Oklahoma City, IRS in February 1989 worked on the investigation and conviction of a "$1 million plus" money laundering scheme by a heroin dealer who used BCCI accounts in New York and Hong Kong.

- In Dallas, the IRS district office in early 1989 requested permission to conduct its own undercover investigation of BCCI's Miami office. In a major undercover operation in Dallas, Sadruddin Alani offered BCCI Miami accounts as "an additional

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• In Chicago, a joint IRS/DEA drug trafficking and money laundering undercover operation resulted in the indictment of Shaid Rikey, a Chicago-based BCCI employee on charges of conspiracy, mail and wire fraud and failing to file cash transaction reports. The indictment was eventually dismissed on technical grounds. But by that time, BCCI had been deterred from pursuing an application for an Illinois banking license, and the Justice Department had encountered significant delay by BCCI in responding to subpoenas for its financial records. Despite all the time invested, and strong indications that something was amiss at BCCI, the entire matter appears to have been dropped.

• In Los Angeles, IRS received a referral from DEA in 1986 on a large-scale Iranian heroin trafficker, Satter Nadjmehchi. In a meeting with an undercover DEA agent and a representative of the BCCI branch in Los Angeles, Nadjmehchi bragged that "he would conceal and launder accounts at a foreign bank." The IRS issued a $9.5 million "jeopardy assessment" against his property (which he contested), but there was no resulting criminal investigation.

• In Washington, representatives of the Government of India provided IRS in 1986 with evidence of an alleged multi-million dollar money laundering scheme. The Indian Government, through the assistance of a retained investigating firm, provided documents to the IRS showing that the scheme was furthered through different BCCI accounts in a number of countries.

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from Jordan to Guatemala -- financed by letters of credit opened at BCCI-Miami.

The August indictment against Bilbeisi was apparently aided by a criminal referral from the Federal Reserve in November 1988 to the IRS, about possible Bank Secrecy Act violations by BCCI. The referral described suspicious deposits of checks and money orders into accounts through the Boca Raton and Miami offices of BCCI. After deposit, the funds were wired to Panama.

Bilbeisi could still face prosecution on other charges.

d. In Washington, the DEA review of files has, so far, revealed 125 cases that have been identified "as having something to do with BCCI." Most of the cases are undercover money laundering storefront operations which lead to warrants to seize BCCI bank accounts containing suspected drug proceeds. In other words, DEA undercover agents in storefronts all over the country knew, as a matter of course, that BCCI is the place to launder drug money. DEA also uncovered three cases involving BCCI officials.

Other instances of strong leads left dangling around the country are the following:

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c. The Customs Service learned in 1983 that Jordanian arms dealer Munther Bilbeisi, one of the largest customers of BCCI's South Florida office, was using fraudulent bills of lading and cargo manifests to carry out a massive illegal coffee smuggling scheme. Any reasonable investigation into Bilbeisi's operations would have uncovered that Bilbeisi's coffee business had established a financial relationship with BCCI in 1983, and that BCCI had issued phony letters of credit from 1983 to 1986 to finance the smuggling.

The Justice Department failed to bring an indictment against Bilbeisi until August 1991 -- after the expiration of the five-year statute of limitations on most of the coffee smuggling matters. Bilbeisi is charged only with tax evasion. BCCI has not been charged -- even though BCCI's own counsel had determined by November 1990 in its own internal review that BCCI had played an indispensable role in providing letter-of-credit financing without questioning the irregularities in the coffee shipments.

The delay in indicting Bilbeisi occurred despite warnings to Federal prosecutors in Miami from counsel representing certain underwriters at Lloyd's of London, which was pursuing an insurance fraud case against Bilbeisi, that Bilbeisi had repeatedly violated customs laws from 1983 to 1986. Bilbeisi's personal assistant and counsel tipped Customs that Bilbeisi might have attempted to broker illegal sales of helicopter gunships

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Based on considerable information gleaned from Mr. Rehman over the next 18 months and IRS' own investigative efforts, the Criminal Investigative Division Special Agent (now a Group Manager in IRS Miami Office), recommended that IRS launch an undercover operation directed at BCCI. This request was approved by her supervisors but was denied by higher-echelon officials in the IRS District office, despite three attempts to gain approval during the period January through March 1986. The IRS Group Manager requesting the undercover operation sought the advice of senior IRS officials at a Criminal Investigative Group Manager's conference and was told that she was fighting a losing battle.

b. In December 1988, an IRS special agent in Tampa offered to direct a senior official of the Federal Reserve Board in Washington, to five or six former BCCI officers who could testify about BCCI secret ownership and control of First American Bank in Washington. He showed little interest in the proffered evidence, telling the agent he would need documentation of any such allegations in order for the Federal Reserve to take action. The agent did not understand why the evidence he had offered, which might have been sufficient for criminal charges, was insufficient for the Federal Reserve. The Federal Reserve ultimately made a criminal referral on these same allegations on its own -- but not until two years later, in January 1991.

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For instance, the IRS has thus far identified for the Subcommittee staff 15 separate matters involving BCCI from 1984 to present, that may involve criminal activities. Of this number, ten were referred to the Justice Department for criminal action, with seven resulting in indictment. The three other matters are presently part of separate ongoing grand jury investigations. Various Federal authorities, such Customs and DEA, knew of BCCI's possible involvement in criminal activities from 1983 on.

Among the Subcommittee staff's findings:

a. Most startling is the IRS' refusal to begin an undercover investigation of BCCI despite persistent requests by Criminal Investigation Division personnel in Miami who acquired considerable information about BCCI's involvement in criminal activities over which the IRS had law enforcement jurisdiction. Former BCCI employee Aziz Rehman was interviewed by IRS Special Agents in IRS' Miami office in April 1984 shortly after he was fired by BCCI for refusing to transport large volumes of currency which he believed to be in violation of existing federal laws. He provided them with documentation of deposits to a non-existent BCCI branch in Nassau Bahamas and described his role as a former courier for large cash deposits to BCCI accounts of "customers" and other banks.

1325015-000-7469

and its officials during and since the resolution of the Tampa cases in 1990.

WIDESPREAD FEDERAL KNOWLEDGE OF BCCI

It is clear that Federal authorities had scores of contacts concerning BCCI dating as far back as 1983. Despite the fact that BCCI was cropping up repeatedly in a variety of places and in an array of questionable activities, no one in the law enforcement community noticed the pattern. In fact, on at least two occasions, high-ranking officials squelched actions recommended by rank-and-file investigators that might have transformed the government's isolated brushes with BCCI in the United States into a full-scale investigation of a criminal enterprise of international proportions.

Time and time again, the front-line crimefighters did the job but their colleagues elsewhere or bosses never got the news. That might not have happened had there been a mechanism in place to ensure a sharing of information between agencies or a flow of information upward to decisionmakers. The government had enough information on BCCI by the mid-1980s to have put BCCI on the most wanted list. When the Tampa prosecutors and investigators finally cornered BCCI they did so without any advance notice. They had to be told by a drug trafficker -- not by a law enforcement official.

1325015-000-7470

were present in meetings with Federal officials, and they were conducted subsequent to debriefings by other Federal law enforcement officials.

Justice and Treasury are to be commended for arranging the requested briefings and interviews. Though the rigidity of the interviewing process may have affected certain interviewees' demeanor, no interviewee has declined to answer a question except when they related to ongoing investigative or tax-related matters. However, there have been delays in delivering the great bulk of the requested documents to the Subcommittee staff, and when delivered they have been in redacted form, in order, according to Justice and Treasury, to protect ongoing investigations or the identity of law enforcement officials.

The staff has requested further briefings, information and documentation on BCCI, its employees or ex-employees, BCCI customers and BCCI banking accounts.

The bulk of the Subcommittee staff's information has necessarily been gleaned from interviews with law enforcement and non-government sources. Despite the lack of documents that would expand upon and corroborate oral information, certain conclusions can clearly be drawn from the information already derived about the government's knowledge of BCCI and its actions and about the government's performance in investigating and prosecuting BCCI

1325015-000-7471

BACKGROUND OF INVESTIGATION

In late July, Robert S. Mueller, the Assistant Attorney General for the Criminal Division, offered to present an overview of the Department of Justice's past and current investigations of BCCI to Chairman Schumer and Subcommittee counsel, Jim Rowe. This briefing occurred on July 29, 1991. Following the briefing, Chairman Schumer requested the Subcommittee staff to investigate the nature and extent of the government's knowledge about BCCI among Justice and the various law enforcement agencies with which it generally coordinates its activities. During the August district work period, Subcommittee staff requested and received background briefings in Washington and Florida by officials of the Internal Revenue Service (IRS) and U.S. Customs Service, both arms of the Department of Treasury, and the Drug Enforcement Administration (DEA), an arm of the Department of Justice, as well as Justice Department prosecutors involved in the Department's investigations and prosecutions of BCCI matters in Miami and Tampa. Subcommittee staff also interviewed former law enforcement, state banking regulatory officials and other knowledgeable individuals.

Though the interviews conducted for the purposes of this investigation were not under oath, the information obtained is, for the most part, considered highly credible. The interviews were coordinated by Justice and Treasury, whose representatives

1325015-000-7472

INTRODUCTION

The Subcommittee's investigation has focused on what the Federal law enforcement agencies knew about the Bank of Credit and Commerce International (BCCI) and when they knew it, and how those agencies have performed thus far in investigating and prosecuting BCCI.

As described in detail in the sections that follow, the treatment of information about BCCI by the various law enforcement agencies involved throughout the 1980s is a classic case of many of the most often-cited stereotypes about large bureaucracies: lack of coordination, issues and functions slipping between the cracks, turf battling, little, if any, information sharing and inability to see the forest for the trees.

There is no doubt that BCCI was and is an institution whose activities have been well known to Federal law enforcement personnel throughout our government, in many parts of the country, for quite some time. As one official said, BCCI was "on the list of usual suspects," for various illegal activities. Much more could and should have been done to put it out of business, sooner rather than later.

1325015-000-7473

THE WASHINGTON POST

8/19/91 pg A9

Writer's Papers Shed Little Light on His Death

Casolaro Sought to Prove 'Octopus' Theory Encompassing Hostage Delay, Inslaw, BCCI

By Gary Lee
Washington Post Staff Writer

Ever since Joseph Daniel Casolaro's death was described by relatives and friends as a possible murder because the writer "knew too much" about an alleged government conspiracy, authorities and journalists have tried to pinpoint what it was that he knew and why he might have been killed for it.

But neither the summary Casolaro wrote of his research nor analyses of his notes and papers provided by his family to journalists from ABC News and Time magazine have provided clues of what would have put the Fairfax City writer in danger, although his family claims that notes Casolaro carried with him are missing.

At least one New York publisher rejected Casolaro's book proposal as too vague and sources said several others also passed on it.

Casolaro, 44, was buried in Arlington Friday. Authorities say the evidence still points to suicide.

The writer had spent nearly a year researching a link between several allegations: that associates of Ronald Reagan acted to prevent an "October surprise" release of U.S. hostages in Iran to help Reagan defeat Jimmy Carter in the November 1980 election and that the Justice Department stole software from Inslaw, a Washington based computer firm.

The link between these unproven events, according to Casolaro's account and those of several of his friends, was a small group of shadowy figures that Casolaro called the "octopus."

The "octopus," which Casolaro believed was led by an associate of former attorney general Edwin Meese III, allegedly sold the stolen software and other contraband, and used the funds to finance, among other things, the promises made to Iran preventing an "October surprise."

Casolaro also held that the Bank of Credit and Commerce International, under investigation in many countries for fraud, was a conduit in the operations.

On Aug. 8, Casolaro went to Martinsburg, W. Va., where he told relatives and friends he was going to meet a key source in his investigation.

West Virginia police and medical authorities, called after Casolaro's body was found in the Martinsburg Sheraton, originally ruled the death a suicide but reopened the case after relatives, angry that the body had been embalmed before they were notified of his death, demanded it.

Authorities also said they reopened the case after learning of the focus of Casolaro's research.

An autopsy supported the preliminary suicide finding, authorities said in a Thursday news conference, but they are conducting further investigations.

Casolaro's associates said he was a strong investigator and reporter and that is why they believe he was killed in the course of researching his book.

"When he got a good story, he was like a dog with a piece of steak," said Betty Borsage, editor of Washington Crime News, a small-circulation, Arlington-based newsletter where Casolaro worked. "He would not stop gnawing until he was finished."

But associates could produce few examples of his investigative articles.

A review of several boxes of his notes and [illegible] by a team of investigative reporters from ABC News yielded little to substantiate Casolaro's octopus theory, an ABC spokesman said. He said most of the material was newspaper and magazine clippings and other publicly available documents.

"He had some strong contentions," said Jonathan Beaty, a veteran investigative reporter for Time who held several conversations with Casolaro about his work, including one three weeks ago. "But it was always difficult to determine whether he was really on to something."

Editors at Little, Brown & Co. had asked Beaty to examine Casolaro's work and recommend whether they should finance a book proposal he had submitted. The New York publisher rejected the proposal, an editor there said.

Over the past eight to 10 months, Casolaro undertook a wide-ranging investigation for his book that included several conversations a week with Inslaw co-owner William Hamilton and a visit to rural Washington state to interview Michael Riconosciuto, a computer specialist who claims to have been hired to modify what turned out to be the stolen Inslaw software. Riconosciuto has been in jail since last March on drug-related charges.

Recently, Casolaro gave several of his contacts the impression he was nearing a breakthrough.

In a telephone call a couple of weeks ago, "he said he had narrowed the list of people [involved in the octopus] to about 10," said Ray Lavis, a California-based computer specialist used by Casolaro as a source. "He said they were controlling the world," Lavis added in a telephone interview.

In late July, Casolaro called reporter Don Devreaux in Phoenix. "He seemed almost breathless," Devreaux said, "as if he was on to something."

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FBI/DOJ

1325015-000-7474

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
September 25, 1991

Joseph I. Goldstein, Esq.
Associate Director
Division of Enforcement
U.S. Securities and Exchange Commission
50 Fifth Street, Northwest
Washington, D.C. 20549

Re: In the matter of Financial General Bankshares, Inc., HO-1068

In the matter of CenTrust Bank, HO-2360

In the matter of transactions between and among certain individuals and entities involving or related to Bank of Credit and Commerce International, S.A., HO-2512

Dear Mr. Goldstein:

We request access to the investigative and other non-public files of the U.S. Securities and Exchange Commission (the "Commission") related to the captioned matters. This request is made in connection with an ongoing lawful investigation or official proceeding inquiring into a violation of, or failure to comply with, a criminal or civil statute or regulation, rule or order issued pursuant thereto, being conducted by the Federal Bureau of Investigation.

We understand that the files in this matter contain "financial records" of "customers," as those terms are defined in the Right to Financial Privacy Act of 1978 [12 U.S.C 3401-22]. We have reason to believe that that information is relevant to our investigation and/or proceeding.

We will establish and maintain such safeguards as are necessary and appropriate to protect the confidentiality of files to which access is granted and information derived therefrom. The files and information may, however, be used for the purpose of our investigation and/or proceeding, and any resulting proceedings.

29B-WF-171994 MAIN — 220

1325015-000-7478

Other than as set forth in the preceding paragraph, we will:

make no public use of these files or information without prior approval of your staff;

notify you or any legally enforceable demand for the files or information prior to complying with the demand, and assert such legal exemptions or privileges on your behalf as you may request; and

not grant any other demand or request for the files or information without prior notice to and lack of objection by your staff.

We recognize that until this matter has been closed, the Commission continues to have an interest and will take further investigatory or other steps as it considers necessary in the discharge of its duties and responsibilities.

Should you have any questions, please contact Special Agent [redacted] at (202) 324-6404. b6 b7C

Sincerely,

Robert M. Bryant
Special Agent in Charge

1325015-000-7479

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/25/91

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE 38
FIF; FAG;
OO:WMFO

On 9/24/91, [redacted] Price Waterhouse (PW), Boston, MA, contacted SA [redacted] and advised that she is willing to be interviewed. She and PW request that PW's legal counsel be present during the interview to ensure that [redacted] complies with the bank secrecy laws of the United Kingdom. b6 b7C

[redacted] advised that [redacted] of OLWINE, CONNOLLY, CHASE, O'DONNELL, and WEHYER, NY, NY, is [redacted] PW. b6 b7C

SA [redacted] will contact [redacted] at a later date to arrange for the interview, which will be conducted in Boston. b6 b7C

MTU:mtu

29B-WF-171994 Main
-221

[redacted] b6 b7C

1991

[redacted]

1325015-000-7480

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/26/91

[redacted] was contacted at his place of employment, the New York State Banking Department, 530 Fifth Avenue, New York, New York. [redacted] was aware of the identity of the contacting Agent and was informed of the nature of the inquiry. [redacted] was than introduced to SA [redacted] Atlanta Division and [redacted] SA [redacted], Atlanta, who interviewed him about the National Bank of Georgia (NBG). The FD-302 setting forth the results of said interview is attached hereto. Prior to that interview, the writer discussed Caprock Savings and Loan with [redacted].

b6 b7C b7E

[redacted] was familiar with Caprock. He was aware that Caprock [redacted] was a close friend of [redacted] [redacted] did not know to what extent [redacted] may have been involved with [redacted] knew that [redacted] received a loan from BCCI for a company [redacted], Market Place Georgia. [redacted] provided the writer with copies of three checks from BCCI to [redacted] in the amounts of $25,000, payable to Dillman Associates, $32,500, payable to [redacted] and $38,000, payable to [redacted] Each check was dated November 16, 1988.

b6 b7C

[redacted] advised that the above checks were a payout for a loan. [redacted] was not knowledgeable about the details of the loan. He suggested that [redacted] of BCCI, New York, be contacted for details pertaining to the loan.

b6 b7C

[redacted] was aware that DR. [redacted] a BCCI client, played a prominent role in the [redacted] deal.

b6 b7C

Investigation on 8/28/91 at New York, New York File # 29B-WF-171994 -222

by SA [redacted] Date dictated 9/27/91

b6 b7C

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1325015-000-7481

FD-302 (REV. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/17/91

[redacted] was interviewed at his place of employment, THE NEW YORK STATE BANKING DEPARTMENT, at 530 Fifth Avenue, New York, New York. [redacted] provided the following information: b6 b7C

[redacted] was formerly employed in the regional office of the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) at 530 Fifth Avenue. When the NEW YORK STATE BANKING DEPARTMENT closed down the BCCI operations in New York, it took over that office and used it for maintaining BCCI's records. [redacted] was among several former BCCI employees who were hired by the NEW YORK STATE BANKING DEPARTMENT to assist them in their cataloging of the BCCI records and assets. b6 b7C

[redacted] was employed by EQUITABLE LIFE INSURANCE COMPANY, in their Atlanta office, in 1982. His position at EQUITABLE was [redacted] of the Real Estate Division. In that position, [redacted] checking accounts of the firm and had the occasion to open some accounts with the NATIONAL BANK OF GEORGIA (NBG). He recalled meeting NBG employee [redacted] at a social function in 1983. He recalled that [redacted] was interested in getting some of EQUITABLE's business at NBG. b6 b7C

He recalled being invited to several of NBG's social functions while he lived in Atlanta. One such occasion was in 1984 when NBG owner, GHAITH PHARAON, threw a large party at the old BOBBY JONES Mansion in Atlanta, Georgia. He recalled that this party was attended by approximately 900 people. He recalled asking [redacted] how NBG could afford such a lavish party, and [redacted] explained that it was because NBG did not advertise. b6 b7C

[redacted] introduced [redacted] to Mr. AGHA HASAN ABEDI, the president of BCCI. He recalled that this meeting took place at the RITZ CARLTON HOTEL in Atlanta, Georgia, sometime around 1985. He recalled that he had dinner in ABEDI's hotel room with him at that time. ABEDI wanted [redacted] to come to work for BCCI. At that time, he explained that they were hiring approximately 100 Americans to dispatch around the world to the various BCCI b6 b7C

Investigation on 8/28/91 at New York, New York File # 194A-AT-67917

by SA [redacted] SA [redacted] :rkb Date dictated 9/9/91 b6 b7C b7E

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FD-302a (Rev. 11-15-83)

194A-AT-67917

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Continuation of FD-302 of [redacted], On 8/28/91, Page 2

facilities, to give the bank "an American look." ABEDI told him in the meeting about the benevolence of his bank, explaining that any time there is a disaster in the world, particularly the third world, BCCI was there to provide assistance. He told [redacted] that there were great opportunities for advancement because of the rapid growth that the bank was undergoing. b6 b7C

Prior to going to work for BCCI, [redacted] met with PHARAON at his estate in Richmond Hill, Georgia. He traveled to Richmond Hill with [redacted]. He recalled that PHARAON questioned him about his treasury experience with EQUITABLE. [redacted] could not explain why it was necessary for him to meet with PHARAON, and did not know exactly what this experience had to do with his being hired by BCCI, if anything. b6 b7C

He was hired by BCCI in July, 1986, to work in their regional office in New York City. He said that one reason that he accepted this job was because he wanted to return to his home in New York. At the time he was hired, he attended a six month training seminar at Pace University in Westchester County, New York. Immediately thereafter, he began to work at the New York Office. He recalled that he was given no specific responsibilities, and had no idea what his duties were to be. He recalled spending some time trying to solicit international business for the bank, that is, import-export business. He eventually went into the Human Resources Department of BCCI, where he began trying to consolidate agencies, i.e., representative offices of the bank.

[redacted] recalled that his supervisor at BCCI was [redacted] was a Pakistani, and wanted to get rid of the Americans that were working in the bank. For that reason, he did not like [redacted] b6 b7C

[redacted] recalled attending a BCCI annual conference in Luxembourg in 1986. He was invited to attend the conference by [redacted] who was still employed at NBG at that time. b6 b7C

[redacted] recalled that there came a time when the officials of NBG were trying to change the name of the bank to FIRST AMERICAN BANK. This name change required a change in the Georgia banking law. [redacted] called from the London office of BCCI at that time. He told [redacted] that there were forty eight black members of the Georgia legislature, and they needed a black b6 b7C

1325015-000-7483

FD-302a (Rev. 11-15-83)

195A-AT-67917

Continuation of FD-302 of [redacted], On 8/28/91, Page 3 b6 b7C

person to contact these legislators to convince them to vote for the change in the Georgia law. At first [redacted] told [redacted] that he did not want to get involved in this. He recalled that [redacted] called him again a short while later and told [redacted] that this was very important, that they really needed him to help. He agreed to do this. [redacted] said that when [redacted] used the term "we", he understood that to mean BCCI. He said that he knew PHARAON was a member of the board of BCCI and also that he owned NBG, so therefore, he knew that there was a relationship of some sort between the two banks. b6 b7C

[redacted] recalled that he and [redacted] traveled to Atlanta by air, arriving at approximately midnight, just prior to the vote in the Georgia legislature. [redacted] recalled that he stayed in his home which he still owned in Atlanta at that time. When he got to Atlanta, [redacted] told him to stand by and they would call him when they needed him to take specific action. He recalled that he waited in his house for two days and finally [redacted] called him and told him that it was not necessary to do anything, that the bill had been approved by the Georgia legislature. b6 b7C

[redacted] recalled that he was told that there was a lobbyist in Georgia working on the change in the Georgia law. [redacted] said during the time he was in Atlanta, he stayed at his home at [redacted] in southwest Atlanta. He said that he did not speak to anyone in the Georgia legislature, or anyone else about the lobbying effort. He said that he and [redacted] had not had any further discussions regarding his assistance on this after the second telephone call. b6 b7C

[redacted] recalled that approximately six months after the Georgia law was changed, he heard from someone in BCCI's London Office about a party at PHARAON's estate in Richmond Hill, Georgia. This party was held sometime after the Georgia law was changed. PHARAON was overheard pointing out an individual at his party and commenting to the effect that "we" had to pay him over a million dollars for the legislation. [redacted] said he did not know who this person was that PHARAON was referring. b6 b7C

[redacted] said that he is familiar with a BCCI employee named [redacted]. He described [redacted] in the New York Office of BCCI. He said that to his knowledge, [redacted] had no involvement in the Georgia lobbying effort. b6 b7C

FD-302a (Rev. 11-15-83)

194A-AT-67917

Continuation of FD-302 of [redacted], On 8/28/91, Page 4 b6 b7C

[redacted] said that he felt uneasy about the Georgia lobbying effort and was concerned about being "implicated" himself. He explained that after hearing the PHARAON quote about the payment of one million dollars to the individual at his party, he began feeling uneasy. He recalled talking to [redacted] the [redacted] to Georgia Governor JOE FRANK HARRIS. He had met [redacted] when he had previously lived in Atlanta, and he discussed the Georgia lobbying effort for NBG with PERDUE. He recalled that [redacted] was familiar with the lobbyist that worked on this legislation for NBG. [redacted] could not recall the name of this individual, but he said that [redacted] described him as "the sleaziest guy in Georgia." b6 b7C

[redacted] also recalled hearing talk that Georgia Speaker of the House, TOM MURPHY, and the lobbyist had an apartment somewhere in the state of Florida, and that is where the deal was made to get the Georgia legislation approved. [redacted] said that he could not be more specific than this, and repeated that this was merely talk that he had heard in the BCCI offices. He could not recall who made these comments. b6 b7C

[redacted] said that after the trip to Atlanta, his relationship with [redacted] deteriorated. He started asking questions about the trip to Atlanta, and why [redacted] had asked him to go there and then did not use him as he originally stated that he would. He said that he has had very little contact with [redacted] since that time, and he now understands that [redacted] is living in Pakistan. b6 b7C

[redacted] said that he met [redacted] in New York City in 1974 when he saw [redacted] and CORETTA KING on a New York street corner. He recalled that he had been an admirer of [redacted] and he walked up and introduced himself at that time. He said that he saw him again in New York at the 1976 Democratic Convention. He recalled that when he was living in Atlanta, while working at EQUITABLE, [redacted] asked him to take a look at the plans for Underground Atlanta. He recalled that the city of Atlanta was having trouble getting this project off the ground, and they asked [redacted] to look at it from a business standpoint to see if he could make any recommendations. [redacted] recalled that he did recommend that they fire some of the people that were involved in the project. He recalled that the city made these changes and the project was improved. b6 b7C

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 b6 b7C

[redacted] later learned that [redacted] had entered into a consulting agreement with BCCI. He did not know how he became aware of this, but he recalled sitting in on a meeting at the London offices of BCCI between [redacted] and [redacted] This discussion concerned BCCI wanting an introduction to Nicaraguan leader, DANIEL ORTEGA. He later learned that [redacted] accompanied some BCCI employees from the Miami office to Nicaragua to make the introduction to ORTEGA. b6 b7C

[redacted] recalled that [redacted] told him that BCCI had reneged on paying him a consulting fee. He also was aware that YOUNG had a loan from NBG. He said that he did not know what happened on this loan, but he heard that the [redacted] loan was sold by NBG to BCCI. b6 b7C

[redacted] recalled that when he lived in Atlanta, he got involved with [redacted] on the State Agricenter Project. He was appointed to this project by then Governor HARRIS and he helped plan the project which was constructed in Perry, Georgia. During this project, he became familiar with some of the members of the Georgia legislature by name, but did not know any of them well, and certainly did not know any of them personally. [redacted] repeated that he never talked to any member of the Georgia legislature about the NBG name change. b6 b7C

[redacted] provided the following descriptive data regarding himself:

Name:	[redacted]
Address:	[redacted] Street, Brooklyn, New York
Telephone Number:	[redacted]
Date of Birth:	
Social Security Account Number:	[redacted]
Race:	Black
Sex:	Male

b6 b7C

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/26/91

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[redacted] advised that the above checks were a payout for a loan. [redacted] was not knowledgeable about the details of the loan. He suggested that [redacted] of BCCI, New York, be contacted for details pertaining to the loan.

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[redacted] was aware that DR. [redacted] a BCCI client, played a prominent role in the [redacted] deal.

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Jus 1, 2, 3,

Investigation on 8/28/91 at New York, New York File # 29B-WF-171994

by SA [redacted] Date dictated 9/27/91

b6
b7C

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1325015-000-7487

223-WF-171994-222

FD-302 (REV. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/17/91

[redacted] was interviewed at his place of employment, THE NEW YORK STATE BANKING DEPARTMENT, at 530 Fifth Avenue, New York, New York. [redacted] provided the following information:

[redacted] was formerly employed in the regional office of the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) at 530 Fifth Avenue. When the NEW YORK STATE BANKING DEPARTMENT closed down the BCCI operations in New York, it took over that office and used it for maintaining BCCI's records. [redacted] was among several former BCCI employees who were hired by the NEW YORK STATE BANKING DEPARTMENT to assist them in their cataloging of the BCCI records and assets.

[redacted] was employed by EQUITABLE LIFE INSURANCE COMPANY, in their Atlanta office, in 1982. His position at EQUITABLE was [redacted] of the Real Estate Division. In that position, [redacted] checking accounts of the firm and had the occasion to open some accounts with the NATIONAL BANK OF GEORGIA (NBG). He recalled meeting NBG employee [redacted] at a social function in 1983. He recalled that [redacted] was interested in getting some of EQUITABLE's business at NBG.

He recalled being invited to several of NBG's social functions while he lived in Atlanta. One such occasion was in 1984 when NBG owner, GHAITH PHARAON, threw a large party at the old BOBBY JONES Mansion in Atlanta, Georgia. He recalled that this party was attended by approximately 900 people. He recalled asking [redacted] how NBG could afford such a lavish party, and [redacted] explained that it was because NBG did not advertise.

[redacted] introduced [redacted] to Mr. AGHA HASAN ABEDI, the president of BCCI. He recalled that this meeting took place at the RITZ CARLTON HOTEL in Atlanta, Georgia, sometime around 1985. He recalled that he had dinner in ABEDI's hotel room with him at that time. ABEDI wanted [redacted] to come to work for BCCI. At that time, he explained that they were hiring approximately 100 Americans to dispatch around the world to the various BCCI

Investigation on 8/28/91 at New York, New York File # 194A-AT-67917

by SA [redacted] SA [redacted] :rkb Date dictated 9/9/91

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1325015-000-7489

FD-302a (Rev. 11-15-83)

194A-AT-67917

Continuation of FD-302 of [redacted], On 8/28/91, Page 2 b6 b7C

facilities, to give the bank "an American look." ABEDI told him in the meeting about the benevolence of his bank, explaining that any time there is a disaster in the world, particularly the third world, BCCI was there to provide assistance. He told [redacted] that there were great opportunities for advancement because of the rapid growth that the bank was undergoing. b6 b7C

Prior to going to work for BCCI, [redacted] met with PHARAON at his estate in Richmond Hill, Georgia. He traveled to Richmond Hill with [redacted] He recalled that PHARAON questioned him about his treasury experience with EQUITABLE. [redacted] could not explain why it was necessary for him to meet with PHARAON, and did not know exactly what this experience had to do with his being hired by BCCI, if anything. b6 b7C

He was hired by BCCI in July, 1986, to work in their regional office in New York City. He said that one reason that he accepted this job was because he wanted to return to his home in New York. At the time he was hired, he attended a six month training seminar at Pace University in Westchester County, New York. Immediately thereafter, he began to work at the New York Office. He recalled that he was given no specific responsibilities, and had no idea what his duties were to be. He recalled spending some time trying to solicit international business for the bank, that is, import-export business. He eventually went into the Human Resources Department of BCCI, where he began trying to consolidate agencies, i.e., representative offices of the bank.

[redacted] recalled that his supervisor at BCCI was [redacted] was a Pakistani, and wanted to get rid of the Americans that were working in the bank. For that reason, he did not like [redacted] b6 b7C

[redacted] recalled attending a BCCI annual conference in Luxembourg in 1986. He was invited to attend the conference by [redacted] who was still employed at NBG at that time. b6 b7C

[redacted] recalled that there came a time when the officials of NBG were trying to change the name of the bank to FIRST AMERICAN BANK. This name change required a change in the Georgia banking law. [redacted] called from the London office of BCCI at that time. He told [redacted] that there were forty eight black members of the Georgia legislature, and they needed a black b6 b7C

FD-302a (Rev. 11-15-83)

19A-AT-67917

Continuation of FD-302 of [redacted], On 8/28/91, Page 3 b6 b7C

person to contact these legislators to convince them to vote for the change in the Georgia law. At first [redacted] told [redacted] that he did not want to get involved in this. He recalled that [redacted] called him again a short while later and told [redacted] that this was very important, that they really needed him to help. He agreed to do this. [redacted] said that when [redacted] used the term "we", he understood that to mean BCCI. He said that he knew PHARAON was a member of the board of BCCI and also that he owned NBG, so therefore, he knew that there was a relationship of some sort between the two banks. b6 b7C

[redacted] recalled that he and [redacted] traveled to Atlanta by air, arriving at approximately midnight, just prior to the vote in the Georgia legislature. [redacted] recalled that he stayed in his home which he still owned in Atlanta at that time. When he got to Atlanta, [redacted] told him to stand by and they would call him when they needed him to take specific action. He recalled that he waited in his house for two days and finally [redacted] called him and told him that it was not necessary to do anything, that the bill had been approved by the Georgia legislature. b6 b7C

[redacted] recalled that he was told that there was a lobbyist in Georgia working on the change in the Georgia law. [redacted] said during the time he was in Atlanta, he stayed at his home at [redacted], in southwest Atlanta. He said that he did not speak to anyone in the Georgia legislature, or anyone else about the lobbying effort. He said that he and [redacted] had not had any further discussions regarding his assistance on this after the second telephone call. b6 b7C

[redacted] recalled that approximately six months after the Georgia law was changed, he heard from someone in BCCI's London Office about a party at PHARAON's estate in Richmond Hill, Georgia. This party was held sometime after the Georgia law was changed. PHARAON was overheard pointing out an individual at his party and commenting to the effect that "we" had to pay him over a million dollars for the legislation. [redacted] said he did not know who this person was that PHARAON was referring. b6 b7C

[redacted] said that he is familiar with a BCCI employee named [redacted]. He described [redacted] in the New York Office of BCCI. He said that to his knowledge, [redacted] had no involvement in the Georgia lobbying effort. b6 b7C

FD-302a (Rev. 11-15-83)

194A-AT-67917

Continuation of FD-302 of [redacted], On 8/28/91, Page 4 b6 b7C

[redacted] said that he felt uneasy about the Georgia lobbying effort and was concerned about being "implicated" himself. He explained that after hearing the PHARAON quote about the payment of one million dollars to the individual at his party, he began feeling uneasy. He recalled talking to [redacted] to Georgia Governor JOE FRANK HARRIS. He had met [redacted] when he had previously lived in Atlanta, and he discussed the Georgia lobbying effort for NBG with PERDUE. He recalled that [redacted] was familiar with the lobbyist that worked on this legislation for NBG. [redacted] could not recall the name of this individual, but he said that [redacted] described him as "the sleaziest guy in Georgia." b6 b7C

[redacted] also recalled hearing talk that Georgia Speaker of the House, TOM MURPHY, and the lobbyist had an apartment somewhere in the state of Florida, and that is where the deal was made to get the Georgia legislation approved. [redacted] said that he could not be more specific than this, and repeated that this was merely talk that he had heard in the BCCI offices. He could not recall who made these comments. b6 b7C

[redacted] said that after the trip to Atlanta, his relationship with [redacted] deteriorated. He started asking questions about the trip to Atlanta, and why [redacted] had asked him to go there and then did not use him as he originally stated that he would. He said that he has had very little contact with [redacted] since that time, and he now understands that [redacted] is living in Pakistan. b6 b7C

[redacted] said that he met [redacted] in New York City in 1974 when he saw [redacted] and CORETTA KING on a New York street corner. He recalled that he had been an admirer of [redacted] and he walked up and introduced himself at that time. He said that he saw him again in New York at the 1976 Democratic Convention. He recalled that when he was living in Atlanta, while working at EQUITABLE, [redacted] asked him to take a look at the plans for Underground Atlanta. He recalled that the city of Atlanta was having trouble getting this project off the ground, and they asked [redacted] to look at it from a business standpoint to see if he could make any recommendations. [redacted] recalled that he did recommend that they fire some of the people that were involved in the project. He recalled that the city made these changes and the project was improved. b6 b7C

b6 b7C

[redacted] later learned that [redacted] had entered into a consulting agreement with BCCI. He did not know how he became aware of this, but he recalled sitting in on a meeting at the London offices of BCCI between [redacted] and [redacted] This discussion concerned BCCI wanting an introduction to Nicaraguan leader, DANIEL ORTEGA. He later learned that [redacted] accompanied some BCCI employees from the Miami office to Nicaragua to make the introduction to ORTEGA.

b6 b7C

[redacted] recalled that [redacted] told him that BCCI had reneged on paying him a consulting fee. He also was aware that YOUNG had a loan from NBG. He said that he did not know what happened on this loan, but he heard that the [redacted] loan was sold by NBG to BCCI.

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[redacted] recalled that when he lived in Atlanta, he got involved with [redacted] on the State Agricenter Project. He was appointed to this project by then Governor HARRIS and he helped plan the project which was constructed in Perry, Georgia. During this project, he became familiar with some of the members of the Georgia legislature by name, but did not know any of them well, and certainly did not know any of them personally. [redacted] repeated that he never talked to any member of the Georgia legislature about the NBG name change.

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[redacted] provided the following descriptive data regarding himself:

b6 b7C

Name: [redacted]
Address: [redacted] Street, Brooklyn, New York
Telephone Number: [redacted]
Date of Birth: [redacted]
Social Security Account Number: [redacted]
Race: Black
Sex: Male

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/30/91

[redacted] was contacted at the New York State Banking Department (NYSBD), 530 Fifth Avenue, New York, New York. [redacted] was aware of the identity of the contacting Agent and was familiar with the nature of the inquiry. [redacted] provided the writer with the [redacted] BCCI loan file. After consulting with [redacted] Special Deputy Superintendent, NYSBD, [redacted] advised that it was okay to copy the file. He added that [redacted], who was the [redacted] at BCCI, New York, should be contacted for information relevant to said loan file.

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Investigation on 8/29/91 at New York, New York File # 29B-WF-171994-223

by SA [redacted] Date dictated 9/27/91

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1325015-000-7494

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/30/91

[redacted] was contacted at the New York State Banking Department (NYSBD), 530 Fifth Avenue, New York, New York. [redacted] was aware of the identity of the contacting Agent and was familiar with the nature of the inquiry. [redacted] provided the writer with the [redacted], BCCI loan file. After consulting with [redacted], Special Deputy Superintendent, NYSBD, [redacted] advised that it was okay to copy the file. He added that [redacted], who was the [redacted] at BCCI, New York, should be contacted for information relevant to said loan file.

b6
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Investigation on 8/29/91 at New York, New York File # 29B-WF-171994-223

by SA [redacted] Date dictated 9/27/91

b6
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1325015-000-7495

29B-WF-171994-223

1325015-000-7496

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/19/91

[redacted] was interviewed in the presence of [redacted] his Attorney. The interview took place at the office of the United States Attorney, District of Columbia. Prior to the start of the interview [redacted] met briefly with AUSA'S [redacted] and [redacted]. The purpose of the interview was for [redacted] to provide information concerning his loan dealings with First American Bank (FAB). [redacted] furnished the writer with the attached summary of his transactions with FAB, which he reviewed verbatim with the writer. In addition to the summary [redacted] provided the following information:

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FAB officials who he dealt with included [redacted] described in the attached summary and [redacted], who handled [redacted] of his loan payments. [redacted] were located at 740 15th St., N.W., Washington, D.C. As detailed in the summary, all [redacted] loans, except for the line of credit, were [redacted] and came from the Trust Department. [redacted] told [redacted] that the line of credit was approved by FAB [redacted] never dealt directly with [redacted]

b6
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All that [redacted] required from [redacted] was a handwritten financial statement and an appraisal for each loan. [redacted] did not complete any formal loan documents nor were there any credit checks.

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[redacted] advised that his loan payment history was very poor. His prior loans were always in arrears. They were always in a delinquent status.

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[redacted] stated that his monthly debt requirement was approximately $40,000 and his monthly income was approximately $14,000. He emphasized that he did not hide this fact from FAB. [redacted] income was clearly reported on his financial statement. He added that he would not have been able to obtain loans from other banks and yet despite the disparity between the debt requirement and monthly income FAB kept approving his loans.

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Investigation on 8/5/91 at Washington, D.C. File # 29B-WF-171994-2274

by SA [redacted] Date dictated 8/7/91

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182501B-000-7497

 b6 b7C

[redacted] believed that FAB made the loans to him from trust funds in order to obtain his deposit accounts. He made the analogy to the BCCI philosophy of obtaining deposits. b6 b7C

With respect to the loans from FAB'S Trust Department, [redacted] never received payment coupons, cards or books. He received occasional type written statements. b6 b7C

[redacted] advised that he made certain loan payments by issuing checks from his escrow account. He sent the checks to [redacted]. The checks were clearly marked as coming from his escrow account. b6 b7C

[redacted] stated that he never paid any gratuities to [redacted] or other FAB officials in return for loan approvals. b6 b7C

Specific details of [redacted] loan activities are attached hereto. b6 b7C

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/19/91

[redacted] was interviewed in the presence of [redacted] his Attorney. The interview took place at the office of the United States Attorney, District of Columbia. Prior to the start of the interview [redacted] met briefly with AUSA'S [redacted] and [redacted]. The purpose of the interview was for [redacted] to provide information concerning his loan dealings with First American Bank (FAB). [redacted] furnished the writer with the attached summary of his transactions with FAB, which he reviewed verbatim with the writer. In addition to the summary [redacted] provided the following information:

FAB officials who he dealt with included [redacted] described in the attached summary and [redacted] FAB [redacted], who handled [redacted] of his loan payments. [redacted] were located at 740 15th St., N.W., Washington, D.C. As detailed in the summary, all [redacted] loans, except for the line of credit, were [redacted] and came from the Trust Department. [redacted] told [redacted] that the line of credit was approved by FAB [redacted] never dealt directly with [redacted]

All that [redacted] required from [redacted] was a handwritten financial statement and an appraisal for each loan. [redacted] did not complete any formal loan documents nor were there any credit checks.

[redacted] advised that his loan payment history was very poor. His prior loans were always in arrears. They were always in a delinquent status.

[redacted] stated that his monthly debt requirement was approximately $40,000 and his monthly income was approximately $14,000. He emphasized that he did not hide this fact from FAB. [redacted] income was clearly reported on his financial statement. He added that he would not have been able to obtain loans from other banks and yet despite the disparity between the debt requirement and monthly income FAB kept approving his loans.

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Investigation on 8/5/91 at Washington, D.C. File # 29B-WF-171994

by SA [redacted] Date dictated 8/7/91

b6 b7C

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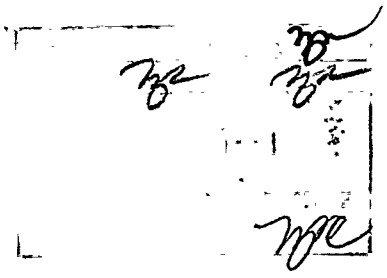
139A-HQ-1225015-000-7504

29B-WF-171994-229



1325015-000-7505

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 9/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
(OO: WMFO)

On 7/25/91 SA [redacted] per the request of AUSA [redacted] District of Columbia, was scheduled to interview [redacted] had received loans through high level officials at First American Bank (FAB), Washington, D.C. [redacted] believed there was a connection between the manner in which his loans were transacted and BCCI. The interview was canceled. b6 b7C

On 8/5/91, the writer was requested to conduct the above interview. The interview took place at the office of the U.S. Attorney, District of Columbia. Refer to the FD-302, interview date 8/5/91, for said interview results.

On 8/7/91, [redacted] met with the writer. [redacted] provided copies of documents relevant to his loan transactions. He advised that [redacted] were done by [redacted] W.S. Kidwell Associates, Inc., telephone [redacted] advised that his tenant at one of the Washington Harbour Condominiums was [redacted] telephone [redacted] added that [redacted] could provide information concerning this matter. b6 b7C

On 8/12/91, [redacted] contacted the writer. He sent the writer via facsimile correspondence concerning the sale of the Washington Harbour Condominiums by FAB. [redacted] emphasized that the appraisals were inflated. He again stated that [redacted] could be helpful. b6 b7C

On 8/20/91 [redacted] was in contact with the writer and AUSA [redacted] advised that he intended to file for bankruptcy protection in order to stop the foreclosure sale of his property by FAB. Subsequently, the writer contacted FAB [redacted] concerning the above. [redacted] stated that in view of [redacted] debt, FAB would proceed as scheduled with the sale of [redacted] property. b6 b7C

29B-WF-171994-MAIN - 225

1325015-000-7508

Administrative:

It should be noted that there does not appear to be any direct correlation between the [redacted] loans and the FAB/BCCI investigation. Former FAB [redacted] is scheduled to be interviewed on 9/27/91, in conjunction with the ongoing investigation. The [redacted] situation will be incorporated into said interview. b6 b7C

It should also be noted that the [redacted] loan situation with FAB appears to be questionable and may warrant further inquiry. b6 b7C

1325015-000-7509

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(NVMRA) Date 9/25/91

From : SA WALTER J. ROSINUS, JR.

Subject: HIDDEN INTERESTS
MAJOR CASE 38
FIF(B); FAG
(OO: WMFO)

Re: LEAD #9

Leads to interview key players of BCCI-WDC are being held in abeyance pending review of additional information regarding the BCCI operations in WDC and their participation in these operations.

Re: LEAD #10

[redacted] has been located at [redacted] Avenue, Washington, D.C., and arrangements have been made to interview him regarding his association with FGB prior to and subsequent to its being purchased by a group of "Arab Investors". b6 b7C

On 9/19/91 [redacted] was interviewed regarding his association with FGB. Results of this interview are set forth in an FD-302 contained in Sub file D. b6 b7C

[redacted] have been located in Austin, Texas and appropriate leads have been set forth to have the San Antonio Division interview them regarding their association with GHAITH PHARAON. See airtel in Sub file S. b6 b7C

Re: LEAD #11

(FNU) [redacted] has been identified as [redacted] formerly president of Citibank. [redacted] can be contacted through the Citicorp Headquarters Office, New York, New York, telephone 212-559-2710. This information was furnished to SA [redacted] who stated he would make arrangements to interview [redacted] regarding his being interviewed by ABEDI, [redacted] CLIFFORD, and [redacted] for the [redacted] at FAB-NY, during his trip to New York City scheduled for the week of September 30 through October 4, 1991. b6 b7C

29B-WF-171994 main-226

1 - WMFO
WJR/dbm
(1)

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1325015-000-7510

Efforts to locate and interview [redacted] have been negative. [redacted] is not and has not been associated with Security Pacific National Bank, headquartered in Los Angeles, California. Will follow through with possibility [redacted] is associated with Security Pacific International, whereabouts unknown, and set up interview regarding his being interviewed by ABEDI, [redacted], CLIFFORD, and [redacted] for the [redacted] at FAB-NY.

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1325015-000-7511

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(NVMRA) Date 9/26/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MAJOR CASE #38;
FIF;
OO:WMFO

For information, on 9/19/91, [redacted] requested writer to locate [redacted] for the purpose of setting up an interview. [redacted] advised that [redacted] was formerly employed by the Houston law firm Vincent & Elkins and is rumored to have recently returned to the U.S. from London. b6 b7C

On 9/19/91, it was determined that [redacted] had recently moved from Denver, Colorado to Austin, Texas and could be reached through his brother, [redacted] Austin, Texas, [redacted] DMV records from Denver revealed the following information re [redacted]: b6 b7C

DOB: [redacted]
Denver DL:
Address: [redacted]
Greenwich Village, Colorado 80121
Height: 5'10"
Weight: 180 pounds
Hair: Brown
Eyes: Brown

On 9/18/91, SA [redacted] determined that an airtel dated 9/17/91 had been sent to FBI, San Antonio to locate and interview [redacted]. SA [redacted] telephonically contacted the FIF supervisor, San Antonio and requested that, upon receipt of the above airtel, San Antonio hold the lead in abeyance. b6 b7C

On 9/18/91, [redacted] was advised of the above information and she requested writer to contact [redacted] and set up an appointment for the week of 10/1/91 in Austin, Texas. On 9/23/91, SA [redacted] telephonically contacted [redacted] and a meeting was scheduled for 10/4/9. in Austin, Texas. b6 b7C

2 - WMFO
DCR:das
(2)

29B-WF-171994-227

1325015-000-7512

[redacted] was advised of the above facts and it was determined that Atlanta SA [redacted] would meet [redacted] in Austin and assist in the interview. SA [redacted] concurred with the above and will contact [redacted] upon his return from annual leave on 9/30/91.

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1325015-000-7513

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(NVMRA) Date 9/26/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MAJOR CASE #38;
FIF;
OO:WMFO

For information, on 9/19/91, [redacted] requested b6 b7C
writer to locate [redacted] for the purpose of setting up an interview. [redacted] advised that [redacted] was formerly employed by the Houston law firm Vincent & Elkins and is rumored to have recently returned to the U.S. from London.

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On 9/18/91, [redacted] was advised of the above information b6 b7C
and she requested writer to contact [redacted] and set up an appointment for the week of 10/1/91 in Austin, Texas. On 9/23/91, SA [redacted] telephonically contacted [redacted] and a meeting was scheduled for 10/4/91 in Austin, Texas.

29B-WF-171994-227

2 - WMFO
DCR:das
(2)

1325015-000-7514

Memorandum

To : SAC, WMFO (261A-WF-165601) Date 9/26/91
ATTN: SA [redacted] WMFO SECURITY OFFICER

From : SSA [redacted] (C-5)

Subject: SECURITY BRIEFING

The purpose of this memorandum is to request a security briefing for SA [redacted] (DOB [redacted]; SSAN [redacted] to enable him to have access to a highly classified serial in an FBIHQ file. SA [redacted] needs to review the document in preparation for an interview of the person to whom the serial relates, to be conducted during the week of 10/20/91, in "Hidden Interests; MC #38; OO:WMFO" (29B-WF-171994).

It is requested that said briefing be accomplished during and not later than the week ending COB 10/11/91.

(2) - WMFO
(1 - 261A-WF-165601)
(1 - 29B-WF-171994)
GJL:das
(2)

29B-WF-171994 Main-228

1325015-000-7515

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 9/26/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF;
FAG
OO:WMFO

The purpose of this memorandum is to report the results of my trip to Grand Cayman, BWI, 9/9-12/91. The main purpose for the trip was to gain access to and to survey records presently in the custody of the provisional liquidator of BCCI and ICIC in the Cayman Islands (CI), Deloitte Ross Mohastsu (DRM) of Canada (an affiliate of Touche Ross).

In addition to myself, the investigative party consisted of: [redacted] of DOJ Fraud; [redacted] Aspen Systems Corporation (computer consultant to DOJ); [redacted] London [redacted]; [redacted] and [redacted]. We were met at the CI Airport by [redacted]. b6 b7C b7D

pp. 2, 3, 4, 5, 6

The [redacted] officials informed us that a meeting had been arranged with the CI's Attorney General Richard Ground for 9/10/91, after which, in order to have any access to the BCCI records, it would be necessary for each of us to be sworn as a [redacted] of the [redacted]. b7D

On 9/10/91, we met with Attorney General (AG) Ground in regard to the CI's stance toward our request for access to the records of BCCI. AG Ground said the executive counsel (Exco) of CI had agreed to meet with attorneys [redacted] and the two computer specialists from our group later that day. Exco is the local cabinet of the governor of the CI and is comprised of four elected and three appointed officials, chaired by the governor. According to AG Ground, the concerns of the Exco were what we b6 b7C

1 - WMFO
JNR:das
(1)

[redacted] b6 b7C

29B-WF-171994 main - 229

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wanted to do, and how we wanted to do it, with regard to the BCCI records, and what safeguards against unwarranted disclosure, particularly with regard to the U.S. delegation, could be articulated to the Exco.

With regard to the records, AG Ground said that a Canadian computer firm was working for the provisional liquidator (DRM) and was scheduled on 9/11/91 to see how many of BCCI's records were in the system and how much was on paper. AG Ground further informed us that DRM's [redacted] at CI, [redacted] would be meeting with us later in the day. b6 b7C

As part of the CI's regulatory action against BCCI, the entity known as ICIC was also seized. Several ICIC entities existed in the CI, with one of those entities, ICIC (overseas) (ICIC(O)) being a registered bank in its own right. The other entities were non-banking companies believed to have been operated by and from ICIC(O). Therefore, ICIC(O) was placed under the jurisdiction of DRM, while on 7/5/91, AG Ground sought and was granted a preliminary injunction preventing the other ICIC-related entities from disposing of assets. Since that time, some shareholders have asked for access to documents and other transactions, but none has challenged the injunction. The entities enjoined were: Financial Controls (Cayman), Limited; Financial Portfolio (Cayman) Limited; Financial Measures (Cayman) Limited; ICIC Apex Holdings, Limited; ICIC Holdings, Limited; ICIC Investments, Limited; ICIC Foundation (Cayman); ICIC Staff Benefit Fund/Trust. AG Ground was unsure whether the last entity, ICIC Staff Benefit Fund/Trust, was actually two.

[redacted] from [redacted] informed AG Ground that recent Price Waterhouse (PW) reports show extensive use of the Cayman entities in nominee transactions and that, therefore, the CI possibly has an investigative/prosecutive interest. AG Ground reported that he knew of no apparent losses incurred within the CI. b6 b7C b7D

In regard to the liquidation of BCCI, AG Ground reported there are negotiations ongoing with the royal family of Abu Dhabi toward a restructuring of BCCI. AG Ground stated his personal belief that the restructuring effort would be unsuccessful, and would certainly be so if he were ordered to wind up the corporation. The overall [redacted] of Touche Ross in Luxembourg, had encouraged restraint on the part of the various governments, and had successfully sought an adjournment of liquidation hearings until December 1991. b6 b7C

After the meeting with AG Ground, our group met with [redacted] of DRM. With regard to the records of BCCI, White said that five years of BCCI's computerized accounting records were backed up on between 50-60 tapes. He advanced his opinion that it could take a month to download those b6 b7C

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tapes onto the system and create a data base. With regard to ICIC, [redacted] said that four or five years of records already had been downloaded to the BCCI system, as had the records of Credit and Finance Corporation, Limited (CFC). b6 b7C

The physical records of BCCI and ICIC are located in three different places: The BCCI offices; the ICIC offices; and a warehouse. [redacted] acknowledged that since assuming control in July 1991, their efforts had been directed at locating and securing control over the assets of the corporations; an effort which had precluded an examination of the historical records in the various locations. b6 b7C

With regard to the warehouse location, there apparently was a computer at the warehouse used for cataloguing records at that location. DRM has the information from that computer. The warehouse itself is "very large" and full of documents, the ages of which are unknown to [redacted] He was aware that, prior to July 5, in response to a subpoena from the United States concerning Clifford and [redacted], about six people had been working in the warehouse putting together various records. b6 b7C

With regard to the storage area in BCCI, most of it is located in the basement of the building in which BCCI occupied approximately 10,000 square feet of space. The office area, which is on the second floor of that building, housed what current records seemed to be available. The basement area, which also had not been inventoried, contained not-so-current records.

All of the computer systems located in any of the offices had been backed up on the first day of DRM's arrival. DRM took control of BCCI and ICIC(O) at 7:00 a.m. on 7/5/91, prior to the arrival of any employees.

According to [redacted] there apparently are some missing files and records. By comparison of the list of records from the liquidator in London and their own list in the CI, White noted that related records do not seem to be present in both locations. b6 b7C

DRM has had access to the work of PW as set forth in the "sandstorm" report (i.e., the audit report done by PW in 1990).

The computer system used by BCCI was an N.C.R. system consisting of some 20 or 30 PCs.

[redacted], who ran ICIC, left CI approximately one week before DRM arrived. b6 b7C

In response to our request that the computer specialist be given an opportunity to view the warehouse prior to the meeting with Exco, [redacted] agreed to allow [redacted] b6 b7C

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[redacted] a superficial look at the facility in order to estimate what mass of documents was there. On their return, [redacted] reported to the rest of us their estimation that the building contained somewhere between 2 million and 3 million documents which, according to DeVanna, would take ten scanners approximately three or four months to image. While on the premises, the three noted an area apparently used by PW in compiling its report. This area seemed to contain approximately 300,000 documents. Overall, they reported the cabinet designations were "interesting" and definitely required further and closer examination. The physical layout of the facility was a two-level room, approximately 40 feet by 50 feet. The second level seemed to consist mostly of credit vouchers.

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During the afternoon of September 10, attorneys [redacted] and [redacted], and computer specialists [redacted] met with the Exco. They reported back to the group that the Exco had agreed to allow our further survey of the records, but not the copying or the collection of any information from those records.

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On 9/11/91, our group met with CI [redacted] who reported why and how the CI government had taken over BCCI and ICIC(O). On 7/5/91, the CI government appointed a [redacted] to take control of the facilities and operations of three banks: BCCI (Overseas); CFC; and ICIC(O). Court orders were also issued to restrict the operations of another eight (possibly nine) other entities. [redacted] had yet to determine whether ICIC Staff Benefit Fund might be the same as ICIC Staff Benefit Trust. [redacted] provided us with a copy of the order.

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Since taking control of those entities, [redacted] had become aware of another entity that was either affiliated or associated with them: Lhasa Holdings. Lhasa, a CI company, was possibly owned by Ghaith Pharaon. The [redacted] of ICIC Holdings, [redacted] told [redacted] that Pharaon was a nominee through Lhasa in the ownership of 70 percent of the shares of Finance and Investment International Limited (FIIL) for ICIC Holdings. [redacted] has seen a document purporting to be Pharaon's nominee agreement with ICIC Holdings. Although this document was not complete and was somewhat non-specific, it seemed to corroborate what [redacted] told him. To date, no one had come forward to seek a return of, or access to, the books and records of ICIC Holdings.

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[redacted] came to see [redacted] on or about 7/12/91, and began by telling [redacted] that, at one time, ICIC(H) was a large debtor of ICIC(O). [redacted] suggested that [redacted] consider allowing [redacted] to call in the assets of ICIC(H), e.g., Attock Oil, various securities transactions in New York, and contracts in Nigeria. Then, operating from "ICIC House" under the [redacted] would continue the operation of

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1325015-000-7519

these assets, relinquishing the proceeds of that activity to [redacted]. This, [redacted] told [redacted] would prevent dissipation of assets. An affidavit to this effect was presented to [redacted] (phonetic), the CI inspector of banks. With [redacted] approval, [redacted] agreed to amend the court order and allow the operation of ICIC(H). However, it was not long before [redacted] came to [redacted] and reported he was having a problem supervising [redacted] activities and accepting the contingent liabilities which might fall to the liquidator. Therefore, [redacted] asked that [redacted] revert to the original order, which was done by means of a second amendment. b6 b7C

[redacted] may know the whereabouts of Dossani. b6 b7C

There was a third amendment to the order (the first two having to do with the ICIC(H) operation) which concerned a $500 million transaction in the United States for the account of ICIC Investments (ICIC(I)) that apparently had yielded a profit of more than $20 million. An investment firm named Oppenheimer was holding that profit. The amendment was to allow the payment of that profit into ICIC(I).

The injunction against the various companies was based on prima facie evidence that criminal acts had occurred in the CI. There have been no challenges to the injunction, nor have there been any claims by anyone to be a shareholder of the various enjoined entities. In [redacted] opinion, each accession to the injunction strengthens the CI's position with regard to its enforcement. b6 b7C

Concerning Lhasa and the other entities involved in the injunction, the CI government's position has been to ask [redacted] to petition the court to wind up all of them. [redacted] believes that the financing of "upstream companies" by ICIC(O) possibly put control over those companies in the hands of the CI government through its hold over the affairs of ICIC(O). b6 b7C

One person, [redacted] has come forward to [redacted] claiming to be [redacted] of the shareholders of ICIC(I) and seeking records. [redacted] presented what purported to be a power of attorney and said he was represented by Bruce Campbell and Company, which [redacted] knew to be Campbell Corporate Services, a company on the CI which provides directorship services for off-shore entities. [redacted] had never heard of [redacted] prior to that occasion, and the matter is still pending. b6 b7C

The filings for the various entities associated with BCCI on the CI can be found in the corporate registry.

After our meeting with [redacted] we met with the [redacted] who told us he had received and accepted the authorization of the CI executive council for b6 b7C

1325015-000-7520

our preliminary survey of the amount and type of records under his control. He also informed us that DRM's [redacted] would be returning to the CI the following day. Although [redacted] assured us we would have access to all record-storage sites, we would be held to conformity with the Exco's mandate; that we could assess the number and type of documents present, but not copy or otherwise gather any information from them. b6 b7C

The first site we surveyed was the warehouse: a free-standing, concrete-block structure, measuring approximately 40 feet by 50 feet on the outside. Inside, we found that the building housed records, stored (about 50-50) in banker's boxes or on open, metal shelves on the first floor and on shelves on the second level. Physically, the entire first floor was used, except for an area, measuring about 15 feet by 15 feet, with desks where it appeared, from the records present, that Price Waterhouse had been working on its audit reports. The second level of the building included a small office, and platforms which ran the length of two walls and out about 15 feet. Our estimate was that somewhere between three and four million documents were stored there, and that they primarily were ICIC(O) records.

Noted among the records was the presence of files on CCAH, Clark Clifford, [redacted], Ghaith R. Pharaon, Interedec, [redacted] b6 b7C

"ICIC House" was found to be a three-story structure, the second and third floors of which essentially were devoid of furniture. On the first floor, which housed the bank known as ICIC(O), a vault containing the bulk of the records remaining at the site was surveyed. As in the warehouse, numerous pertinent references were seen. It was estimated that approximately 500,000 documents remained at this location. Some of the records, we were told, had been transported by DRM to the BCCI office for ease of acquisition.

At BCCI, which was located on the second floor of a large building in the center of George Town, we met with DRM [redacted] prior to our survey of the records. [redacted] informed us that, currently, DRM employs about six or seven former BCCI employees, who, after being interviewed and evaluated by DRM, were hired to assist in DRM's efforts to locate and secure control over BCCI's various assets. [redacted] agreed to provide a list of the current and former officials of BCCI, CFC (about six people) and ICIC (about eight people). The [redacted] BCCI was [redacted] and the [redacted] was [redacted] Caymans b6 b7C

BCCI's offices were located on one floor of the building, while archival storage was maintained in the basement

1325015-000-7521

of the building. According to [redacted], no inventory of the records in any of the locations had been done. When DRM took over all of the facilities at 7:00 a.m. on 7/5/91, the buildings were secured and access controls were established. One of the first steps taken was to back up all of the information on the computers and to thereafter limit access to them. b6 b7C

On 7/31/91, DRM terminated all of the employees of BCCI and its affiliated entities, then rehired approximately 50 percent of them. Those rehired were selected after interviews by DRM personnel specialists and a review of local police records.

The primary, active storage area in BCCI was a main-floor filing room with a vault. Stringent controls to prevent record removal and destruction were placed on that facility.

During our survey of the BCCI records storage we noted that, in the vault/filing room, there were numerous, pertinent filing designations. Of particular interest were five 5-drawer filing cabinets containing what [redacted] said were loan files, each in separate accordian folders. Opening one of the drawers, I noted folders labeled "Clark Clifford" and [redacted] However, I was prevented by [redacted] from viewing the contents of those folders. b6 b7C

In the archival storage area of the basement, computerized and references to microfilmed records were found, in addition to a large area housing the personal files of various officers within the bank. It was estimated that, within BCCI's offices and basement storage areas, approximately 1.5 million documents exist.

1325015-000-7522

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/27/91

From : SA [redacted] das

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Subject: HIDDEN INTERESTS
MAJOR CASE #38
OO:WMFO

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The purpose of this memorandum is to update the file on developments concerning the potential interviews of subjects [redacted] and a witness, [redacted]

On 7/30/91, I received a telephone call from SSA [redacted], FBIHQ, who said that Baltimore SA [redacted] had a source who was close to subject [redacted]

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In a subsequent telephone conversation with SA [redacted], the source was identified as [redacted] (protect), [redacted] Gamal Abdel Nasser. [redacted], who is a [redacted], was of assistance to [redacted]

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I notified AUSA [redacted] WDC, of [redacted] overture. AUSA [redacted] said that, as of 6/26/91 [redacted] has been represented by [redacted]

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On 8/13/91, SA [redacted] reported having contacted [redacted] who assured him that [redacted] said [redacted] Agha Hasan Abedi and [redacted]

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On 8/20/91, SA [redacted] and I met with [redacted] at the latter's residence, [redacted] During this meeting, [redacted] In addition, [redacted]

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b7D

-230

298-WF-[redacted]

1-WMFO

[redacted]

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[redacted] b6 b7C b7D

On 8/27/91, SA [redacted] reported another contact with [redacted] b6 b7C b7D

On 9/13/91, SA [redacted] and I met with [redacted], who reported knowing that, on [redacted] b6 b7C b7D

On 9/19/91, AUSA [redacted] and I, in the company of SA [redacted] met with [redacted]. During this meeting, [redacted] b6 b7C b7D

AUSA [redacted] has requested my assistance in conducting these interviews in Cairo, Egypt, during the week of October 13. AUSA [redacted] met with counsel for both [redacted] and [redacted] on 9/20/91, at which time he discussed the conditions of the proposed interviews. Those conditions were: [redacted] b6 b7C b7D

Based on the foregoing, AUSA [redacted] has begun preparations to travel to Cairo, Egypt, during the week of 10/13-19/91, and has requested that I make arrangements to accompany him. b6 b7C

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On 9/23/91, SA [redacted] reported yet another contact by [redacted] who said that the week of 10/13/91 is acceptable to [redacted] b6 b7C b7D

With regard to the proposed trip to Cairo, [redacted] told SA [redacted] b6 b7C b7D

On 9/25/91, AUSA [redacted] notified me that, due to a court-date conflict, he has had to push back the proposed Cairo trip to 10/19-26/91. [redacted] b6 b7C b7D

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 9/18/91

From SA
SA

Subject: "HIDDEN INTERESTS"
MC #38
(OO: WMFO)

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ROTOR
NOTE: WITH ADDED ID DATA

On 9/16/91, we attended a meeting at DOJ Fraud with WDC AUSA , DOJ , Denver (formerly Tampa) AUSA , Tampa SA , Oakes, Miami Tax Division AUSA and DOJ . The purpose of the meeting was to gather known information about those persons shown on the attached list (received from DOJ Fraud Section Deputy Chief on 9/9/91) who were arrested last week in Abu Dhabi. The information will be used by Assistant Attorney General (AAG) Robert Mueller, Deputy AAG and Deputy Chief on their upcoming trip later this week to Abu Dhabi and Pakistan, where they plan to negotiate for access to, or extradition of certain people on the list, and for access to and copies of BCCI records. The three-man party, known as the "process team," will pave the way for a group called the "substance team," which will follow in about two weeks and will consist of a representative from each of the groups investigating BCCI-related cases.

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The meeting resulted in a prioritization of the names on the list and a list of documents to be requested. The prioritization was accomplished by consensus, based on what was known about each person, a summary of which appears below.

AUSA suggested that an SA from WMFO should prepare to go along with the "substance team."

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AUSAs were each provided with copies of the FD-302 on (9/5/91) and of the 9/13/91 editions of "Who's Who" and "What's What."

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1-WMFO (Att. 1)

29B-WF-171994 - 231

JNR:DML:jnr
(1)

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Set forth below is the list of the BCCI Officials detained in Abu Dhabi. Included is a brief description of their functions:

1. [redacted] BCCI [redacted] ABEDI. [redacted] b6 b7C

[redacted] ABEDI [redacted].

2. [redacted] b6 b7C

3. [redacted] b6 b7C

4. [redacted] b6 b7C

5. [redacted] b6 b7C

[redacted] ABEDI.

6. [redacted] b6 b7C

7. [redacted] b6 b7C

8. [redacted] b6 b7C

9. [redacted] b6 b7C

10. [redacted] b6 b7C

[redacted] ABEDI.

11. [redacted] b6 b7C

12. [redacted] UNKNOWN

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13. [redacted] b6 b7C

14. [redacted] b6 b7C

15. [redacted] b6 b7C

Unknown

16. [redacted] b6 b7C

[redacted] to Sheik ZAYED. [redacted]

in Abu Dhabi.

17. [redacted] b6 b7C

[redacted] Sheik ZAYED.

18. [redacted] b6 b7C

Unknown

19. [redacted]

20. [redacted] b6 b7C

21. [redacted] ABEDI in [redacted]

[redacted]

22. [redacted] b6 b7C

23. [redacted]

Unknown

24. [redacted] b6 b7C

[redacted] ABEDI. [redacted]

25. [redacted] b6 b7C

26. [redacted]

Unknown

27. [redacted] b6 b7C

28. [redacted]

29. [redacted]

Unknown

30. [redacted] b6 b7C

31. [redacted] Unknown b6 b7C

32. [redacted] Unknown

33. [redacted] Unknown

34. [redacted] Unknown

35. [redacted] b6 b7C

[redacted] b6 b7C

36. [redacted]

37. [redacted] b6 b7C

38. [redacted] Unknown b6 b7C

Set forth below is the prioritization list for individuals listed above:

1. (1)
2. (35)
3. (9)
4. (21)
5. (7)
6. (4)
7. (6)
8. (5)
9. (19)
10. (16)
11. (14)
12. (2)

[redacted] b6 b7C

1. [redacted] b6 b7C
2.
3.
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9.
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11.
12.

13. [redacted] b6 b7C
14.
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34.
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It is believed that numbers 1 - 15 hold British Passports; the rest are thought to be Pakistani nationals.

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/20/91

From: SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE 38
FIF; FAG;
OO:WMFO

This memo requests authorization to request a permanent advance in the amount of $750.00 each for SA [redacted] SA [redacted] and SSA [redacted] for investigative travel necessitated by captioned case. b6 b7C

To date, captioned case has required investigative travel to numerous locations including New York, Miami, Atlanta, London, and the Grand Cayman Islands. It is anticipated that this long-term investigation will require, not only repeated return trips to these locations, but also additional domestic and international travel to locations not yet known.

Given the extensive travel anticipated, it is requested that authorization be granted to obtain permanent $750.00 advances for each of the aforementioned Agents.

APPROVED: b6 b7C

SSA ASAC

MTU:mtu

29B-WF-171994-MAIN 232

SEARCHED ... INDEXED ... FILED ...
SERIALIZED ... 1991
FBI—WASH METROPOLITAN FIELD

1325015-000-7531

0-9 (Rev. 8-16-79)

C-5

TRANSMIT VIA: AIRTEL

CLASSIFICATION: _____

DATE: 9-20-91

b6
b7C

FROM: Director, FBI

TO: SAC, Washington Metropolitan Field Office (29-WF-171994) (C-5)

AUTOMOTIVE MATTERS
CLARK MCADAMS CLIFFORD;
ETAL;
FIF; FAG;
OO: WMFO

Re WMFO teletype to Director, FBI dated 8-6-91 and telcalls between WMFO and [redacted] Automotive Unit.

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WMFO is authorized to rent nine vehicles in connection with the captioned matter. The rental period for these vehicles is 90 days. Purchase Order #R109982 has been issued for the remainder of Fiscal Year 1991. The continuation of these rentals is contingent upon Fiscal Year 1992 appropriations.

These vehicles are assigned Bucar Numbers 99-6560 thru 99-6568. WMFO is to ensure these vehicles are rented in accordance with the Manual of Administrative Operations and Procedures.

The Case Agent should ensure these vehicles are properly serviced and all costs should be forwarded to the WMFO Automotive Clerk.

WMFO should forward to FBIHQ, the vehicles make and model information.

UCFN ☒ Pos ☐ Neg

GENERAL INDICES:

☐ Automated Search

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

☐ Manual Search

WF: ☐ Pos ☒ Neg AX: ☐ Pos ☐ Neg

29-WF-171994-233

[redacted] 5015-000 b6 b7C

Memorandum

To : SAC, WMFO (29-WF-~~1719940~~ 171994) (P) (C-5) Date 9/26/91

From : Director, FBI (66-64)

Subject : FACSIMILE EQUIPMENT
WMFO EQUIPMENT

Reurtel dated 8/6/91, captioned "CLARK MCADAMS CLIFFORD; ET AL; FIF; FAG; (OO:WMFO)."

Reference airtel requested that a facsimile machine be provided to WMFO to be utilized at Tysons Corner on a temporary basis to assist in the BCCI investigation.

Operations Management Section (OMS) concurs with this request and has forwarded to Special Agent (SA) [redacted] a Panafax Model UF-270 facsimile machine identified by Serial Number: 340121136. Upon completion of the above described investigation your office is to return the facsimile machine to FBIHQ, Room 6421, OMS. b6 b7C

29-WF-171994
29-WF-171994-234

SEARCHED ... INDEXED ... FILED ...
OCT 03 1991
FBI — WASHINGTON FIELD

1325015-000-7588

FD-36 (Rev. 8-26-82)

FBI

C-5

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[redacted]

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 9/26/91

TO: DIRECTOR FBI
(ATTN: WCCS, FIF, CID; OLIA, I/FPCU, ROOM 7458)

FROM: LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT: CLARK McADAMS CLIFFORD, aka;
ET AL;
FIF;
FAG
OO: WMFO
(29B-WF-171994)

[redacted]

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CENTRUST BANK,
MIAMI, FLORIDA;
OO: MIAMI
(29D-MM-49881)

b6
b7C

Enclosed for WMFO and Miami is a report prepared by [redacted] dated September 17, 1991, referencing an undated communication on captioned investigation from WMFO.

UCFN: [redacted]
[redacted] ☐ Pos ☐ Neg
☐ Manual Search
☐ Neg AX: ☐ Pos ☐ Neg

6 - Bureau (Enc)
(1 - WCCS, FIF, CID)
(1 - OLIA)
(1 - Miami) (Enc) (INFO)
(2 - WMFO) (Enc)
1 - London
EJK/bt
(7)

29-B-WF-171994-235

SEARCHED [redacted]
SERIALIZED [redacted]
OCT 09 1991
WASH FIELD OFFICE

Approved: _____ Transmitted _____ (Number)

b6
b7C

[redacted]

ROSINUS

1325015-000-7589

17 September 1991

To: Incident Room, Operation ICECAP
(B.C.C.I. Enquiry) Action 290
and
Embassy of the United States of America
Office of Legal Attache
24 Grosvenor Square
London, W1A 1AE
(Reference 29B-WF-171994)

b6
b7C

From: [redacted]

Re. "Hidden Interests" Correspondence
received from U.S. Embassy
Reference 29B - WF - 171994

Enquiries have been made at Lloyds of London (Mr [redacted] and [redacted] Cargo Claims, telephone 071-623-7100 extension [redacted]) regarding this matter.

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The "Time" magazine article in question, (July 29, 1991 edition - page 23) concerns litigation currently taking place in the U.S.A. between Lloyds of London and [redacted] a Jordanian with extensive business interests in the U.S.A.

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Briefly, [redacted] is in dispute with Lloyds of London over two insurance claims he has made against Lloyds policies.

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The first concerns a "robbery" of 2½ million dollars from [redacted] home at the Sanctuary, Boca Raton, Florida during 1986, and the second a "stolen" coffee shipment in 1987.

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Lloyds of London allege fraud on the part of [redacted] in respect of both matters, and have refused to pay out on the insurance polices.

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b7C

Lloyds have instructed a U.S. attorney, James F. DOUGHERTY II, 1301 Dade Boulevard, Miami Beach, Florida, 33139. (Telephone 305-531-7300, Facsimile 305-532-2435) to act for them in this matter.

It is apparent that DOUGHERTY has amassed a vast amount of intelligence on [redacted] and his connections with B.C.C.I. Miami, and that he may have been endeavouring to interest the authorities there in the results of his work.

b6
b7C

The only B.C.C.I. [redacted] connection I have been able to establish is the production by [redacted] of certain B.C.C.I. cheques to evidence a bona fide transaction underlying his coffee claim. These cheques are believed to be in the possession of DOUGHERTY.

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BCCI:CITY:7533:JR

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1325015-000590

I understand that DOUGHERTY seeks a "Declaratory Judgement" on these matters before Judge Marcus, Southern District Court of Miami on 22.9.91 (Reference 88.0125.CIV).

My own view is that DOUGHERTY has been speaking to "Time" magazine journalists, and the relevant section of the July 29, 1991 article is the result.

It is suggested that DOUGHERTY may be an appropriate source of detailed information, and I ask that a copy of this report be forwarded to Assistant Legal Attache [redacted] Legal Attaches Office, Embassy of the United States of America, 24, Grosvenor Square, London W1A 1AE, for action. b6 b7C

[redacted]

FD-36 (Rev. 8-29-85)

C5

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FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 9/30/91

TO : SAC, WASHINGTON METROPOLITAN FIELD OFFICE

FROM : SAC, HOUSTON (29B-WF-171994) (RUC)

SUBJECT : HIDDEN INTEREST
MAJOR CASE 38
OO:WMFO

Re telephone call to SA [redacted] Washington Metropolitan Field Office, from SA [redacted] Houston.

b6
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Enclosed for Washington Metropolitan Field Office are the original and one copy of the FD-302 describing the interview of [redacted] Original notes of this interview are also enclosed.

b6
b7C

On August 14, 1991, Captain [redacted] of the Federal Prison Camp in Bryan, Texas contacted the Bryan Resident Agency in regard to inmate [redacted] white/female, date of birth [redacted] social security number [redacted] place of birth Concord, Oklahoma. [redacted] claimed to have information regarding the BCCI scandal. The results of the interview are enclosed. Houston will leave the decision of any further interviews of [redacted] to the discretion of WMFO after a review of the enclosed.

b6
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(2) - WMFO (Enc. 3)
2 - Houston

SWL/swl

29-WF-171994-236

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
OCT 09 1991
Per

Approved: [redacted] Transmitted ___ (Number) ___ (Time) ___

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

1325015-000-7592

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/12/91

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE 38
FIF; FAG;
OO:WMFO

On 10/12/91, [redacted], Price Waterhouse (PW), Boston, MA, contacted SA [redacted] and advised that she will be available to be interviewed on 10/22/91 at 10:00 a.m. in the office of [redacted] of OLWINE, CONNOLLY, CHASE, O'DONNELL, and WEHYER, 750 7th Avenue, NY, NY. OLWINE & CONNOLLY is counsel for PW. b6 b7C

This interview was scheduled in NY as WMFO agents are expected to be in NY on related matters during this time period.

MTU:mtu

29B-WF-171994 MAIN-238

OCT -8 19[illegible]

1325015-000-7601

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/12/91

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE 38
FIF; FAG;
OO:WMFO

On 10/10/91, AUSA [redacted] requested that the writer contact appropriate management at PRICE WATERHOUSE (PW) to determine who [redacted] should contact in PW's Legal Counsel Dept. for purposes of opening lines of communication between DOJ and PW re captioned investigation. b6 b7C

On 10/10/91, SA [redacted] contacted [redacted] PW, Boston, MA. [redacted] advised that [redacted] should contact [redacted] PW, NY, [redacted] This info was promptly forwarded to [redacted] b6 b7C

MTU:mtu

29B WF-171994 Main-239

FILED
OCT 1991

1325015-000-7602

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/12/91

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTERESTS"
MAJOR CASE 38
FIF; FAG;
OO:WMFO

On 9/30/91, SA [redacted] contacted DR. [redacted] at his office, [redacted] Street, Apt. A102, Arlington, VA, [redacted] to request an interview. SA [redacted] advised [redacted] that the interview would concern any direct information [redacted] possessed concerning [redacted] (DANIEL CASALARO - Deceased) alleged investigation involving BCCI. SA [redacted] stated that the interviewing agents would be interested in obtaining copies of any recent phone records and/or credit card receipts belonging to [redacted] b6 b7C

[redacted] agreed to be interviewed but stated that he has "very little if anything on BCCI" and that he has already turned over much of [redacted] receipts to the news media. b6 b7C

When asked how to contact [redacted] advised that her name is [redacted] and that her phone number is listed under [redacted], McLean, VA. b6 b7C

[redacted] agreed to be interviewed at his residence on 10/17/91 at 2:00 P.M. b6 b7C

29B-WF-171994 MAJ -240

MTU:mtu

OCT

1325015-000-7603

000I MRI

PP RUCNFB FBIWMFO FBIAT FBITP

DE FBIHQ #0005 2882309

ZNR UUUUU

P 151727Z OCT 91

FM FBI HOUSTON (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

INFO FBI ATLANTA/PRIORITY/

FBI TAMPA/PRIORITY/

BT

UNCLAS

CITE: //3290//

PASS: FBIHQ WCC SECTION FIE UNIT.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38.

RE HQ TELETYPE TO ALL RECEIVING OFFICES, 10/3/91.

ON 10/8/91 ABDULLA Z. AL NAHAYAN, AMBASSADOR FROM ABU DHABI ASSIGNED TO WASHINGTON D.C., CAME TO HOUSTON, TEXAS, [redacted] (PROTECT IDENTITY WITHIN FBI) HAD DINNER ON EVENING OF [redacted]

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29B-WF-171994-241

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SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 15 1991
FBI - WASH. METRO FIELD [redacted]

1325015-000-7604

[redacted]

b6
b7C
b7D

[redacted] WRITER INFORMED SOURCE

THAT ANY INFORMATION ON THE WHEREABOUTS OF THE FOLLWING

FEDERALLY INDICTED FUGITIVES WOULD BE USEFUL: [redacted]

[redacted] SOURCE

WILL PROVIDE ANY POSITIVE INFORMATION TO THE FEDERAL BUREAU OF

INVESTIGATION (FBI).

BT

- TIGFE DE FBIHO 0005 UNCLAS

#0005

NNNN

Record Request
FD-125 (Rev. 1-30-75)

Date 10-17-91

☐ Birth ☑ Credit ☐ Criminal ☐ Death ☐ INS ☐ Marriage * ☑ Motor Vehicle ☐ Other _____
☑ Driver's License

To
COM. CENTER

Buded

Return to
SA [redacted]

File number
29B-WF-171994

b6
b7C

Name and aliases of subject, applicant, or employee, and spouse

[redacted]

b6
b7C

Addresses

Residence

Business

Former

* Date and place of marriage (if applicable)

Race	Sex	Age	Height	Weight	Hair	Eyes
	☑ Male ☐ Female					

[redacted]

Birthplace

b6
b7C

Arrest Number

Fingerprint classification

Criminal specialty

Specific information desired

DMV CHECK FOR NEW YORK, NEW JERSEY + CONNECTICUT

credit check for current address

Social Security Number

[redacted]

Results of check

29B-WF-171994 - 242

SEARCHED _____ INDEXED
SERIALIZED _____ FILED

OCT 21 1991

(Use reverse side, if necessary)

* USGPO: 1986-491-309/54777

1325015-000-7607

Record Request
FD-125 (Rev. 1-30-75)

Date 10-17-91

☐ Birth ☑ Credit ☐ Criminal ☐ Death ☐ INS ☐ Marriage* ☑ Motor Vehicle ☐ Other _____
☑ Driver's License

To: COM. CENTER

Buded:

Return to: SA [redacted]

File number: 29B-WF-171994

b6
b7C

Name and aliases of subject, applicant, or employee, and spouse

[redacted]

b6
b7C

Addresses

Residence

Business

Former

* Date and place of marriage (if applicable)

Race	Sex	Age	Height	Weight	Hair	Eyes
	☑ Male ☐ Female					

Birth date: [redacted]

Birthplace

b6
b7C

Arrest number

Fingerprint classification

Criminal specialty

Specific information desired

DMV CHECK FOR NEW YORK, NEW JERSEY + CONNECTICUT

credit check for current address

Social Security Number: [redacted]

Results of check

(Use reverse side, if necessary)

* U.S.G.P.O.: 1983-421-525/55-1

1325015-000-7608

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-16-2018 BY

FD-160 (Rev. 7-28-89)

b6
b7C

Date 8/27/91

To: Office Services Manager

Requested by: SA WALTER J. ROSINUS JR

Ext. 6356 | Squad: | File No. 29B-WF-171994

Subject [redacted]

Social Security Account #

b6
b7C

Aliases

Address SPRINGFIELD, VA

Birth Place | Race | Sex ☒ Male ☐ Female

☐ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☒ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

[redacted] 9.10.91 Date

☐ **ISIS:** ☐ NEG ☐ POS
Searched by | Date

☐ **Confidential Indices:** ☐ NEG ☐ POS
Searched by | Date

☐ **OCIS:** ☐ NEG ☐ POS
Searched by | Date

☐ **ELSUR Indices:** ☐ NEG ☐ POS
Searched by | Date

☐ **IIS:** ☐ NEG ☐ POS
Searched by | Date

☐ **FOIMS:** ☐ NEG ☐ POS
Searched by | Date

☐ **MICRO:** ☐ NEG ☐ POS
Searched by | Date

☐ **GLOBAL:** ☐ NEG ☐ POS
Searched by | Date

[redacted] 9.10.91 Date

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Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast

☐ Albany
☐ Bern Switzerland
☐ Bonn Germany
☐ Boston
☐ London England
☐ Mexico City Mexico
☐ New York City
☐ Newark
☐ Paris France
☐ Philadelphia
☐ Rome Italy
☐ All above

Mid-Atlantic

☐ Atlanta
☒ Baltimore
☐ Birmingham
☐ Charlotte
☐ Jackson
☐ Jacksonville
☐ Knoxville
☐ Memphis
☐ Miami
☐ Mobile
☐ New Orleans
☐ Norfolk
☐ Quantico
☒ Richmond
☐ San Juan
☐ Savannah
☐ Tampa
☒ Washington Field
☐ All above

Central

☐ Buffalo
☐ Chicago
☐ Cincinnati
☐ Cleveland
☐ Dallas
☐ Denver
☐ Detroit
☐ El Paso
☐ Houston
☐ Indianapolis
☐ Kansas City
☐ Little Rock
☐ Louisville
☐ Milwaukee
☐ Minneapolis
☐ Oklahoma City
☐ Omaha
☐ Pittsburgh
☐ San Antonio
☐ Springfield
☐ St. Louis
☐ All above

Western

☐ Albuquerque
☐ Anchorage
☐ Butte
☐ Honolulu
☐ Las Vegas
☐ Los Angeles
☐ Phoenix
☐ Portland
☐ Sacramento
☐ Salt Lake City
☐ San Diego
☐ San Francisco
☐ Seattle
☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
	UCFN ☐ Pos ☐ Neg		
	GENERAL INDICES:		
	Automated Search		
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	[illegible] Search		
	[illegible]		

29B-WF-171994

Consolidated by | Date

Reviewed by | Date

File Review Symbols

I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

132-15-000-7610

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
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☆U.S. Government Printing Office: 1989-262-209/08030

1325015-000-7611

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 04-16-2018 BY [redacted]

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~~SECRET~~

[redacted]

NO: 001
REC-NO: 001

DDN:
TRUE: [redacted]
FO: WF CASE NO: [redacted] CLASS: [redacted]
NAME TYPE: A MAIN REF: M EVENT DATE: INDEXED: 051590
MODIFIED:
VIOLATION: [redacted] SPECIAL:
SERIALS:

b6
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RACE: U SEX: U ID-NO:
DOB: [redacted] POB: BAGHDAD IRAQ
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC: IRAQ

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MISCELLANEOUS:

CLASSIFICATION LEVEL: ~~S~~ CLASSIFIED BY: ~~G-3~~ DECLASSIFY ON: ~~OADR~~
F4 - QUERY AX
<GO> - NEXT INDEX F2 - ALIASES F8 - DELETE F10 - INDEX
F1 - REQUERY F3 - SUMMARY F6 - ADD INDEX F9 - MODIFY SHIFT-F10 - FOIMS
4Ã NUM á 33

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※M1 OF 1 NM-[redacted] CA-[redacted],AV,NEW YORK,NY,10022,03/90 b6 b7C

※ FA-[redacted]AV,BAYSIDE,NY,11361,02/90

※ SS-[redacted]

※

※END OF EQUIFAX IDENTIFICATION INFORMATION REPORT - 10/21/91

※

※* 007 EQUIFAX CREDIT INFORMATION SERVICES

※ 12501 PROSPERITY DR SILVER SPRING MD 20904 301/680-0770

※

※[redacted] SINCE 01/26/86 FAD 10/21/91 FN-301 b6 b7C

※ [redacted],AV,NEW YORK,NY,10022,TAPE RPTD 03/90

※ [redacted],AV,BAYSIDE,NY,11361,TAPE RPTD 02/90

※ [redacted],AV,FLUSHING,NY,11358,TAPE RPTD 12/89

※ SSS-[redacted]

※

※END OF EQUIFAX IDENTIFICATION INFORMATION REPORT - 10/21/91 b6 b7C

※

※

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-16-2018 BY [redacted]

13250

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 8/27/91
Requested by: SA WALTER ROSINUS
Ext.: 6356 | Squad: | File No.: 29B-WF-171994

Subject: [redacted] b6 b7C
Social Security Account #:
Aliases:

Address	Birth Date	Birth Place	Race	Sex
				☒ Male ☐ Female

☐ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☑ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

[redacted] b6 b7C
9.10.91 Date

☐ **ISIS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **Confidential Indices:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **OCIS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **ELSUR Indices:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **IIS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **FOIMS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **MICRO:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **GLOBAL:** ☐ NEG ☐ POS — Searched by ____ Date ____

[redacted] b6 b7C
9.10.91 Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☒ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☒ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☒ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

LOCAL ☐ Pos ☐ NEG
GENERAL INDICES:
Name Unit Search
☐ Neg ☐ Pos ☐ Neg
29B-WF-171994-244

Consolidated by ____ Date ____

Reviewed by ____ Date ____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

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1325015-000-7614

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☆U.S. Government Printing Office: 1989-262-209/08030

1325015-000-7615

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8/27/91

To: Office Services Manager

Requested by: SA WALTER J. ROSINUS, JR

Ext. 6356 | Squad: | File No. 29B-WF-171994

Subject [redacted] b6 b7C

Aliases [redacted]

Address BETHESDA, MD [redacted] | Birth Place | Race | Sex ☒ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of

☐ All References ☐ Criminal References Only

☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*

☐ Security References Only ☒ Main Criminal *(if no Main, list all Criminal References)*

[redacted] 9.10.91 Date b6 b7C

☐ **ISIS:** ☐ NEG ☐ POS
Searched by Date

☐ **Confidential Indices:** ☐ NEG ☐ POS
Searched by Date

☐ **OCIS:** ☐ NEG ☐ POS
Searched by Date

☐ **ELSUR Indices:** ☐ NEG ☐ POS
Searched by Date

☐ **IIS:** ☐ NEG ☐ POS
Searched by Date

☐ **FOIMS:** ☐ NEG ☐ POS
Searched by Date

☐ **MICRO:** ☐ NEG ☐ POS
Searched by Date

☐ **GLOBAL:** ☐ NEG ☐ POS
Searched by Date

[redacted] 9.10.91 Date b6 b7C

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast	Mid-Atlantic		Central		Western
☐ Albany	☐ Atlanta	☐ New Orleans	☐ Buffalo	☐ Little Rock	☐ Albuquerque
☐ Bern Switzerland	☒ Baltimore	☐ Norfolk	☐ Chicago	☐ Louisville	☐ Anchorage
☐ Bonn Germany	☐ Birmingham	☐ Quantico	☐ Cincinnati	☐ Milwaukee	☐ Butte
☐ Boston	☐ Charlotte	☒ Richmond	☐ Cleveland	☐ Minneapolis	☐ Honolulu
☐ London England	☐ Jackson	☐ San Juan	☐ Dallas	☐ Oklahoma City	☐ Las Vegas
☐ Mexico City Mexico	☐ Jacksonville	☐ Savannah	☐ Denver	☐ Omaha	☐ Los Angeles
☐ New York City	☐ Knoxville	☐ Tampa	☐ Detroit	☐ Pittsburgh	☐ Phoenix
☐ Newark	☐ Memphis	☒ Washington Field	☐ El Paso	☐ San Antonio	☐ Portland
☐ Paris France	☐ Miami	☐ All above	☐ Houston	☐ Springfield	☐ Sacramento
☐ Philadelphia	☐ Mobile		☐ Indianapolis	☐ St. Louis	☐ Salt Lake City
☐ Rome Italy			☐ Kansas City	☐ All above	☐ San Diego
☐ All above					☐ San Francisco
					☐ Seattle
					☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
	UCFN ☐ Pos ☐ Neg		
	GENERAL INDICES:		
	Automated Search		
	F: ☐ Pos ☒ Neg AX: ☐ Pos ☒ Neg		
	Manual Search		
	☐ Pos ☒ Neg AX: ☐ Pos ☒ Neg		

29B-WF-171994-245

Consolidated by Date

Reviewed by Date

[redacted] b6 b7C

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-7616

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☆U.S. Government Printing Office: 1989-262-209/08030

1325015-000-7617

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8/27/91

To: Office Services Manager

Requested by: SA WALTER J. ROSINUS JR

Ext. 6356 | Squad: | File No. 29B-WF-171994

St [redacted] Social Security Account # [redacted] b6 b7C

Al [redacted]

Address POTOMAC, MD [redacted] Birth Place | Race | Sex ☒ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of

☐ All References ☐ Criminal References Only

☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*

☐ Security References Only ☒ Main Criminal *(if no Main, list all Criminal References)*

[redacted] b6 b7C

Date	☐ **ISIS:** ☐ NEG ☐ POS
	Searched by Date
☐ **Confidential Indices:** ☐ NEG ☐ POS	☐ **OCIS:** ☐ NEG ☐ POS
Searched by Date	Searched by Date
☐ **ELSUR Indices:** ☐ NEG ☐ POS	☐ **IIS:** ☐ NEG ☐ POS
Searched by Date	Searched by Date
☐ **FOIMS:** ☐ NEG ☐ POS	☐ **MICRO:** ☐ NEG ☐ POS
Searched by Date	Searched by Date
☐ **GLOBAL:** ☐ NEG ☐ POS	[redacted] 9.10.91
Searched by Date	Date

b6 b7C

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast

- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic

- ☐ Atlanta
- ☒ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☒ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☒ Washington Field
- ☐ All above

Central

- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western

- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
	[redacted]		
	[redacted]		
	[redacted]		
	[redacted]		
	[redacted]		
	[redacted]		

[redacted] ☐ Pos ☐ Neg

GENERAL INDICES:

Automated Search

☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

Manual Search

☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

29B-WF-171994-246

Consolidated by Date

Reviewed by Date

File Review Symbols

I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

[redacted] b6 b7C

15.000

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date

☆U.S. Government Printing Office: 1989-262-209/08030

1325015-000-7619

[redacted]

SENSITIVE

b6
NO: 001 b7C
REC-NO: 001

DDN:
TRUE:
FO: WF CASE NO: [redacted] CLASS: [redacted]
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 071191
MODIFIED:
VIOLATION: [redacted] SPECIAL: b6 b7C
SERIALS: 4P85;

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:

MISCELLANEOUS:

CLASSIFICATION LEVEL: SN CLASSIFIED BY: DECLASSIFY ON:
F4 - QUERY AX F7 - ADD ALIAS
<GO> - NEXT INDEX F8 - DELETE F10 - INDEX
F1 - REQUERY F3 - SUMMARY F6 - ADD INDEX F9 - MODIFY SHIFT-F10 - FOIMS
4Ã NUM á 33

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date: 8/27/91
Requested by: SA WALTER ROSINUS
Ext.: 6356 | Squad: | File No.: 29B-WF-171994

Subject: [redacted] b6 b7C
Social Security Account #:
Aliases:

Address	Birth Date	Birth Place	Race	Sex
BETHESDA, MD				☒ Male ☐ Female

☐ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☒ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

[redacted] 9.10.91 Date — b6 b7C

☐ **ISIS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **Confidential Indices:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **OCIS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **ELSUR Indices:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **IIS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **FOIMS:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **MICRO:** ☐ NEG ☐ POS — Searched by ____ Date ____

☐ **GLOBAL:** ☐ NEG ☐ POS — Searched by ____ Date ____

[redacted] 9.10.91 Date — b6 b7C

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☒ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☒ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☒ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
	[illegible]		
	GENERAL INDICES:		
	☒ Automated Search [illegible]		
	FBI: ☐ Yes ☒ Neg ATF: ☐ Pos ☒ Neg		
	☒ Manual Search [illegible]		
	☐ Neg ☐ Pos		

Consolidated by ____ Date ____

Reviewed by ____ Date ____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

29B-WF171994 Serial 247
SEP 03 [illegible]

[redacted] b6 b7C

015-000-7021

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date

☆U.S. Government Printing Office: 1989-262-209/08030

1325015-000-7622

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date 8/27/91

Requested by: SA WALTER J. ROSINUS, JR

Ext. 6356 | Squad: | File No. 29B-WF-171994

Su [redacted] Social Security Account # b6 b7C

Alia

Address WDC | Birth Date | Birth Place | Race | Sex ☒ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☐ All References ☐ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☒ Main Criminal *(if no Main, list all Criminal References)*

[redacted] 9.10.91 Date ☐ **ISIS:** ☐ NEG ☐ POS b6 b7C
Searched by Date

☐ **Confidential Indices:** ☐ NEG ☐ POS ☐ **OCIS:** ☐ NEG ☐ POS
Searched by Date Searched by Date

☐ **ELSUR Indices:** ☐ NEG ☐ POS ☐ **IIS:** ☐ NEG ☐ POS
Searched by Date Searched by Date

☐ **FOIMS:** ☐ NEG ☐ POS ☐ **MICRO:** ☐ NEG ☐ POS
Searched by Date Date

☐ **GLOBAL:** ☐ NEG ☐ POS [redacted] 9.10.91 b6 b7C
Searched by Date Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast	Mid-Atlantic		Central		Western
☐ Albany	☐ Atlanta	☐ New Orleans	☐ Buffalo	☐ Little Rock	☐ Albuquerque
☐ Bern Switzerland	☒ Baltimore	☐ Norfolk	☐ Chicago	☐ Louisville	☐ Anchorage
☐ Bonn Germany	☐ Birmingham	☐ Quantico	☐ Cincinnati	☐ Milwaukee	☐ Butte
☐ Boston	☐ Charlotte	☒ Richmond	☐ Cleveland	☐ Minneapolis	☐ Honolulu
☐ London England	☐ Jackson	☐ San Juan	☐ Dallas	☐ Oklahoma City	☐ Las Vegas
☐ Mexico City Mexico	☐ Jacksonville	☐ Savannah	☐ Denver	☐ Omaha	☐ Los Angeles
☐ New York City	☐ Knoxville	☐ Tampa	☐ Detroit	☐ Pittsburgh	☐ Phoenix
☐ Newark	☐ Memphis	☒ Washington Field	☐ El Paso	☐ San Antonio	☐ Portland
☐ Paris France	☐ Miami	☐ All above	☐ Houston	☐ Springfield	☐ Sacramento
☐ Philadelphia	☐ Mobile		☐ Indianapolis	☐ St. Louis	☐ Salt Lake City
☐ Rome Italy			☐ Kansas City	☐ All above	☐ San Diego
☐ All above					☐ San Francisco
					☐ Seattle
					☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
	LCFN ☐ Pos ☐ Neg		
	GENERAL INDICES:		
	Automated Search		
	☐ Pos ☐ Neg ☐ Pos ☐ Neg		
	Manual Search		

29B-WF-171994

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

[redacted] b6 b7C

SEARCHED INDEXED SERIALIZED FILED

MICRO COMPUTER *(Continued)*

☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐POS
Date Base		Date Base	
Searched by	Date	Searched by	Date
☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐ POS
Date Base		Date Base	
Searched by	Date	Searched by	Date
☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐ POS
Date Base		Date Base	
Searched by	Date	Searched by	Date
☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐ POS
Searched by	Date	Date Base	
		Searched by	Date
☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐ POS
Date Base		Date Base	
Searched by	Date	Searched by	Date
☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐ POS
Date Base		Date Base	
Searched by	Date	Searched by	Date
☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐ POS
Date Base		Date Base	
Searched by	Date	Searched by	Date
☐ **MICRO:**	☐ NEG ☐ POS	☐ **MICRO:**	☐ NEG ☐ POS
Date Base		Date Base	
Searched by	Date	Searched by	Date

☆U.S. Government Printing Office: 1989-262-209/08030

1325015-000-7624

[redacted]

SENSITIVE

b6
NO: 001 b7C
REC-NO: 001

DDN:
TRUE:
FO: WF CASE NO: [redacted] CLASS: [redacted]
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 073091
MODIFIED:
VIOLATION: [redacted] SPECIAL:
SERIALS: 27

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:

MISCELLANEOUS:

CLASSIFICATION LEVEL: SN CLASSIFIED BY: DECLASSIFY ON:
F4 - QUERY AX F7 - ADD ALIAS
<GO> - NEXT INDEX F8 - DELETE F10 - INDEX
F1 - REQUERY F3 - SUMMARY F6 - ADD INDEX F9 - MODIFY SHIFT-F10 - FOIMS
4Ã NUM á 33

[redacted]

SENSITIVE

b6
NO: 001 b7C
REC-NO: 001

DDN:
TRUE:
FO: WF CASE NO: [redacted] CLASS: [redacted]
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 071091
MODIFIED: 071191
VIOLATION: [redacted] SPECIAL: b6 b7C
SERIALS: 4P26;4P85;

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:

MISCELLANEOUS:

CLASSIFICATION LEVEL: SN CLASSIFIED BY: DECLASSIFY ON:
F4 - QUERY AX F7 - ADD ALIAS
<GO> - NEXT INDEX F8 - DELETE F10 - INDEX
F1 - REQUERY F3 - SUMMARY F6 - ADD INDEX F9 - MODIFY SHIFT-F10 - FOIMS
4Ã NUM á 33

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(NVMRA) Date 10/31/91

From : SA WALTER J. ROSINUS, JR.

Subject: HIDDEN INTERESTS
MAJOR CASE 38
FIF(B); FAG
(OO: WMFO)

Re: LEAD #9

Leads to interview key players of BCCI-WDC are being held in abeyance pending review of additional information regarding the BCCI operations in WDC and their participation in these operations.

b6
b7C

Re: LEAD #10

[redacted] has been located at [redacted] Avenue, Washington, D.C., and interviewed on 09/19/91.

[redacted] have been located in Austin, Texas. [redacted] has been interviewed and efforts continue to locate and interview [redacted]

b6
b7C

Re: LEAD #11

[redacted] Citibank. [redacted] has been interviewed by BuAgents in New York in October 1991.

b6
b7C

[redacted] has been located in Southern California, and a lead has been sent to the Los angeles Division to interview him regarding his being interviewed by ABEDI, [redacted] CLIFFORD, and [redacted] for the [redacted] FAB-NY.

b6
b7C

- WMFO
WJR/dbm
(#)

[redacted]

b6
b7C

29B-WF-171994-249

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___

OCT 3 1991

FBI—WASH. METRO FIELD OFFICE

1825015-000-7626

FD-36 (Rev. 8-29-85)

[redacted] b6 b7C

C-5

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
[X] Teletype	[ ] Immediate	[ ] TOP SECRET
[ ] Facsimile	[X] Priority	[ ] SECRET
[ ] AIRTEL	[ ] Routine	[ ] CONFIDENTIAL
		[ ] UNCLAS E F T O
		[X] UNCLAS

Date 9/30/91

FM FBI WMFO (29B-WF-171994) (C-5)

TO FBI NEW YORK/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; FAG; OO:WMFO.

RE TELCALL, 9/30/91, BETWEEN WMFO SA [redacted] AND NEW YORK SSA [redacted] b6 b7C

FOR INFORMATION OF NEW YORK, WMFO SAS [redacted], [redacted] AND [redacted] WILL BE IN NEW YORK CITY BETWEEN 10/1/91 - 10/4/91. WMFO SAS WILL BE ACCOMPANIED BY [redacted], FRAUD SECTION, DOJ AND [redacted] THE PURPOSE OF TRAVEL IS TO CONDUCT WITNESS INTERVIEWS AND TO REVIEW RECORDS AT VARIOUS FINANCIAL INSTITUTIONS. b6 b7C

29B-WF-171994-250

SEARCHED [ ] INDEXED [ ]
SERIALIZED [ ] FILED [ ]

OCT 21 1991

Approved: [redacted] Original filename:

Time Received: 3:05 Telprep filename: DMLOO7SO.273

MRI/JULIAN DATE: 984/273 ISN: 016

FOX DATE & TIME OF ACCEPTANCE: 9/30/91 3:10 KLH

INVESTIGATION AT NEW YORK WILL BE COORDINATED WITH SSA [redacted]. SACS WMFO AND NEW YORK CONCUR WITH THE ABOVE TRAVEL.

b6
b7C

BT

PP FBIWM

DE FBIWMFO #0016 2731910

ZNR UUUUU

P 301910Z SEP 91

FM FBI WMFO (29B-WF-171994) (C-5)

TO FBI NEW YORK/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; FAG; OO:WMFO.

RE TELCALL. 9/30/91, BETWEEN WMFO SA [redacted] AND NEW YORK SSA [redacted]

b6
b7C

FOR INFORMATION OF NEW YORK, WMFO SAS [redacted] WILL BE IN NEW YORK CITY BETWEEN 10/1/91 - 10/4/91. WMFO SAS WILL BE ACCOMPANIED BY [redacted] FRAUD SECTION, DOJ AND [redacted] THE PURPOSE OF TRAVEL IS TO CONDUCT WITNESS INTERVIEWS AND TO REVIEW RECORDS AT VARIOUS FINANCIAL INSTITUTIONS.

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29B-WF-171994-250

SEARCHED 2 INDEXED 24
SERIALIZED 21 FILED

OCT 21 1991

1329015-000-7629

TWO DE FBIWMFO 0016 UNCLAS

INVESTIGATION AT NEW YORK WILL BE COORDINATED WITH SSA

[redacted] SACS WMFO AND NEW YORK CONCUR WITH THE ABOVE

b6
b7C

TRAVEL.

BT

#0016

NNNN

1325015-000-7630

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 9/30/91

TO : SAC, WASHINGTON METROPOLITAN FIELD OFFICE

FROM : SAC, HOUSTON (29B-WF-171994) (RUC)

SUBJECT : HIDDEN INTEREST
MAJOR CASE 38
OO:WMFO

Re telephone call to SA [redacted] Washington Metropolitan Field Office, from SA [redacted] Houston. b6 b7C

Enclosed for Washington Metropolitan Field Office are the original and one copy of the FD-302 describing the interview of [redacted] Original notes of this interview are also enclosed. b6 b7C

On August 14, 1991, Captain [redacted] of the Federal Prison Camp in Bryan, Texas contacted the Bryan Resident Agency in regard to inmate [redacted] white/female, date of birth [redacted], social security number [redacted], place of birth Concord, Oklahoma. [redacted] claimed to have information regarding the BCCI scandal. The results of the interview are enclosed. Houston will leave the decision of any further interviews of [redacted] to the discretion of WMFO after a review of the enclosed. b6 b7C

2 - WMFO (Enc. 3)
2 - Houston

SWL/swl

29B-WF-171994-251

302's to Sub D

[redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-7631

/FIND/MRI

UNKNOWN id code of:

/READ/MRI 1414/297
0000 MRI 01414

RR RUCNFB FBIWMFO

DE LON #0005 2980116

ZNR UUUUU

R 241832Z OCT 91

FM LEGAT LONDON [redacted] (P) b3 b7E

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS b6 b7C

CITE: //5200:LON589.297 24 OCT 1991//

PASS: HQ FOR SSA [redacted]; WMFO ATTN SSA [redacted] b3 b6 b7C b7E

SUBJECT: BCCI [redacted]; CLARK MCADAMS CLIFFORD; [redacted] BCCI; OO: WMFO (29B-WF-171994).

ON OCTOBER 22, 1991, ASSISTANT LEGAL ATTACHE (ALAT) [redacted] b6 b7C [redacted] WAS CALLED TO A MEETING AT THE AMERICAN EMBASSY, LONDON, BY [redacted]. THIS MEETING WAS HELD AT THE REQUEST OF THE GOVERNMENT ACCOUNTING OFFICE (GAO), [redacted] WHO WAS ACCOMPANIED BY [redacted]

29B-WF-171994-253

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
OCT 24 1991
FBI-WASH. METRO FIELD OFFICE
162

1325015-000-7635

b3
b7E

ALL OF THE GAO. ALSO IN ATTENDANCE FROM THE EMBASSY WAS [redacted] b6 b7C [redacted] STATE DEPARTMENT; [redacted] UNITED STATES CUSTOMS SERVICE; AND [redacted] U.S. TREASURY.

[redacted] EXPLAINED THAT GAO WAS SENT TO LONDON BY HOUSE b6 b7C MINORITY LEADER BOB MICHAEL AND THE HOUSE BANKING COMMITTEE. HE SAID THEY WERE MANDATED BY CONGRESS TO LOOK INTO THREE AREAS:

(1) ALLEGATIONS OF POLITICAL CORRUPTION RELATING BUT NOT LIMITED TO FIRST AMERICAN BANK AND THE NATIONAL BANK OF GEORGIA.

(2) SYSTEMIC PROBLEMS WITH THE REGULATORY PROCESS IN THE BANKING INDUSTRY.

(3) THE ROLE OF EXTERNAL AUDITORS IN THE BCCI SCANDAL.

[redacted] EMPHASIZED THAT THEIR INTERESTS WERE NOT b6 b7C b7D PROSECUTORIAL, AND ANY EVIDENCE THEY UNCOVERED IN THAT AREA WOULD BE REFERRED TO THE DOJ. [redacted] ADMITTED, HOWEVER, THAT IT WAS EXTREMELY DIFFICULT TO SEPARATE THEIR INQUIRIES FROM THE CRIMINAL INVESTIGATIONS THAT ARE CURRENTLY UNDERWAY BY THE FBI/DOJ. HE DID STATE, HOWEVER, THAT THEY HAD NO INTEREST IN ANY MONEY LAUNDERING UNLESS CORRUPTION WAS INVOLVED. [redacted] STATED THAT THE GAO WOULD BE TALKING WITH THE BANK OF ENGLAND, PRICE WATERHOUSE AND TOUCHE ROSS, AND REQUESTED TO MEET WITH THE [redacted]

b3
b7D
b7E

PAGE THREE LON [redacted] UNCLAS

[redacted]

[redacted] WAS THEN BRIEFED BY EMBASSY/STATE DEPARTMENT AND TREASURY PERSONNEL ON THE BCCI CASE FROM THE UK PROSPECTIVE. ALL THE INFORMATION PROVIDED WAS PUBLIC SOURCE/NEWSPAPER REPORT INFORMATION. USCS AND THE FBI DECLINED TO DISCUSS ANY MATTERS RELATING TO ONGOING CRIMINAL INVESTIGATIONS.

b6
b7C

AS A COURTESY, [redacted] OFFERED TO ARRANGE AND MAKE INTRODUCTIONS TO [redacted] PERSONNEL ON THEIR BEHALF. ON OCTOBER 23, 1991, [redacted] MET WITH DEPUTY DIRECTOR [redacted] AND ASSISTANT DIRECTOR [redacted] BRIEFED [redacted] ON THE NATURE OF GAO VISIT. [redacted] REFUSED TO DISCUSS ONGOING CRIMINAL INVESTIGATIONS AND EXPRESSED THEIR RELUCTANCE TO TURN OVER ANY DOCUMENTATION WHICH WOULD BE THE SUBJECT OF CONGRESSIONAL SUBPOENA. THE ISSUE OF CONGRESS PROTECTING INFORMATION PROVIDED TO IT WAS OF GREAT CONCERN TO [redacted] WHO NOTED THAT THE BANK OF ENGLAND AND PRICE WATERHOUSE, ETC., WOULD ALSO EXPRESS THESE CONCERNS. THE RELEASE OF DOCUMENTS IN THE CLARENCE THOMAS HEARINGS RECEIVED CONSIDERABLE ATTENTION IN THE UK PRESS AND WAS BROUGHT UP BY [redacted] AS AN

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b7D

EXAMPLE OF WHY THEY ARE RELUCTANT TO PROVIDE INFORMATION TO

PAGE FOUR LON [redacted] UNCLAS b3 b7E

CONGRESS EVEN WITH GUARANTEES OF CONFIDENTIALITY.

THE MEETING CONCLUDED WITH THE GAO REQUESTING ANY

INFORMATION FROM [redacted] THAT THEY COULD COMFORTABLY PROVIDE AND b7D

GAO ADVISING [redacted] THAT ANY INFORMATION THEY OBTAIN RELATING TO

CRIMINAL MATTERS IN THE UK WOULD BE SHARED WITH [redacted]

BT

#0005

NNNN

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 10/28/91

TO : SAC, HOUSTON

FROM : SAC, WMFO (29B-WF-171994) (P)

SUBJECT : HIDDEN INTEREST,
MAJOR CASE 38;
FIF;
OO:WMFO

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Enclosed for Houston Division are the original and one copy of a federal grand jury subpoena issued 10/25/91 in the [redacted]

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b7C

For information Houston Division, one copy of the above federal grand jury subpoena was facsimiled to [redacted] N.A., by [redacted] on 10/25/91. [redacted] accepted the facsimile copy only until such time as personal service by a special agent could be arranged.

LEAD

HOUSTON DIVISION
AT HOUSTON, TEXAS

Will serve the enclosed federal grand jury subpoena on [redacted] as soon as possible. Houston Division will execute the original federal grand jury subpoena and return it to WMFO.

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2 - Houston (Encs. 2)
1 - WMFO
DCR:das
(3)

29B-WF-171994-254
SEARCHED INDEXED
SERIALIZED FILED

OCT 21 1991

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-7639

FD-36 (Rev. 8-29-85)

C-5

b6
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FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
[X] Teletype	[X] Immediate	[ ] TOP SECRET
[ ] Facsimile	[ ] Priority	[ ] SECRET
[ ] AIRTEL	[ ] Routine	[ ] CONFIDENTIAL
		[ ] UNCLAS E F T O
		[X] UNCLAS

Date 10/29/91

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

FBI TAMPA/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. CID, WCCS, FIFU.

SUBJECT: HIDDEN INTERESTS; MC #38; OO: WMFO.

RE WMFO TELCALL TO FBIHQ, DATED 10/28/91.

FOR INFORMATION OF FBIHQ AND TAMPA, THE PURPOSE OF THIS COMMUNICATION IS TO BRIEFLY REPORT ON THE RESULTS OF INTERVIEWS OF [redacted], CONDUCTED IN CAIRO, EGYPT, BY WMFO SA [redacted] AND WASHINGTON, D.C. AUSA [redacted] BETWEEN 10/22/91 AND 10/24/91. FBIHQ WILL RECALL THAT [redacted] IN BOTH BCCI AND IN

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29B-WF-171994-255

Approved: B/C Original filename:

Time Received: 11:15 Telprep filename: DML0045.302

MRI/JULIAN DATE: 1041 1302 ISN: 0311

FOX DATE & TIME OF ACCEPTANCE: 10/29/91 11:23 KLH

1325015-000-7640

THE TAKEOVER OF FINANCIAL GENERAL BANKSHARES (FGB); AND [redacted] b6 b7C
[redacted], FORMERLY A CONTRACT EMPLOYEE OF THE GOVERNMENT OF SAUDI ARABIA, WAS THE PERSON WHO INTERESTED [redacted] IN INVESTING IN FGB. [redacted] (NO RELATION TO [redacted] IS AN [redacted]

ESSENTIALLY AND CATEGORICALLY, BOTH [redacted] AND [redacted] b6 b7C DENY EVER BEING NOMINEES FOR BCCI, PARTICULARLY WITH REGARD TO OWNERSHIP OF FGB AND CREDIT AND COMMERCE AMERICAN HOLDINGS (CCAH) SHARES. EACH MAINTAINED (1) THAT HIS ORIGINAL INVESTMENT WAS MADE WITH HIS OWN EXISTING FUNDS; (2) THAT HE HAD A "FACILITY", I.E., A LINE OF CREDIT, ESTABLISHED WITH BCCI, WHICH HE USED FOR SUBSEQUENT PURCHASES OF CCAH SHARES; (3) THAT NONE OF HIS SHARES HAS EVER BEEN PLEDGED AS COLLATERAL AGAINST THE MONEY DRAWN FROM HIS "FACILITY", OR ANY LOAN REQUIRED TO ENHANCE THE "FACILITY"; (4) THAT HE HAD NOT MADE ANY FALSE STATEMENT DURING ANY TESTIMONY GIVEN IN THIS CASE; (5) THAT ALTHOUGH HE WAS AWARE BCCI WAS NOT ACCEPTABLE TO THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (BGFRS) AS A LENDER OR PARTICIPANT IN THE ORIGINAL ACQUISITION OF FGB SHARES, SUBSEQUENT FINANCING BY BCCI WAS NOT

PROSCRIBED; (6) THAT DOCUMENTS PURPORTING TO SHOW NOMINEE ARRANGEMENTS BETWEEN HIM AND BCCI WERE CONCOCTED BY BCCI TO DECEIVE ITS AUDITORS WHILE INFLATING ITS BALANCE SHEET; (7) THAT BCCI SERVED AS HIS INVESTMENT BANKER AND AGHA HASAN ABEDI SERVED AS HIS [redacted] AND AS [redacted] b6 b7C OTHER CCAH INVESTORS; (8) THAT HE HAS PARTICIPATED IN SEMI-[redacted] ABEDI, CLARK CLIFFORD AND/OR [redacted] BUT AT NO TIME WERE OPERATIONAL DECISIONS DISCUSSED OR MADE REGARDING CCAH OR ANY SUBSIDIARY.

[redacted] WAS INTERVIEWED PARTICULARLY WITH REGARD TO b6 b7C DOCUMENTS WHICH, AS IN-HOUSE COUNSEL TO [redacted] HE REVIEWED. THOSE DOCUMENTS, A 4/2/88 LETTER TO INTERNATIONAL CREDIT AND INVESTMENT CORPORATION (ICIC) FROM [redacted] AND AN ALMOST-IDENTICAL, 4/6/88 LETTER FROM [redacted] PURPORT TO SHOW [redacted] PLEDGED CCAH SHARES AS COLLATERAL FOR A PERIOD OF FIVE YEARS IN RETURN FOR LOANS. BOTH [redacted] MAINTAINED THAT THE LETTERS WERE PROPOSALS RESULTING FROM NEGOTIATIONS BETWEEN THEM AND BCCI, AT THE BCCI'S BEHEST, AS PART OF A DEAL TO RESTRUCTURE THEIR DEBTS, AND THAT, ALTHOUGH EACH SIGNED HIS RESPECTIVE DOCUMENT, THE

ORIGINALS WERE NEVER CONVEYED TO ICIC. SHORTLY AFTER THE COPIES WERE GIVEN TO [redacted] AT BCCI, [redacted] DISCOVERED THAT THE TERMS OF THE PROPOSAL VIOLATED THE SAUDI ARABIAN LEGAL CODE, KNOWN AS THE "SHARIAA", WHICH, INTER ALIA, PROHIBITS THE MORTGAGING OF ASSETS. AFTER [redacted] WAS INFORMED OF THE PROBLEM, HE RETURNED THE COPIES OF THE PROPOSAL AND APOLOGIZED FOR ANY MISUNDERSTANDING. (IN ITS RECENT REPORTS, A COPY OF EACH OF THE LETTERS WAS OFFERED BY PRICE WATERHOUSE AS EVIDENCE THAT [redacted] WERE [redacted] ICIC. [redacted] DISPUTE THIS CLAIM, HOWEVER, REITERATING THAT THE ORIGINAL LETTERS HAVE NEVER LEFT THEIR POSSESSION).

b6
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FOR INFORMATION OF FBIHQ, FORMER WHITE HOUSE AIDE [redacted], WAS IN PRESENCE OF [redacted] BEFORE COMMENCEMENT OF EACH DAY OF TWO-DAY INTERVIEW OF [redacted] BUT DID NOT REMAIN IN THE ROOM OR PARTICIPATE IN THE INTERVIEWS IN ANY WAY. SA [redacted] AND AUSA [redacted] ASKED, BUT WERE NOT TOLD, WHY [redacted] WAS IN CAIRO. IT WAS NOT UNTIL AFTER 10/27/91 DEPARTURE FROM CAIRO, THAT SA [redacted] AND AUSA [redacted] LEARNED (FROM READING DAY-OLD COPY OF "THE

b6
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WASHINGTON POST" FOUND IN PARIS AIRPORT WAITING ROOM) OF CURRENT CONTROVERSY ABOUT [redacted]. ACCORDING TO AUSA [redacted] ARTICLE TO APPEAR IN MEDIA 10/29/91 ALLEGES THAT [redacted] SA [redacted] AND AUSA [redacted] TRAVELED TO AND FROM CAIRO ON SAME PLANES. IF THAT OCCURRED, IT WAS UNKNOWN TO SA [redacted] AND AUSA [redacted]; NO CONTACT WAS HAD WITH [redacted] OTHER THAN AS INDICATED ABOVE.

b6
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FOR INFORMATION OF TAMPA, DURING INTERVIEW, [redacted] RELATED STORY OF HOW, SOMETIME IN 1987, [redacted] CAME TO HIM AND COMPLAINED ABOUT "NOT BEING HAPPY WITH THE WAY THINGS WERE BEING DONE IN BCCI". REPORTEDLY [redacted] TOLD [redacted] THAT, AT THE END OF THE BUDGET YEAR (NOT FURTHER IDENTIFIED), ABEDI [redacted] WHO AT THE TIME WAS HEAD OF BCCI'S TREASURY DIVISION, AND OTHERS WOULD MEET TO DISCUSS THE BCCI'S PROFIT PICTURE. ABEDI AND [redacted] WOULD CONSISTENTLY SAY THAT THE PROFIT WAS NOT ENOUGH; THAT STEPS HAD TO BE TAKEN TO MAKE THE BANK LOOK BETTER. THIS WOULD RESULT IN DOCUMENTS, E.G. LOAN ARRANGEMENTS, BEING CREATED AND FORGED TO MAKE THE BANK APPEAR MORE SOLID THAN IT WAS. [redacted] ALSO SUPPOSEDLY TOLD

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[redacted] THAT, WHEN [redacted] LEFT BCCI [redacted] CAPCOM, [redacted]

BT

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OO P12 FBITP

DE FBIWMFO #0031 3021623

ZNR UUUUU

O 291621Z OCT 91

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

FBI TAMPA/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. CID, WCCS, FIFU.

SUBJECT: HIDDEN INTERESTS; MC #38; OO: WMFO.

RE WMFO TELCALL TO FBIHQ, DATED 10/28/91.

FOR INFORMATION OF FBIHQ AND TAMPA, THE PURPOSE OF THIS COMMUNICATION IS TO BRIEFLY REPORT ON THE RESULTS OF INTERVIEWS OF [redacted] b6 b7C [redacted] CONDUCTED IN CAIRO, EGYPT, BY WMFO SA [redacted] AND WASHINGTON, D.C. AUSA [redacted] BETWEEN 10/22/91 AND 10/24/91. FBIHQ WILL RECALL THAT [redacted]

29B-WF-171994-255

[redacted] b6 b7C

1325015-000-7646

[redacted] IN BOTH BCCI AND IN THE TAKEOVER OF FINANCIAL GENERAL BANKSHARES (FGB); AND [redacted] FORMERLY A CONTRACT EMPLOYEE OF THE GOVERNMENT OF SAUDI ARABIA, WAS THE PERSON WHO INTERESTED [redacted] IN INVESTING IN FGB. [redacted] (NO RELATION TO [redacted] IS AN [redacted]

b6
b7C

ESSENTIALLY AND CATEGORICALLY, BOTH [redacted] AND [redacted] DENY EVER BEING NOMINEES FOR BCCI, PARTICULARLY WITH REGARD TO OWNERSHIP OF FGB AND CREDIT AND COMMERCE AMERICAN HOLDINGS (CCAH) SHARES. EACH MAINTAINED (1) THAT HIS ORIGINAL INVESTMENT WAS MADE WITH HIS OWN EXISTING FUNDS; (2) THAT HE HAD A "FACILITY", I.E., A LINE OF CREDIT, ESTABLISHED WITH BCCI, WHICH HE USED FOR SUBSEQUENT PURCHASES OF CCAH SHARES; (3) THAT NONE OF HIS SHARES HAS EVER BEEN PLEDGED AS COLLATERAL AGAINST THE MONEY DRAWN FROM HIS "FACILITY", OR ANY LOAN REQUIRED TO ENHANCE THE "FACILITY"; (4) THAT HE HAD NOT MADE ANY FALSE STATEMENT DURING ANY TESTIMONY GIVEN IN THIS CASE; (5) THAT ALTHOUGH HE WAS AWARE BCCI WAS NOT ACCEPTABLE TO THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (BGFRS) AS A LENDER OR PARTICIPANT IN THE ORIGINAL ACQUISITION OF FGB SHARES, SUBSEQUENT FINANCING BY BCCI WAS NOT

b6
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b6
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b6
b7C

CURRENT CONTROVERSY ABOUT [redacted] ACCORDING TO AUSA [redacted] ARTICLE TO APPEAR IN MEDIA 10/29/91 ALLEGES THAT [redacted] SA [redacted] AND AUSA [redacted] TRAVELED TO AND FROM CAIRO ON SAME PLANES. IF THAT OCCURRED, IT WAS UNKNOWN TO SA [redacted] AND AUSA [redacted]; NO CONTACT WAS HAD WITH [redacted] OTHER THAN AS INDICATED ABOVE. b6 b7C

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BT

#0031

NNNN

MEMORANDUM 10/31/91

TO: SAC, WMFO (29B-WF-171994) (P)(main)

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTERESTS
MC #38
OO:WMFO

Recently, information was received that [redacted] b6 b7C and/or his daughter may own property at [redacted] Washington, D.C. Preliminary investigation reveals that this address is a cooperative apartment in the vicinity of George Washington University. [redacted] daughter, [redacted] dob [redacted] is believed to be a student at the University.

Inquiry of the LUSK Network by [redacted], WMFO b6 b7C Forfeiture Unit, revealed no ownership information concerning this property. Personnel of the Lusk Company were contacted directly by [redacted] and advised that their real estate data base contained no information on cooperative apartments.

Based on the above information it appears that the only way to determine if [redacted] and/or his daughter own shares in the b6 b7C above mentioned cooperative is to contact the management of Potomac Plaza Terrace.

2-WMFO
CMA:cma
(2)

29B-WF-171994-main-256

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
OCT 31 1991
FBI WASH METRO FIELD OFFICE

[redacted] b6 b7C

MEMORANDUM 10/31/91

TO: SAC, WMFO (29B-WF-171994) (P)

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTERESTS
MC #38
OO:WMFO

Recently, information was received that [redacted] b6 b7C and/or his daughter may own property at [redacted], Washington, D.C. Preliminary investigation reveals that this address is a cooperative apartment in the vicinity of George Washington University. [redacted] daughter, [redacted] dob [redacted] is believed to be a student at the University.

Inquiry of the LUSK Network by [redacted] WMFO Forfeiture Unit, revealed no ownership information concerning this property. Personnel of the Lusk Company were contacted directly by [redacted] and advised that their real estate data base contained no information on cooperative apartments. b6 b7C

Based on the above information it appears that the only way to determine if [redacted] and/or his daughter own shares in the above mentioned cooperative is to contact the management of Potomac Plaza Terrace. b6 b7C

2-WMFO
CMA:cma
(2)

29B-WF-171994-257

1325015-000-7653

MEMORANDUM 11/1/91

TO: SAC, WMFO (29B-WF-171994) (P)

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTEREST
MC #38
OO:WMFO

On November 1, 1991, [redacted], George Washington University (GW) Security Office, provided the following information concerning [redacted], the daughter of [redacted] b6 b7C

[redacted] is a student at [redacted] but is not enrolled this semester. Her Social Security Account Number is [redacted] and her date of birth is [redacted]. Her student ID number is [redacted] b6 b7C

[redacted] advised that a preliminary review of [redacted] records reflects that she is a [redacted]. She last attended [redacted] during the Spring 91 semester. [redacted] speculated that she has only been at the college for two years and may have previously attended another college. [redacted] advised that no local employment is reflected for her. b6 b7C

[redacted] advised that [redacted] address is reflected as [redacted] Washington D.C., [redacted] An evening number of [redacted] is also reflected. Next of kin is listed as [redacted] b6 b7C

[redacted] advised that he will do some additional investigation to determine prior college information and when [redacted] is eligible for graduation. b6 b7C

2-WMFO
CMA:cma
(2)

29B-WF-171994-MAIN
SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
OCT 1 1991
FBI - WASH. METRO FIELD OFFICE
[redacted] b6 b7C

1525015-000-7034

MEMORANDUM 11/1/91

TO: SAC, WMFO (29B-WF-171994) (P)

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTEREST
MC #38
OO:WMFO b6 b7C

On November 1, 1991, [redacted] George Washington University (GW) Security Office, provided the following information concerning [redacted], the daughter of [redacted]

[redacted] is a student at [redacted] but is not enrolled this semester. Her Social Security Account Number is [redacted], and her date of birth is [redacted]. Her student ID number is [redacted] b6 b7C

[redacted] advised that a preliminary review of [redacted] records reflects that she is a [redacted]. She last attended [redacted] during the Spring 91 semester. [redacted] speculated that she has only been at the college for two years and may have previously attended another college. [redacted] advised that no local employment is reflected for her. b6 b7C

[redacted] advised that [redacted] address is reflected as [redacted], Washington D.C., [redacted] An evening number of [redacted] is also reflected. Next of kin is listed as [redacted] b6 b7C

[redacted] advised that he will do some additional investigation to determine prior college information and when [redacted] is eligible for graduation. b6 b7C

2-WMFO
CMA:cma

29B-WF-171994 main-258

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 07 1991
FBI - WASH. METRO FIELD OFFICE

1

1325015-000-7655

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 11/6/91

To: JAY B. STEPHENS, Washington, D.C.
(Name and Address of USA)

From: ROBERT M. BRYANT
(Name of Official in Charge and Field Division)

B/C
(Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by MERRICK GARLAND
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] (Name) on 11/6/91 (Date)

b6
b7C

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title [redacted], USC, Section(s) [redacted]

b6
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Synopsis of case: Referring to a 10/30/91 facsimile transmission from [redacted] of your office, you are currently in possession of the following FD-302s:

NAME	DATE(S)
[redacted]	7/10-11/91
	6/3/91
	9/12/91
	7/30/91
	4/4/91; 4/17/91
	3/15/91; 3/19/91; 5/7/91; 5/15/91
	5/29&31/91; 8/1/91; 8/14/91
	4/4/91

b6
b7C

Initials:

29B-WF-171994-259

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
NOV
FBI - WASH. METRO FIELD OFFICE

2-USA, WDC (Enc. 50)
(1) WMFO
JNR:jr.
(3)

MA 132506-000-7656

3

NAME	DATE(S)
[redacted]	.....9/5/91
	.....4/16/91
	.....5/1/91; 6/27/91
	.....8/8/91
	.....7/22/91; 8/1/91(*)
	.....9/19/91
	.....9/20/91
NEW YORK STATE BANKING DEPT.	...8/2/91
[redacted]	.....9/27/91
	.....9/17/91
	.....4/11/91
	.....7/12/91; 8/9/91
	.....5/29/91
	.....7/31/91
	.....10/3/91
[redacted]-FBI REVIEW	.....9/9/91
[redacted]	.....5/10/91
	.....10/3/91

b6
b7C

Accompanying this communication are the following FD-302s:

NAME	DATE(S)
BANK OF NEW YORK-FBI REVIEW	...10/2-4/91
[redacted]	.....7/3/91
	.....9/30/91
	.....10/17/91
	.....9/12/91
	.....8/28/91
CLIFFORD & WARNKE	.....10/24/91; 10/24/91
[redacted]	....8/20/91
	....9/25/91
	....8/28/91; 8/29/91
	....9/25/91
	....8/29/91; 9/3/91
	....10/22/91
	....9/7/91
	....4/26/91
	....10/8/91
	....8/1/91 (* REPLACEMENT)
	....10/1/91
	....8/27/91
	....6/21/91
	....11/1/91
	....7/24/91
	....4/22/91
	....8/14/91; 8/15/91
SCHWALB & DONNENFELD	.....10/24/91
[redacted]	.....7/25/91
	.....10/3/91
	.....9/19/91
	.....10/18/91

b6
b7C

1325015-000-7657

NAME	DATE(S)
[redacted]	9/24/91
	10/28/91
U.S. ATTORNEY/ ATLANTA	9/24/91
[redacted]	9/27/91
	9/3/91

b6
b7C

Also accompanying this communication are the following investigative inserts:

INVESTIGATION BY	FIRST DATE
[redacted]	5/10/91
	5/16/91
	5/30/91
	6/7/91
	6/13/91
	6/15/91
	7/5/91
	7/10/91
	7/21/91
	7/26/91
	8/2/91
	8/16/91

b6
b7C

1325015-000-7658

MEMORANDUM 11/8/91

TO: SAC, WMFO (29B-WF-171994) (P)

FROM: SA [redacted] (C-5) b6 b7C

SUBJECT: HIDDEN INTERESTS;
MC #38
OO:WMFO

On 11/7/91, a meeting was held in the office of [redacted], Assistant United States Attorney, Office of International Affairs, (OIA) Department of Justice, 5th floor, 14th Street and New York Avenue N.W., Washington, D.C. Present during the meeting were the writer, AUSA [redacted] OIA, AUSA [redacted] Money Laundering Section, DOJ, and [redacted] Deputy Chief, Fraud Section, DOJ. b6 b7C

The purpose of the meeting was to advise the participants that the government of JAMAICA has recently offered the Department of Justice access to certain BCCI documents in their possession. [redacted] of the Bank of Jamaica, will be available to assist investigators during the week of 11/11/91. b6 b7C

[redacted] explained that she has only vague information concerning the nature of the documents. She said that the Jamaican government is specifically concerned about four groups of transactions involving BCCI and the Bank of Jamaica [redacted] also mentioned that there was also some type of relationship between the Miami agency of BCCI, the BCCI branch in Jamaica, and the Independence Bank in Los Angeles, California. b6 b7C

Plans were made by the group to proceed to Kingston, Jamaica, on or about 11/12/91 to review the above mentioned documents.

2-WMFO
CMA:cma
(2)

~ 262
29B-WF-171994 Main
Su Su

[redacted] b6 b7C

1325015-000-7745

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
ENFORCEMENT

October 17, 1991

Mr. Robert M. Bryant
Special Agent in Charge
U.S. Department of Justice
Federal Bureau of Investigation
1900 Half Street
Washington, D.C. 20535

Re: *In the Matter of Trading in Certain Bank Stocks (HO-2527)*

Dear Mr. Bryant:

Your request, by letter dated September 26, 1991, for access to Commission files has been granted. In granting access, the Commission has relied upon your assurances that, except as set forth in your letter, your agency will:

provide such safeguards as are necessary and appropriate to protect the confidentiality of these files;

make no public use of these files or information derived therefrom without prior approval of our staff;

notify us of any legally enforceable demand for the files or information prior to complying with the demand, and assert such legal exemptions or privileges on our behalf as we may request; and

not grant any other demand or request for the files or information without prior notice or over our objection.

298-HQ-471994-MAW 252

The files in this matter contain financial records transferred to you pursuant to Section 21(h)(9)(B) of the Securities Exchange Act of 1934. Briefly, that section permits the Commission to transfer such records to your agency without providing a customer notice pursuant to Section 1112 of the Right to Financial Privacy Act, 12 U.S.C. 3412. Section 21(h)(9)(B) places certain limitations upon your use of such records and, pursuant to Section 21(h)(10) of the Securities Exchange Act of 1934,

SERIALIZED FILED
OCT 22 1991
FBI - OFFICE

b6 Per FBI
b7C

1325015-000-7632

Excerpts from Section 21(h) of the Securities Exchange Act of 1934

(7)(A) Following the expiration of the period of delay of notification ordered by the court pursuant to paragraph (4) of this subsection, the customer may, upon motion, reopen the proceeding in the district court which issued the order. If the presiding judge or magistrate finds that the movant is the customer to whom the records obtained by the Commission pertain, and that the Commission has obtained financial records or information contained therein in violation of this subsection, other than paragraph (1), it may order that the customer be granted civil penalties against the Commission in an amount equal to the sum of --

(i) $100 without regard to the volume of records involved;

(ii) any out-of-pocket damages sustained by the customer as a direct result of the disclosure; and

(iii) if the violation is found to have been willful, intentional, and without good faith, such punitive damages as the court may allow, together with the costs of the action and reasonable attorneys' fees as determined by the court.

(9)(B) The Commission may, without notice to the customer pursuant to Section 1112 of the Right to Financial Privacy Act of 1978, transfer financial records or the information contained therein to . . . to the Department of Justice. Financial records or information transferred by the Commission to the Department of Justice . . . pursuant to the provisions of this subparagraph may be disclosed or used only in an administrative, civil, or criminal action or investigation by the Department of Justice . . . which arises out of or relates to the acts, practices, or courses of conduct investigated by the Commission, except that if the Department of Justice . . . determines that the information should be disclosed or used for any other purpose, it may do so if it notifies the customer, except as otherwise provided in the Right to Financial Privacy Act of 1978, within 30 days of its determination, or complies with the requirements of Section 1109 of such Act regarding delay of notice.

(10) Any government authority violating paragraph (9) shall be subject to the procedures and penalties applicable to the Commission under paragraph (7)(A) with respect to a violation by the Commission in obtaining financial records.

violation of those limitations may subject your agency to the penalties of Section 21(h)(7)(A). A copy of these provisions is enclosed.

The Commission makes no recommendation with respect to investigation or prosecution by your agency. In addition, until this matter is closed, the Commission continues to have an interest and will take such further investigatory or other steps as it considers necessary in the discharge of its duties and responsibilities.

The files to which access has been granted are being retained by the Home Office of the Commission. Your representative should contact [redacted] at [redacted] to make arrangements to review the files. I would also appreciate it if you would inform us in the event that your agency institutes public proceedings based upon information that you obtain as a result of this grant of access.

b6 Per SEC
b7C

Sincerely,

[redacted]

b6 Per SEC
b7C

Enclosure: Excerpts from Section 21(h) of the
Securities Exchange Act of 1934

DECLASSIFIED BY: NSICG [redacted]
ON 09-05-2023

b6
b7C

(Rev. 01-31-2003)

~~SECRET~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/18/2007

To: Records Management **Attn:** [redacted]

From: Philadelphia
Contact: [redacted]

b6
b7C
b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: (U) 62F-HQ-C1039976

Title: (U) NAME CHECK SUMMARY FILE

Synopsis: (U) Philadelphia lead regarding FRED CHARLES IKLE covered.

(U) ~~(S)~~ ~~Derived From : G-3~~
~~Declassify On: 04/18/2007~~

Reference: (U) 62F-HQ-C1039976 Serial 66729

(U) **Details:** ~~(S)~~ Philadelphia was requested to review 62A-HQ-102487 serial 1 to determine if any derogatory information regarding Fred Charles Ikle, date of birth August 21, 1924, in Switzerland, social security number 108-26-9020, pursuant to a name check request from the Office of Personnel Management (OPM).

(U) ~~(S)~~ 62A-HQ-102487 serial 1 was consolidated into 62A-HQ-1024847 on 5/27/92. 62A-HQ-1024847 serial 1 is a teletype to All FBI Field Offices from Director, FBI dated 4/29/92. No identifying data regarding Fred C. Ikle was located. No LHM will follow.

~~SECRET~~

DECLASSIFIED BY: NSICG [redacted]
ON 09-05-2023

b6
b7C

(Rev. 08-28-2000)

~~SECRET~~

FEDERAL BUREAU OF INVESTIGATION

Precedence: IMMEDIATE **Date:** 04/11/2007

To: Records Management **Attn:** [redacted]
NNCPU/NCU#1

1325 G St.
Room G-300

From: New York
Legal Unit
Contact: [redacted]

b6
b7C
b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: (U) 62-HQ-C1039976

Title: (U) NAME CHECK SUMMARY FILE
FRED CHARLES IKLE
DOB: AUGUST 21, 1924
POB: SWITZERLAND

Synopsis: (U) Results of requested review.

(U) ~~(S)~~ ~~Derived From : G-3~~
~~Declassify On: X1~~

Reference: (U) 62-HQ-C1039976 Serial 66729

(U) **Details:** ~~(S)~~ HQ requested a review of [redacted]
This file concerns [redacted]

b3
b7E

[redacted] Dr. Fred C. Ikle (not further identified) [redacted]

♦♦

~~SECRET~~

March 22, 1973

FRED CHARLES IKLE - [illegible]

Captioned individual, who you advised was born August 21, 1924, at Seneden, Switzerland, and resides at 1467 Amalfi Drive, Pacific Palisades, California, has not been the subject of an investigation conducted by the FBI.

Our files, however, reveal that during a security-type investigation conducted by the FBI in 1969, a 236-page program for the Second National Conference of The Congress of Scientists on Survival, Inc., which also is known as the Scientists on Survival (S.O.S.), held June 14-16, 1963, at New York, New York, listed one Fred C. Ikle, Center for International Affairs, Harvard University, as being the Chairman of the panel on Effective Methods of International Negotiations. The S.O.S., allegedly a Communist Party (CP) front, was organized in 1961 in New York City "to use revelant scientific disciplines in a positive program for world disarmament peace." The investigation was directed solely toward establishing the extent of possible CP infiltration of the S.O.S., and no further derogatory information concerning captioned individual was developed. (100-442365-20)

During a security-type investigation conducted by the FBI in 1972, captioned individual was determined to have resided at 1467 Amalfi Drive, Pacific Palisades, California, since March 7, 1968, and was employed by the Rand Corporation in Santa Monica, California. On several occasions Ikle was interviewed by the FBI concerning the Daniel Ellsberg case but no derogatory information was developed involving Ikle. (100-46[illegible]49-3)

The central files of the FBI, including the files of the Identification Division, contain no additional pertinent information concerning captioned individual based upon background information submitted in connection with this name check request.

A full field investigation has been initiated on Fred Charles Ikle and the results will be forwarded to you upon completion.

Per request of [redacted] Staff Assistant (Security).

(4)

[redacted]

b6
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MAIL ROOM [ ] TELETYPE UNIT [ ]

4-22 (Rev. 1-22-60)

Federal Bureau of Investigation
Records Branch

_____, 19___

- ☐ Name Searching Unit - Room 6527
- ☐ Service Unit - Room 6524
- ☐ Forward to File Review
- ☐ Attention _____
- ☐ Return to _____
  Supervisor Room Ext.

Type of References Requested:

- ☐ Regular Request (Analytical Search)
- ☑ All References (Subversive & Nonsubversive)
- ☐ Subversive References Only
- ☐ Nonsubversive References Only
- ☐ Main _____ References Only

MAR 1 91973

Type of Search Requested:

- ☐ Restricted to Locality of _____
- ☐ Exact Name Only (On the Nose)
- ☐ Buildup ☐ Variations

Subject IKLE, FRED CHARLES
Birthdate & Place
Address

Localities

R# [redacted] Date 3/19 Searcher Initials SOB

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Prod. 2

FILE NUMBER	SERIAL
NR	
FRED C	[redacted]
[redacted]	
100-442365-20 ENCL pg 13	
100-446114-9-3 I	
FRED	
[redacted]	

b3
b7E

MAR 1 91973

b6
b7C

PLEASE EXPEDITE

MEMORANDUM

THE WHITE HOUSE

WASHINGTON

March 19, 1973

MAR 19 1973

C019

TO: [redacted], FBI

FROM:

SUBJECT: FBI Investigations

b6
b7C

Subject's Name IKLE, Fred Charles

Date of Birth 8/21/24 Place of Birth Seneden, Switzerland

Present Address: 1467 Amolfi Drive, Pacific Palisades, Calif.

We Request:

____ Copy of Previous Report

X Name Check

X Full Field Investigation

The person named above is being considered for:

____ White House Staff Position

X Presidential Appointment

____ Position with another Agency

Attachments:

____ SF 86 (in duplicate)

____ SF 87, Fingerprint Card

X Biography

Remarks:

62-5-39422

ENCLOSURE

FD 36 (Rev 8 26-82)

FBI

TRANSMIT VIA
☐ Teletype
☐ Facsimile
☒ Airtel

PRECEDENCE
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 8/9/83

TO: DIRECTOR, FBI (52A-106049)

FROM: SAC, WFO (52A-18088) ~~(P)~~ (C-3)

"FACTFIND"
MAJOR CASE #48
TGP
OO:WFO

Re WFO airtel to Bureau, dated 8/5/83.

Enclosed for the Bureau are five (5) copies each of the following listed FD-302's concerning captioned case:

1. [redacted]
2.
3.
4.
5. Madeleine Corvell Albright on 8/3/83.
6. [redacted]
7.
8. Fred C. Ikle on 8/3/83.
9. [redacted]
10.
11.

b6
b7C

Investigation continuing at WFO.

EBF

DE-118

[redacted]

25 AUG 10 1983

[redacted]

ENCLOSURE

(3) - Bureau (Enclosures 55) enclosures declassified upon closing
2 - WFO (52A-18088)

1 cert Airtel and 44 copies 302's to WCCS.

[redacted] (5)

[redacted]

[redacted]

b6
b7C

Approved [redacted] Transmitted _____ (Number) _____ (Time) Per _____

79 AUG 1 1983 all 302s

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 86
Page 6 ~ b6; b7C; b7D;
Page 7 ~ b6; b7C; b7D;
Page 8 ~ b6; b7C; b7D;
Page 9 ~ b7D;
Page 10 ~ b6; b7C; b7D;
Page 11 ~ b6; b7C; b7D;
Page 20 ~ b7D;
Page 28 ~ b6; b7C; b7D;
Page 29 ~ b6; b7C; b7D;
Page 35 ~ b6; b7C; b7D;
Page 37 ~ b6; b7C; b7D;
Page 38 ~ b6; b7C; b7D;
Page 43 ~ Duplicate;
Page 44 ~ Duplicate;
Page 45 ~ Duplicate;
Page 49 ~ b6; b7C; b7D;
Page 50 ~ b6; b7C; b7D;
Page 63 ~ b6; b7C; b7D;
Page 64 ~ b6; b7C; b7D;
Page 66 ~ Duplicate;
Page 67 ~ Duplicate;
Page 68 ~ b6; b7C; b7D;
Page 69 ~ Duplicate;
Page 70 ~ Duplicate;
Page 72 ~ b6; b7C; b7D;
Page 73 ~ b6; b7C; b7D;
Page 74 ~ b6; b7C; b7D;
Page 100 ~ b7D;
Page 101 ~ b7D;
Page 127 ~ b3; b6; b7C; b7D;
Page 128 ~ b3; b6; b7C; b7D;
Page 160 ~ b6; b7C;
Page 161 ~ b6; b7C;
Page 162 ~ b6; b7C;
Page 163 ~ b6; b7C;
Page 171 ~ b5; b6; b7C; b7D;
Page 172 ~ b5; b6; b7C; b7D;
Page 173 ~ b5; b6; b7C; b7D;
Page 174 ~ b5; b6; b7C; b7D;
Page 175 ~ b5; b6; b7C; b7D;
Page 176 ~ b5; b6; b7C; b7D;
Page 177 ~ b5; b6; b7C; b7D;
Page 178 ~ b5; b6; b7C; b7D; b7E;
Page 179 ~ b5; b6; b7C; b7D; b7E;
Page 180 ~ b5; b6; b7C; b7D; b7E;
Page 181 ~ b5; b6; b7C; b7D; b7E;
Page 182 ~ b5; b6; b7C; b7D; b7E;
Page 183 ~ b5; b6; b7C; b7D; b7E;

Page 184 ~ b5; b6; b7C; b7D; b7E;
Page 185 ~ b5; b6; b7C; b7D; b7E;
Page 186 ~ b5; b6; b7C; b7E;
Page 187 ~ b5; b6; b7C; b7D; b7E;
Page 188 ~ b5; b6; b7C; b7D; b7E;
Page 189 ~ b5; b6; b7C; b7D;
Page 190 ~ b5; b6; b7C; b7D;
Page 191 ~ b5; b6; b7C; b7D;
Page 192 ~ b5; b6; b7C; b7D;
Page 211 ~ b6; b7C; b7D;
Page 212 ~ b6; b7C; b7D;
Page 213 ~ b6; b7C; b7D;
Page 214 ~ b6; b7C; b7D;
Page 215 ~ b6; b7C; b7D;
Page 227 ~ b6; b7C; b7D;
Page 261 ~ Referral/Consult;
Page 262 ~ Referral/Consult;
Page 263 ~ Referral/Consult;
Page 264 ~ Referral/Consult;
Page 265 ~ Referral/Consult;
Page 266 ~ Referral/Consult;
Page 267 ~ Referral/Consult;
Page 269 ~ Referral/Consult;
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Page 285 ~ Referral/Consult;
Page 286 ~ Referral/Consult;
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Page 290 ~ Referral/Consult;

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X For this Page X
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FD-487 (Rev. 6-25-84)

NCIC ACTIVITY LOG

(Instructions - Reverse Side)

Bureau File No. _____ Field Office File No. 199-WE-191[illegible]4

Activity	Date	Serial	NCIC Number	Date Retention Period Expires	Miscellaneous Information
ENTER	11-22-91	47 Sub S	[illegible]		AGHA HASAN
ENTER	11-22-91	48 Sub S			
ENTER	11-22-91	49 Sub S			
ENTER	1-10-92	319			
CLEAR	1-15-92	314			
CLEAR	5-9-94	79 FUG 5			
CLEAR	1-25-95	83 FUG 1			
					b6 b7C

Validation: *(Date/Initials)*

1	5	9
2	6	10
3	7	11
4	8	12

TOP SERIAL - NOT TO BE SERIALIZED

1325015-000-8164
FBI/DOJ

INSTRUCTIONS

1. **Entry:**
   (a) Supervisor stamp serial containing entry information, check entry, initial and route to NCIC operator.
   (b) NCIC operator make local and/or NCIC checks including III for additional information, make entry, route serial and printout to rotor clerk. (NCIC operator may stamp jacket, insert NCIC Activity Log as top serial in file and complete "entry" line.)
   (c) Rotor clerk serialize printout, stamp jacket, insert NCIC Activity Log as top serial in file and complete "entry" line if not already accomplished by NCIC operator. Note: NCIC Activity Log is to be maintained as the top serial in the current Volume of case file.
2. **Modify:**
   (a) Supervisor stamp serial containing modify information, check modify, initial and route to NCIC operator.
   (b) NCIC operator modify record, route serial and printout to rotor clerk. (NCIC operator may complete "modify" line on NCIC Activity Log.)
   (c) Rotor clerk serialize printout and complete "modify" line on NCIC Activity Log, if not accomplished by NCIC operator.
3. **Clear/Cancel:**
   (a) NCIC operator clears/cancels record upon notification by case agent or supervisor, routes printout to rotor clerk. (NCIC operator may complete "clear/cancel" line on NCIC Activity Log.)
   (b) Rotor clerk serializes printout, completes "clear/cancel" line on NCIC Activity Log and makes slash marks (NCIC) through NCIC stamp on File jacket.
4. **Validation:**
   (a) When validation printout is received from NCIC, an agent (or clerk if case is in closed status) will review the NCIC entry to insure that it is complete and accurate. Any discrepancy should be resolved by an appropriate agent and, if necessary, a modify message should be initiated to update and/or correct the record. When validation is complete, reviewer will date and initial NCIC Activity Log.
5. **Retention Periods:**

Unless otherwise removed, records will be retained in file as follows:

Article File

Remainder of the year of entry plus one year.

Boat File

Remainder of the year of entry plus four years.

Records entered without BHN or OAN will remain in file 90 days.

Canadian Warrant File

Retained indefinitely until entering agency removes record from file.

Gun File

Retained indefinitely until entering agency removes record from file.

Recovered weapons are retained for the remainder of the year of entry plus two years.

III File

Retained until the individual reaches the age of 80.

License Plate File

Retained in file for one year after the end of the plate's expiration year.

Nonexpiring license plates remain in file for the remainder of the year of entry plus four years.

Missing Person File

Retained indefinitely until action is taken by the entering agency to clear the record. This includes unemancipated juvenile records.

Securities File

Retained for the remainder of the year of entry plus four years, except records for traveler's checks and money orders. These records will be retained for the remainder of the year of entry plus two years.

U.S. Secret Service Protective File

Retained indefinitely until action is taken by the U.S. Secret Service to remove it.

Unidentified Person File

Retained for the remainder of the year of entry plus nine years.

Vehicle File

Retained for the remainder of the year of entry plus four years.

Records entered which do not contain VINs or OANs will remain in file for 90 days after entry.

Felony vehicles will remain in file for 90 days after entry.

Stolen parts (VIN plates, harrows, or boat motors) which contain an OAN or SER will remain in file for the year of entry plus four years.

Wanted Person File

Retained until action is taken by the originating agency to clear the record.

Temporary felony want records will be automatically removed from file after 48 hours.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 02/29/2000

Source, who is not in a position to testify, provided the following information.

On [redacted] a reliable [redacted] source provided the following information to SA [redacted] Source advised that [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

Investigation on 02/24/2000 at [redacted] b7D

File # 29B-WF-171994 (437) Date dictated 02/28/2000

by SA [redacted] djc b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Washington Field
29B - WF- 86438

1325015-000-8174

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 02/29/2000

To: General Counsel Attn: [redacted] b6 b7C

Information Resources Attn: Criminal Investigative Analysis Program

Investigative Services Attn: International Relations Unit
Chicago
Ottawa Attn: ALAT [redacted]
San Francisco
Washington Field Attn: [redacted]

From: [redacted] b7D

Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] djc

Case ID #: 29B-WF-171994 (Pending) OEO #838
74-CG-86438 (Closed) - 132
62D-SF-120200 (Closed) - 12
252B-IR-5392 (Closed) - 3

Title: HIDDEN INTERESTS
OO:WASHINGTON FIELD

INSLAW; [redacted] b6 b7C
MAJOR CASE 51;
OO:CHICAGO

UNSUB(S);
BRENDAN ABERNATHY-VICTIM
NEAL ABERNATHY-VICTIM
VIO-DOUBLE HOMICIDE;
02/19/1997
OO:SAN FRANCISCO

UNSUB(S);
BRENDAN ABERNATHY-VICTIM
NEAL ABERNATHY-VICTIM
VIO-DOUBLE HOMICIDE;
02/19/1997
OO:INFORMATION RESOURCES

[redacted] b6 b7C

29B-WF-171994-838 1325015-000-8175

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] b7D DIVISION.

Synopsis: Information regarding interview of a reliable [redacted] source by [redacted] b6 b7C b7D

Enclosure(s): Enclosed for receiving offices is: [redacted] b6 b7C b7D

[redacted] 3) A four (4) page FD-302 with attachments.

Enclosed for General Counsel, LEGAT Ottawa, Washington Field and Investigative Services, is [redacted] b6 b7C b7D

Details: On [redacted] an extremely reliable and sensitive [redacted] source advised that he/she was [redacted] b6 b7C b7D regarding information the source had regarding [redacted]

The source was interviewed for [redacted] by [redacted] at the source's residence in [redacted] from [redacted] b6 b7C b7D

During the interviews conducted on [redacted] b6 b7C b7D [redacted] SA [redacted] FBI, was present. SA [redacted] was introduced to [redacted] as [redacted] Chief Division Counsel (CDC) [redacted] concurred with SA [redacted]s presence at the interview and with withholding his identity as an FBI Special Agent.

[redacted] b6 b7C b7D

1325015-000-8176

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

The disclosure of enclosed information to [redacted] will compromise an extremely reliable and sensitive source. This information is provided to FBIHQ and interested offices for whatever action they deem appropriate since [redacted] is not aware of the significance or possible connections of b6 b7C b7D

1325015-000-8177

To: General Counsel From: [redacted] b7D
Re: 29B-WF-171994, 02/29/2000

[redacted] b7D

1325015-000-8178

LEAD(s):

Set Lead 1:

GENERAL COUNSEL

AT WASHINGTON, DC

Read and clear.

Set Lead 2:

INFORMATION RESOURCES

AT WASHINGTON, DC

CIAP is requested to provide [redacted] with a summary b7D
of case entitled: UNSUB(S); BRENDAN ABERNATHY-VICTIM, NEAL ABERNATHY-VICTIM, VIO-DOUBLE HOMICIDE; 02/19/1997; 00:INFORMATION RESOURCES (252B-IR-5392).

Set Lead 3:

CHICAGO

AT CHICAGO, IL

Provide [redacted] with a summary of case b7D
entitled INSLAY; [redacted] MAJOR CASE 51; OO:CHICAGO, and b6
determine whether information provided is corroborated by Chicago b7C
Division's investigation.

Set Lead 4:

OTTAWA

AT OTTAWA, CANADA

Read and clear.

Set Lead 5:

SAN FRANCISCO

AT SAN FRANCISCO, CA

Read and clear.

Set Lead 6:

1325015-000-8179

To: General Counsel From: [redacted] b7D
Re: 29B-WF-171994, 02/29/2000

WASHINGTON FIELD

AT WASHINGTON, DC

Provide [redacted] Division with a summary of case b7D
entitled HIDDEN INTERESTS, OO:WASHINGTON FIELD (29B-WF-171994) and determine whether information provided is corroborated by Washington Field's office.

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] b7D
DIVISION.

♦♦

1325015-000-8180

(01/26/1998)

C5

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/27/2000

To: [redacted] **Attn:** SA [redacted] b7D b7C
Washington Field Squad 15
Attn: [redacted]

From: CIRG
NCAVC
Contact: SSA [redacted] 703-632-4342 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] ms

Case ID #: 29B-WF-171994 (Pending) ;839
252B-IR-5392 (Closed) ;4

Title: HIDDEN INTERESTS
00:WASHINGTON FIELD

UNSUB(S)
BRENDAN ABERNATHY - VICTIM (DECEASED);
NEAL ABERNATHY -VICTIM (DECEASED);
HERCULES POLICE DEPARTMENT,
HERCULES, CALIFORNIA;
02/19/1997
NCAVC - DOUBLE HOMICIDE

THIS INFORMATION IS SINGULAR IN NATURE, DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] DIVISION. b7D

Synopsis: The NCAVC is providing a copy of completed analysis to [redacted] b7D

Administrative: Reference telcal between SSA [redacted] and SA [redacted] on 03/27/2000. b6 b7C

Enclosure(s): Enclosed for [redacted] is one copy of a behavioral assessment completed by Special Agent Supervisor (SAS) [redacted], California Department of Justice (DOJ). b7D b6 b7C

Details: SA [redacted] was advised that SSA [redacted] is the liaison contact with the California Department of Justice's Violent Crime Profiling Unit. Per an existing Memorandum of Understanding b6 b7C

Cover Sheet Safford 3/31/00

29B-WF-171994-839

1325018-000-8183

b7D

between the FBI and California DOJ, SAS [redacted] provides a copy of her behavioral assessments to the NCAVC for review and comment. An FBI 252B matter is initiated upon receipt of a draft copy of a written assessment and closed upon receipt of the completed analysis. The completed analysis has been disseminated to the requesting law enforcement agency with jurisdiction for the investigation. A copy of the copy of the completed analysis is enclosed. The NCAVC considers this lead covered.

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THIS INFORMATION IS SINGULAR IN NATURE, DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] DIVISION.

b7D

♦♦

1325015-000-8184

FBI FACSIMILE

COVER SHEET

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

CLASSIFICATION

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: _____
Sender's Initials: ale
Number of Pages: 2
(including cover sheet)

To: WFO Date: 03/22/2000
Name of Office

Facsimile Number: 202/278-2478

Attn: [redacted] b6 b7C
Name Room Telephone

From: Legat Islamabad
Name of Office

Subject: BCCI

Special Handling Instructions: Please hand carry to SA [redacted] b6 b7C

Originator's Name: [redacted] Telephone: 011-92-51-2080-2205

Originator's Facsimile Number: 011-92-51-278342

Approved: _____

Brief Description of Communication Faxed: _____

WARNING

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29B-WF-171994-
840

1320115-000-8185

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 07/10/2000

Source, who is not in a position to testify, provided the following information.

On [redacted], a reliable [redacted] source provided the following information to Special Agent (SA) [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

Investigation on [redacted] at [redacted] b7D b7D

File # 29B-WF-171994 , 65X-AQ-54187 Date dictated 07/07/2000

by SA [redacted] djc b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/04/2000

To: [redacted] **Attn:** Squad 15
SA [redacted]

b7D
b6
b7C

From: WFO
C-5/NVRA
Contact: SA [redacted] 703-762-3416

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] rhm

Case ID #: 29B-WF-171994 (Pending)

Title: Hidden Interests
Major Case # 38
FIF; FAG
OO:WFO

Synopsis: Summary of Hidden Interests investigation regarding lead.

Reference: 29B-WF-171994 Serial 838

Details: [redacted] requested a summary of the Hidden Interests investigation. Hidden Interests was a Major Case investigation into an international banking organization which was set up as follows:

b7D

BCCI Holdings (Luxembourg) S.A. - Was a foreign bank holding company established under the laws of Luxembourg.

Bank of Credit and Commerce International S.A. (BCCI SA) - BCCI Holdings owned and controlled BCCI SA, which operated agencies in Los Angeles, California and New York, New York.

Bank of Credit and Commerce International (Overseas) Limited (BCCI Overseas) - BCCI Holdings owned and controlled BCCI Overseas, which was a foreign bank established under the laws of the Cayman Islands. BCCI Overseas operated agencies in Miami, Tampa and Boca Raton, Florida.

The above listed entities will be referred to as the BCCI Group.

[redacted]

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29B-WF-171994 - 841

1325015-0008190

International Credit and Investment Company (Overseas) Limited (ICIC Overseas) - Was a foreign bank established under the laws of the Cayman Islands.

The major defendants in this matter were:

AGHA HASAN ABEDI - Founder of BCCI. Former Director and President of BCCI Holdings. ABEDI was a principal of BCCI Holdings, BCCI Overseas, BCCI SA and ICIC Overseas. Now deceased.

[redacted] of BCCI Holdings, BCCI Overseas, BCCI SA and ICIC Overseas. Described as [redacted] at BCCI. [redacted] BCCI after ABEDI's illness in 1983. b6 b7C

GHAITH PHARAON - A nominee (straw purchaser) for BCCI regarding the illegal purchases of Independence Bank of Encino and the National Bank of Georgia. PHARAON also illegally purchased subordinate debentures from Centrust Saving Bank, Miami. PHARAON was a Saudi Arabian businessman and shareholder in the BCCI Group.

Background of the investigation:

The BCCI "scandal" was a world wide scandal. It was one of the largest commercial frauds and the largest bank failure in history. The fall of BCCI resulted in almost 12 billion dollars in depositors' moneys being lost and it left some 250,000 unpaid creditors around the world. Thousand of families lost their life savings in the bank's collapse.

Within the United States, BCCI's fraudulent activities, caused the closure of two banks.

In 1985, BCCI, using straw purchasers, secretly acquired the Independence Bank of Encino, California. The concealment of this secret agreement was a violation of the federal regulations and enabled the Independence Bank to obtain insurance protection fraudulently from the Federal Government, backed by the funds and security of the United States. BCCI Officers used wire communications in order to transmit information to further the scheme.

Through deceptive stock purchases by the BCCI Group, Abedi, [redacted] and Pharaon, the BCCI Group acquired and maintained control and influence over the National Bank of Georgia. b6 b7C

1325015-000-8191

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In January 1988, Pharaon (a fugitive in this matter) participated in a conspiracy with BCCI and its principal officers to defraud the U.S. Government and individual investors. Pharaon used BCCI to facilitate a fraud by manipulating the financial market for a subordinate debenture offering issued by the Centrust Savings Bank in Miami, Florida. When Centrust issued the subordinate debenture, Centrust had secretly agreed with Pharaon to buy back the $25 million subordinate debenture originally purchased by Pharaon. Thus making it appear that the offering was fully funded. In reality, the subordinate debentures were bought by Centrust which wanted the issue to appear to be popular in order to inflate the price artificially and thus bring in more funds to the bank. Pharaon purchased the subordinate debentures with funds he had received from BCCI.

Prosecution:

On November 15, 1991, a U.S. Grand Jury in Washington, D.C., filed an indictment, charging the below listed individuals and entities with the following: 1) Title 18 U.S.C. 371 (Conspiracy); 2) Title 18 U.S.C. 1343 (Wire Fraud); 3) Title 18 U.S.C. 1962d (Racketeering Conspiracy); and 4) Title 18 U.S.C. 2 (Aiding and Abetting). There were several superseding indictments which followed.

The entities indicted were:

BCCI Holdings
BCCI SA
BCCI Overseas
ICIC Overseas

The individuals indicted were:

AGHA HASAN ABEDI
[redacted]
GHAITH PHARAON

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Results of the investigation:

In December of 1991 the BCCI Group and ICIC Overseas plead guilty to the charges in the November indictment. The action successfully resolved all United States charges against BCCI Group and ICIC Overseas. It forfeited all of the BCCI Groups assets in the United States and required full BCCI Group cooperation in the ongoing investigation.

There were four key elements to the plea agreement:

1325015-000-8192

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1) BCCI Group and ICIC Overseas plead guilty to the original and the superseding charges filed in the U.S. District Court for the District of Columbia. The charges accused BCCI Group and ICIC Overseas of violating the RICO statute through conspiring to commit racketeering acts involving fraud, money laundering, tax evasion and conspiracy. Specifically, the BCCI Group was charged with secretly acquiring control and influence over First American Bank of Washington, D.C.; The Independence Bank of Encino, California; and the National Bank of Georgia. The racketeering conspiracy also included allegations of fraud in the sale of the subordinate debentures of Centrust Savings Bank of Miami.

2) The BCCI Group and ICIC Overseas further plead guilty to charges which had been filed by the District Attorney's Office in the Supreme Court of New York County. As part of the plea, BCCI Group agreed to pay a $10 million fine to New York State.

3) The plea agreement also required the BCCI Group to forfeit all of its assets in the United States to the Federal Government.

4) The final element of the plea agreement related to the cooperation that the BCCI Group was to provide in the ongoing investigation. The BCCI Group was to provide full access to documents and witnesses.

AGHA HASAN ABEDI - While he was indicted, he was never arrested nor did a trial take place. Abedi was residing in Pakistan and being protected by the Pakistani government. He has since passed away.

[redacted] was brought to the United States and plead guilty to Count One, Conspiracy, Title 18 U.S.C. 371, Count Two, Wire Fraud, Title 18 U.S.C. 1343, and Count Three, RICO Conspiracy, Title 18 U.S.C. 1962, of the Superseding Indictment.

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GHAITH PHARAON - Pharaon is still a fugitive. Should Pharaon be arrested and extradited to the United States either a trial or plea agreement will be undertaken. Currently all of Pharaon's assets within the United States are frozen. There is currently an ongoing negotiation for a settlement between the United States and Pharaon.

WFO considers the lead covered.

♦♦

1325015-000-8193

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 08/07/2000

To: Counterterrorism Attn: SSA [redacted] b6 b7C

Albuquerque SA [redacted]
Ottawa Legat [redacted]
Washington Field

From: [redacted] b7D

Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] djc

Case ID #: 29B-WF-171994 (Pending)) 843
65X-AQ-54187 (Pending)) 841
[redacted] Pending) b7D

Title: HIDDEN INTERESTS;
OO:WASHINGTON FIELD

LOS ALAMOS NATIONAL LABORATORY
OO: ALBUQUERQUE

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] b7D DIVISION.

Synopsis: Information regarding [redacted] b6 b7C b7D

Enclosure(s): Enclosed for receiving office is a three (3) page FD-302 containing information provided by a reliable [redacted] b7D source on [redacted]

Details: On [redacted] a reliable [redacted] source provided b6 b7C information regarding [redacted] b7D

29B-WF-171994-843

1325019-000-8197

To: Counterterrorism From: [redacted] b7D
Re: 29B-WF-171994, 08/07/2000

[redacted] b7D This information is contained in the attached FD-302.

1325015-000-8198

To: Counterterrorism From: [redacted] b7D
Re: 29B-WF-171994, 08/07/2000

LEAD(s):

Set Lead 1: (Adm)

ALL RECEIVING OFFICES

Read and clear.

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] b7D DIVISION.

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1325015-000-8199

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY Date: 08/07/2000

To: General Counsel
Counterterrorism

Chicago
Los Angeles
Ottawa
[redacted]

San Francisco
Washington Field

Attn: [redacted]
SSA [redacted]
[redacted]

Chief Division Counsel
Legat Stewart Sturm
Chief Division Counsel,
Charles Walker
Chief Division Counsel

b6
b7C

From: [redacted]

b7D

Contact: SA [redacted]

b7D
b7C

Approved By: [redacted]

Drafted By: [redacted] djc

Case ID #: 29B-WF-171994 (Pending)
74-CG-86438 (Pending)
[redacted] (Pending)

b7D

Title: HIDDEN INTERESTS;
OO:WASHINGTON FIELD

INSLAW;
[redacted]
MAJOR CASE #51;
OO:CHICAGO

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Synopsis: Information regarding [redacted]

b6
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b7D

Enclosure(s): Enclosed for receiving offices are: 1) Copies of [redacted] 2) Copy of [redacted]

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29B-WF-171994-846

1325015-000-8202

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b7D

3) Three (3) page FD-302 dated 06/03/2000. 4) Four (4) page FD-302 dated 02/24/2000.

Details: From through an extremely reliable and sensitive source has been in contact with

b6
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is an extremely reliable and sensitive source reporting on

and interviewed the source on in the presence of SA Federal Bureau of Investigation (FBI), SA was introduced to and as Chief Division Counsel (CDC) concurred with the presence of SA at this interview and During subsequent meetings with the source SA was not present.

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On source advised that

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advised that on August 2, 2000, drove to the Los Angeles FBI accompanied by and last name unknown (LNU), left the other investigators and entered the FBI alone. claimed she was allowed to read through FBI files regarding stated that she was also put in contact with former FBI Agent confirmed for that was

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b7D

1325015-000-8203

[redacted] According to [redacted] FBI b6 b7C
wiretap summaries indicated [redacted]

[redacted] stated that she reviewed the files, which b6
confirmed that [redacted] had been [redacted] b7C
[redacted] stated she observed documents which b7E
indicated that the FBI sent an inquiry to [redacted] to determine if
[redacted] provided details regarding
FBI wiretaps. [redacted] said that when she interviewed former FBI
Agent [redacted] he revealed that Danny Casolaro had been
threatened by [redacted] just prior to his death, but the FBI
stonewalled his investigation of Casolaro's death.

[redacted] stated that b6
they had requested information from the FBI and received a b7C
significant report that confirmed that [redacted] was suspected of b7D
[redacted] These facilities
were originally owned by [redacted]
[redacted].

[redacted] stated that b6
[redacted] b7C
b7D

[redacted] b7D

[redacted] b6
b7C
b7D

1325015-000-8204

[redacted] b7D b7E

[redacted] b6 b7C b7D b7E

Detective [redacted] advised that in June, 2000 she traveled to the San Francisco FBI and reviewed FBI documents regarding [redacted] b6 b7C b7D stated through her review of FBI documents she confirmed that [redacted] was an FBI informant working for FBI Agent [redacted] Detective [redacted] stated that she has confronted [redacted] and he has confirmed that he was an FBI informant, and she has confronted retired FBI Agent [redacted] and he has confirmed that [redacted] was an FBI informant. Detective [redacted] has also identified [redacted] as a possible FBI informant.

On 08/04/2000, SA [redacted] contacted [redacted] b6 b7C Legal Division, Los Angeles Division, and confirmed that Detective [redacted] did in

1325015-000-8205

fact visit the Los Angeles FBI on 08/02/2000. The log at the reception counter indicates that she entered at 13:15 hours. [redacted] were present when Detective [redacted] b6 b7C reviewed the file of [redacted] Detective [redacted] was permitted to read through the entire file and place post-it notes on serials she wished copies of. [redacted] advised that the copies requested have not been sent to Detective [redacted] nor will they, pending the resolution of Detective [redacted] s actions.

[redacted] advised that he was contacted by [redacted] b6 b7C San Francisco Division, regarding the request for the release of information to Detective [redacted] IA [redacted] may have been present during the review of FBI files by Detective [redacted]

Detective [redacted] has compromised information she has b6 b7C b7D obtained from FBI files in San Francisco and Los Angeles, and provided this information to [redacted] and a [redacted] source. It appears that Detective [redacted] is providing FBI information through unauthorized channels.

[redacted] b6 b7C b7D

[redacted]

1325015-000-8206

LEAD(s):

Set Lead 1:

COUNTERTERRORISM

AT WASHINGTON, DC

Will brief National Security Law Unit (NSLU) regarding this matter and obtain guidance as to appropriate course of action in this matter.

Set Lead 2:

OTTAWA

AT OTTAWA, CANADA

Read and clear.

Set Lead 3:

SAN FRANCISCO

AT SAN FRANCISCO, CA

Read and clear.

Set Lead 4:

LOS ANGELES

AT LOS ANGELES, CA

Read and clear.

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♦♦

1325015-000-8207

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 9/21/2000

To: Washington Field Office **Attn:** SSA [redacted] b6 b7C

From: WFO
C-5/NVRA
Contact: SA [redacted] ext. 3416 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :rhm

Case ID #: 29B-WF-171994 (Pending)

Title: Hidden Interests;
Major Case #38;
FAG; FIF;
OO:WFO

Synopsis: Case status report and re-assignment request.

Details: The writer is providing the following case status report due to his pending transfer.

2000 Case STATUS

In January 1988, PHARAON participated in a conspiracy with BCCI, and its principal officers, to defraud the U.S. Government and individual investors. PHARAON utilized BCCI to facilitate a fraud by manipulating the financial market for subordinate debentures issued by Centrust Savings Bank (CSB) in Miami, Florida. When CSB issued the subordinate debenture offer, CSB had secretly agreed with PHARAON to buy back the $25 million worth of subordinate debentures purchased by PHARAON. Thus making it appear that the subordinate debenture offering was fully funded. In reality, the subordinate debentures were bought by CSB which wanted the issue to appear popular in order to inflate the price artificially. PHARAON originally purchased the subordinate debentures with funds he had received from BCCI.

An arrest warrant was issued on November 15, 1991, as a result of an indictment, by the judicial authorities in the District of Columbia, United States, for: conspiracy to commit wire fraud; wire fraud; and racketeering conspiracy. PHARAON was also indicted on Federal Charges stemming from his banking ties in Miami, Florida and Atlanta, Georgia. PHARAON was indicted on state/local charges in New York.

[redacted] b6 b7C

Reassign to SA [redacted] 9/28/00 SA [redacted] 9/29/00

~~FM00265X1, EC~~

FM00265 1, EC

29B-WF-171994-847

1325015-000/8208

PHARAON is known to live in Jeddah, Saudi Arabia and to travel throughout the Middle East and Mediterranean. However, it is believed PHARAON is spending more time in Syria. PHARAON has business interests in the Middle East, United States and elsewhere. Currently all his assets in the United States are frozen and there is a claim, by various enforcement agencies, against PHARAON's U.S. assets for about $110 million.

PHARAON often travels via his private yacht `LE PHARAON'. PHARAON is known to have traveled via commercial air lines in the past.

The yacht has been spotted at the port in Limassol, Cyprus on several occasions, having been boarded by the Cyprian Law Enforcement Authorities on a couple of occasions. Each time PHARAON was not aboard. The yacht has also been spotted, throughout the years, at the port in DuBai.

Previous attempts to detain and extradite PHARAON have failed due to his location and/or his stature within the Middle East Community.

In October of 1999, discussions took place between the Department of Justice (DOJ), the U.S Federal Reserve, District Attorney's Office of New York City (DANYC), the Bank of Credit and Commerce International (BCCI) Liquidators, and the lone remaining indicted fugitive, GHAITH R. PHARAON.

On 10/19/99, the writer had a telephonic conversation with [redacted] DOJ - Fraud Section regarding the status of PHARAON. [redacted] advised there is a proposal on the table, from the civil side, wherein PHARAON would pay a sum of $250,000,000.00 to: the BCCI Liquidators; the U.S. Federal Reserve; and DANYC. The above three entities wanted to know how DOJ would view such an agreement, specifically would DOJ still pursue a criminal prosecution of PHARAON or would DOJ negotiate plea with PHARAON. b6 b7C

PHARAON's attorney requested, if the proposed agreement was accepted, that the U.S. Government agree not to have PHARAON extradited from anywhere in the world, but it would be understood that the criminal charges would still be pending. DOJ advised that would not be possible.

[redacted] b5

1325015-000-8209

[redacted] b5

DOJ contacted the relevant U.S. Attorney Offices concerning PHARAON for their input. DOJ contacted WFO to do the same. DOJ requested that FBIHQ be contacted concerning the matter.

[redacted] b5

Thus, at this time no deal was been made and PHARAON remains a fugitive.

Attached is a list of relevant telephone numbers. DOJ Attorney [redacted] has been the writer's main point of contact for the past two years. Sometime the liquidators have provided information concerning the whereabouts of PHARAON, as they deal with his attorney on a regular basis. b6 b7C

There is a significant amount of documents to be returned or destroyed in this matter. The Federal Reserve took possession of numerous boxes of evidence, the contact at the Federal Reserve was [redacted] b6 b7C

There were at one time approximately 3000 boxes of evidence at the Federal Reserve Office in Miami, Florida. The Subfile Sub H contains the bulky sheets.

Some of the closed subfiles are boxed in the locked storage room on the ninth floor, the IMA knows the location.

Due to the pending transfer of the case agent, it is requested that the above captioned matter be re-assigned. The writer will be available to assist if there are any questions. The writer could also transfer pertinent case write ups to the new case agents directory.

♦♦

1325015-000-8210

NAMES & NUMBERS FOR BCCI

FBI

LEGAT ISLAMABAD (10 HOURS AHEAD) FBI
LEGAT - 011-92-51-827833
[redacted] b7E

LEGAT ROME (6 HOURS AHEAD) FBI
LEGAT - 011-396-4788-7010
FAX - 011-396-4674-2593

ECU
WK - 202-324-5660/5995

SSA INTERNATIONAL RELATIONS SECT.
WK - 202-324-4691
WK - 202-305-0196
Fax - 202-324-1096

FBI INTERPOL LIAISON
WK - 202-616-8400
WK - 202-616-9000
FAX - 202-616-1087

[redacted] b7E

[redacted] b7E

DOJ

CRIMINAL FORFEITURE
WK - 202-616-8678
WK - 202-514-1263
FAX - 202-514-5522

OIA
WK - 202-514-0018
FAX - 202-514-0080

OIA - FUGITIVE
WK - 202-514-0039
FAX - 202-514-0080

[redacted] DOJ - FRAUD b6 b7C
WK - 202-514-0631

FAX - 202-514-7021
PAGER - 800-759-8888 PIN 1577174

OTHER NUMBERS
DOJ COMMAND CENTER - 202-514-5000
DOJ - OIA GENERAL # - 202-514-0000
DOJ OPERATOR - 202-514-2000

FEDERAL RESERVE

[redacted] b6 b7C

NAVY

OFFICE OF NAVY INTELLIGENCE
WK - 301-669-3222
WK - 301-688-8001

ONI
WK - 301-669-3212

LIQUIDATORS

[redacted] - ATTY FOR LIQUIDATORS b6 b7C
WK - [redacted]
FAX - 202-466-5738
HM - [redacted]

[redacted] - ATTY FOR LIQUIDATORS b6 b7C
WK - [redacted]

[redacted] - ATTY FOR LIQUIDATORS b6 b7C

29B-WF-171994-848

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b7C

FD-448 (Rev. 6-2-97)

FBI FACSIMILE

COVER SHEET

PRECEDENCE

- ☐ Immediate
- ☐ Priority
- ☒ Routine

CLASSIFICATION

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☒ Unclassified

Time Transmitted: _____
Sender's Initials: arh
Number of Pages: 3
(including cover sheet)

To: AIU, ISD, FBIHQ
Name of Office

Date: 10/20/2000

Facsimile Number: 202/324-8560

Attn: [redacted]
Name

202/324-5080
Room Telephone

b6
b7C

From: FBI, WFO
Name of Office

Subject: [redacted]

b7D

Special Handling Instructions: If you need anything further or reduced to an EC call.

Originator's Name: SA [redacted]

Telephone: 703/762-3422

b6
b7C

Originator's Facsimile Number: 703/762-3420

Approved: kl

29B-WF-171994-849

Brief Description of Communication Faxed: [redacted]

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1325015-000-8216

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/27/2000

Source, who is not in a position to testify, provided the following information.

On [redacted] a reliable [redacted] source provided the following information to Special Agent (SA) [redacted] Source advised that [redacted] b6 b7C b7D

[redacted]

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

Investigation on 10/20/2000 at [redacted] b7D

File # 29B-WF-171994/850-CG-86438 Date dictated 10/23/2000

by SA [redacted] djc b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

29B-WF-171994-850

1325015-000-8222

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 10/27/2000

To: General Counsel
Counterterrorism

Chicago
Los Angeles

Ottawa
[redacted]

San Francisco
Washington Field

Attn: [redacted] b6 b7C
SSA [redacted]
[redacted]

Chief Division Counsel
SA [redacted]
Palm Springs RA
Legat [redacted]
Chief Division Counsel,
[redacted]
Chief Division Counsel

From: [redacted] b7D
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] djc

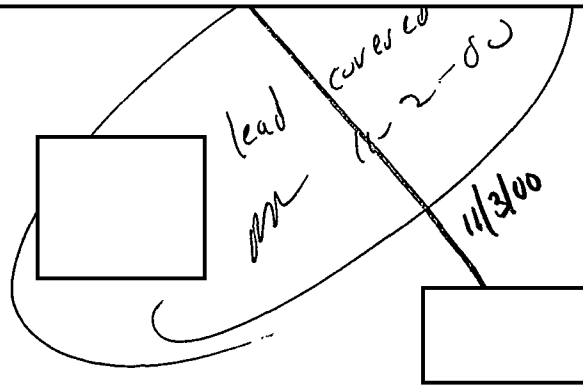
Case ID #: 29B-WF-171994 (Pending) 851
74-CG-86438 (Pending) 140
[redacted] (Pending) b7D

Title: HIDDEN INTERESTS;
OO:WASHINGTON FIELD

INSLAW;
[redacted] b6 b7C
MAJOR CASE #51;
OO:CHICAGO

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] b7D DIVISION.

Synopsis: Information regarding [redacted] b6 b7C b7D



AMA

29B-WF-171994-851 NB

1325015-000-8226

To: General Counsel From: [redacted] b7D
Re: 29B-WF-171994, 10/27/2000

Enclosure(s): Enclosed for receiving offices is a four (4) page FD-302 containing information provided by a reliable source on 10/20/2000.

Details: On 10/20/2000, a reliable [redacted] source provided information regarding [redacted] b6 b7C b7D This information is contained in the attached FD-302.

1325015-000-8227

To: General Counsel From: [redacted] b7D
Re: 29B-WF-171994, 10/27/2000

LEAD(s):

Set Lead 1: (Adm)

ALL RECEIVING OFFICES

Read and clear.

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] b7D DIVISION.

♦♦

1325015-000-8228

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/09/2001

To: Washington Field **Attn:** ADIC Carter
SAC Knowlton
ASAC [redacted] b6 b7C

From: Washington Field
C-5
Contact: SA [redacted] 703/762-3422

Approved By: [redacted]

Drafted By: [redacted] arh

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
Major Case #38;
FIF; FAG;

Synopsis: Request approval of [redacted] b6 b7C b7D

Details: [redacted] b6 b7C b7D

[redacted] Pharaon remains a fugitive at this time.

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

29B-WF-171994-857

1325015 0001229

AH010094, EC

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] Assistant Director, The Federal Reserve Board, had previously advised that [redacted] b6 b7C b7D

[redacted] Asset Informant Unit, FBIHQ, advised that [redacted] b6 b7C b7D

Based on the above, it is requested that [redacted] b6 b7C b7D

ADIC Carter CD11701

SAC Knowlton

ASAC [redacted] b6 b7C

♦♦

1325015-000-8230

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/22/2001

To: Washington Field **Attn:** ADIC

From: Washington Field
C-5
Contact: SA [redacted] 703/762-3422 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] arh

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
Major Case #38;
FIF; FAG;

Synopsis: [redacted] b6 b7C

Details: On 1/19/2001, [redacted] Asset Informant Unit, FBIHQ, was provided a facsimile copy of WFO EC dated 1/9/2001, authorizing request for [redacted] b6 b7C b7D

[redacted] explained that the EC provided her and the information [redacted] was to provide directly to her would be sufficient to [redacted] b6 b7C b7D

♦♦

29B-WF-171994-858

AN010222.EC

1325015-000-8231

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/25/2001

To: ✓ Washington Field **Attn:** C-5/NVRA [redacted] b6 b7C

From: Warsaw
Contact: [redacted] 011-4822-625-3094

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994-859 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WFO

Synopsis: Status of investigation at Warsaw.

Details: For the information of WFO, Legat Warsaw was in contact with [redacted] b6 b7C b7D concerning information he received from a confidential informant re [redacted]

The confidential source also contacted telephonically the Legal Attache Office at the American Embassy [redacted] b6 b7C b7D on two occasions stating that [redacted]

In view of the above, Warsaw will conduct no further investigation in this matter and considers this lead covered.

b6 b7C

1) Assign lead to SA

2) MARK LEAD covered 2/1/01 KM

2/2/01 AGS

SA [redacted]

29B-WF-171994-859

1825015-000-8232

LEAD(s):

Set Lead 1: (Adm)

WASHINGTON FIELD

AT WASHINGTON, D.C.

Read and clear.

♦♦

1325015-000-8233

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/19/2001

To: Director's Office
Counterterrorism
General Counsel
Chicago
Los Angeles
Ottawa
[redacted]
San Francisco
Washington Field

Attn: [redacted] b6 b7C
DT Squad
Chief Division Counsel
Legat [redacted]
Chief Division Counsel
[redacted]
Chief Division Counsel
DT Squad

From: [redacted] b7D
Contact: SA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :djc

Case ID #: 29B-WF-171994 (Pending)
74-CG-86438 (Pending)
[redacted] (Pending) b7D

Title: HIDDEN INTERESTS;
OO:WASHINGTON FIELD

INSLAW;
[redacted] b6 b7C
MC #51
OO:CHICAGO

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] DIVISION b7D

Synopsis: Information regarding [redacted] b6 b7C b7D

Enclosure(s): Enclosed for receiving offices is: 1) A
[redacted] b6 b7C b7D

[redacted] b6 b7C

29B-WF-171994-868

1225015-000-8254

To: Director's Office From: [redacted] b7D
Re: 29B-WF-171994, 01/19/2001

[redacted] 3) Two (2) page FD-302 containing b7D
information provided by a reliable [redacted] source on [redacted]
and [redacted] 4) [redacted]

Details: On [redacted], a reliable [redacted] b6 b7C b7D
source provided information regarding [redacted]

[redacted]

Source advised that [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] (THIS INFORMATION IS
EXTREMELY SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION
WILL COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE)

[redacted] b6 b7C b7D

1325015-000-8235

To: Director's Office From: [redacted] b7D
Re: 29B-WF-171994, 01/19/2001

LEAD(s):

Set Lead 1: (Adm)

ALL RECEIVING OFFICES

Read and clear.

THIS INFORMATION IS SINGULAR IN NATURE. DISCLOSURE OF THIS INFORMATION OR ENCLOSURES COULD COMPROMISE AN EXTREMELY RELIABLE AND SENSITIVE SOURCE. ANY LEADS GENERATED FROM SOURCE INFORMATION SHOULD BE CLOSELY COORDINATED WITH [redacted] b7D DIVISION

♦♦

1325015-000-8236

Automated Serial Permanent Charge-Out
FD-5a (1-5-94)

Date: 04/17/01 Time: 08:37

Case ID: 29B-WF-171994 Serial: 861

Description of Document:

Type : INSERT
Date : 02/05/01
To : WASHINGTON FIELD
From : WASHINGTON FIELD
Topic: ATTEMPT MADE TO SEIZE TRASH,OUTSIDE OF [redacted] RESIDENCE

b6
b7C

Reason for Permanent Charge-Out:

document was put into the wrong case file do to agents error on case id number.

Transferred to:

Case ID: 29B-WF-214902 Serial: 161

Employee: [redacted]

b6
b7C

Permanent Charge-Out

861

1325015-000-8237

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/07/2001

To: Washington Field **Attn:** ADIC

From: Washington Field
C-5
Contact: SA [redacted] 703/762-3422 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] arh

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FAG; FIF;

Synopsis: Contact with [redacted] Division Re: dissemination of information b7D

Details: This writer spoke with SA [redacted] Division, telephone number [redacted] concerning source information being forwarded to WFO. According to [redacted] the information being provided related to [redacted] b6 b7C b7D

[redacted] b7D

On 2/7/2001, this writer contacted [redacted] and explained the above. It was requested that [redacted] cease forwarding source information concerning [redacted] as it does not relate to WFO's interest in this matter. b6 b7C b7D

♦♦

AA010385.EC 29B-WF-171994-1325015.000-8238

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/07/2001

To: Criminal Investigative **Attn:** SSA E [redacted] b6 b7C
FIF Unit
[redacted] b7D

From: Washington Field
C-5
Contact: SA [redacted] 703/762-3422 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:arh

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
Major Case #38;
FIF; FAG;

ARMED AND DANGEROUS

Synopsis: Request to re-contact sources

Reference: 29B-WF-171994 Serial 49 & 71

Enclosure(s): Copy of WFO teletype dated 11/21/91 [redacted] b7D

Copy of WFO teletype dated 11/19/91 [redacted]

Details: Ghaith Pharaon was indicted on fraud charges relating to his dealings with the Bank of Credit and Commerce International (BCCI) and the dealing of debentures of a Florida bank. An arrest warrant was issued in Washington, D.C. on 11/19/1991, charging Conspiracy, Wire Fraud, Racketeering Conspiracy, as well as aiding and abetting. Since that time Pharaon has remained a fugitive despite efforts to have him arrested and returned to the United States. Pharaon is believed to confine his travel to the middle east where he wields considerable influence.

Shortly after his indictment, [redacted] b7D that they had developed information through confidential sources, concerning

29B-WF-171994-863

AH0103864EC

1326015-000-8239

Pharaon's whereabouts [redacted]

WFO is renewing efforts to locate and arrest Pharaon. In furtherance of those efforts [redacted] Divisions are being requested to attempt to re-contact these sources to determine if they are still in a position to have knowledge of Pharaon's whereabouts and if they are willing to continue in assisting this fugitive investigation. b7D

1325015-000-8240

LEAD(s):

Set Lead 1:

[redacted] b7D

[redacted]

Will attempt to re-contact source mentioned in enclosed communication to determine if source has knowledge of whereabouts of Ghaith Pharaon. Ascertain willingness of source in assisting in fugitive investigation of Pharaon.

Set Lead 2:

[redacted] b7D

[redacted]

Will attempt to re-contact source mentioned in enclosed communication to determine if source has knowledge of whereabouts of Ghaith Pharaon. Ascertain willingness of source in assisting in fugitive investigation of Pharaon.

ARMED AND DANGEROUS

♦♦

1325015-000-8241

[redacted] b6 b7C

C-5

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☒ Teletype	☒ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☐ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☒ UNCLAS

Date 11/21/91

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

LEGAT TOKYO/IMMEDIATE/

LEGAT BANGKOK/IMMEDIATE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. OLIA; CID, WCCS, FIFU, SSA [redacted]

copy filed Sub Jug 3 b6 b7C

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WMFO TELETYPE TO ALL OFFICES AND LEGATS, 11/19/91.

AS SET FORTH IN REFERENCED TELETYPE, INDICTMENTS AND ARREST WARRANTS WERE ISSUED 11/15/91, IN WASHINGTON, D.C., INCLUDING GHAITH RACHAD PHARAON.

Jug 3

WMFO NOTIFIED 11/20/91, BY AUSA, WASHINGTON, D.C., THAT NEW YORK DISTRICT ATTORNEY HAS SOURCE INFORMATION ON THE WHEREABOUTS OF FUGITIVE GHAITH RACHAD PHARAON (SAUDI ARABIAN

SubA 49

29B-WF-171994

SEARCHED SU INDEXED SU SERIALIZED SU FILED SU SEP 14 1992 FBI/DOJ METRO FIELD OFFICE

INDEXED SU NOV 10 1991 FBI/DOJ FIELD OFFICE

Approved: _____ Original filename: SO

Time Received: ~~[illegible]~~ 1:10 pm Telprep filename: DML001@325

MRI/JULIAN DATE: ~~[illegible]~~ 1281/325 ISN: ~~015~~ 025

FOX DATE & TIME OF ACCEPTANCE: 11/21/91 ~~[illegible]~~ 1:11 pm KTW

1325015-000-8242

CITIZEN; DOB: 9/7/41; WHITE MALE; 5'9" TALL; WEIGHT: 250 LBS). REPORTEDLY, PHARAON IS IN PAKISTAN, PROCLAIMING HIS INNOCENCE BEFORE VARIOUS AUDIENCES. HE IS EXPECTED TO TRAVEL, WITHIN THE NEXT DAY OR TWO, TO SOUTH KOREA TO HAVE A BUSINESS MEETING WITH A MAJOR KOREAN MANUFACTURER, WHO CURRENTLY IS ATTENDING A LARGE ECONOMIC CONFERENCE IN THAT COUNTRY.

LEGAT BANGKOK IS REQUESTED TO ATTEMPT VERIFICATION OF PHARAON'S WHEREABOUTS AND ITINERARY.

LEGAT TOKYO IS REQUESTED TO NOTIFY SOUTH KOREAN AUTHORITIES OF EXISTENCE AND NATURE OF WARRANT FOR PHARAON, AND OF THE POSSIBILITY THAT HE IS COMING THERE. NOTIFY WMFO AND OTHERS AS APPROPRIATE OF ANY INFORMATION.

BT

1325015-000-8243

b6
b7C

C-5

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☒ Teletype
☐ Facsimile
☐ AIRTEL

PRECEDENCE:
☒ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

Date 11/19/91

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

ALL FBI OFFICES/IMMEDIATE/

ALL LEGATS/IMMEDIATE/

Copy filed Sub Aug 1, 2 3

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. OLIA; CID, WCCS, FIFU, SSA [redacted]

b6
b7C

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WMFO TELETYPES TO FBIHQ, DATED 11/17/91 AND 11/18/91.

FOR INFORMATION OF RECEIVING OFFICES, REFERENCED TELS REPORTED THAT ON 11/15/91, THE U.S. GRAND JURY IN WASHINGTON, D.C., IN A THREE-COUNT INDICTMENT, CHARGED THE BELOW-LISTED INDIVIDUALS AND ENTITIES WITH RACKETEERING CONSPIRACY FOR SECRETLY TAKING OVER A CALIFORNIA BANK AND FOR FRAUDULENTLY

Aug 3-91
29B-WF-171994 -48
SUB A

SEARCHED SU INDEXED SU
SERIALIZED SU FILED SU
SEP 14 1992
FBI - WASH. METRO FIELD OFFICE
SU

SEARCHED SU INDEXED SU
SERIALIZED SU FILED SU
NOV 1991
FBI—WASH. METRO FIELD OFFICE

Approved: _____ Original filename: _____

Time Received: 8:20 Telprep filename: DML012 SO.323

MRI/JULIAN DATE: 848/324 ISN: 017

FOX DATE & TIME OF ACCEPTANCE: 11/20/91 8:22 am KTW

1325015-000-8244

DEALING IN DEBENTURES OF A FLORIDA BANK. THOSE NAMED IN THE INDICTMENT WERE:

BCCI HOLDINGS (LUXEMBOURG) S.A.

BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.

BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS), LIMITED

INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS), LIMITED

AGHA HASAN ABEDI

[redacted] b6 b7C

GHAITH PHARAON

FOR INFORMATION OF ALL RECIPIENTS, ARREST WARRANTS BASED ON INDICTMENT WERE ISSUED 11/15/91, BY THE U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA FOR AGHA HASAN ABEDI, [redacted] b6 b7C [redacted] AND GHAITH R. PHARAON, AND ARE ON FILE WITH THE U.S. MARSHAL'S, WASHINGTON, D.C. NO BOND RECOMMENDATION. SUBJECTS ENTERED IN NCIC.

IDENTIFYING INFORMATION ON FUGITIVES FOLLOWS:

1. AGHA HASAN ABEDI, WHITE MALE, DOB: 1/1/21; POB: MAHMUDABAD, INDIAN, PAKISTANI CITIZENSHIP; ABOUT 5 FEET 6 INCHES TALL; WEIGHT: 160 POUNDS.

2. [redacted] WHITE MALE; DOB: [redacted]; [redacted] CITIZENSHIP; 5 FEET 7 INCHES TALL; WEIGHT: 170 LBS. b6 b7C

3. GHAITH R. PHARAON, AKA DR. GHAITH RACHAD PHARAON, GHAITH RASHAD PHARAON; WHITE MALE, DOB: 9/7/41, POB: RIYADH, SAUDI ARABIA, SAUDI CITIZEN; 5 FEET 9 INCHES; WEIGHT: 250 LBS

[redacted] CONTACTED [redacted] WHO IS VERY KNOWLEDGEABLE OF [redacted] b6 b7C b7D

[redacted] SOURCE HAS BEEN TASKED TO OBTAIN MORE SPECIFIC INFORMATION. ALL SUBJECTS ARE FOREIGN NATIONALS.

WMFO REQUESTS ALL OFFICES CONTACT LOGICAL SOURCES AND REPORT ANY POSITIVE INFORMATION RE FUGITIVES.

BT

TO: SSA SQUAD C-5 DATE: 3/1/01

FROM: SA [redacted] b6 b7C
COMMUNICATION CENTER

RE: REQUEST FROM MPD TO VALIDATE WFO NCIC ENTRIES

X WANTED PERSONS ____ STOLEN GUNS

____ STOLEN VEHICLES ____ STOLEN SECURITIES

Validation is the process by which the entering agency confirms that each NCIC entry is accurate, complete, and still outstanding or active. Each month, WFO receives a printout of records from its state Control Terminal Agency (WALES/MPD). Inaccurate or incomplete data entered into NCIC could lead to the false arrest of an individual.

The attached computer printout contains all records on file in NCIC which were believed to have been entered by your squad in the month of NOVEMBER

Please make sure the entries are current and accurate. Any entry which is not current or accurate should cleared, canceled,or modified. A printout showing your action taken must be placed in the case file.

Please sign this form and return to writer. Do not put the original in your file although you may make a copy of it for your file if you wish. Make the appropriate notation on your FD-487 "NCIC Activity Log", which should be stamped "NCIC".

Please indicate action to be taken by the WFO Communications Center by placing a check mark in one of the spaces below.

____ CANCEL

____ CLEAR

____ MODIFY

X RETAIN WARRANTS ARE CURRENT AND ACCURATE.

I certify that appropriate action has been taken regarding the above entries made by Squad C-5

SSA CERTIFICATION: [redacted] DATE: 3-5-01 b6 b7C

ROUTE BACK TO SA [redacted] COMMUNICATION CENTER, UPON COMPLETION.

[redacted] AMA HQA b6 b7C

29B-WF-171994 - 1325016-000-8247

NCIC2000 FEBRUARY VALIDATIONS

b6
b7C

[redacted]

MKE/WANTED PERSON
ORI/DCFBIWF00 NAM/PHARAON,GHAITH RACHAD SEX/M RAC/W POB/SB DOB/19410907
HGT/509 WGT/250 HAI/BLK
OFF/FRAUD
DOW/19911118 OCA/29B171994
MIS/RICO,FBW,CONSPIRACY,A&A, SAUDI CITIZEN CALL SA MANSFIELD AT 703-762-3000
AKA/PHARAON,DR GHAITH R
AKA/PHARAON,GHAITH RASHAD
NIC/W665764502 DTE/19911119 0000 EST

C-5

b6
b7C

[redacted]

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/14/2001

To: Washington Field **Attn:** SA [redacted] b6 b7C

From: Criminal Investigative
Financial Crimes Section/Financial Institution
Fraud Unit/Room 4997
Contact: SSA [redacted], (202) 324-5721 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:hem

Case ID #: 29B-WF-171994-865 (Pending)

Title: HIDDEN INTERESTS
Major Case #38
FIF; FAG

Synopsis: Lead to contact possible source of information.

Enclosure(s): Enclosed for Washington Field Office are photocopies of an email message and its corresponding header information received from Voice of America (VOA).

Details: FBI Liaison Officer [redacted] provided the enclosed photostatic copies of an email message and its header information from VOA, an United States Government entity which broadcasts a radio program overseas, as well as featuring fugitives on its web page (www.voa.gov). [redacted] the producer for VOA's international crime alert, business telephone number [redacted] is the appropriate point of contact at VOA. b6 b7C

[redacted] b7E

UPLOADED BY [redacted] ON 3/14/01 b6 b7C

1325015-000-8249

LEAD(s):

Set Lead 1:

WASHINGTON FIELD

AT WASHINGTON, DC

Conduct logical investigation based on enclosed email message.

CC: 1 - [redacted]
1 -

b6
b7C

♦♦

1325015-000-8250

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/16/2001

To: New York **Attn:** SSA [redacted] b6 b7C
Washington Field SA [redacted]

From: Criminal Investigative
Financial Crimes Section (FCS)/Financial Institution
Fraud Unit/Room 4997
Contact: SSA [redacted] (202) 324-5721 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:hem

Case ID #: 29B-WF-171994-866 (Pending)

Title: HIDDEN INTERESTS
MAJOR CASE #38
FIF; FAG

Synopsis: To forward copies of videocassettes of deposition of Ghaith Pharaon.

Package Copy: Being forwarded under separate cover for New York are the original six videocassettes provided to the FCS by SSA [redacted] and one copy of the entire set (copied on nine videocassettes) of the deposition taken of Pharaon on 4/4-6/00. Being forwarded under separate cover for the Washington Field Office is a copy of the above-described set of videocassettes. b6 b7C

Details: SSA [redacted] provided to the FCS a set of six videocassettes containing a deposition taken of Pharaon on 4/4-6/00. These tapes were duplicated at FBIHQ and are being distributed to captioned field divisions. b6 b7C

[redacted] b7E

UPLOADED BY [redacted] ON 3/16/01 b6 b7C

29B-WF-171994-866

1328015-000-8253

LEAD(s):

Set Lead 1: (Adm)

NEW YORK

AT NEW YORK, NY

Read and clear.

Set Lead 2:

WASHINGTON FIELD

AT WASHINGTON, DC

Review testimony of Pharaon and consider transcribing tapes for inclusion in above-captioned file.

CC: 1 - [redacted]
1 - [redacted]

b6
b7C

♦♦

1325015-000-8254

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/26/2001

To: Washington Field

From: [redacted] b7D
SQ 4
Contact: SA [redacted] (410) 281-0329 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:pef

Case ID #: 29B-WF-171994-867 (Pending)

Title: HIDDEN INTEREST;
FIF;
OO: WASHINGTON FIELD

Synopsis: Results of contact with [redacted] Source, [redacted] is reported to Washington Field in the attached FD-302. b6 b7C b7D

Enclosure(s): Enclosed for Washington Field is an FD-302 dated 03/26/2001, containing a debriefing of [redacted] Source [redacted] b6 b7C b7D

Details: The attached FD-302 reports on [redacted] Source believes [redacted] Source is attempting to learn [redacted] b6 b7C b7D

[redacted] will maintain contact with the Source concerning [redacted] b6 b7C b7D

SA [redacted] b6 b7C

UPLOAD & SEND 3-28-2001 29B-WF-171994-867

1325015-000-8255

085PEF08.EC

To: Washington Field From: [redacted]
Re: 29B-WF-171994, 03/26/200[redacted]

b7D

LEAD(s):

Set Lead 1: (Adm)

WASHINGTON FIELD

AT WASHINGTON, DC

For information.

♦♦

1325015-000-8256

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 03/26/2001

A Source, who is not in a position to testify, advised as follows:

[redacted] b6 b7C b7D

[redacted] b7D

[redacted] b7D

Investigation on 3/26/01 at [redacted] MD b7D

File # [redacted] 29B-WF-171994-868 Date dictated 3/26/01 b7D

by SA [redacted] :pef b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

29B-WF-171994-868

325015-000-8257

March 14, 2001

[redacted] b6 b7C

Insight on the News
3600 New York Avenue, NE
Washington, DC 20002

Dear [redacted]

Your February 6th letter to Attorney General John Ashcroft was referred to the FBI for reply. You request that the Inslaw case be reopened based on allegations set forth in a series of articles appearing in your magazine.

Because of FBI and Department of Justice policy, we can neither confirm nor deny the existence of an FBI investigation. We are aware of the allegations described in the series of articles appearing in *Insight* magazine, and the information has been referred appropriately.

Sincerely yours,

[redacted] b6 b7C
Unit Chief
Office of Public and
Congressional Affairs

1 - ES, DOJ - Enc.
1 - LEGAT, Ottawa - Enc.
1 - ADIC, Los Angeles
Attention SAC Ron Iden: ReBufax and call 2/27/01 from [redacted], OPCA, and your e-mail 3/2/01. b6 b7C
1 - SAC, Chicago (74-CG-86438) - Enc.
Attention: DOMTERR Squad
1 - SAC, [redacted] - Enc. b7D
Attention SA [redacted] ReBucal 2/27/01 from [redacted] b6 b7C
[redacted] OPCA, and urECs 2/26/01 and 3/2/01.
1 - ADIC, WFO (29B-WF-171994) - Enc.
Attention Sq. Supervisor [redacted] ReBucal 2/28/01
from [redacted], OPCA. - ADVISED NO WFO INTEREST
1 - [redacted] (7128) - Enc.
Attention: SSA [redacted]
1 - [redacted] (7975) - Enc.
Attention: AGC [redacted]
1 - [redacted] (7230) - Enc.
1 - [redacted] (7222) - Enc.
1 - IOS, ISD (7443) - Enc.
1 - OPCA ES (6248) - Enc.
62C-HQ-1077231
BHM

29B-WF-171994-869

SEE NOTE - PAGE TWO

[redacted] b6 b7C

1325015-000-[illegible]

[redacted]

b6
b7C

NOTE: Incoming was reviewed by SAC Ron Iden, LA Office; Unit Chief [redacted] and AGC [redacted] OGC; and OPCA Section Chiefs [redacted] Reply based on information furnished by AGC [redacted] Deputy Director, Commercial Litigation Branch, Civil Division, DOJ, who is one of attorneys who handled the referenced Inslaw case and has read the allegations set forth in the series of articles appearing in *Insight* magazine, advised by phone that the Inslaw matter has been reviewed by three Attorneys General and that the allegations raised in that case were totally without merit. She said there is nothing in the series of articles appearing in *Insight* magazine to suggest that further investigation is warranted.

b6
b7C

Insight
ON THE NEWS

[redacted] b6 b7C

3600 NEW YORK AVENUE, N.E.
WASHINGTON, D.C. 20002 202-636-3154

February 6, 2001

John Ashcroft
Attorney General
United States of America
Justice Department
Washington, D.C.

Dear Attorney General,

That certainly sounds a lot nicer than the "Dear John" letter I was happy to tear up once you got confirmed. Congratulations on getting through the process! It was tough to watch but you went in an honorable gentleman and emerged the same.

Besides the heartfelt congratulations, I'm asking you to personally look into this matter of the Royal Canadian Mounted Police (RCMP) probe (see the attached four-part series [redacted] on my staff wrote). It is a most troubling news account -- 100% accurate I might add -- about what the RCMP was looking into. And doing so under cover of secrecy. b6 b7C

We've been told that FBI in Washington has mounted a quiet investigation, e.g. requesting agents in the Los Angles Field Office to interview people the RCMP contacted. Needless to say we are as curious about what's going on as is the FBI and some folks on Capitol Hill.

What's especially troubling about the series is that [redacted] was able to verify some key portions of [redacted] strange stories. And if these were correct, other portions might be to; this would be most unfortunate needless to say. b6 b7C

From a journalistic perspective I'm only interested in what the RCMP found and whether any corruption existed (or exists) in the U.S. government. From a personal perspective [redacted] I'd say that [redacted] Inslaw, certainly are due something; even one of the former DOJ lawyers handling the so-called Reno report in 1994 says that. b6 b7C

1325015-000-8260

Anyway, I know this matter has been poured over several times. But this series clearly establishes that very serious evidence has been overlooked and/or dismissed when certainly it should not have been. I'm asking you to have the matter reopened and that information gleaned from the FBI, the U.S. Customs Service, [redacted] and info we've collected be looked at by someone with as much honor as yourself. Let's get to the bottom of it all. b7D

Ahead of time, many thanks for assisting on this matter and for having helped Insight so [redacted]t. Until next we may speak, God bless. b6 b7C

PS - There's a fella named [redacted] you should speak to, despite having worked for Eric Holder as the [redacted] and was appalled at what went on prior to you joining the department. A straight shooter as ever I've seen; someone you should meet and get an unfiltered briefing about the department. b6 b7C

OPERATIONAL SITE PROCESSING SUBUNIT
INVESTIGATIVE INFORMATION PROCESSING UNIT
FIELD INFORMATION SUPPORT SECTION
INFORMATION RESOURCES DIVISION

Reference EC case ID: 242-HQ-A1078703-460, dated 10/21/97, Re: Policy Changes - FBIHQ. Attached you will find a document that needs to be handled and/or placed in the Office of Origin (OO) Bureau file. Please handle accordingly.

Field Office: WF HQ Division: FIF

Room: _____

Case ID: 29B-WF-171994

___ Document not uploaded

___ Document needs to be serialized

___ Document restricted

___ Outside agency, please place in OO file.

___ Unable to upload attached material, please file

___ Additional case ID quoted, please serialize

✓ Place in OO file

___ Please place in OO file - additional indexing

___ Other

NAME: [redacted] b6 b7C

ROOM: 7373

EXT: 8580

DATE: 3/16/01

(Revised 1/14/98)

SA [redacted]

29B-WF-171994 - 870

1326015-000-8262

29B-WF-171994
ARH:arh

1

The following investigation was conducted by SA [redacted] b6 b7C
[redacted] on 3/30/01:

[redacted] Voice of America (VOA), telephone number [redacted], was telephonically contacted. [redacted] advised that the VOA operates a radio program which routinely features information relating to international fugitives. In response to one of the programs features on Ghaith Pharaon, the VOA received an e-mail from [redacted] advised through this e-mail that they had information that might be of value to authorities seeking to capture Pharaon. b6 b7C

According to [redacted] this is the only contact they had with [redacted] agreed to respond to this e-mail message. In [redacted]s response he was to encourage [redacted] to supply any information that he might have. He was also to furnish [redacted] with this writer's name and telephone number, if [redacted] wished to contact the FBI directly. b6 b7C

[redacted] advised that an additional broadcast featuring Pharaon is be broadcast next week. b6 b7C

1325015-000-8263

(Rev. 10-01-1999)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/10/2001

To: Atlanta **Attn:** SSA [redacted]
El Paso SSA [redacted]
SA [redacted]
Los Angeles SSA [redacted]
SA [redacted]
Miami SSA [redacted]
New York SSA [redacted]
Washington Field SSA [redacted]
SA [redacted]

b6
b7C

From: Criminal Investigative
Financial Crimes Section (FCS)/Financial Institution Fraud Unit/Room 4997
Contact: SSA [redacted] (202) 324-5721

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :hmm

Case ID #: 194A-AT-67917-119 (Pending)
29A-LA-126283-171 (Pending)
29D-MM-49881-1077 (Pending)
29B-WF-171994-873 (Pending)

Title: HIDDEN INTERESTS
MAJOR CASE #38
FIF
FAG

Synopsis: To announce a coordination meeting to be held in Washington, D.C. on 5/3/01.

Details: As receiving offices are aware, the FBI has several investigations involving Ghaith Pharaon, who is currently a fugitive and believed to be residing at his home in Saudi Arabia. Pharaon has, through his attorney, attempted to negotiate with the Department of Justice (DOJ) for a way to mitigate his exposure from these many investigations. To date, DOJ has rejected his offers. In order to better coordinate the FBI's efforts to locate and apprehend Pharaon, the FCS will host a one-day conference on 5/3/01 in Washington, D.C. for all interested parties to discuss issues related to the many investigations as well as strategies to locate Pharaon.

29B-WF-171994-873

[redacted] b7E

UPLOADED BY [redacted] ON 4/12/01

125015-000-8

b6 4
b7C

Although FBIHQ will not offer separate funding for travel expenses, all receiving offices are encouraged to attend. In order to make this conference as meaningful as possible, attendees are requested to conduct a thorough review of their case files and arrive prepared to discuss current and prospective strategies to effect Pharaon's capture. Additionally, should receiving offices know of any other agencies with an interest in Pharaon who may be able to offer value to this conference, they are requested to contact the FCS so their participation may be discussed.

1325015-000-8265

LEAD(s):

Set Lead 1:

ATLANTA

AT ATLANTA, GA

Read and clear.

Set Lead 2:

EL PASO

AT EL PASO, TX

Read and clear.

Set Lead 3:

LOS ANGELES

AT LOS ANGELES, CA

Read and clear.

Set Lead 4:

MIAMI

AT MIAMI, FL

Read and clear.

Set Lead 5:

NEW YORK

AT NEW YORK, NY

Contact [redacted] Assistant District Attorney, New York County District Attorney's Office, business telephone number [redacted] and [redacted] Investigator, Manhattan District Attorney's Office, business telephone number (212) [redacted] to determine their interest in attending this conference. b6 b7C

1325015-000-8266

Set Lead 6:

NEW YORK

AT NEW YORK, NY

Contact [redacted] Federal Reserve, to determine his office's interest in attending this conference. b6 b7C

Set Lead 7:

NEW YORK

AT NEW YORK, NY

Read and clear.

Set Lead 8:

WASHINGTON FIELD

AT WASHINGTON, DC

Read and clear.

CC: 1 - [redacted] b6 b7C
1 -
1 -

♦♦

1325015-000-8267

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/11/2001

To: Washington Field **Attn:** ADIC

From: Washington Field
C-5
Contact: SA [redacted] 703/762-3422 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] arh

Case ID #: 29B-WF-171994 (Pending)

Title: HIDEN INTERESTS
Major case #38

Synopsis: Request of bulky technician

Administrative: EC dated 6/25/01 from [redacted] captioned: "EVIDENCE CONTROL MATTER; PICKETT STREET LOCATION," 66F-A2516. b6 b7C

Details: On 7/11/2001, this writer spoke with [redacted] Evidence Control Center, x 3347, concerning her request to move evidence. [redacted] advised that the Pickett Street storage facility was never properly designated as a evidence storage facility. She was in the process of removing all items stored at that location and that was the purpose of the above communication. [redacted] requested the items identified in this communication, be picked-up and removed by the case agents. b6 b7C

This communication refers to items held under file number 29B-WF-171994. This writer asked [redacted] if she was aware that this was a pending case and she replied that she did not know this. b6 b7C

[redacted] was asked why it was necessary to have the case agent retrieve these items, sign them out, transport them and sign them back in. It was pointed out to her that any entry made in the chain of custody was subject to scrutiny by the defense and superfluous entries should be avoided. [redacted] advised that evidence technicians are prohibited from transporting any evidence and that agents must transport these items. When asked on what authority she based this decision to have agents trasnport these items, [redacted] said she would refer this writer to her program manager. b6 b7C

29B-WF-171994-876

AN01192I, RC

1376015-000-8268

This writer explained that he was scheduled for leave until 8/6/2001 and the communication directed this project to be completed by 8/3/2001. [redacted] stated that she would work with any problems in this area and specifically, this writer did not have to complete the transfer of evidence until after returning from leave. [redacted] added that she appreciated cooperation in this matter as, "you are doing us a favor." b6 b7C

♦♦

1325015-000-8269

FD-448 (Rev. 6-2-97)

FBI FACSIMILE

COVER SHEET

PRECEDENCE

- ☐ Immediate
- ☒ Priority
- ☐ Routine

CLASSIFICATION

- ☐ Top Secret
- ☐ Secret
- ☒ ~~Confidential~~
- ☐ Sensitive
- ☐ Unclassified

Time Transmitted: _____
Sender's Initials: LRR
Number of Pages: 26
(including cover sheet)

To: FBI NEW YORK Date: 10/05/2001
Name of Office

Facsimile Number: [redacted] SENT SECURE FAX b7E

Attn: SSA [redacted] 914/989-6000 b6 b7C
Name Room Telephone

From: FBI NVRA/WFO
Name of Office

Subject: REQUESTED PAGES FROM SERIALS IN
29B-WF-171994

Special Handling Instructions: HAND DELIVER TO SSA [redacted] b6 b7C

Originator's Name: SSA [redacted] Telephone: 703/762-3433 b6 b7C

Originator's Facsimile Number: 703/762-3078

Approved: SSA [redacted] b6 b7C

Brief Description of Communication Faxed: _____

WARNING

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29B-WF-171994-877 1325015-000-8270

From:
To:
Date: Tuesday, April 6, 1993 4:10 pm
Subject: BCCI; [redacted] SOURCE INFORMATION

b6
b7C
b7D

[redacted]

b6
b7C
b7D

INFORMATION PERTAINING TO BCCI

On [redacted] contacted SAs assigned to the BCCI investigation at WMFO. The source advised that [redacted]

b6
b7C
b7D

By way of background, the source has provided reliable information pertaining to the BCCI investigation in the past. The source has been open and providing reliable information to the FBI [redacted]

b6
b7C
b7D

On [redacted] WMFO SAs met with the source. The meeting was coordinated with [redacted] SAs that the source has been dealing with. With respect to BCCI, the source advised that [redacted]

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b7D

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

SER # 596 Pg 2

The following investigative steps are anticipated, contingent upon evidence reviews and the development of additional evidence:

A. First American Bank

1. Consider indictments against nominee shareholders of CCAH stock. TA [redacted] opined that such action could be accomplished in the near future. b6 b7C

2. Attempt to obtain the cooperation of one or more nominees.

3. Consider an indictment against [redacted]

4. Consider an indictment against CLARK CLIFFORD.

In order to accomplish the above steps the review of records from sources including the Cayman Islands, Miami and London need to continue.

With respect to [redacted] and CLIFFORD, it is believed that stronger evidence exists against [redacted] at this juncture. However, at this time, prosecutive evidence is lacking. It is believed that the following BCCI insiders could provide direct evidence against [redacted] and CLIFFORD: b6 b7C

[redacted] b6 b7C

Other BCCI insiders who are believed to be knowledgeable of [redacted] and CLIFFORD are: b6 b7C

[redacted]

Efforts are under way to gain access to the above individuals through different channels.

Further, additional interviews at London need to be conducted. Such should include:

[redacted] b6 b7C

Sect 377 pg 2

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/11/92

[redacted] telephone [redacted] was advised as to the identity of the interviewing agents and the nature of the investigation and thereafter provided the following information. b6 b7C

[redacted] advised that he started in the banking business in [redacted] in [redacted] working for [redacted]. He eventually became a certified public accountant and went to work for [redacted] advised that in 1975 he learned that AGAHA HASSAN ABEDI and the Bank of America were going to form a new bank. [redacted] advised that he interviewed with ABEDI and was subsequently hired to work in the Bank of Credit and Commerce International (BCCI) Holding Company which was located in London. [redacted] did not know ABEDI prior to the interview. [redacted] advised that his duties consisted of [redacted] said that BCCI had between 30 and 35 subsidiaries. [redacted] advised that he was [redacted] of the bank. He advised that he worked in [redacted] office of the bank which was [redacted] b6 b7C

[redacted] advised that he worked at BCCI in this position until he resigned in [redacted] to accept a position at the [redacted] said that he resigned from BCCI because the BCCI Board of Directors decided that the bank's headquarters should be moved to Abu Dahbi in order to be closer to the investors. [redacted] advised that [redacted] therefore he wanted to remain in London. b6 b7C

[redacted] advised that he has never heard of a "black network" associated with BCCI. Likewise, he has not heard of and has no information concerning BCCI financing of arms or technology transfers, Iran-Contra financing, financing for the development of Iraqi or Pakistani nuclear capabilities, money laundering, or narcotics trafficking. He did not have any knowledge of BCCI ownership of First American Bank. b6 b7C

-153

Investigation on 3/11/92 at [redacted] File # 29B-WF-171994_D b6 b7C

SA's [redacted] cma

by _____ Date dictated _____

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 b6 b7C

[redacted] recalled that he was introduced to [redacted] by [redacted] at one of the BCCI jamborees in Geneva or Vienna. [redacted] advised that he saw CLARK CLIFFORD at the BCCI offices in London in 1989 or 1990. [redacted] said that CLIFFORD was at the bank to discuss the plea bargaining arrangement regarding the BCCI Florida money laundering case. [redacted] advised that ABEDI referred to CLIFFORD and [redacted] as "our cousins". b6 b7C

At this point, [redacted] was asked if he had any information concerning the following individuals: [redacted] b6 b7C

[redacted] advised that [redacted] is currently in Pakistan. He advised that he did not know the current location of [redacted] said that [redacted] was in Abu Dahbi. He recalled that [redacted] at the bank. He did not know the current location of [redacted] and he thought that [redacted] may be working somewhere in London. b6 b7C

[redacted] advised that [redacted] for a period of time. [redacted] further advised that he was also aware that [redacted] worked at [redacted] but he does not know if [redacted] and left BCCI to work at [redacted] stated that [redacted] was [redacted] at BCCI but he has no idea where [redacted] is now. [redacted] advised that he does not recall meeting [redacted] or [redacted] b6 b7C

 b6 b7C

who met with [redacted] concerning having a Saudi Arabian investor, GHAITH R. PHARAON buy the company. b6 b7C

In or about the Fall of 1982, [redacted] started with BCCI in the representative office in New York, operated by [redacted] In the representative office along with [redacted] were about four other BCCI officers and two staff. [redacted] and an Iranian, [redacted] had been sent by ABEDI and [redacted] to work on acquiring and operating BCCI branches in Central and South America. Their mandate was to open a branch in every country where it was legal to do so, or have BCCI enter into a joint venture with local investors in those countries where outright ownership was not a possibility. In that he and [redacted] were reporting directly to [redacted] the number three man in BCCI, London, they did not come under the supervision of [redacted] b6 b7C

It was about a week after [redacted] arrived at BCCI/NY that he first met [redacted] an attorney from WDC. [redacted] observed that [redacted] subsequently came to see [redacted] about three or four times a month, and it was [redacted]'s understanding that [redacted]s firm was "key" counsel to BCCI in the United States. The first time [redacted] met [redacted] was at about the end of the takeover of Financial General Bankshares (FGB). b6 b7C

As was the case with most BCCI offices, the office of BCCI/NY was an open area, enabling [redacted] to overhear discussions among, for example, [redacted] From those portions he overheard, [redacted] determined they were talking about the takeover of FGB and the setting up of operations in New York. Often these meetings included [redacted] in the BCCI merchant banking division in London), and their discussions often began in the open area. Usually, however, they would adjourn to the conference room. b6 b7C

[redacted] had no knowledge of any involvement of [redacted] in the takeover of FGB, nor did [redacted] see or meet any of the alleged investors in that takeover. b6 b7C

In or about early-1983, [redacted] came to [redacted] to see about assistance in buying some Banker's Trust branches for First American Bank of New York (FAB/NY). [redacted] knew Banker's Trust to be a client of the firm of WHITE & CASE, an felt that if [redacted]'s firm, CLIFFORD and WARNKE were to handle such a transaction, it would jeopardize [redacted]'s standing with WHITE & CASE. b6 b7C

SER # 73 pg 3 SUB D

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/14/91

[redacted] was interviewed in the office and presence of his attorneys, [redacted] Present during the interview were Assistant United States Attorney (AUSA) [redacted] and United States Department of Justice Trial Attorney (TA) [redacted] was aware of the identity and purpose of the interviewing agents, and that this interview was a continuation of earlier interviews of him on 5/29/91 and 5/31/91. [redacted] provided the following information.

b6
b7C
b7D
b3

[redacted]

b6
b7C
b7D
b3

[redacted]

b6
b7C
b7D
b3

[redacted]

b6
b7C
b7D
b3

SUB D

Investigation on 8/1/91 at New York, New York File # 29B-WF-171994 - 30

by [redacted] das Date dictated 8/6/91

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

b6
b7C
b7D

[redacted]

b6
b7C
b7D
b3

[redacted]

b6
b7C
b7D
b3

[redacted]

b6
b7C
b7D
b3

[redacted]

b3
b6
b7C

At this point, the interview was terminated and a Grand Jury subpoena was served on [redacted] by SA [redacted]

[redacted]

b6
b7C
b7D

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/4/91

[redacted] voluntarily appeared at the New York office of the Federal Bureau of Investigation (FBI), 26 Federal Plaza, New York, New York 10278. [redacted] is represented by Miami Attorney [redacted]. This interview was coordinated with [redacted] At the outset he was advised of the identity of the interviewing Agents and the purpose of the inquiry. Also present was Trial Attorney [redacted] U.S. Department of Justice. [redacted] furnished the following information: b6 b7C

By way of background, [redacted] was born in [redacted] on [redacted] His Social Security Account Number is [redacted] has resided in the United States for [redacted] years. He has been a [redacted] Prior to that time, [redacted] was [redacted] In the United States [redacted] resides at [redacted] telephone number [redacted] Until recently [redacted] was employed as [redacted] New York, New York 10022-[redacted] telephone number [redacted] is currently in the process of establishing [redacted] b6 b7C

[redacted] was a college honors graduate with a major in [redacted] He had [redacted] training in [redacted] b6 b7C

In [redacted] went to work in the banking industry in [redacted] He worked for [redacted] which was the same bank that AGHA HASAN ABEDI was working at. [redacted] spent one year as a [redacted] in [redacted], he transferred to London, England and spent two years in [redacted] In London, [redacted] completed his studies. Following that, [redacted] went back to [redacted]. By [redacted] he grew to be [redacted] b6 b7C

In [redacted] left [redacted] and went to work as [redacted] for the Management Association of b6 b7C

Investigation on 7/31/91 at New York, New York File # 29B-WF-171994 -29

SA [redacted]

by SA [redacted] Date dictated 8/4/91 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-8280

SUBD

Pakistan (MAP). It was funded by the Ford Foundation. It's purpose was to set up management consulting firms and to give training seminars. He moved to London and worked at Ruddock and Partners, the largest Consulting firm in the United Kingdom. Ruddock subsequently became a part of Price Waterhouse. [redacted] worked at Ruddock for one year and than returned to [redacted] to work at the MAP. He left MAP and went to work for Barklays Bank Europe for a short time. He again returned to [redacted] as the [redacted] In 1973, Pakistan nationalized the MAP and appointed [redacted] Consultant to the National Bank of Pakistan. [redacted] supervised the nationalization of thirteen insurance companies. He was than appointed Director of the Industrial Board of Pakistan. [redacted] was not happy with this appointment. He did not want to be a government servant. After two days [redacted] had this appointment rescinded and he returned to his position as Adviser to the National Bank of Pakistan. The bank was nationalized in 1973. [redacted] remained at the National Bank of Pakistan until 1974. At that time, he went to Saudi Arabia to start a joint venture between the National Bank of Pakistan and Saudi Arabia. In mid 1976, [redacted] started the Bank of Algezira. This was the first joint banking venture with the Saudi's. [redacted] worked closely with the Saudi's between October, 1974 and December, 1976. In January, 1977, [redacted] started to work with the Bank of Commerce and Credit, International (BCCI).

[redacted] knew ABEDI between 1963 and 1969 at the United Bank. [redacted] was a fairly junior officer and did not have much contact with ABEDI. When he left in 1969, ABEDI left the door open for [redacted] to return to the bank. ABEDI approached [redacted] in 1973 about joining BCCI. [redacted] declined at that time.

BCCI wanted to get into Saudi Arabia and was unsuccessful at doing so. ABEDI kept approaching [redacted] to join BCCI. [redacted] was not interested. He had his own problems and wanted to move to North America or Europe. ABEDI hired talented people. [redacted] was one of these people.

At the end of 1976, BCCI moved it's head office from ABU DHABI to London. [redacted] joined the bank and was given no particular job. ABEDI had no specific structure. The Bank of America (BOA), the worlds largest bank and Sheik ZAYED the worlds richest man were behind the bank. These were attractive considerations in [redacted]S decision to join BCCI.

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[redacted] started the Human Resources Division in London. Prior to this no records were maintained. Everything had been done on an "ad hoc" basis. [redacted] had no experience in the area of human services. He put together a Human Resources system. [redacted] also devoted time to setting up Exchange Agencies (Bureau de Change). [redacted] devoted 60% of his time to Human Resources and 40% to the Currency and Exchange Division. [redacted] wanted to spend 100% of his time on Currency and Exchange matters. Money changers were very attractive to [redacted] He was told to concentrate on Human Resources. [redacted] was not happy with his job and wanted to leave BCCI. The pay was about 1/3 of what he previously made and he did not like his job.

As a result, ABEDI sent [redacted] to Canada as the [redacted] was the [redacted] spent most of his time in London. BCCI had one office in Toronto, Canada when [redacted] arrived. While he was there, they expanded to four offices. BCCI received approval to become a licensed bank in Canada. BCCI Canada was 50% owned by BCCI and 50% owned by [redacted] described [redacted] as a Canadian citizen with a checkered background. When it was converted to a bank it was owned 100% by BCCI. [redacted] held the position of [redacted] in Canada between [redacted] and [redacted] His only formal duty was to serve as [redacted]

During his tenure at BCCI Canada, [redacted] suggested to [redacted] that BCCI should expand into the Caribbean, specifically into Jamaica. [redacted] EDWARD SIAGA, Prime Minister of Jamaica. [redacted] had a residence in Toronto, Canada. At about the same time, [redacted] in Atlanta, Georgia recommended that BCCI consider buying a branch of Citizen and Southern Bank (C & S), located in Jamaica which was for sale. [redacted] went to Jamaica to negotiate the deal. They met with the Governor of the Central Bank, [redacted] They told [redacted] that they wanted to open a branch in Jamaica because of trade and entrepreneurial interests.

In August, 1981, [redacted] was told that he would be moved out of Canada when the bank license was issued. [redacted] from Habib Bank was taking over.

[redacted] looked at a banking acquisition in Spain. He would be sent to Spain as the head of the bank if the deal went through. The bank involved had failed and the deal did not go

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through. A second attempt was made to purchase a good bank in Spain. Spain would not allow a foreign bank to purchase the Spanish bank. The deal did not go through. [redacted] would have been appointed the [redacted] of this bank. b6 b7C

[redacted] had been travelling like crazy and in February, 1982, he was asked to help an elderly BCCI official, [redacted] set up the Miami office. After three days [redacted] returned to Pakistan. He refused to stay in Miami. In the meantime the Spanish deal did not proceed. In June, 1982, [redacted] told [redacted] that he was to stay in Miami. [redacted] was in charge of the western hemisphere for BCCI. He was stationed in London. [redacted] was the head of the Planning Division, which included expansion and profitability. b6 b7C

By mid 1982, [redacted] was more settled down in Miami. He had no designation but he was [redacted] in Miami. In the meantime, [redacted] established an office in Kingston, Jamaica. On August 11, 1982, [redacted] opened the Miami banking agency of BCCI. During mid 1982 and 1983 BCCI expanded throughout the Caribbean. [redacted] was also put in charge of offices in Venezuela and Panama. b6 b7C

[redacted] was appointed [redacted] Latin American Region (LACRO). They were in a state of flux in 1983 and 1984. There was confusion over who was responsible for what between [redacted] was not in favor of making the Colombian acquisition. He was also against a joint venture in Peru. Because of [redacted]s opposition to these acquisitions [redacted] was put in charge of them. According to [redacted] the bank in Peru was in bad shape and the bank in Colombia was too large and the clientele was dangerous. ABEDI had always been against getting involved with the wrong people. [redacted] referred to this as the "goonda criminal element." b6 b7C

In April, 1984, they split into two regions. The Miami/Caribbean region was under [redacted] and the LACRO region under [redacted]. The Miami office opened a representative office in Houston to do business with high tech and energy companies. The Houston office was closed in 1989. b6 b7C

In 1984 troubles started to surface between [redacted] and [redacted] They came to a boil in 1986. [redacted] was interfering with the Miami agency's business. [redacted] was ordering accounts to be b6 b7C

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opened and was conducting other bank business he had no authority to perform. An example given by [redacted] was how [redacted] would open a million dollar account and not provide the identification for the customer. [redacted] would not accept deposits without the proper identification being provided. b6 b7C

[redacted] was involved in bringing in big money deposits. Such were for questionable accounts. This was the culture that had developed within BCCI. Young guys like [redacted] and [redacted] generated questionable deposits. All diligence and prudence were dropped. b6 b7C

In 1985, ABEDI launched a worldwide program called "the External Market Place" (EMP). This came about because a Strategy Group of 12 members recommended to ABEDI that he cut back operations and fire a number of employees because expenses were getting out of hand. Members of the group included [redacted] by this time was at Independence Bank. ABEDI'S philosophy was not to fire anyone. His solution was the EMP. The program called for the use of excess employees to generate deposits/business in other parts of the world. There were two types of deposit solicitation. They were institutional solicitation, which was very good and individual solicitation which was very bad according to [redacted] The theory was good if people were properly trained and planned well. b6 b7C

Deposits came in with no control. Customers could decide to move deposits wherever they wanted to. A competition to attract business was created which opened the door for money laundering. [redacted] objected that BCCI did not care enough about good banking practices. With hindsight, [redacted] stated that what took place was money laundering. Such laundering was not planned. It just happened and people did not care. In mid 1986, [redacted] went to ABEDI and told him he wanted to resign. b6 b7C

[redacted] discussed transactions [redacted] attempted to make with Eastern Airlines (EAL) through the Miami office. [redacted] was opposed to such transactions. [redacted] wanted to issue a standby letter of credit. This would have violated BCCI'S license. BCCI could not do business with a corporation. EAL would open accounts with BCCI in Spain, Columbia and Jamaica. BCCI and EAL set up a joint finance committee in Columbia. They were attempting to begin a fly now pay later program. EAL was a credit risk. EAL funds would be deposited in BCCI accounts. The Colombia part of b6 b7C

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the deal was coordinated by LACRO. EAL deposited $12,000,000 with BCCI and BCCI issued the standby letter of credit. This happened while [redacted] was away from Miami. It was done by [redacted] b6 confronted [redacted] upon his return to Miami. Money was converted b7C from pesos in Colombia to dollars and was deposited in BCCI at Miami for 30 to 90 days per agreement.

In February, 1987, [redacted] (LACRO) wanted to issue a b6 letter of credit on behalf of EAL with Visa to free up credit b7C card receipt money. In return EAL would deposit $12,000,000 in BCCI for no charge. [redacted] would not go along with this transaction. He was concerned that a commitment was issued with a lack of diligence. [redacted] dealt with [redacted] from EAL. [redacted] stated that he dealt with officials at EAL that were three levels higher than [redacted]. This deal was not done at that time. [redacted] believed that after he left Miami this deal took place.

Following the EAL matter and the standby letter of credit, [redacted] went to ABEDI. He told ABEDI he could not take any b6 more and wanted out. There was no due diligence. [redacted] was b7C complaining that [redacted] did not know banking, which was causing [redacted] problems.

At this point in time [redacted] was in charge of b6 the Americas. [redacted] addressed the above problems with [redacted] b7C [redacted] did not understand. [redacted] described [redacted] as being incompetent. He termed [redacted] as being "mentally bankrupt."

With regard to the deposit situation, [redacted] advised b6 that they had no idea who account holders were. BCCI was open to b7C abuse and they should not have placed themselves in that position. BCCI Miami was not looking clean, at that time, to the regulators. [redacted] used to warn [redacted] that he would get in trouble some day.

In April or May, 1986, a BCCI Official from Chicago was arrested in the BCCI office there. He was charged with money laundering involving a transaction in Miami.

At the BCCI annual meeting held at Luxembourg in May, 1986, [redacted] first learned of the BCCI treasury loss. After b6 hearing about the treasury loss [redacted] asked [redacted] about the b7C story [redacted] wanted to tell concerning the loss. A thirty minute meeting was held in the hotel lobby to address the loss. The

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meeting was attended by [redacted] b6
[redacted] was [redacted] at BCCI. He took b7C
over from [redacted] The meeting continued over dinner. [redacted]
explained the treasury loss as being attributable to a change in
the accounting standards. The accountants had changed the games
on them causing a liquidation of positions. The result was a loss
on the books of $365,000,000. $150,000,000 of the loss had been
subvented by a shareholder. The impression given to [redacted] was
the shareholder was [redacted] During the dinner [redacted]
discussed his plans for the treasury.

After the Chicago situation surfaced [redacted] was very b6
concerned about money laundering. He set up training and controls b7C
to deal with money laundering at BCCI in Miami.

The tension between [redacted] and the LACRO division was b6
intense. [redacted] went to ABEDI and told ABEDI that he could not b7C
take any more. There were no internal controls or compliance.
[redacted] warned that BCCI people would be in jail as a result.
[redacted] than resigned. ABEDI insisted that [redacted] withdraw his
resignation. [redacted] was given a promotion to a global position.
[redacted] wanted to stay in the United States. ABEDI appointed him
to a global position stationed in New York. This meeting took
place on August 12, 1986. [redacted] was very much subdued after this
and controls were put in place at BCCI Miami.

[redacted] recalled that in the first half of 1984, ABEDI b6
called him at home and asked [redacted] if he knew United States b7C
Senator PAULA HAWKINS. [redacted] met her once. ABEDI wanted [redacted]
to meet Senator HAWKINS. It was very important. [redacted] set up a
meeting through Assistants to the Senator. The purpose of the
meeting was to discuss statements made by Senator HAWKINS. She
had been in Pakistan and had met with General ZIA. Senator
HAWKINS apparently discussed stopping the flow of drugs from
Pakistan to the United States. She mentioned that she had
information that a Pakistani bank located in the Cayman Islands
was involved in money laundering. Following that meeting ZIA
called ABEDI who in turn called [redacted] met briefly one
morning with Senator HAWKINS. He discussed how her statement hurt
BCCI. [redacted] assured the Senator that BCCI would fully cooperate.
The bank was a guest in the United States. The Senator's
expression completely changed and she asked [redacted] if they could
reconvene the meeting at 3:00PM that afternoon. She had to leave
at this point to meet with the President. The 3:00PM meeting was

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canceled and rescheduled for the following morning. When [redacted] arrived the next morning he was met by a battery of officials. There were representatives from the Drug Enforcement Agency (DEA), Department of Justice (DOJ), State Department and Senator HAWKINS and members of her staff. [redacted] was told that BCCI was not under investigation. He commented that this was what was told to ZIA. Senator HAWKINS told [redacted] that the State Department would follow up by sending ZIA a letter advising that BCCI was not under investigation. Senator HAWKINS was looking at the flow of drugs. b6 b7C

In February, 1987, [redacted] went to New York. BCCI became one region in the United States. [redacted] was placed in charge. The New York and California offices were a failure. One of [redacted] S functions was to evaluate BCCI representative offices in the United States. For years [redacted] lobbied for BCCI to establish a direct presence in the United States by either forming a bank or by upgrading New York or California to full bank status. [redacted] worked as [redacted] in the United States from February, 1987, until 1989. He reiterated that he wanted to establish a full banking presence in the United States. Canada was made a part of the United States region, which was also referred to as the North American region. LACRO remained separate from the North American region. b6 b7C

With respect to the Financial General Bankshares (FGB) takeover, [redacted] commented that everyone in BCCI knew that BCCI was buying FGB. In meetings ABEDI discussed his "future vision" of having one bank in Europe and one bank in the United States. [redacted] recalled hearing this future vision as early as 1979. ABEDI never discussed operational details for this with [redacted] b6 b7C

[redacted] was not aware of the nominee arrangements made for the FGB purchase. [redacted] heard that there was nominee ownership in Nigeria and Egypt. [redacted] believed that the [redacted] ownership interest in BCCI Canada may have been a nominee arrangement. b6 b7C

In November, 1985, BCCI decided to buy a bank in Florida and to make Florida their home state. There was a BCCI conference in Florida and 160 people attended. [redacted] looked at banks in Florida that they could purchase. Because of the treasury loss in early 1986, BCCI was prevented from making an open purchase of a bank. A decision was made to buy a bank in b6 b7C

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Florida through nominee shareholders. [redacted] discussed this topic with [redacted] By using nominee shareholders BCCI'S balance sheet would not become an issue before the Federal Reserve Bank.

[redacted] took minutes of meetings he had with [redacted] concerning the purchase of a Florida bank. He also had diaries which would point to dates he met with [redacted] came to Miami at least three times regarding the Florida bank purchase. Meetings took place in the Miami BCCI office, at Eagle National Bank and at Miami National Bank. On these occasions [redacted] came to Miami by himself. The banks they considered purchasing were Eagle National Bank and Miami National Bank. The Eagle deal fell through when the Eagle parent company in Colombia changed ownership.

[redacted] participated in discussions addressing the nominee purchase of a Florida bank. Nominees mentioned included [redacted] spoke with [redacted] on the telephone about the nominee ownership in [redacted]S presence. [redacted] heard [redacted]S part of the conversation. [redacted] sent file copies of PHARAON documents regarding the Independence Bank purchase. Said file would serve as a model of how the nominee purchase should be done. [redacted] had a copy of the file and [redacted] had a copy. [redacted] did not recall if he gave a copy to [redacted] or if [redacted] gave him a copy. [redacted] did recall that he and [redacted] did exchange the file.

[redacted] described [redacted] as being the eyes and ears of ABEDI in the United States. Every time ABEDI discussed expansion and bank development he would consult with [redacted]

[redacted] had nothing to do with loans to the shareholders of CCAH. He had nothing to do with filings to the Federal Reserve Bank.

[redacted] reviewed a letter he had written to [redacted] It dealt with joint BCCI/FAB marketing. [redacted] stated that BCCI was helping FAB to market and grow. Any business that BCCI could not handle was passed along to FAB. [redacted] was told by a former head of BCCI'S International Division, AKHTAR ANIS (deceased), that FAB was part of BCCI. Between 1/3 and 50% of BCCI'S foreign exchange business went to FAB. BCCI officials including ABEDI, [redacted] and ANIS described BCCI and FAB as one and the same entity. BCCI had to market for FAB. [redacted]

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recalled that at one meeting in Miami ABEDI discussed a complaint made to him by [redacted] that FAB was not getting enough business from BCCI. b6 b7C

[redacted] attended a meeting in Washington, D.C., at the FAB office. Present with him were [redacted]. The topic of discussion was how BCCI and FAB could do business together. BCCI could market in Florida for mortgage business and deposit business for FAB and FAB could get commercial business for BCCI. The underlining theme was that BCCI and FAB were one and the same bank. b6 b7C

[redacted] went to the Brazilian Embassy with [redacted] a FAB official, to market on behalf of FAB. [redacted] described FAB as being our (BCCI) bank. The sales pitch and the selling point was that FAB and BCCI were a banking network. b6 b7C

[redacted] pointed out that CLARK CLIFFORD and [redacted] were placed as CCAH officers without having to meet the CCAH shareholders. b6 b7C

The decision for FAB to purchase the National Bank of Georgia (NBG) was made by ABEDI. In November, 1985, meetings were held over a two day period in Miami. Both CLIFFORD and [redacted] met with ABEDI in Miami. b6 b7C

It was [redacted]'S opinion that the reason for the sale of NBG was that ABEDI wanted to get GHAITH PHARAON out. PHARAON had serious financial problems worldwide. Thirty five banks were involved in PHARAON'S overseas default involving $300,000,000. b6 b7C

CLIFFORD and [redacted] met with ABEDI and [redacted] in [redacted]S office at BCCI MIAMI. [redacted] was not involved in that meeting but watched it through the office window. Immediately following the meeting, ABEDI called [redacted] and [redacted] into the office. ABEDI informed them of his decision that FAB would purchase NBG. ABEDI set the purchase price and conditions of the sale. ABEDI and [redacted] than told [redacted] that he would go to NBG. [redacted] had been transferred from NBG back to BCCI London. ABEDI wanted [redacted] to go from FAB to NBG. [redacted]'S salary was paid by FAB. b6 b7C

[redacted] was not happy about going to NBG. He attempted to talk ABEDI into allowing him to stay at FAB. [redacted] reasoned that b6 b7C

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[redacted] was unhappy with [redacted] going from FAB to NBG. [redacted] also questioned why he was being sent to NBG if he was just going back to FAB. b6 b7C

[redacted] wanted to purchase a bank in Florida. ABEDI disagreed with [redacted] on this point. [redacted] told [redacted] several times to look for a bank in Florida that FAB could purchase. ABEDI did not permit this. b6 b7C

With regard to the purchase of NBG by FAB, [redacted] several times later told [redacted] that ABEDI pushed him to buy a lemon. [redacted] referred to NBG as "a can of worms." [redacted] felt maneuvered or pushed into buying NBG. [redacted] hated that acquisition with a passion. b6 b7C

[redacted] was not involved with the deal itself. He believed that the [redacted] purchase of BCCI/CCAH stock was separate from the NBG takeover. This was due to the time frame of both events. b6 b7C

[redacted] discussed some of the officials who were sent from BCCI to American banks. These officials included [redacted] went from BCCI to NBG and back to BCCI. [redacted] went from BCCI to NBG. [redacted] went from BCCI to Independence Bank. [redacted] went from BCCI to FABNY. [redacted] returned a few years later to BCCI. b6 b7C

[redacted] advised that within BCCI, NBG was considered "our bank," and FAB was considered "our bank." Independence Bank remained at arms length from BCCI. [redacted] kept Independence Bank totally independent from BCCI. This was from the standpoint that no BCCI employees were placed there. [redacted] knew that Independence Bank was owned by BCCI. b6 b7C

ABEDI did not tell [redacted] that he sent the above named BCCI officials or other BCCI officials to the American banks, including FAB, NBG and Independence Bank. [redacted] was under the impression that [redacted] asked ABEDI to send him to New York. [redacted] told [redacted] that ABEDI sent him to FABNY. [redacted] stated that he and [redacted] were part of a group of 12 individuals who had a meeting with ABEDI in 1985. Following the meeting ABEDI transferred [redacted] back to BCCI London from FABNY. b6 b7C

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[redacted] has met PHARAON. Their contacts were mostly on a social basis. In one business situation, [redacted] arranged meetings for PHARAON with the Prime Minister of Trinidad. PHARAON wanted to open an ammonia plant there.

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In the third quarter of 1988 [redacted] travelled from London to Washington, D.C. for a meeting with [redacted] The meeting took place in [redacted]'S office at Clifford and Warnke. [redacted] and [redacted] met with [redacted] in regard to a BCCI presence in California. At the end of the meeting [redacted] asked [redacted] if CLIFFORD was in his office. [redacted] wanted to pay a visit to CLIFFORD. [redacted] took [redacted] and [redacted] into CLIFFORD'S office. CLIFFORD greeted [redacted] warmly and stated [redacted] it's good to have you back. Now we will start telling lies all over again." No business was discussed at that time with Clifford. [redacted] commented that the statement made by Clifford captured the essence of everything in this matter.

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By way of background concerning [redacted]'S relationship with CLIFFORD and [redacted] advised that [redacted] ran the New YORK representative office of BCCI. [redacted] had been involved in the FGB takeover and worked closely with CLIFFORD and [redacted] As an aside, [redacted] commented that prior to [redacted] running the New York representative office of BCCI, it had been run by [redacted] was the first BCCI official who did business with [redacted]

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ABEDI always told [redacted] and others that they should never visit the Board of Governors of the Federal Reserve System (BGFRS). [redacted] had told ABEDI that the BGFRS did not want them to contact them. ABEDI agreed with [redacted] that [redacted] would handle all contacts with the BGFRS. After the Tampa indictments [redacted] met with [redacted] at the BGFRS. This was between October, 1988 and February, 1989. [redacted] learned that the BGFRS was upset that BCCI never maintained contact with them. This was a direct contradiction to what [redacted] led ABEDI to believe.

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[redacted] was pushing for BCCI to set up a home state bank in Florida. Other possible home states were New York and California. As part of his effort, [redacted] had prepared a takeover analysis. [redacted] told ABEDI that there was no way the state of Florida would agree to a home state bank for BCCI in Florida. [redacted] went to Florida Governor GRAHAM and [redacted]. [redacted] told them he understood that BCCI would not be welcome in Florida. Governor GRAHAM and [redacted] advised that this was not so,

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that BCCI would be welcome in Florida. [redacted] came to London in December, 1985. He met with the BCCI Board of Directors and gave them an invitation for BCCI to bank in Florida.

[redacted] wanted to have a BCCI presence in the United States. He believed that [redacted] was opposed to that and that [redacted] wanted BCCI out altogether. Anytime there was talk with ABEDI about upgrading any place in the United States from agencies to banks, ABEDI would speak to CLIFFORD and [redacted] Such efforts always died.

After the indictments, [redacted] maintained close contact with [redacted] Right after the indictments, [redacted] took a "whirlwind tour" to meet with regulators. He wanted to insure them of the banks liquidity, desire to cooperate and resolve the situation. [redacted] met with federal and state regulators from New York, Washington, D.C., San Francisco and Tallahassee, Florida. [redacted] would brief [redacted] about said meetings. [redacted] would than brief [redacted] and in so doing he would turn the facts around. [redacted] would then tell [redacted] what [redacted] said whereupon [redacted] would challenge such representations. [redacted] stated that after the indictments [redacted] and [redacted] screwed up the case. He cited an example of working on a memorandum of understanding (MOU) with the state of Florida to permit BCCI to remain open. [redacted] did not act on said MOU.

[redacted] had no knowledge of CLIFFORD and [redacted]'S CCAH stock purchase.

[redacted] had no knowledge of bribes paid by BCCI in Florida or New York. [redacted] was aware that the Peruvian government maintained a bank account with BCCI at below the market rate. He deduced that a payoff had to be made to keep this account at below market value interest. [redacted] sensed that the amount of the payoff would have been the difference between the market value and below market value interest rates. [redacted] heard gossip that payoffs were made in Georgia. They may have been masked as campaign contributions. [redacted] did not have direct knowledge of payoffs in Peru or Georgia.

[redacted] hired [redacted] as a reward for helping BCCI with the Georgia legislature. [redacted] had connections with the state legislature. [redacted] characterized [redacted] as being a misfit.

In [redacted]S opinion, it looked like [redacted] had a loan with BCCI that he couldn't pay back. The loan was converted to contributions.

[redacted] had no knowledge of any Capcom/BCCI dealings.

In 1988, [redacted] told [redacted] that PHARAON was buying 18% of Centrust. This did not seem like a BCCI deal. BCCI people were not involved in the deal.

[redacted] reviewed a memorandum that he prepared, to the file, on May 7, 1986. This followed a meeting in Luxembourg. It stated that [redacted] would be used as the nominee to purchase the Miami National Bank.

In January or February, 1982, [redacted] was the head of Security Pacific Bank. ABEDI met with [redacted] in New York. ABEDI interviewed [redacted] for the position of President at FABNY. [redacted] had dinner with [redacted] after the interview with ABEDI, which took place at the Helmsley Palace Hotel. [redacted] had a stroke and remained at Security Pacific.

When [redacted] was hired, he had to be approved by ABEDI. Decisions concerning FABNY were always made by ABEDI. The FABNY office space was rented by ABEDI. A group went to see the premises with ABEDI. [redacted] were part of the group. ABEDI told [redacted] you should keep this, change that, etc. ABEDI was providing ideas about the space. ABEDI signed the lease for the property.

[redacted] teased [redacted] about FABNY by telling him "if you cannot make a profit at FABNY with $80,000,000 in capital turn it over to me and I'll do it." [redacted] responded by complaining that he had to pay $10,000,000 in rent thanks to MR. ABEDI.

The term "RAF" (rent a face) was coined by [redacted] in 1986. [redacted] sat at desks at BCCI London near the elevator. They considered themselves to be RAF'S. There were two empty desks on either side of them. They joked that these desks were for CLIFFORD and [redacted] The insinuation was that CLIFFORD and [redacted] were RAF'S. [redacted] was hired at BCCI as the head of Public Relations. He was another RAF.

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[redacted] did not consider [redacted] to be an RAF. He was hired to run FABNY. Since ABEDI hired [redacted] did not accept him and always interfered with [redacted] hated [redacted] b6 b7C

ABEDI wanted coordination between BCCI, FAB and NBG in the United States. ABEDI wanted a coordinated effort, one entity, one network. There was a joint marketing agreement between BCCI and FAB.

[redacted] reiterated that decisions concerning BCCI becoming an approved bank or to remain an agency had to be approved by [redacted] b6 b7C

[redacted] reviewed Coordinating Meeting Minutes for a meeting in Miami. [redacted] convened that meeting. [redacted] had no certain knowledge that CLIFFORD and/or [redacted] were aware of the existence of the committee. b6 b7C

There was a Regional BCCI conference in Miami in November, 1985.

[redacted]'S own impression all along was that using nominees in the FGB takeover was the brain child of CLIFFORD and [redacted] not ABEDI. This was BCCI'S first effort in a developed country. b6 b7C

[redacted] was the head of BCCI California. [redacted] found Independence Bank. It was owned by a Chinese group. [redacted] had previously been the BCCI Hong Kong Manager. [redacted] and [redacted] negotiated the Independence deal. b6 b7C

SHOAIB was under the impression that the Federal Reserve would not allow BCCI to be involved with Independence Bank for it's first five years. After that five year period BCCI would be permitted to be involved with Independence Bank.

[redacted] expected that SHOAIB would go on the Board of Directors of FAB. However, at his choosing, SHOAIB went to Independence Bank. b6 b7C

Prior to the time [redacted] was transferred from Miami to New York, the transfer was discussed by [redacted] always conceived that someday BCCI and FAB would merge. b6 b7C

 b6 b7C

[redacted] was in San Francisco talking on the telephone with [redacted] when he learned that [redacted] had resigned from BCCI. [redacted] sent word that [redacted] should call him. [redacted] called and attempted to get him to un-resign. [redacted] had [redacted] come to New York to stay with him for a few days and to talk. [redacted] would not work for [redacted] because [redacted] was a tough boss but they were friends and [redacted] could talk to him. [redacted] and [redacted] had been subpoenaed to testify before the Senate. [redacted] contacted [redacted] in New York and told [redacted] that [redacted] advised that [redacted] should not testify before the Senate. [redacted] and [redacted] were advised to leave the country and not come back. [redacted] recommended against this in discussions with [redacted] went to a lawyer, who like [redacted] advised [redacted] to testify. [redacted] did testify. b6 b7C

After the indictments [redacted] fought with [redacted] to fire [redacted] as a lawyer. [redacted] stated that [redacted] was the wrong guy to handle the case. [redacted] told [redacted] that they had to get rid of the case before regulators really took a look at BCCI and found out that there were no internal controls. [redacted] did not accept this warning and elected to fight the case. b6 b7C

In February or March, 1990, the death knell came for BCCI. There was a drug arrest at JFK International Airport. A deposit slip from BCCI New York was found. The account was an account at BCCI Panama that contained no identification or address.

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/09/2002

To: Washington Field **Attn:** ADIC

From: Washington Field
C-5
Contact: SA [redacted] 703/762-3422 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] arh

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS
MAJOR CASE #38

Synopsis: Request re-assignment of case

Details: Due to the transfer of the current case agent, this matter should be re-assigned.

Currently the only remaining investigation relates to the fugitive, Ghaith Pharaon.

♦♦

b6 b7C

Reassign to SA [redacted] 5/10/02

5/13/02

29B-WF-171994-878

AH021292, EC

1226015-000-8296

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/08/2002

To: Houston **Attn:** Richard Dye
Conroe RA

From: Washington Field
C-5
Contact: SA [redacted] 703/762-3422 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]arh

Case ID #: [redacted] (Pending) b7D

Title: [redacted] b7D

Synopsis: Lead to furnish copy of serial covered

Reference: [redacted] b7D

Enclosure(s): Copy of serial 440, file number 29B-WF-171994

Details: As requested in referenced communication, serial 440, file 29B-WF-171994 is being furnished. This serial was created prior to the implementation of ACS and thus text was not available to receiving office.

As no investigation remains, WFO considers lead covered.

♦♦

MARK LEAD COVERED
5/8/02

assessment
Houston will
have to assign
+ Covered

29B-WF-171994-879

1325015-000-8297

AH021281, EC

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/12/2002

To:	Albuquerque	**Attn:** Manual Indices
	Dallas	**Attn:** Manual Indices
	Houston	**Attn:** Manual Indices
	Investigative Services	**Attn:** Asset/Informant Unit
	Newark	**Attn:** Manual Indices
	Records Management	**Attn:** Records Maintenance
	Tampa	**Attn:** Manual Indices
	San Antonio	**Attn:** Manual Indices
	Seattle	**Attn:** Manual Indices
	Washington Field	**Attn:** Manual Indices

From: Houston
Conroe RA
Contact: [redacted] 281-298-0307 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: [redacted] (Pending) b7D

Title: [redacted] b7D

Synopsis: Request for copies of serials

Details: In accordance with Attorney General Guidelines, an annual Suitability Report and Recommendation has been initiated on the captioned source. As part of this review, it is required that all references to the source in ACS be explained. The [redacted] b6 b7C Therefore, there are numerous references to this source in ACS. b7D

Most of the references are too old to have text uploaded in ACS. Therefore, Houston's Conroe Resident Agency is setting leads to the receiving offices to provide a copy of the requested serials to Houston in order to complete this annual review.

To: Albuquerque From: Houston
Re: [redacted] 04/12/2002 b7D

LEAD(s):

Set Lead 1:

ALBUQUERQUE

AT ALBUQUERQUE, NEW MEXICO

Provide Houston Conroe RA with a copy of the document contained in your file, 198B-AQ-40801 Serial 57

Set Lead 2:

DALLAS

AT DALLAS, TEXAS

Provide Houston Conroe RA with a copy of the documents contained in your files: 196B-DL-69306 Serial 4, 196C-HO-DL-77869 Serial 347

Set Lead 3:

HOUSTON

AT HOUSTON, TEXAS

Provide the Conroe RA with a copy of the documents contained in your files: 92C-HO-26953-0158 Serials 6 and 13, 9A-HO-38590 All, HO 72-134 Serial 39, [redacted] Serial 67, 166B-HO-49748-C-9-GJ-SBP Serial 127, 29A-5335-2 Serial 17, 29B-HO-32040 Serial 69P2, HO 66-A2143-196 Serial 145, HO 72-134 Serial 39 b3 b7E

Set Lead 4:

INVESTIGATIVE SERVICES

AT WASHINGTON, D.C.

Read and clear

1325015-000-8299

Set Lead 5:

NEWARK

AT NEWARK, NEW JERSEY

Provide Houston Conroe RA with a copy of the document contained in your file, 58D-NK-65748 Serial 135

Set Lead 6:

RECORDS MANAGEMENT

AT WASHINGTON, D.C.

Provide Houston Conroe RA with a copy of the document contained in Headquarters files: HQ 190-C2 Serial 38832, HQ 201-4934 Serial 39, HQ 87-159591 All, HQ 58-11927 Serial 6

Set Lead 7:

SAN ANTONIO

AT SAN ANTONIO, TEXAS

Provide Houston Conroe RA with a copy of the documents contained in your file, 29E-SA-36400 Serials 85 and 87

Set Lead 8:

SEATTLE

AT SEATTLE, WASHINGTON

Provide Houston Conroe RA with a copy of the document contained in your file, SE 29B-3320-D Serial 201A

Set Lead 9:

TAMPA

AT TAMPA, FLORIDA

Provide Houston Conroe RA with a copy of the document contained in your file, TP 196-0 Serial 3523

1325015-000-8300

To: Albuquerque From: Houston
Re: [redacted], 04/12/2002 b7D

Set Lead 10:

WASHINGTON FIELD

AT WASHINGTON, D.C.

Provide Houston Conroe RA with a copy of the document contained in your file, 29B-WF-171994 Serial 440

♦♦

1325015-000-8301

DECLASSIFIED BY: NSICG
ON 04-27-2018

b6
b7C

05/02/02 View Case ICMCMO12
15:37:24 ~~SECRET~~ Page 2 of 3

View Case, then press Enter

Case ID. . . . . : 29B-WF-171994 ~~(S)~~ (U)
Primary Investigator : [redacted]
Previously Assigned : [redacted] * Date : 09/29/2000
Program . . . . . : 05 WHITE COLLAR CRIME PROGRAM
Crime Problem Ind. . : FIF FINANCIAL INSTITUTION FRAUD ACTIVITY *
Office Deadline. . . :
Bureau Deadline. . . :
Closed . . . . . :
To Be Destroyed. . . :
Access Level . . . . : UNRESTRICTED ACCESS
Consolidated To. . . :
Consolidated From. . :
Previous OO. . . . . : Class : Reclassified :
Classification Level : ~~S~~ Authority . : ~~G-3~~ Duration . : ~~X-1~~
Handling Caveat. . . : Grand Jury Material . :

~~SECRET~~

Command . . > ..... +
F1=Help F3=Exit F4=Prompt F6=Multv F10=PreviousPg F11=NextPg F12=Cancel
F13=ListSerial

View Case, then press Enter

Case ID. . . . . : 29B-WF-171994 ~~(S)~~ (U)
Class. . . . . : 029 B FIF - $100,000+ FED-INS BNK
Status . . . . . : P PENDING
Squad. . . . . : C5 CRIMINAL 5
Source . . . . . : 99 FOIMS CONVERSION
Case Type. . . . . :
Opened . . . . . : 02/14/1991
Identity Theft . . . : N

Title

HIDDEN INTERESTS
-
29B-WF-171994 SERIALS 20, 24, 25, 28 CONSOL SUBQ

Summary

1

~~SECRET~~

Command . . > ..... +
F1=Help F3=Exit F4=Prompt F6=Multv F7=Bkwd F8=Fwd F11=NextPg F12=Cancel
F13=ListSerial

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/30/2002

To: Washington Field **Attn:** SA [redacted] b6 b7C
NVRA, Squad C-5

Brasilia
Investigative Services SSA [redacted] IOS-II

From: Buenos Aires
Contact: [redacted] b6 b7C

Approved By: [redacted] AR/MHR

Drafted By: [redacted] mhr

Case ID #: 29B-WF-171994 - 881 (Pending)

Title: GAITH RASHAD PHARAON - FUGITIVE

Synopsis: Request for additional details concerning e-mail described in referenced EC.

Reference: 29B-WF-171994 Serial 880

Administrative: Reference telcal between ALAT [redacted] and SA [redacted] dated 08/30/2002. b6 b7C

Details: Referenced EC provides details concerning an e-mail originating in Rio de Janeiro, drafted by an individual identifying himself as [redacted] The e-mail refers to an unidentified individual who reportedly observed subject at an unspecified time while the unidentified individual was staying at The Carmelo Four Seasons Resort in Uruguay. b6 b7C

Per referenced telcal, it was agreed that further information be sought, if possible, from [redacted] Specifically, the identity of the unidentified individual, details as to the time, date, and location of the reported sighting, and any other pertinent details, to include details as to the basis of [redacted]s relationship with subject. Identifying information for [redacted] is provided in referenced EC. b6 b7C

Should positive information be developed, WFO will forward photographs of subject, along with further identifying information, to Buenos Aires for investigation in Uruguay.

Lead covered at Buenos Aires.

1325015-000-8304

LEAD(s):

Set Lead 1:

BRASILIA

AT RIO DE JANEIRO

Review referenced EC, and have appropriate authorities interview [redacted] Report results to OO and Buenos Aires. b6 b7C

Set Lead 2:

WASHINGTON FIELD

AT NVRA

Lead covered at Buenos Aires pending development of information at Legat Brasilia.

Set Lead 3: (Adm)

INVESTIGATIVE SERVICES

AT WASHINGTON, DC

For information.

♦♦

1325015-000-8305

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/09/2002

To: Criminal Investigative **Attn:** Criminal Intelligence Section,
Asset/Informant Unit
SSA [redacted] b6 b7C

From: Washington Field
Squad C-5, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3361 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38

Synopsis: Status of [redacted] b6 b7C b7D

Administrative: Reference e-mail from SSA [redacted] to SA [redacted] dated 09/04/02. b6 b7C

Details: Per referenced e-mail, SSA [redacted] requested an updated status on [redacted] On September 6, 2002, SA [redacted] telephonically contacted [redacted] telephone number [redacted] and learned that [redacted] b6 b7C b7D

[redacted] telephone number [redacted] The telephone number at which [redacted] was contacted was [redacted] b6 b7C

29B-WF-171994-882

1325015-000-8306

[redacted] b7E

LEAD(s):

Set Lead 1:

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

The Asset/Informant Unit is requested to continue efforts to [redacted] b6 b7C b7D

♦♦

1325015-000-8307

LEGAL ATTACHE OFFICE

U.S. EMBASSY - BUENOS AIRES
UNIT 4303, APO AA 34034
Tel. 011-541-15-777-4300
Fax 011-541-15-777-4217

TO: SA [redacted]
NVRA, Squad 5
WF

File Number: 29B-WF-171994

b6
b7C

FROM: [redacted]
Office Assistant

b6
b7C

DATE: March 25, 2003

SUBJECT: Closed File

All leads have been covered by Legat Buenos Aires and the attached originals are being forwarded for inclusion to your case file.

[redacted]

b6
b7C

1325015-000-8308

Record Request
FD-125 (Rev. 7-6-90)

Date 9/6/02

☐ Birth ☐ Credit ☑ Criminal ☐ Death ☐ INS ☐ Marriage* ☐ Motor Vehicle ☐ Other

To	Buded
OPS CENTER	
Return to	File number
SQ. C-5, X-3361	29B-WF-171994

b6
b7C

Name and aliases of subject, applicant, or employee, and spouse

Addresses
Residence
Business
Former

*Date and place of marriage (if applicable)

Race	Sex	Age	Height	Weight	Hair	Eyes
	☑ Male ☐ Female					

Birth date / OR Birthplace /

b6
b7C

Arrest Number	Fingerprint classification	Criminal specialty

Social Security Number	Drivers License Number

Specific information desired

Results of check

883

29B-WF-171994-

1325015-000-8309

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/06/2002

To: Washington Field

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38

Synopsis: Contact with Overseas Private Investment Corporation (OPIC).

Details: On December 5, 2002, [redacted] Unit Chief, National Name Check Program (NNCP), FBIHQ, telephonically contacted writer and advised that OPIC had made an inquiry earlier that day regarding Ghaith Pharoan. [redacted] the OPIC point of contact, telephone number (202) 336-8589, advised [redacted] that OPIC had pulled information from the Internet relating to Pharoan's involvement in the BCCI scandal and his outstanding arrest warrant. [redacted] inquired whether or not the warrant was still valid and if the FBI was still interested in Pharaon. b6 b7C

On December 6, 2002, writer telephonically contacted [redacted] and learned the following information: For the past several months, OPIC has been working on a request from Pride International (PI), a Texas-based oil drilling company, to provide political risk insurance on two oil rigs in Pakistan, on which PI has been contracted to perform services. One oil rig is idle. While conducting research, OPIC learned that Pakistan Oil Fields Ltd has ownership in the second oil rig, along with the Pakistan Government. Further research indicated that Pharaon is the Chairman of Pakistan Oil Field Ltd. b6 b7C

SA [redacted] advised that Pharaon is a fugitive and his outstanding arrest warrant is still valid. SA [redacted] advised [redacted] that the FBI would be interested in any information about the possible whereabouts of Pharaon. [redacted] advised that OPIC may write a letter to PI stating OPIC's decision on PI's request for political risk insurance. The letter would also mention the FBI's continued interest in Pharaon and that any b6 b7C

29B-WF-171994-884

1425015-000-8314

[redacted] b7E

information could be passed on to SA [redacted] b6
transferred writer to [redacted] OPIC, telephone number b7C
[redacted] to obtain further information on PI.

[redacted] advised that PI is located at 5847 San Felipe, b6
Suite 3300, Houston, Texas 77057. [redacted] PI's Vice b7C
President of Corporate/Government Affairs, has been the contact
point with OPIC.

♦♦

1325015-000-8315

CRU

U.S. Department of Justice

Federal Bureau of Investigation

File No. 29B-WF-171994

Office of the Legal Attache
Siesmayerstrasse 21
60323 Frankfurt

22 April 2003

b7D

DRINGEND

Betreff: International Fugitive Gaith Rashad PHARAON

The FBI Legal Attache Office was contacted telephonically on 4/22/03 by a person using the name and claimed is in his name and is aware that his true identity can be determined via the subscriber information. has information regarding

b6
b7C
b7D

FBI confirmed with FBI Washington that

b6
b7C
b7D

information is that

1-Addressee
1-29B-WF-171994 -885
1-29B-WF-171994 (WF) -
1-80-BN-13160 -975
FEG:hme (4)
bka2422.ltr

b6
b7C

1325015-000

Fearing repercussions from [redacted] wishes to remain confidential. FBI [redacted] telephonically advised him we would do everything possible to ensure that. [redacted] did not wish to discuss the details over the phone for security reasons, but proposed meeting him today in [redacted]

b6
b7C
b7D

[redacted]

b7D

[redacted]

b6
b7C
b7D

Attached is an International Crime Alert printed from the Internet listing PHARAON as a fugitive.

Please refer to FBI [redacted] document #1685 when referring to this document and any future communications concerning this matter. SA [redacted] is available to discuss this matter in detail.

b6
b7C

Mit Freundlichen Grüssen,

[redacted]
Legal Attache

b6
b7C

By: SA [redacted]

International Crime Alert

IRS Department of the Treasury Internal Revenue Service

WANTED BY THE U.S. FEDERAL BUREAU OF INVESTIGATION and THE INTERNAL REVENUE SERVICE

Gaith Rashad PHARAON

DESCRIPTION: Born on September 7, 1940, in Saudi Arabia, Gaith Rashad Pharaon is a white male, 175 centimeters in height and weighing 113 kilograms. He is of stocky build with thinning black hair, graying at the temples. He normally wears a small pointed beard, but has been seen with only a moustache.

Pharaon is a citizen of Saudi Arabia and travels on a Saudi passport. He speaks Arabic, French, English, and some Greek. He smokes cigars, and wears traditional Arab clothing when in Saudi Arabia. In other countries, he usually wears Western-style business attire.

Pharaon owns a yacht named "Le Pharaon" with a picture of the Egyptian Sphinx painted on the stern. Its home port is believed to be London, although there is no indication that this yacht has been there in many years. Since 1992, Pharaon has traveled through Europe, North Africa, the Caribbean and Latin America, and Asia.

Pharaon is extremely wealthy and has numerous contacts within governments around the world. His son competes in international speedboat races and there is a possibility that he occasionally watches those races.

CASE DETAILS:It was one of the largest commercial frauds and the largest bank failure in history. The fall of the Bank of Credit and Commerce International, or B. C. C. I., took almost twelve billion dollars in depositors' money and left some two hundred fifty thousand unpaid creditors around the world. Thousands of families lost their life savings in the bank's collapse. B. C. C. I. officials and their agents are charged with bribing bank regulators and central bankers in Pakistan, Nigeria, Morocco, Senegal, Tunisia, Ivory Coast, Congo, Zambia, Argentina, and Peru. In some cases, B. C. C. I. funds were used to defraud lending agencies, including the International Monetary Fund.

In the United States, B. C. C. I. illegally purchased American banks and defrauded American investors and the U. S. Government. A key figure in the B. C. C. I. conspiracy was Gaith Rashad Pharaon. On

November 15, 1991, a U. S. court in Washington, D. C., issued an arrest warrant for Pharaon, charging him with fraud, conspiracy, and racketeering.

If you have information concerning Pharaon, you should contact the nearest U.S. embassy or consulate. The identity of individuals who furnish information will be kept in strict confidence. If appropriate, the U. S. is prepared to protect informants by relocating them.

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your world of photos

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Community: Sports: Boating: Feadship, a collection - Volume One.: the Van Lent Feadship Le Pharaon

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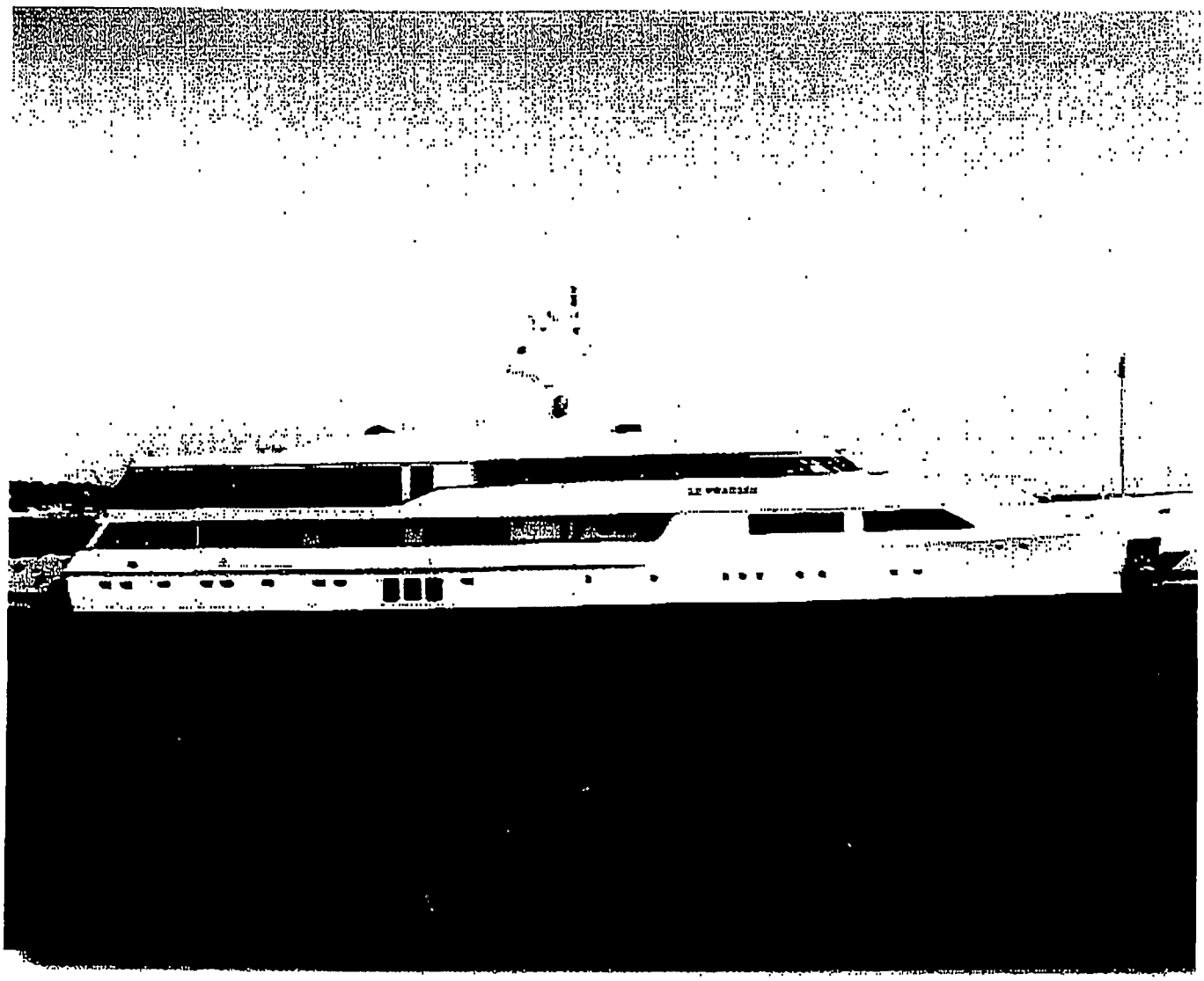

the Van Lent Feadship Le Pharaon

The 55 meter LE PHARAON was launched in 1989 for her Saudi owner. Typical for a yacht destined for the hot sun of the Red Sea is the lack of sundecks or the complete shade provided for the sundeck. She is rarely seen outside the Middle East but I had the chance to see her at Port Camille Rayon at Golfe Juan in September 1993 when I took this photo. Her owner is also a repeat client

(Rev. 08-28-2000)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/23/2003

To: Criminal Investigative **Attn:** Criminal Intelligence Section,
Asset/Informant Unit
SSA [redacted] b6 b7C

From: Washington Field
Squad C-5, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS; b6 b7C b7D
MAJOR CASE #38

Synopsis: [redacted]

Administrative: Reference e-mail from SSA [redacted] to SA [redacted] b6 b7C
dated March 27, 2003.

Details: As background, WFO initially requested the Asset/Informant Unit to [redacted] b6 b7C b7D

[redacted]

Per referenced e-mail, a meeting was held on March 27, 2003, between [redacted], and [redacted] BCCI Liquidator, to discuss the status of the [redacted] Following the meeting, [redacted] contacted the INS, and was informed [redacted] As such, Washington Field is requesting the process b6 b7C b7D

[redacted]

29B-WF-171994-1228015000-8343 b7E

[redacted]

b6
b7C
b7D

1325015-000-8344

LEAD(s):

Set Lead 1: (Action)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

The Asset/Informant Unit is requested to [redacted] b6 b7C b7D

[redacted]

♦♦

1325015-000-8345

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 04/25/2003

On 04/22/2003, Assistant Legal Attache (ALAT) [redacted] FEDERAL BUREAU OF INVESTIGATION (FBI), Office of the Legal Attache (LEGAT), [redacted] met with [redacted], date of birth, [redacted], place of birth, [redacted] cell phone number, [redacted] The meeting took place at [redacted] The purpose of the meeting was for [redacted] to provide information regarding the [redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

[redacted]

b7E

Investigation on 04/22/2003 at [redacted]

b7D

File # 29B-WF-171994-890 Date dictated 04/25/2003

by SA [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1525015-000-8346

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 04/25/2003

On 04/24/2003, [redacted] of [redacted], telephoned Assistant Legal Attache (ALAT) [redacted] FEDERAL BUREAU OF INVESTIGATION (FBI), Office of the Legal Attache (LEGAT), Berlin, Germany. b6 b7C b7D

[redacted] notified [redacted] that the yacht "LE PHARAON" was seen at a ship wharf in Wewelsfleth, Germany, and that the fugitive GAITH RASHAD PHARAON might be located with the yacht. [redacted] conducted a surveillance to confirm the location of the "LE PHARAON." [redacted] sighted the yacht at Wewelsfleth, but could not confirm PHARAON's presence. The yacht was lying in water, and smoke was coming from the smoke stack of the vessel. [redacted] then conducted further checks with the Harbor Master for the port of Wewelsfleth, [redacted] learned that the "LE PHARAON" had been at the ship wharf in Wewelsfleth since approximately 10/21/2002, undergoing extensive modifications. The yacht had been lengthened, a new hull lining added, and the yacht interior was being renovated. The renovation work was almost finished, and the yacht was supposed to leave the wharf in approximately one week. b6 b7C b7D

LKA302.wpd(mc,rpd)

Investigation on 04/24/2003 at Wewelsfleth, Germany

File # 29B-WF-171994 - 891 Date dictated 04/25/2003

by SA [redacted] b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/25/2003

To: Criminal Investigative **Attn:** Violent Crimes Major Offenders
Financial Crimes Section

International Operations **Attn:** UC [redacted] b6
SSA [redacted] b7C

Washington Field SSA [redacted]
SA [redacted]

Islamabad Legat [redacted]
Riyadh Legat

From: Berlin
Contact: [redacted] 011-49-30-8305-1440 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 - 892 (Pending)

Title: HIDDEN INTEREST
MC #38
OO:WF

Synopsis: Results of meeting with [redacted] b6 b7C b7D
regarding [redacted]

Reference: 29B-WF-171994 Serial 885
29B-WF-171994 Serial 888

Administrative: Reference Meckenheim document #1685. Reference telephone calls between Assistant Legal Attache (ALAT) [redacted] b6
and Special Agent (SA) [redacted] on 04/22/2003, and b7C
04/24/2003, regarding PHARAON, the yacht "LE PHARAON," and b7D
[redacted] to search for PHARAON.

Enclosure(s): For Washington Field, Original and one copy of FD-302, Report of Interview with [redacted] with FD-340, 1-A Envelope with investigative notes. Original and one copy of FD-302, Report of Interview with [redacted] b6 b7C b7D

Details: Referenced Serial 885 is a letter [redacted] b6
[redacted] to interview [redacted], then search for and b7C b7D

[redacted] b6 b7C

1325015-000-8348

b6
b7C
b7D

arrest PHARAON. Referenced [redacted] is an EC which outlined [redacted]' initial contact with Legat Berlin.

b6
b7C
b7D

During the evening of [redacted] ALAT [redacted] met with [redacted] date of birth, [redacted] place of birth, [redacted] cell phone number, [redacted]

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

In an effort to show ALAT [redacted] ALAT [redacted]

[redacted]

b6
b7C
b7D

[redacted]

b6
b7C
b7D

[redacted] also wanted guarantees that his identity would remain confidential. [redacted] thought that if PHARAON knew he had spoken to the FBI, PHARAON would threaten [redacted]

1325015-000-8349

life. [redacted] also thought PHARAON might be connected with extremists. ALAT [redacted] told [redacted] stated he wouldn't reveal any more details and the meeting ended. b6 b7C b7D

Almost an hour later [redacted] re-contacted ALAT [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] On 04/24/2003, [redacted] confirmed that the yacht "LE PHARAON" was located in Wewelsfleth. Further checks by [redacted] showed that the yacht had been at the wharf since 10/21/2002, undergoing extensive work. This work included lengthening the yacht, adding a coating to the hull, and renovating the interior. The yacht is now in the water, and work is nearly completed. The "LE PHARAON" is expected to leave Wewelsfleth in approximately one week.

[redacted] b6 b7C b7D

[redacted] Per conversation between ALAT [redacted] and SA [redacted] if PHARAON is found, he will be arrested and the yacht allowed to leave.

Approximately 04/29/2003, ALAT [redacted] will travel to Schleswig Holstein to await the departure of the yacht [redacted] When the ship is stopped ALAT [redacted] will immediately notify SA [redacted] by phone, the status of the search for PHARAON and any other pertinent details. ALAT [redacted] will also attempt to photograph the yacht for intelligence purposes. b6 b7C b7D

1325015-000-8350

LEAD(s):

Set Lead 1: (Info)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

Read and clear.

Set Lead 2: (Info)

INTERNATIONAL OPERATIONS

AT IO1, D.C.

Read and clear.

Set Lead 3: (Info)

WASHINGTON FIELD

AT WASHINGTON, D.C.

Read and clear.

Set Lead 4: (Info)

ISLAMABAD

AT ISLAMABAD

Read and clear.

Set Lead 5: (Info)

RIYADH

AT RIYADH

Read and clear.

1stEC.wpd (page 4)
♦♦

1325015-000-8351

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/01/2003

To: Berlin **Attn:** Legat [redacted] b6 b7C
Criminal Investigative **Attn:** Financial Crimes Section,
Financial Institution Fraud
International Operations SSA [redacted]

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending) -893

Title: HIDDEN INTERESTS;
MAJOR CASE #38

ARMED AND DANGEROUS

Synopsis: Set lead to Legat Berlin to locate and arrest fugitive Ghaith Rashad Pharaon.

Reference: 29B-WF-171994 Serials 888-891

Administrative: Reference Meckenheim document #1685. Reference telephone calls between Assistant Legal Attache (ALAT) [redacted] b6 b7C
[redacted] and SA [redacted] WFO, dated 04/28/2003 and 04/30/2003.

Details: As background, Legat Berlin notified WFO on April 22, 2003, that an individual had come forward to provide information about [redacted] b6 b7C
Legat Berlin contacted and interviewed this individual, further identifed as [redacted] provided b7D
information [redacted]

Per telephonic conversations between ALAT [redacted] and b6
SA [redacted] ALAT [redacted] has outlined the information obtained by b7C
[redacted] and has discussed the plans to stop the b7D
yacht after it leaves Wewelsfleth to search for Pharaon. German regulations require the yacht be taken by a local ship pilot from the wharf. ALAT [redacted] advised that [redacted] had

1325015-000-8352

[redacted] b7E

shown pictures of Pharaon to the ship pilot who had taken the yacht for a "test run" on April 28, 2003. In the ship pilot's opinion, the photographs matched the description of an older gentleman seen on or near the yacht. The latest available information indicated the yacht would be taken for one additional "test run" before leaving Wewelsfleth. The final departure date has not been determined, but may be as early as May 2, 2003.

SA [redacted] has informed ALAT [redacted] that past attempts to locate and apprehend Pharaon on the yacht have been unsuccessful. However, based on the information from the ship pilot and the willingness of German authorities to stop and search the yacht, the possibility exists that Pharaon may be apprehended. Even if Pharaon is not located on or near the yacht, [redacted] which may aid in apprehending Pharaon. b6 b7C b7D

Armed and Dangerous statement added to reflect that during past boardings of the yacht, it was noted that firearms, to include shoulder-fired weapons, were stored on the yacht.

Descriptive Data:

Main Subject

Name -	
Last:	Pharaon
First:	Ghaith
Middle:	Rashad
Race:	White
Sex:	M
DOB:	09/07/1940
POB:	Riyadh or Jeddah, Saudi Arabia
Height:	5'9"
Weight:	250 lbs.
Passport:	Saudi Arabia #100182/31
Alias(es) -	
Last:	Pharaon
First:	Gaith
Middle:	Rachad
Other:	Interpol Red Notice, A355/8-1992 File#38304/91

Through Groupwise e-mails sent on April 24 & 25, 2003, SA [redacted] provided ALAT [redacted] with photographs and fingerprints of Pharaon. b6 b7C

1325015-000-8353

LEAD(s):

Set Lead 1: (Action)

BERLIN

AT WEWELSFLETH, GERMANY

[redacted] b7D

Set Lead 2: (Info)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, D.C.

Read and clear.

Set Lead 3: (Info)

INTERNATIONAL OPERATIONS

AT WASHINGTON, D.C.

Read and clear.

ARMED AND DANGEROUS

♦♦

1325015-000-8354

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/02/2003

To: Criminal Investigative **Attn:** Violent Crimes Major Offenders
Financial Crimes Section

International Operations **Attn:** UC [redacted] b6
SSA [redacted] b7C

Washington Field **Attn:** CR-11, Northern Virginia
Resident Agency
SSA [redacted]
SA [redacted]

Legat Islamabad **Attn:** Legat
Legat Riyadh Legat [redacted]

From: Berlin
Contact: [redacted] 011-49-30-8305-1440 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 - 894 (Pending)

Title: HIDDEN INTEREST
MC #38
OO:WF

ARMED AND DANGEROUS

Synopsis: German State law enforcement actions conducted in an effort to locate and arrest GAITH RASHAD PHARAON indicate PHARAON may indeed be with the yacht "LE PHARAON." However, plans to board and search the yacht have been delayed due to unforseen maintenance problems with the ship.

Reference: 29B-WF-171994 Serial 890
29B-WF-171994 Serial 891
29B-WF-171994 Serial 892

Administrative: Reference [redacted] document #1685. Reference telephone calls between Assistant Legal Attache (ALAT) [redacted] and Special Agent (SA) [redacted], on 04/30/2003, regarding PHARAON [redacted] described below. b6 b7C b7D

Details: On 04/30/2003, ALAT [redacted] The b6 b7C b7D

[redacted] b6 b7C

1325015000-8355

[redacted] b7D

[redacted] b7D

In an effort to protect the Source, [redacted] b6 b7C
[redacted] see referenced [redacted]

[redacted] b7D

[redacted] b7D

[redacted] b7D

[redacted] b7D

There are two likely departure scenarios for the yacht:

NOTE: The yacht is required to have a pilot to depart the wharf to pass through the lock into the Elbe River. The wharf must request the pilot 1-2 days ahead of time to schedule his help to move any vessel. [redacted] b7D

1. After the test run, the yacht immediately tries to leave for the North Sea. In this situation arrangements must be made for the pilot to leave the yacht on the Elbe River or the yacht makes the test run without a pilot. [redacted] b7D

2. The pilot will be scheduled to assist the wharf move the yacht out of dock and through the lock for its test run. Afterwards, the pilot will be requested to return on another day to again move the yacht through the lock for its final departure.

[redacted] b7D

The yacht can only move during a high tide, currently around 1:00 - 5:00 p.m., while the current is moving in. This limited time frame will make it more difficult for the yacht to undergo a test run and leave immediately if the pilot is present. The unidentified elderly man seen with the yacht has already been with the ship almost a week and may stay in Germany until the yacht leaves. [redacted] Legat remain on standby to b7D

1325015-000-8357

respond immediately [redacted] b7D

[redacted]

Also on [redacted] contacted ALAT [redacted] to b6 b7C
share information he had recently learned. [redacted] b7D

[redacted]

LEAD(s):

Set Lead 1: (Info)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

Read and clear.

Set Lead 2: (Info)

INTERNATIONAL OPERATIONS

AT IO1, AT D.C.

Read and clear.

Set Lead 3: (Info)

WASHINGTON FIELD

AT NORTHERN VIRGINIA RESIDENT AGENCY

Read and clear.

Set Lead 4: (Info)

ISLAMABAD

AT ISLAMABAD

Read and clear.

Set Lead 5: (Info)

RIYADH

AT RIYADH

Read and clear.

ARMED AND DANGEROUS

2ndEC.wpd (prepped)
♦♦

1325015-000-8359

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 05/12/2003

[redacted]

b6
b7C
b7D
b7E

Pg. 2,3

[redacted]

b6
b7C
b7D

Investigation on 05/08/2003 at Wewelsfleth, Germany

File # 29B-WF-171994 - 895 Date dictated 05/12/2003

by ALAT [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted]

0-8360

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b7D

[redacted] the items identified above can be found in the 1-A Exhibit Section of this File.

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/12/2003

To: Criminal Investigative **Attn:** Violent Crimes Major Offenders
Financial Crimes Section
Financial Institution Fraud

International Operations **Attn:** SAC Rod Beverly
SC
UC
SSA

Washington Field **Attn:** CR-11, Northern Virginia
Resident Agency
SSA
SA

Islamabad **Attn:** Legat
Riyadh Legat

From: Berlin
Contact: 011-49-30-8305-1440

Approved By:

Drafted By:

Case ID #: 29B-WF-171994 (Pending) - 896

Title: HIDDEN INTEREST
MC #38
OO:WF

ARMED AND DANGEROUS

Synopsis:

Legat Berlin considers all Leads for Berlin completed.

Reference: 29B-WF-171994 Serial 892
29B-WF-171994 Serial 893
29B-WF-171994 Serial 894

Administrative: Reference telephone call between Special Agent (SA) and Assistant Legal Attache (ALAT) on 05/09/2003, regarding

Enclosure(s): The following items are being sent to the Northern Virginia Resident Agency (NVRA) [redacted] b7D b7E

[redacted] b6 b7C b7D

Details: Referenced [redacted] discussed information provided by [redacted] regarding [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

During the evening of [redacted] phoned ALAT [redacted] to inform him that [redacted] b6 b7C b7D

On Thursday morning, 05/08/2003, from approximately 10:40 am to 1:00 pm, ALAT [redacted] conducted a surveillance of the yacht while it was docked at the ship yard of [redacted] AG, Am Hafen 6, D-25599 Wewelsfleth, Germany, telephone, 04829-71 295. No suspicious activity was noted during this time. It did appear the yacht was preparing for departure. [redacted] b6 b7C b7D

[redacted] b7D

At approximately 9:00 am, Friday, 05/09/2003, ALAT [redacted] photographed the "Le Pharaon" as it departed Wewelsfleth for Morocco. These photos are attached in a mini CD as Enclosure 11. The photos have also been sent separately via Group Wise to SA [redacted]

b6
b7C

Legat Berlin considers all Leads for Berlin completed.

1325015-000-8371

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

ARMED AND DANGEROUS

CloseEC.wpd (prepped)
♦♦

1325015-000-8372

CR 11

U.S. Department of Justice

Federal Bureau of Investigation

File No. 29B-WF-171994

Office of the Legal Attache
United States Embassy
Clayallee 170
14195 Berlin, Germany

14 May 2003

[redacted]

b6
b7C

Dear [redacted]

Thank you for your assistance in the investigation of Ghaith Rashad Pharaon, and the location of his yacht the "Le Pharaon." Ghaith Pharaon is being sought by the Federal Bureau of Investigation (FBI) for his involvement in the multibillion dollar fraud scheme involving the Bank of Credit and Commerce International (BCCI). Your reporting information regarding the movements of his yacht were very important to our efforts. Although Pharaon was not found, the search of his yacht provided the FBI with valuable information. Without your assistance this would not have been possible. The FBI is grateful for your assistance in this matter.

Sincerely,

Frank E. Goetz
FBI Chief Germany

[redacted]

b6
b7C

1-Addressee
1-29B-WF-171994 -897
KS:ks (2)
[redacted] ltr

1325015-000-8373

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 06/30/2003

[redacted] b6 b7C b7D

These recordings were placed in an FD-340 envelope, and forwarded to the Federal Bureau of Investigation (FBI), Washington, D.C. Field Office, for enclosure in captioned Case File records.

Investigation on 06/24/2003 at Kiel, Germany

File # 29B-WF-171994-899 Date dictated 06/30/2003

by ALAT [redacted] b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/30/2003

To: Criminal Investigative **Attn:** Violent Crimes Major Offenders
Financial Crimes Section
Financial Institution Fraud

International Operations **Attn:** UC [redacted]
SSA [redacted]

Washington Field **Attn:** CR-11, Northern Virginia
Resident Agency
SSA [redacted]
SA [redacted]

Legat Islamabad **Attn:** Legat
Legat Riyadh Legat [redacted]

From: Berlin
Contact: [redacted] 011-49-30-8305-1440

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 29B-WF-171994 (Pending)- 900

Title: HIDDEN INTEREST
MC #38
OO:WF

Synopsis: [redacted]

Reference: 29B-WF-171994 Serial 895
29B-WF-171994 Serial 896

Enclosure(s): For the Northern Virginia Resident Agency (NVRA)

[redacted]

The following items have been enclosed in an FD-340 Envelope and sent to the NVRA:

[redacted]

[redacted]

KL/9

1325015-000-8375

[redacted]

Details: Referenced Serial 895 is an FD-302 which documented the [redacted] b7D

Referenced Serial 896 is the accompanying EC to the above FD-302.

[redacted] b7D

These items have been sent to the NVRA for enclosure in captioned case file records.

NOTE: These recordings were made in PAL video format. To be viewed on an American video player/TV they must be re-recorded in NTSC format.

1325015-000-8376

LEAD(s):

Set Lead 1: (Info)

ALL RECEIVING OFFICES

Read and clear.

VideoEC.wpd
♦♦

1325015-000-8377

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/07/2003

To: Investigative Technology **Attn:** Forensic Audio, Video & Image Analysis Unit

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MC #38

Synopsis: Lead set to convert videocassettes from PAL to NTSC standard.

Enclosure(s): One (1) Sony digital videocassette and one (1) Fuji VHS videocassette, maintained as 29B-WF-171994, serial 1A-10.

Details: [redacted] b7D

[redacted] Legat Berlin indicated the videocassettes were PAL standard.

Washington Field requests the enclosed videocassettes be converted to an NTSC standard and their content placed on VHS videocassettes so they can be reviewed by the Case Agent.

29B-WF-171994-901 KL

1605015-000-8378

[redacted] b7E

LEAD(s):

Set Lead 1: (Action)

LABORATORY

AT QUANTICO, VIRGINIA

The Laboratory Division is requested to convert the enclosed videocassettes from PAL to NTSC standard.

♦♦

1325015-000-8379

 b6 b7C

From: [redacted] b6 b7C
To:
Date: Fri, Sep 26, 2003 10:21 AM
Subject: Re: Per our conversation

I cannot say if this person is identical to the visa applicant. I do not have sufficient information to make that determination.

>>> [redacted] 09/26 10:20 AM >>> b6 b7C
Thank you for the information. What is the possibility of this person being ident to the DOS's request? If you think it is ident, would you have any objections to this individual obtaining a visa? Please advise.

>>> [redacted] 09/26 9:16 AM >>> b6 b7C
29B-WF-171994 is still a pending case. Serial 26 of sub file BB concerns an EC with attachments. The attachments pertain to a meeting in January in Geneva, Switzerland. One of the attachments is a list of "CCAH Shareholders - Addresses & Numbers". The first name on the list is:

[redacted] b6 b7C

The following telephone numbers were associated with this individual:
Tel
Tel
Fax

Tel
Fax
[redacted] b6 b7C

That is all of the information that I have on this individual in this serial. For background, this case is titled "Hidden Interests" and is major case #38. It concerns the Bank of Credit and Commerce International (BCCI) and the only outstanding fugitive is Gaith Pharoan, one of the wealthiest men in the world. The meeting mentioned on serial 26 produced an agreement between the U.S. Government and the majority shareholders of BCCI. I will send you a copy of serial 26 to room 6387.

>>> [redacted] 09/25 11:34 AM >>> b6 b7C
I was advised 29B-WF-171994-BB is currently in your possession. Iwas interested in viewing serial 26 to determine whether the Department of State's (DOS) request was ident with the subject in the file, if so, whether derogatory information exists. The DOSs subject is [redacted] born [redacted] in [redacted] If you do not mind, would you please review that serial and advise. Thank you for your assistance concerning this name check request.

SA [redacted] b6 b7C

29B-WF-171994 1335015-000-8380

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/09/2003

To: Washington Field **Attn:** SA [redacted] b6 b7C

From: Criminal Investigative
Financial Crimes Section/Financial Institution
Fraud Unit (FIFU)/Room 7373
Contact: Unit Chief [redacted] (202) 324-6338 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:gjg

Case ID #: 29B-WF-171994-898

Title: (O) HIDDEN INTERESTS
MC 38
FIF;FAG

Synopsis: Enclosed e-mail forwarded to SA [redacted] b6 b7C

Enclosure(s): E-mail from [redacted]@yahoo.com regarding [redacted] b6 b7C

Details: Reference fax from FBIHQ Unit Chief [redacted] to Washington Field (WF) Office SA [redacted] dated 06/06/2003. The enclosed communication from [redacted]@yahoo.com is being forwarded to WF for whatever action deemed appropriate. b6 b7C

UPLOADED
BY [redacted] ON 6/11/03 b6 b7C

1325015-000-8381

[redacted]

b6
b7C

To: Washington Field From: Criminal Investigative
Re: 29B-WF-171994, 06/09/2003

LEAD(s):

Set Lead 1: (Discretionary)

WASHINGTON FIELD

AT WASHINGTON,DC

For whatever action deemed appropriate.

CC: 1 - Correspondence - citizen
1 - [redacted] b6 b7C

♦♦

1325015-000-8383

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 11/25/2003

To: Criminal Investigative **Attn:** Financial Institution Fraud
[redacted] Budget Unit, b6
Rm. 5129 b7C
Asset/Informant Unit

Berlin ALAT [redacted]

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38
OO:WF

Synopsis: Request authority to establish a $250,000 reward for information leading to the arrest of Ghaith Pharaon.

Reference: 29B-WF-171994 Serial 905

Details: As background, captioned matter was an investigation of the secret ownership interests in U.S. financial institutions by the Bank of Credit and Commerce International (BCCI). The collapse of world-wide BCCI was the largest bank failure in history.

Ghaith Pharaon participated in a conspiracy with BCCI and its principal officers to defraud the U.S. Government and individual investors. As part of the conspiracy, BCCI used Pharaon to secretly acquire the Independence Bank of Encino, California in 1985. Although Pharaon was the purported purchaser, BCCI and Pharaon had an agreement whereby 85 percent of the Independence Bank stock, with its voting rights, was pledged to BCCI.

At no time were state and federal regulators informed of the agreement between BCCI and Pharaon, or of BCCI's true interest in acquiring Independence Bank. The concealment of the agreement was a violation of federal regulations and enabled

29B-WF-171994- 907

1325015-000-8384

[redacted] b7E

Independence Bank to obtain deposit insurance protection from the U.S. Government.

As an additional part of the conspiracy, BCCI officials assisted Pharaon in facilitating a fraud by manipulating the financial market for an offering of subordinate debentures issued by Centrust Savings Bank (CSB) in Miami, Florida. In January 1988, Pharaon acquired approximately 25 percent of the stock in CSB. During the same year, CSB received regulatory approval to raise capital by selling 150 million dollars worth of subordinated debentures. Within a few days prior to the issuance date, CSB had not found subscribers for all the debentures. Pharaon and CSB made an agreement wherein BCCI would purchase 25 million dollars worth of debentures, thus ensuring the debenture offering would appear to be fully subscribed.

The purchase by BCCI was not a bona fide purchase as BCCI's funds were never at risk. Approximately eight weeks after the issue date, CSB repurchased the debentures from BCCI, at full value plus interest, per the stated agreement. Pharaon and CSB used BCCI to artificially inflate the demand for the debentures and thereby deceived investors as to the true value of the notes.

Since Pharaon's indictment on wire fraud and racketeering offenses in November 1991, the FBI has expended a great deal of effort attempting to locate and arrest Pharaon. One part of that effort throughout the years has been the tracking of the "Le Pharaon," a yacht owned by Pharaon. [redacted] b7D

[redacted] b6 b7C has come forward offering possible information about Pharaon's whereabouts. [redacted] claimed he had a source who could provide the global positioning satellite (GPS) coordinates of the yacht and information on when Pharaon could be expected to be onboard. [redacted] advised he would provide the information in return for a reward. Although [redacted] did not mention the identity or occupation of the source, it is most likely a crew member of the Le Pharaon. Washington Field believes the information [redacted] may provide represents the best opportunity to locate and arrest Pharaon.

[redacted] b6 b7C did not state the amount of reward money he would accept in return for information about Pharaon. However, as Pharaon is extremely wealthy and has influence in the Middle East, the establishment of a significant reward may be the

impetus needed for an individual close to Pharaon to provide information on his current whereabouts.

It is requested that up to $250,000 be authorized for payment to a source(s) for information leading to the arrest of Ghaith Pharaon.

LEAD(s):

Set Lead 1: (Action)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

FBIHQ is requested to approve a $250,000 reward for information leading to the arrest of Ghaith Pharaon.

Set Lead 2: (Info)

BERLIN

AT BERLIN, GERMANY

For information only.

♦♦

1325015-000-8386

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 12/09/2003

To: Criminal Investigative **Attn:** Financial Institution Fraud
Asset/Informant Unit,
Attn: [redacted] b6 b7C

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE 38
OO:WF

Synopsis: Request authority to establish a $250,000 reward for information leading to the arrest of Ghaith Pharaon.

Reference: 29B-WF-171994 Serial 905

Details: As background, captioned matter was an investigation of the secret ownership interests in U.S. financial institutions by the Bank of Credit and Commerce International (BCCI). The collapse of world-wide BCCI was the largest bank failure in history.

Ghaith Pharaon participated in a conspiracy with BCCI and its principal officers to defraud the U.S. Government and individual investors. As part of the conspiracy, BCCI used Pharaon to secretly acquire the Independence Bank of Encino, California in 1985. Although Pharaon was the purported purchaser, BCCI and Pharaon had an agreement whereby 85 percent of the Independence Bank stock, with its voting rights, was pledged to BCCI.

At no time were state and federal regulators informed of the agreement between BCCI and Pharaon, or of BCCI's true interest in acquiring Independence Bank. The concealment of the agreement was a violation of federal regulations and enabled Independence Bank to obtain deposit insurance protection from the U.S. Government.

29B-WF-171994 - 908

1325015-000-8387

[redacted] b7E

As an additional part of the conspiracy, BCCI officials assisted Pharaon in facilitating a fraud by manipulating the financial market for an offering of subordinate debentures issued by Centrust Savings Bank (CSB) in Miami, Florida. In January 1988, Pharaon acquired approximately 25 percent of the stock in CSB. During the same year, CSB received regulatory approval to raise capital by selling 150 million dollars worth of subordinated debentures. Within a few days prior to the issuance date, CSB had not found subscribers for all the debentures. Pharaon and CSB made an agreement wherein BCCI would purchase 25 million dollars worth of debentures, thus ensuring the debenture offering would appear to be fully subscribed.

The purchase by BCCI was not a bona fide purchase as BCCI's funds were never at risk. Approximately eight weeks after the issue date, CSB repurchased the debentures from BCCI, at full value plus interest, per the stated agreement. Pharaon and CSB used BCCI to artificially inflate the demand for the debentures and thereby deceived investors as to the true value of the notes.

Since Pharaon's indictment on wire fraud and racketeering offenses in November 1991, the FBI has expended a great deal of effort attempting to locate and arrest Pharaon. One part of that effort throughout the years has been the tracking of the "Le Pharaon," a yacht owned by Pharaon. [redacted] b7D

[redacted] b6 b7C has come forward offering possible information about Pharaon's whereabouts. [redacted] claimed he had a source who could provide the global positioning satellite (GPS) coordinates of the yacht and information on when Pharaon could be expected to be onboard. [redacted] advised he would provide the information in return for a reward. Although [redacted] did not mention the identity or occupation of the source, it is most likely a crew member of the Le Pharaon. Washington Field believes the information [redacted] may provide represents the best opportunity to locate and arrest Pharaon.

[redacted] b6 b7C did not state the amount of reward money he would accept in return for information about Pharaon. However, as Pharaon is extremely wealthy and has influence in the Middle East, the establishment of a significant reward may be the impetus needed for an individual close to Pharaon to provide information on his current whereabouts.

1325015-000-8388

It is requested that up to $250,000 be authorized for payment to a source(s) for information leading to the arrest of Ghaith Pharaon.

LEAD(s):

Set Lead 1: (Action)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

FBIHQ is requested to approve a $250,000 reward for information leading to the arrest of Ghaith Pharaon.

♦♦

1325015-000-8389

OPERATIONAL SITE PROCESSING SUBUNIT
INVESTIGATIVE INFORMATION PROCESSING UNIT
FIELD INFORMATION SUPPORT SECTION
INFORMATION RESOURCES DIVISION

Reference EC case ID: 242-HQ-A1078703-460, dated 10/21/97, Re: Policy Changes -FBIHQ
Attached you will find a document that needs to be handled and/or placed in the Office of Origin (OO) Bureau file. Please handle accordingly.

Field Office: WF HQ Division: CID/FIF

Room: _____

Case ID: 29B-WF-171994-909

___ Document not uploaded

___ Document needs to be serialized

___ Document restricted

___ Outside agency, please place in OO file.

___ Unable to upload attached material, please file

___ Additional case ID quoted, please serialize

_✓_ Place in OO file

___ Please place in OO file - additional indexing

___ Other

NAME: [redacted] b6 b7C

ROOM: 7373

EXT: 8580

DATE: 1/16/04

(Revised 1/14/98)

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/22/2003

To: Washington Field **Attn:** SSA [redacted] b6 b7C

Criminal Investigative [redacted]
Asset/Informant Unit

From: Criminal Investigative
Financial Crimes Section/Financial Institution
Fraud Unit (FIFU)/Room 7373
Contact: SSA [redacted] 202/324-5656 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] tag

Case ID #: 29B-WF-171994-909 (Pending)

Title: (U) HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WF

Synopsis: Response to Washington Field (WF) request for $250,000 reward for information leading to the arrest of Ghaith Pharoan.

Reference: 29B-WF-171994 Serial 907

Details: Reference is made to the captioned serial and 12/18/2003 telcalls to SSA [redacted] and SA [redacted] b6 b7C. In the captioned serial, WF requested authority to offer a reward of up to $250,000 for information leading to the capture of Ghaith Pharaon, the last remaining fugitive in the Bank of Credit and Commerce International (BCCI) matter. The collapse of world-wide BCCI was the largest bank failure in history.

Although FIFU does not support the WF's request for a reward in the amount of $250,000 for information leading to the arrest of Pharoan, FIFU does support offering a reward to individuals providing such information. It is requested that WF provide a follow on request to the FIFU with a name and identifying information for the individual providing the information and justification for the reward. It should be noted that any reward of $100,000 and above requires the personal approval of the Attorney General.

UPLOADED BY [redacted] ON 12/23/03 b6 b7C
1325015-000-

LEAD(s):

Set Lead 1: (Discretionary)

WASHINGTON FIELD

AT WASHINGTON, DC

Will provide name and identifying information of source, as well as reward amount and justification for the issuance of the reward to source providing information leading to the arrest of Ghaith Pharoan.

Set Lead 2: (Discretionary)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

Read and clear.

♦♦

1 - [redacted]
1 - [redacted]

b6
b7C

1325015-000-8392

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/15/2003

To: Washington Field

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38

Synopsis: Contact with [redacted] U.S. Department of Justice, Fraud Section. b6 b7C

Details: As background, on September 24, 2003, ALAT [redacted] telephonically contacted writer and advised that an individual had come forward offering information which could lead to the arrest of Ghaith Pharaon. The individual inquired about the availability of a reward for such information. b6 b7C

On September 25, 2003, writer telephonically contacted [redacted], DOJ Fraud Section, to discuss the establishment of a reward for information leading to Pharaon's arrest. [redacted] advised he was interested in the idea and would make inquiries about how to establish a reward and re-contact writer. b6 b7C

On October 21, 2003, writer left a message on [redacted]'s voice mail, requesting a status on his efforts. On October 24, 2003, [redacted] contacted writer and advised he had "kicked around" the idea of a reward with other prosecutors in the Fraud Section. If Pharaon is eventually arrested, the initial prosecution would be handled by AUSA [redacted] Economic Crimes Section, U.S. Attorney's Office, Miami, Florida. [redacted] placed a call to [redacted]'s office to discuss the reward matter, but [redacted] was out of the office until the first week of November 2003. b6 b7C

On November 6, 2003, SSA [redacted] Squad C-2, Miami Division, contacted writer regarding Pharaon. SSA [redacted] had been contacted by AUSA [redacted] who conveyed to SSA [redacted] that she would veto the idea of allowing Pharaon to pay a fine to settle the criminal charges. Writer explained to SSA [redacted] that the issue was the establishment of a reward and not Pharaon's b6 b7C

[redacted] b7E

29B-WF-171994-910

1325015-000-8393

offer to pay a fine. Writer provided SSA [redacted] with a brief summary of the information provided by Legat Berlin and that the individual had inquired about the existence of a reward for such information. Writer explained that Washington Field was using the individual's inquiry as the basis for requesting the establishment of a reward for information leading to Pharaon's arrest. As Pharaon is extremely wealthy, the establishment of a reward may be the incentive needed for an individual close to Pharaon to provide information leading to his arrest. SSA [redacted] concurred with writer's attempt to establish a reward. b6 b7C

On November 12, 2003, [redacted] returned writer's call and advised that although he believes the establishment of a reward is warranted, DOJ does not have a central fund from which reward money could be offered. Writer advised [redacted] that he would pursue the establishment of a reward with FBIHQ. b6 b7C

♦♦

(Rev. 01-31-2003)

ACS copy

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/31/2004

To: Criminal Investigative **Attn:** Interpol/Fugitive Unit

Investigative Services **Attn:** IOU-II
UC [redacted] b6 b7C

Riyadh **Attn:** Legat [redacted]

Berlin **Attn:** ALAT [redacted]

Washington Field **Attn:** SA [redacted]

From: Abu Dhabi
Contact: [redacted] 011-971-2-414-2688 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :wam

Case ID #: 29B-WF-171994 (Pending) - 912

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
GAITH RACHAD PHARAON, AKA
FUGITIVE;

Synopsis: Abu Dhabi providing details of investigation at Dubai, U.A.E. in connection with attempts to locate and arrest Gaith Pharaon.

Details: Legat Abu Dhabi was contacted on 03/26/2004 by ALAT [redacted] Berlin and advised that the yacht "Le Pharaon" was in Dubai, U.A.E. ALAT [redacted] was advised of information contained in earlier EC dated 3/21/2004. Legat recontacted NCIS investigator [redacted] at the Consulate on 03/27/2004 and requested he recontact his source and ascertain [redacted] b6 b7C b7D

[redacted]

Assign lead SA Lead covered 4/19/04 SA [redacted] b6 b7C

1325015-000-8395

To: Washington Field Criminal Investigative
Investigative Services Riyadh Berlin
From: Abu Dhabi
Re: 29B-WF-171994, 03/31/2004

[redacted] b7D

[redacted] contacted Legat on 03/31/2004 and advised b6 b7C
that source confirmed that the yacht is still at the marina b7D
but it is unlikely that Pharaon is onboard. Source noted that
[redacted]

Source continues to state that [redacted] b7D
[redacted]

This information is provided to Berlin and Riyadh for whatever action is deemed appropriate. Legat will provide any additional positive source information that becomes available.

1325015-000-8396

To: Washington Field Criminal Investigative
Investigative Services Riyadh Berlin
From: Abu Dhabi
Re: 29B-WF-171994, 03/31/2004

LEAD(s):

Set Lead 1: (Discretionary)

ALL RECEIVING OFFICES

Read and clear.

♦♦

1325015-000-8397

(Rev. 01-31-2003)

CR11

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/31/2004

To: Criminal Investigative ~~Investigative Services~~ International Operations **Attn:** Interpol/Fugitive Unit

Attn: IOU-II
UC [redacted] b6 b7C

Riyadh **Attn:** Legat [redacted]

Berlin **Attn:** ALAT [redacted]

Washington Field **Attn:** SA [redacted]

From: Abu Dhabi
Contact: [redacted] 011-971-2-414-2688 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] wam

Case ID #: 29B-WF-171994 (Pending) 912

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
GAITH RACHAD PHARAON, AKA
FUGITIVE;

Synopsis: Abu Dhabi providing details of investigation at Dubai, U.A.E. in connection with attempts to locate and arrest Gaith Pharaon.

Details: Legat Abu Dhabi was contacted on 03/26/2004 by ALAT [redacted] and advised that the yacht "Le Pharaon" was in Dubai, U.A.E. ALAT Berlin was advised of information contained in earlier EC dated 3/21/2004. Legat recontacted NCIS investigator [redacted] at the Consulate on 03/27/2004 and requested he recontact his source and [redacted] b6 b7C b7D

[redacted]

[redacted]

791 wam 01-BC

To: Washington Field Criminal Investigative
Investigative Services Riyadh Berlin
From: Abu Dhabi
Re: 29B-WF-171994, 03/31/2004

[redacted] b7D

[redacted] contacted Legat on 03/31/2004 and advised b6 b7C
that source confirmed that the yacht is still at the marina but b7D
it is unlikely that Pharaon is onboard. Source noted that [redacted]

Source continues to state that [redacted] b7D

This information is provided to Berlin and Riyadh for whatever action is deemed appropriate. Legat will provide any additional positive source information that becomes available.

1325015-000-8399

To: Washington Field Criminal Investigative
Investigative Services Riyadh Berlin
From: Abu Dhabi
Re: 29B-WF-171994, 03/31/2004

LEAD(s):

Set Lead 1: (Discretionary)

ALL RECEIVING OFFICES

Read and clear.

♦♦

1325015-000-8400

Automated Serial Permanent Charge-Out
FD-5a (1-5-94)

Date: 04/27/04 Time: 10:13

Case ID: 29B-WF-171994 Serial: 913

Description of Document:

Type : EC
Date : 03/31/04
To : WASHINGTON FIELD
From : ABU DHABI
Topic: ABU DHABI PROVIDING DATAILS OF INVESTIGATION AT DUBAI,U.A.E

Reason for Permanent Charge-Out:

doc is already in file

Employee: [redacted] b6 b7C

DECLASSIFIED BY: NSICG [redacted]
ON 04-27-2018

b6
b7C

~~SECRET~~

********* Permanent Charge-Out of Serials Summary *********
There are no leads for 29B-WF-171994 with Serial 913 to be discontinued

~~SECRET~~

[redacted] (WF) (FBI) b6 b7C b7D

From: [redacted] (CID) (FBI)
Sent: Tuesday, June 15, 2004 4:07 PM
To: [redacted] (WF) (FBI)
Subject [redacted]

UNCLASSIFIED
NON-RECORD

[redacted] b6 b7C b7D

[redacted] Any questions please contact me at 202-324-5054 or by email.

[redacted] b6 b7C

UNCLASSIFIED

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-27-2018 BY [redacted]

(Rev. 01-31-2003)

b6
b7C

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 01/31/2005

To: Birmingham **Attn:** SA [redacted]
CDC

Washington Field **Attn:** CDC [redacted]

From: Washington Field
CR-11/NVRA
Contact: SA [redacted] (703) 762-3417

Approved By: [redacted]

Drafted By: [redacted] mks

Case ID #: 318A-BH-50510 (Pending) -829

Title: [redacted]
CHIEF EXECUTIVE OFFICER,
CHAIRMAN OF THE BOARD,
HEALTHSOUTH CORPORATION;
ET AL
SECURITIES FRAUD

Synopsis: To report results of lead set to Washington Field requesting documents relating to [redacted]

Reference: 318A-BH-50510 Serial 811

Enclosure(s): Enclosed for Birmingham are copies of one main file and sixteen serials as delineated below.

Details: Pursuant to Electronic Communication (EC) dated 01/06/2005, Washington Field (WFO) has conducted a review of the requested files (main) and serials (reference) as requested in referenced EC. The review of these files/serials has determined that the following files/serials can be released by Birmingham to Department of Justice (DOJ) attorneys for use in the trial of [redacted]

1. 196B-WF-182892 (HQ), main, entry date 02/03/1993. This file was listed twice in referenced EC, (item #1 and item #14);

2. 196B-WF-182892, serial 30, entry date 01/11/1993. This document is contained within the main file, (item #1);

MES 13101.WPD

1325015-000-8418
29B-WF-171994 -916

3. 29B-WF-171994-D, serial 318, reference, entry date 03/13/1995;

4. 29B-WF-171994-D, serials 55, 107p4, 114, reference, entry date 11/26/1991;

5. 29B-WF-171994-P, serials 376, 377, reference, entry date 12/16/1991;

6. 29B-WF-171994-S, serials 21, 22, 171, reference, entry date 11/13/1991, and;

7. 58C-WF-182413-D, serial 6, reference, entry date 9/24/1992. This serial is a duplicate of 29B-WF-171994-S, serial 171, (see #6 above).

The following serials were reviewed and are being provided for Birmingham, however, they contain no reference to [redacted] WFO opines that the serials of interest are Auxiliary Office (AO) serials relating to Washington Field's case 29B-WF-171994. Discretion is left to Birmingham if they wish to set leads to Houston and Legat Bern for a search of their Auxiliary Office files: b6 b7C

1. 29B-WF-171994 (BR), serial 4p2, reference, entry date 05/07/1992;

2. 29B-WF-171994-1 (HO), serial 2, reference, entry date 01/24/1992;

3. 29B-WF-171994 (HO), serial 57, reference, entry date 01/24/1992, and;

4. 29B-WF-171994, serials 88, 457, reference, entry date 01/22/1992.

Washington Field was unable to locate main file 56C-WF-184420, entry date 09/25/1992, within WFO's closed files.

The remaining serials listed below are classified ~~Secret~~, and as such, Washington Field will be required to de-classify them prior to authorizing their release to DOJ:

1. 29B-WF-171994-D, serial 317, reference, entry date 03/13/1995;

2. 29B-WF-171994-S, serial 93, reference, entry date 11/13/1991;

1325015-000-8419

3. 58C-WF-182413-D, serials 3 and 5, reference, entry date 09/24/1992. Serial 3 is a duplicate of 29B-WF-171994-S, serial 93 (see #2). Serial 5 is a duplicate of 29B-WF-171994-12, serial 93, not listed in EC, and;

4. 29B-WF-171994-R, serial 131, reference, entry date 12/16/1991;

Copies of these documents were faxed to Birmingham CDC [redacted] for his review. Washington Field requests that Birmingham advise if they desire to have these documents declassified. b6 b7C

1325015-000-8420

To: Birmingham From: Washington Field
Re: 318A-BH-50510, 01/31/2005

LEAD(s):

Set Lead 1: (Action)

BIRMINGHAM

AT BIRMINGHAM, AL

Washington Field is providing unclassified files/ serials located pursuant to Birmingham EC, serial 811, dated 01/06/2005. Washington Field has no objection to the release of these documents to Department of Justice attorneys for use in the [redacted] case. b6 b7C

Birmingham is requested to advise whether they desire that the remaining documents, which were located but are classified ~~Secret~~, to be de-classified.

Set Lead 2: (Info)

WASHINGTON FIELD

AT WASHINGTON, D.C.

For the information of CDC [redacted]. Read and clear. b6 b7C

♦♦

1325015-000-8421

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

October 5, 2005

b6
b7C

To: [redacted] CR-11

From: ASAC [redacted]

File#: 29B-WF-171994 1B# 32

The above computer evidence is currently in ECR. In a Division-wide effort to free up space in ECR, all computer evidence has been reviewed for disposal potential. In order to legally dispose of it, you must either:

1. Forfeit it - unless you already have forfeiture proceedings pending, your time limitation has expired for this option;
2. Return it to the owner;
3. Abandon it - a legal process by which the owner can not be identified or has chosen not to claim the property;
4. Make a determination that the FBI is the true owner and there is no evidentiary value (e.g. a mirrored hard drive or downloaded data onto a FBI disk).

In an effort to help you eventually dispose of this evidence, WFO will be conducting a massive abandonment project. Even if the item is not ready to be disposed of, we still have the ability to seek an abandonment declaration which will allow you to legally dispose of the evidence at a later date. In order to accomplish this, you are required to review your case file and provide the following information on the above 1B exhibit:

1. Is the evidence ready to be disposed of? No, captioned matter is a pending investigation of the BCCI bank scandal.
2. Do you know the true owner (if not, go to #4)?

3. Name and address (include zip code) of owner (so he/she can be notified that unless they claim, their evidence will be disposed of):

4. Is there either child pornography or classified material on the evidence? Classified material is contained on the diskette.
5. Would you like the Admin Div to include it in the abandonment project? No

6. If not, how do you intend to dispose of it? The evidence will be destroyed after the remaining subject, Ghaith Pharaon (fugitive) is arrested and prosecuted.

SA [redacted]
Name

SA [redacted]
Signature

10/13/2005
Date

b6
b7C

Please return to ASAC McFeely by 10/30/05.

[redacted] MP

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-8422

29B-WF-171994 - 917

DECLASSIFIED BY: NSICG [redacted]
ON 04-27-2018

b6
b7C

Title and Character of Case:

HIDDEN INTERESTS
-

Date Property Acquired: Source from which Property Acquired:

[redacted]/COMPUTER COUNTER/ESPIONAGE BRANCH b6 b7C

10/05/1992

FT MEADE MD

Anticipated Disposition: Acquired By: Case Agent:

[redacted] b6 b7C

Description of Property: Date Entered

1B 32

1B32 ONE COPY-5 1/2 INCH FLOPPY DISKETTE LABELED "BCCI/FT.ME ADE"

Barcode: E0423649 Location: ECR1 CART D20 10/09/1992

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 10/14/94

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

In order to better administrate the captioned matter, the following subfiles have been opened:

Sub A.....Outgoing Teletypes/Facsimiles - General
Sub C.....1As
Sub D.....FD-302s and Inserts
Sub F.....Financial Matters
Sub G.....National Bank of Georgia/BCCI
Sub H.....Bulky Exhibit Forms (FD-192)
Sub I.....Ghaith R. Pharaon - InterRedec, et al
Sub J.....Collection and Review of Records - BCCI
Sub L.....Independence Bank/BCCI
Sub M.....CenTrust/BCCI
Sub N....."C-Chase"; "C-Chase II"
Sub O.....Investigation by Federal Reserve System
Sub P.....Press Coverage
Sub Q.....Subpoenas
Sub R.....Incoming Teletypes/Facsimiles - General
Sub S.....Airtels - In/Out - General
Sub T.....Pharaon/BCCI - All Other Banks
Sub U.....[redacted] et al b6 b7C
Sub V.....[redacted] et al
Sub W.....Clifford & [redacted]
Sub AA.....CAPCOM/TCI
Sub FS.....Forfeiture/Seizure
Sub TS.....~~Top Secret~~
Sub Fug 1.....[redacted] b6 b7C
Sub Fug 2.....
Sub Fug 3.....
Sub Fug 4.....

37-WMFO
(1-29B-WF-171994 Main)
(1-Each Subfile)

JNR:jnr
(37)

29B-WF-171994-NEW

Open Subfile
SUS JJ

1325015-000-8433

29B-WF-171994

Sub BB.....Screening; Liquidation
Sub CC.....Kerry Committee Matters
Sub DD.....Lead Control
Sub EE.....First American Corporation Civil Rico Suit (DCDC CA 93-1309)
Sub FF.....BCCI, et al: Prosecution - D.C. RICO
Sub GG.....Collection/Review of Records - Pharaon
Sub HH.....Collection/Review of Records - [redacted] b7E
Sub II.....Law Enforcement Cooperation/Dissemination

It is now recommended that the following subfile be opened:

Sub JJ..... [redacted] et al, dba GULF INTERNATIONAL HOLDINGS b6 b7C

1325015-000-8434

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-27-2018 BY [redacted] NSICG

b6
b7C

FD-491 (Rev. 5-26-92)

Memorandum

CR11

To : WFO

Date 05/12/2006

From : Paris

Subject: 29B-WF-171994
(Title)

☐ RUC
☐ File Destruction Program

Enclosed are 1 items.

These items are forwarded to your office since file meets criteria for destruction.

Enclosures are described as follows:

☐ Original Notes.
☐ Original FD-302's.
☐ Laboratory and/or Technical Reports.
☒ Miscellaneous Documents.

original serial 919

~~SECRET~~ when enclosure attached

[redacted]

b6
b7C

-919

Enc. 1

Note: Do Not Block Stamp Original Enclosures.

DECLASSIFIED BY: NSICG W43J99B18
ON 05-11-2018

~~SECRET~~ (U)

b6
b7C

[redacted] please call to get an initial assessment & EC w/ info. Thanks, [redacted]

PRECEDENCE: ROUTINE

MEMO NUMBER: O-0003/06

TO: LEGAT

FROM: ORA

SUBJECT: A MOROCCAN NATIONAL WITH INFORMATION REGARDING A BCCI FUGITIVE

ACTION REQUESTED: NONE

We would like to inform you that [redacted] living in France named [redacted] has been attempting to contact both our Agencies in order to pass along information about BCCI fugitive Gaith Rashad Pharaon and [redacted]

[redacted] lives at [redacted].

His telephone number is [redacted] and the best time to reach him appears to be between 0900 and 1300 hours. He speaks Arabic, French, Italian, Flemish, and Spanish. He also has what appears to be a weak command of English.

Since this looks to be a purely law enforcement matter, we are turning this information over to you for follow-up. Our office has not contacted [redacted] and does not plan to do so.

b6
b7C

Called 2/23/06. [redacted] has left the country. T-60. Attempt to read [redacted]

– Called # on 2 May, per respondent no longer resides in France TOS 298-WF-171994-919

BV 2/15/06 ✓

FEB - 1 2006

LADS005

~~SECRET~~ (U)

New lead ?/

1325015-000-8436

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/17/2006

To: Washington Field **Attn:** Evidence Control Center

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 29B-WF-171994 (Pending)
321A-WF-A226437-G1 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38

Synopsis: Document disposition of 29B-WF-171994-1B21, further identified with Barcode number E0423668.

Reference: 29B-WF-171994 Serial 918

Details: As background, the above-described evidence is one of thirty-three (33) boxes of evidence seized during a search of Ghaith Pharaon's residence and business in 1992, and subsequently maintained as serial 1B21.

In January 2006, through writer's research of the transfer of evidence maintained as 1B21 (see referenced serial), it appeared the entire contents of 1B21 was transferred to the Federal Reserve in October 1997. However, the disposition of one box of the production, identified with barcode number E0423668, was not clearly identified in ECC. Attempts to verify this box of evidence is in the possession of the Federal Reserve have been unsuccessful.

Washington Field's Evidence Control Center (ECC) does not possess this item in their inventory. Writer conducted a search of the squad area for the missing item, with negative results. Therefore, it is requested that 29B-WF-171994-1B21, further identified as Barcode number E0423668, be considered "lost" and that ECC reflect that disposition in ACS.

[redacted]

132501-000-8437

b7E

To: Washington Field From: Washington Field
Re: 29B-WF-171994, 03/17/2006

LEAD(s):

Set Lead 1: (Action)

WASHINGTON FIELD

AT EVIDENCE CONTROL CENTER

ECC is requested to consider the one box of evidence further described as 29B-WF-171994, Barcode number E0423668, as "lost" and reflect that disposition in ACS.

♦♦

1325015-000-8438

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/18/2006

To: Washington Field **Attn:** SET [redacted] b6 b7C
WFO Evidence Control Center

From: Washington Field
Squad CR-11, NVRA
Contact: SA [redacted] (703) 762-3386

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: 321A-WF-A226437-G1 (Pending) -368
~~29~~B-WF-171994 (Pending) - 921

Title: EVIDENCE MATTER

Synopsis: Document disposition for evidence item further described as 29B-WF-171994-1B39 (Barcode# E0577090).

Administrative: Reference e-mail from SET [redacted] to SA [redacted] dated April 9, 2006, subject: Evidence matter. b6 b7C

Details: On April 9, 2006, per referenced e-mail, SET [redacted] b6 b7C advised that the Evidence Control Center (ECC) could not locate an evidence item maintained as 29B-WF-171994-1B39 (Barcode# E0577090) and requested writer submit an EC stating the disposition of the item as lost.

A review of ACS revealed the item was placed into storage at Washington Field's ECC by former Evidence Technician (ET) [redacted] on July 22, 1993 and last inventoried on September 30, 1995. There are no entries on the chain-of-custody to indicate the item was ever removed from the ECC. However, during the last ECC inventory conducted on October 26, 2005, the item could not be located. b6 b7C

Therefore, it is requested that 29B-WF-171994-1B39 (Barcode #E0577090) be considered lost and that ECC reflect that disposition in ACS.

-921

[redacted] b7E

To: Washington Field From: Washington Field
Re: 321A-WF-A226437-G1, 04/18/2006

LEAD(s):

Set Lead 1: (Action)

WASHINGTON FIELD

AT EVIDENCE CONTROL CENTER

ECC is requested to consider the evidence item 29B-WF-171994-1B39 (Barcode #E0577090) as lost and reflect that disposition in ACS.

♦♦

[redacted] (WF) (FBI) b6 b7C

From: [redacted] WF) (FBI)
Sent: Sunday, April 09, 2006 8:47 PM
To: [redacted] (WF) (FBI)
Cc: [redacted] (WF) (FBI) [redacted] (WF) (FBI)
Subject: Evidence Matter

Importance: High

UNCLASSIFIED
NON-RECORD

SA [redacted] b6 b7C

Reference: 29B-WF-171994-1B39 (Barcode# E0577090)

I am writing this e-mail regarding evidence item 1B39 (Barcode# E0577090). This evidence is consider lost. A review of ACS/Collected Items shows that all listed 1B39 have been inventory on 10/26/2005 with the exception of 1B39 (Barcode# E0577090). The evidence was stored on 07/22/1993 during the time when Washington Field was housed in the building known as Buzzards Point. Storage location 6 do not exist at the Washington Field Headquarter. The evidence was last inventory on 09/30/1995 and last modified by former Evidence Technician [redacted] on 09/03/1996. Will it be possible for you to b6 b7C
do an EC requesting that the Evidence Technician dispose the evidence as lost.

EC Example - Please reference Case ID# 52A-WF-175285, Serial 174.

Your immediate attention in handling this matter is greatly appreciated.

Thank you for your continued support.

[redacted] b6 b7C
Supervisory Evidence Technician
Evidence Technician
Washington Field Office
Desk# 202-278-3347
Cell# [redacted]

UNCLASSIFIED

[redacted] b6 b7C

-922

29B-WF-171994

1325015-000-8441

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/01/2006

To: Washington Field

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :mrs

Case ID #: 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
ET AL;
FIF;
FAG;
OO:WF

Synopsis: Reclassification of captioned investigation.

Details: Based upon the Financial Institution Fraud (FIF) Reclassification guidelines, captioned investigation should be reclassified as a 290 matter.

12/4/2006

Reclassified 290 12/1/2006

-923

1325015-000-[redacted]

b6
b7C
b7E

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/25/2007

To: Abu Dhabi
International Operations **Attn:** Middle East Unit
Washington Field **Attn:** [redacted] b6 b7C

From: Counterterrorism
NTCS/Public Access Center Unit/Room 5712
Contact: SSA [redacted] (202) 323-3104

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 290-WF-171994-927 (Pending)

Title: Hidden Interests;
Major Case 38

Synopsis: **Internet Activity Report number 1514981.** The information contained herein was received on the FBI's Internet web site as possibly being related to terrorist or other criminal activity. The submitted text has been incorporated into this communication.

Details: [redacted] reports that he has observed the yacht "Le Pharaon," owned by Ghaith Pharaon, moored at the Jumeria Beach hotel as of 01/25/2007. b6 b7C

Internet research conducted by the FBIHQ Public Access Center Unit (PACU) regarding Ghaith Pharaon revealed that he is an international fugitive wanted in U.S. District court for related wire fraud charges.

ACS research conducted by the FBIHQ PACU yielded Case ID, 290-WF-171994, Case Agent SA [redacted] b6 b7C

Internet research conducted by the FBIHQ PACU regarding the Jumeria Beach Hotel identified a Jumeriah Beach Hotel located in Dubai, United Arab Emirates.

[redacted] b6 b7C

290-WF-171994-FUG3 - 399

6325015-000-8443

To: Abu Dhabi From: [redacted]ounterterrorism
Re: 290-WF-171994, 01/25/2007

ACS research conducted by the FBIHQ PACU regarding [redacted] was inconclusive. b6 b7C

Internet research conducted by the FBIHQ PACU regarding Remote IP Address, [redacted] (from the computer used to send the information to www.fbi.gov on 01/25/2007 at 10:36:17 AM EST [1/25/2007 3:36:17 PM GMT]) resolves to Emirates Telecommunications Corporation, P O Box 1150, Dubai, United Arab Emirates, point of contact [redacted] fax [redacted] e-mail: [redacted] b6 b7C b7E

Submitted Text:

"I saw the Le Pharaon owned by Ghaith Pharaon moored at the Jumeria Beach hotel today (25/1/07). The boot did not look like it was about to leave. I have pictures of the boat."

Submitted ID:

Date: 1/25/2007 10:36:17 AM EST [1/25/2007 3:36:17 PM GMT]
First Name: [redacted] b6 b7C
Middle Name:
Last Name: [redacted]
Phone:
Email: [redacted]
Street 1:
Street 2:
Suite:
City: [redacted]
State:
Zip:
Country [redacted]

Remote IP Address: [redacted] b6 b7C b7E

Remote Host: [redacted]
User Browser Info: Mozilla/4.0 (compatible; MSIE 7.0; Windows NT 5.1; .NET CLR 1.1.4322)

1325015-000-8444

LEAD(s):

Set Lead 1: (Discretionary)

ABU DHABI

AT ABU DHABI, UAE

Prior to conducting any actions contact Case Agent, [redacted] Squad CR-11, North Virginia RA. If deemed appropriate, determine if Ghaith Pharaon is physically located on the yacht "Le Pharaon, " moored at the Jumeriah Beach Hotel. Report results of investigation to FBIHQ PACU and WFO-Attn: SA [redacted] b6 b7C

Set Lead 2: (Info)

INTERNATIONAL OPERATIONS

AT IOS, DC

Attn: Middle East Unit. For information.

Set Lead 3: (Info)

WASHINGTON FIELD

AT WASHINGTON, DC

Attn: [redacted] Squad CR-11. For information. b6 b7C

♦♦

1325015-000-8445

7-1 (Rev. 5-13-99)

FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: ADIC, Washington Field Office
Squad CR-11, NVRA
Attention: SA [redacted]

Date: April 5, 2007

b6
b7C

Case ID No.: 29B-WF-171994 -925

Lab No.: 030708250 JD

Reference: Communication dated July 7, 2003

Your No.:

Title: HIDDEN INTERESTS;
MC #38

Date specimens received: July 8, 2003

Specimens:

Q13 One SONY DVM60 Mini DV video tape
("Le Pharaon" / 1A-10)

Q14 One FUJI E60 VHS video tape
(3191G1DA / 1A-10)

The results of the Forensic Audio, Video and Image Analysis Unit examinations are included in this report.

Specimens Q13, Q14, DE1, DE2 along with two VHS video tapes were sent, via FedEx, to the Washington Field Office on March 28, 2007.

[redacted]

b6
b7C

This Report is Furnished for Official Use Only

290-WF-171994 -925

7-1a (Rev. 5-18-99)

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Report of Examination

b6
b7C

Examiner Name:	[redacted]	Date:	April 5, 2007
Unit:	Forensic Audio, Video & Image Analysis	Phone No.:	(703) 985-1087
Case ID No.:	29B-WF-171994	Lab No.:	030708250 JD

Results of Examinations:

The submitted Q13 and Q14 video tape specimens were reviewed. As requested, both video tapes were played and converted from PAL (Phase Alternation by Line) to NTSC (National Television Systems Committee) standard. Two NTSC VHS copies from Q13 were produced, one of which was designated as DE1. Two NTSC VHS copies from Q14 were produced, one of which was designated as DE2.

This Report is Furnished for Official Use Only

(Rev. 01-31-2003)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/10/2007

To: Washington Field

From: Washington Field
Squad CR-11, Northern Virginia Resident Agency
Contact: SA [redacted] (703) 762-3386 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] mrs

Case ID #: [redacted] (Pending) b3 b6 b7C b7E

329A-WF-234432
29Q-WF-228421
29O-WF-227875
29Q-WF-232796
29O-WF-228673
29O-WF-222031
29O-WF-171994 - 926
29Q-WF-207848
29R-WF-214204
29Q-WF-230866

Title: CASE PRIORITIZATION;
FIF

Synopsis: Case prioritization.

Details: Per an e-mail from Acting SSA [redacted] dated May 6, 2007, requesting the overall priority of investigations assigned to SA [redacted] the following information is provided: b6 b7C

Classification "A" investigations

[redacted] b6 b7C b3 b7E

1325015-000-8448

[redacted] b7E

b6
b7C

[redacted]

b3
b7E

[redacted]

b6
b7C
b3
b7E

Classification "B" investigations

329A-WF-234432 [redacted] ET AL

b6
b7C

[redacted]

b3
b7E

29Q-WF-228421 [redacted] PHI BETA SIGMA FRATERNITY; INDUSTRIAL BANK - VICTIM; FIF

b6
b7C
b3
b7E

[redacted]

[redacted]

b6
b7C
b3
b7E

29Q-WF-232796 [redacted] ET AL

b6
b7C

1325015-000-8449

b6
b7C

b6
b7C
b3
b7E

b6
b7C
b3
b7E

Classification "C" investigations

b3
b7E

29Q-WF-207848 ET AL

b6
b7C
b3
b7E

29R-WF-214204

b6
b7C
b3
b7E

29Q-WF-230866

b6
b7C

1325015-000-8450

To: Washington Field From: Washington Field
Re: 290-WF-223918- 05/10/2007

b6
b7C

b3
b7E

♦♦

1325015-000-8451

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 03-04-2019 BY: [redacted]

b6
b7C

Memorandum

~~SECRET~~

To : ADIC, WMFO (29B-WF-171994)(P) Date 12/16/94

From : SA [redacted] (C-5)

b6
b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

Unless otherwise indicated within it, this communication is classified "~~Secret~~".

Attached photocopied documents were received within the last week from DOJ Fraud Section Trial Attorney [redacted] (U)

b6
b7C

[redacted]

b3 Per DOJ
b5
b6
b7C

The last document, a memorandum from TA [redacted] to Deputy Asst. Attorney General Robert S. Litt, setting out interviews needing to be accomplished in the U.K. and Pakistan, probably in January-February, 1995. (U)

b6
b7C

1-WMFO (Att. 3)

29B-WF-171994 MAIN- 642

JNR:jnr
(1)

~~Classified by: G-3~~
~~Declassify on: OADR~~

~~SECRET~~

[redacted]

1325015-000-9196

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 8
Page 2 ~ b3 - Per DOJ; b5; b6; b7C;
Page 3 ~ b3 - Per DOJ; b5; b6; b7C; b7D;
Page 4 ~ b3 - Per DOJ; b5; b6; b7C; b7D;
Page 5 ~ b3 - Per DOJ; b5; b6; b7C; b7D;
Page 6 ~ b5 - Per DOJ; b6; b7C;
Page 7 ~ b5 - Per DOJ; b6; b7C;
Page 8 ~ b5 - Per DOJ; b6; b7C;
Page 9 ~ b5 - Per DOJ; b6; b7C;

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 4
Page 2 ~ b5 - Per ICE; b6; b7C;
Page 3 ~ b5 - Per ICE; b6; b7C;
Page 4 ~ b5 - Per ICE; b6; b7C;
Page 5 ~ b5 - Per ICE; b6; b7C;

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Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 1/7/93

From : SA [redacted] b6 Per FBI b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 51
[redacted] INTERECT b6 Per ICE b7C

The writer reviewed the results of the two interviews of [redacted] which were conducted by the U. S. Customs out of the Middle District of Florida. The interviews were regarding [redacted]'s private investigation into EASTBROOK LTD and MANUEL NORIEGA, copies of the memorandum of interviews are attached. b6 Per ICE b7C

b6 Per FBI b7C

SA [redacted] spoke with SA [redacted] regarding [redacted] and [redacted]'s investigation as it relates to BCCI and EASTBROOK. It was decided that at this point in time the FBI has no interest in [redacted]'s investigation into EASTBROOK. b6 Per ICE b7C

SA [redacted] provided the Department of Justice, Asset Forfeiture Office (DOJ-AFO) with copies of the results of the [redacted] interviews. SA [redacted] also advised DOJ-AFO to contact the Middle District of Florida U. S. Attorneys Office to determine the status of the U. S. Customs investigation into EASTBROOK, making sure that any BCCI-EASTBROOK relationship is fully reviewed including the possibility of any asset forfeiture. b6 Per ICE b7C

RECOMMENDATION

Based on the forgoing information it is recommended that lead 51 be considered "covered".

29B-WF-171994 -551

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 7 1993
FBI — WASH. FIELD OFFICE [redacted]

b6 Per ICE b7C

1 - WMFO (29B-WF-171994)

[redacted]

1325015-000-7894

MEMORANDUM OF INTERVIEW

BY: Senior Special Agent [redacted] b6 Per ICE b7C
United States Customs Service

DATE: August 27, 1992

TIME: Approximately 4:45 p.m. - 5:45 p.m.

PLACE: United States Attorney's Office
Tampa, Florida

PARTICIPANTS: [redacted] b6 Per ICE b7C

SUBJECT: Initial Interview of [redacted]

On August 27, 1992, an initial interview of [redacted] b6 Per ICE b7C was conducted at the U.S. Attorney's Office, Tampa, Florida. The interview was conducted by AUSAs [redacted] and [redacted] and Senior Special Agent [redacted] USCS. [redacted] is the Chief Executive Officer of Intertect, a Houston based private investigations firm, specializing in financial investigations.

[redacted] was hired by the FDIC and M-Bank, Houston to conduct an b6 Per ICE b7C investigation of a re-insurance scheme which involved Liberty Bank, Texas and Best Lloyds Insurance Co. located in Panama. According to [redacted] who was affiliated with Liberty Bank, was trying to open a re-insurance company in Panama. [redacted] had purchased a barge which was used to transport guns to Panama and return with drugs to the U.S. This scheme generated money in an effort to keep Liberty Bank afloat. According to [redacted] an individual known as [redacted] was bringing the cocaine into the U.S. for this operation. [redacted] previously served as a member of the Air National Guard with George Bush, Jr. [redacted] a former business partner of [redacted] hired [redacted] to conduct an investigation relative to the Liberty Bank matter.

While [redacted] investigators were in Panama conducting the b6 Per ICE b7C [redacted] investigation," the U.S. invaded Panama (December 1989). A fire fight broke out at the "El Siglo" newspaper building between U.S. troops and Panamanian nationals. Occupants of the El Siglo facility fled the scene. [redacted] investigators (two from U.S., one from Panama) were in the area and accompanied U.S. troops into the facility. Inside El Siglo they found computer records and a list (attached herein as Attachment 1) of Noriega assets. The investigators seized the list and the computer records.

PANAMA

Mansión fortificada con 20 hectáreas en Playa Blanca (Río Hato), Coclé		3,000,000
Residencia en Altos del Golf (barrio exclusivo de la Capital)	Costo:	275,000
	Mejoras:	700,000
	Dúplex para Escolta:	225,000
Dos edificios en Punta Paitilla (barrio exclusivo)		1,300,000
Casa en San Francisco (La Playita), Ciudad de Panamá		750,000
Fincas ganaderas en Antón — Coclé		1,200,000
Casa en Veraguas a/n Yin Carrizo		105,000
Casa en Señales, Ocú, a/n Checho Carrizo		160,000
Casas/finca "bunker" en Potrerillos, Chiriquí, con aeropuerto y helipuerto		1,200,000
~~Grupo Carlo Vicino David PMA.~~		2.200.000
IV2 (30% de las acciones)		1,000,000
Editora Renovación S.A. (ERSA)		1,500,000
Cable T.V. (Administrado por FFDO)		1,000,000
Explosivos Nacionales S.A. (EXPLOSA)		800,000
Transit S.A. Zona Libre Colón (ada. por FFDO)		500,000
Hoteles Riande-Continental (4)		4,250,000
TENERÍA TAVAO LGO. GRONCHI		1.250.000

Almacenes	A nombre de	
Kis x Menos (dos tiendas).	Víctor Midrie	2,225,000
PI	Ezra Morsany	750,000
El Depósito	Salomón Morsany	500,000
El Millón	Salomón Morsany	500,000
La Casa del Descuento	Tito Díaz	3,000,000
La Casa de la Carne	Grupo Mangravita	1,500,000

Equipajes Acompañados S.A.	600,000
Agencia de Seguridad a/n de Nelly Alexdh	500,000
Banco Patria (20 a 50% de las acciones)	20,000,000
Interbanco/Banco Caletero (Tito Vega y Fisnés)	12,000,000

ESTADOS UNIDOS

Dos edificios en Nueva Orleans, Luisiana	3,200,000
Hoteles en Tampa y Orlando, Florida,	1,500,000

JAPON

Templo Budista (donación)	(350,000)
Casa	750,000
Cuentas Bancarias/Tokyo (Alberto Calvo)	? ? ?

INGLATERRA

Cinco depósitos a plazo (cifrados) (Dao. Vega - C. Millgreen)	21,000,000

ALEMANIA

Cuentas Bancarias Dresdner Bank/Bco. Geraldico	? ? ?

CANADA

Cuentas Bancarias	? ? ?

LUXEMBURGO

Depósito a plazo (transferido de Londres) BCCI	27,000,000

ISRAEL

2 propiedades (Tel Aviv y Cesaréa)	1,250,000
Cuentas Bancarias (Mike Harari)	? ? ?

FRANCIA

Castillo (a/n Vicky Arado (ananie)?)	27,000,000
Apartamento en París (a/n de Lorena Noriega)	800,000
Plazo Fijo en Banque Nationale de Paris (a/n de Sarita Arado)	560,000
Tres Plazos Fijos a/n clas., Rep.Legal: Carlos Millgreen (Emb. de Pan. en París)	20,000,000

ITALIA

Villa en Fiésole, Florencia	1,600,000

ESPAÑA

Residencia (Felicidad Sieiro)	975,000
2 Hoteles con H. Riande en Madrid y Sevilla	3,200,000

SUIZA

Cuatro Cuentas Cifradas (al 1/1/00)	
A) (J.A. Castillero y Marcos Villareal)	125,000,000
B)	232,000,000
C)	126,000,000
D)	150,000,000

VENEZUELA

Penthouse doble, Col Valle Arriba, Caracas	1,200,000

REPUBLICA DOMINICANA

Un Edificio en Santo Domingo	500,000
Finca con helipuerto (Felicidad Sieiro)	2,000,000
Banco Popular Dominicano	? ? ?

COSTA RICA

Finca ganadera	2,300,000

BRASIL

Apartamento en Río	800,000
Inversiones en Sao Paulo	2,700,000

KOREA

Cuentas Bancarias e Inversiones	? ? ?

HONG KONG

Cuentas Bancarias e Inversiones	? ? ?
HongKong Bank (cuentas bancarias)	? ? ?

United States

Hotels in Tampa and Orlando, Florida	1,500,000

England

Cinco depositos a plazo Crifrados Five fixed deposits (CD's) [redacted]	23,000,000 b6 Per ICE b7C

France

Apartamento en Paris (a/n de Lorena Noriega)	800,000
Plazo fijo en Bangue Nationale de Paris (a/n de [redacted]	560,000 b6 Per ICE b7C

Spain

2 Hoteles con [redacted] en Madrid y Sevilla	3,200,000 b6 Per ICE b7C

Costa Rica DEA verified

Finca ganadera (cattle ranch)	2,300,000

During the course of [redacted] investigation of the Liberty Bank, [redacted] matter, [redacted] learned Saudi Sheik [redacted] made arrangements to provide [redacted] a $5 million down payment for the purchase of airplanes, from "the enterprise" which were used to fly guns to Nicaragua and drugs to the U.S. The planes were used by "the enterprise" for the re-supply operation. A former Merrill Lynch stockbroker from London, [redacted] who handled [redacted] accounts, told [redacted] she was in Saudi Arabia, in the tent, with [redacted] and [redacted] when these arrangements for the payments were made. Later, [redacted] wanted a position with [redacted] firm however, [redacted] said he didn't hire her as he didn't fully trust her. [redacted] currently resides in the Miami, Florida area. b6 Per ICE b7C

[redacted] also learned the following during the course of his investigations: b6 Per ICE b7C

[redacted], formerly with City Bank, New York, is the president of Eastbrook Ltd., USA, which was involved in the commodities business. According to [redacted] was the financial power behind Eastbrook which operated from 1987-1991. b6 Per ICE b7C

1325015-000-7901

Eastbrook borrowed $138 million with at least [redacted] name used as collateral. The purpose of the loans were to finance Eastbrook's business operations. Eastbrook was based in New York and had 80 offices worldwide. [redacted] (LNU), an Englishman who worked in BCCI's London offices, was the financial advisor to [redacted] for Eastbrook and BCCI. [redacted] also acted as a go-between for BCCI and Eastbrook. Eastbrook was planning to raise $100 million from wealthy Latin Americans and drug traffickers to form a currency trading fund to launder drug money and flight capital. Allegedly Eastbrook was used as a vehicle by BCCI to pay bribes in Latin America and the U.S. [redacted] was unable to provide specifics of bribes or payees. b6 Per ICE b7C

[redacted] and [redacted] are financial commodity brokers who worked for Eastbrook Ltd., in New York. When Eastbrook ceased operations in New York, in approximately Dec. 1991, [redacted] and [redacted] carried out several boxes of records as did other Eastbrook employees. According to [redacted] and [redacted] have records of Eastbrook payoffs and of Eastbrook employees who were part of the BCCI organization. It was commonly discussed among and between Eastbrook employees that Eastbrook was a part of BCCI. b6 Per ICE b7C

A consortium of 13 banks hired the N.Y. law firm of [redacted] to represent them relative to their combined loss of $138 million from Eastbrook. The law firm hired [redacted] to do the background on Eastbrook. b6 Per ICE b7C

In approximately Feb. 1992, [redacted] provided information concerning Eastbrook to an investigator for the New York District Attorney's Office. [redacted] was told the D.A.'s office was already aware of the Eastbrook connection to BCCI and stated "that's the next train coming down the tunnel." Additionally, [redacted] has had contact with the FBI in Houston, Texas, which is investigating the $5 million loss from 1st City Bank - Texas (part of the $138 million in loans to Eastbrook). b6 Per ICE b7C

[redacted] agreed to (1) provide us with his Noriega and Eastbrook files; and, (2) be debriefed in more detail concerning these matters pending our review of the files. b6 Per ICE b7C

1325015-000-7902

According to [redacted] is the girlfriend of [redacted] b6 Per ICE b7C father is the owner of El Siglo newspaper, and [redacted] was Noriega's finance minister. Accordingly, [redacted] and [redacted] lived above the newspaper facility. [redacted] believes [redacted] was being held hostage in the Bolivian Embassy during this time, along with other Noriega officials. According to [redacted] and [redacted] had left Panama two days prior to the invasion.

[redacted] said he contacted [redacted] former DEA Special b6 Per ICE b7C Agent in Charge, Houston, Texas, with the Noriega information. [redacted] contacted DEA - Miami and relayed same. Thereafter, in February, 1990, [redacted] was interviewed in Houston by a DEA Special Agent and DEA intelligence analyst [redacted] from Miami, Florida. [redacted] provided them with approximately 20 pages of records and the attached list of Noriega assets (Attachment 1). At that time the agent showed [redacted] a cashier's check for $2.6 million for the purchase of the Intercontinental Hotel in Orlando, listed as a Noriega asset. [redacted] told DEA he wanted to be a part of the Noriega financial investigation and that he could provide contacts all over the world. However, he informed DEA he would need funding for his investigation. [redacted] was not further contacted by DEA.

According to [redacted], the following assets on the list were b6 Per ICE b7C established as being tied to Manuel Noriega:[1]

Panama

Mansion en Playa Blanca [redacted] situated on 20 hectareas		3,000,000
Residencia en Altos del Golf (barrio exclusive de la capital) (exclusive neighborhood in the capital)	Cost	275,000
	Improvements	780,000
	Duplex	225,000
Casa/Finca "bunker" en Potrerillos Chiriqui, with airport and heliport		1,200,000
[redacted] Panama		2,800,000
Hoteles Riande - Continental (4)		4,250,000

[1]Due to time constraints the basis for the verification was not obtained.

1325015-000-7900

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 116
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
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Page 24 ~ Referral/Consult;
Page 25 ~ Referral/Consult;
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Page 27 ~ b6; b7C; b7E;
Page 28 ~ b6; b7C; b7E;
Page 29 ~ b6; b7C; b7E;
Page 30 ~ b7E;
Page 31 ~ b6; b7C; b7E;
Page 32 ~ b6; b7C; b7E;
Page 33 ~ b7E;
Page 34 ~ b6; b7C; b7E;
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Page 44 ~ b6; b7C; b7E;
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Page 48 ~ b1; b3; b6; b7C; b7D; b7E;
Page 49 ~ b6; b7C; b7E;
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Page 51 ~ b6; b7C; b7E;
Page 52 ~ b3; b7E;
Page 64 ~ b6; b7C; b7D;
Page 65 ~ b6; b7C; b7D;
Page 88 ~ Referral/Consult;
Page 89 ~ Referral/Consult;
Page 90 ~ Referral/Consult;
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Page 93 ~ Referral/Consult;
Page 94 ~ Referral/Consult;
Page 95 ~ Referral/Consult;
Page 96 ~ Referral/Consult;
Page 97 ~ Referral/Consult;
Page 98 ~ Referral/Consult;
Page 115 ~ b5; b6; b7C;
Page 116 ~ b5; b6; b7C;
Page 117 ~ b5; b6; b7C;
Page 118 ~ b5; b6; b7C;
Page 119 ~ b5; b6; b7C;
Page 120 ~ b5; b6; b7C;
Page 156 ~ Duplicate;
Page 157 ~ Duplicate;
Page 159 ~ Duplicate;
Page 160 ~ Duplicate;
Page 167 ~ b6; b7C;
Page 168 ~ b6; b7C;
Page 169 ~ b6; b7C;
Page 170 ~ b6; b7C;
Page 171 ~ b6; b7C;
Page 172 ~ b6; b7C;
Page 173 ~ b6; b7C;
Page 174 ~ b6; b7C;
Page 175 ~ b6; b7C;
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Page 179 ~ b6; b7C;
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X For this Page X
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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

(1)

Phoenix office has a database case called Pirodets and an [redacted] was referenced on a business card w/ phone [redacted]

FC during search of Tusk Leaded Lights (business) ~

on 1/12/90 [redacted]

No other info on [redacted]

b6
b7C

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

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*** BE SURE TO DELETE YOUR ROUTE WHEN FINISHED ***

COMPLETED 368230.000 CTIME=08:05 STATUS 5342,6,28,28,4383

E ALL-NAMES-SEARCH#
STMT= 368306.000 DATE=09/01/92 TIME=08:06 USER=WFLKO:WFILKO DB=ISIS
*+F
*DE!
!F ,14,- *** ALL-NAMES FILE SEARCH ***
!S2
!F PLACE AN X TO INDICATE SEARCH OF ONLINE,1,OFFLINE/ARCHIVED,1,DATABASES.
!DE*
*F
*F ROUTE TO WHICH PRINTER ,6,.
*F
*F LST-NAME FIRST-NAME MIDDLE-NAME
*S1
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*F -,20,- -,15,- -,12,-.
*S2
*F
*DE!
!F *** DATA-BASE IS USED TO QUALIFY SEARCH ON NAME ***
!DE*
*F DATA-BASE:
*S1
*F -,8,-,8,-,8,-,8,-,8,.
*F -,8,-,8,-,8,-,8,-,8,.
*S2
*F
*F-,74,-
*S1
*I1,E ALL-NAM-SCH ,
*DS>
*RL2

OCIS
Processed 9/1/92
Initialed BJ

COMPLETED 368306.000 CTIME=08:06

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b7C

FOR P-D WITH NYSIIS-NAME [redacted] AND WITH LN [redacted] AND WITH FN [redacted] LISTSA ALL-INFO #
STMT= 279874.000 DATE=09/01/92 TIME=08:01 USER=WFIBLJ:WFIBLJ DB=OCIS

P-[redacted]-*1
QUICK-REF: VEHICLES
QUICK-REF: PHONES
QUICK-REF: PERSON-ORG
QUICK-REF: PERSON-PERSON
CREATED: 16 FEB 1983
LAST-UPDATE: 03 AUG 1991
ENTERED-BY: LV HQ
HOME-ADDR: 01
STREET: [redacted]

This document may not be placed in any file nor given to any non-FBI employee. The information contained in this document may not be disseminated without proper authorization.

b6
b7C

CITY: [redacted]
STATE: NV
ZIP: [redacted]
ADDR-DATE: 11 JAN 1983
HOME-ADDR-S: LV*183*1073-7*6
HOME-ADDR-S: [redacted]
STREET: [redacted]
CITY: [redacted]
STATE: CA
PHONE: [redacted]
ADDR-DATE: 26 OCT 1987
HOME-ADDR-S: LV*183B*1507*34 SC
PHY-DESC: 01
SEX: M
PHY-DESC-S: LV*183*1073-7*6

P-D: [redacted]-*2
QUICK-REF: PERSON-PERSON
QUICK-REF: PHONES
QUICK-REF: PERSON-ORG
CREATED: 17 APR 1984
LAST-UPDATE: 13 APR 1989
ENTERED-BY: SL HO
INVEST-INTEREST: SL*TASK
ALIAS: [redacted]
ALIAS-S: SL*12*180*1
ALIAS: [redacted]
ALIAS-S: SL*12*180*7
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: MO
PHONE: [redacted]
ADDR-DATE: 07 MAY 1984
HOME-ADDR-S: SL*12*180*3
HOME-ADDR-S: HO*12C*821*35
HOME-ADDR: 02
STREET: [redacted]
CITY: [redacted]
STATE: MO
PHONE: [redacted]
ADDR-DATE: 07 MAY 1984
HOME-ADDR-S: SL*12*180*7
TYPE-PERSON: [redacted]
TYPE-PERSON-S: SL*12*180*1
TYPE-PERSON: [redacted]
TYPE-PERSON-S: SL*12*180*7
PHY-DESC: 01
HT: 600
WT: 210
SEX: M
EYES: BROWN
PHY-DESC-S: SL*12*180*7
PHOTO: 1A OF FILE SL 8/2/75
PHOTO-S: SL*12*180*1A-2
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: SL*12*180*1
SPECIAL-CHAR: SSA [redacted]
SPECIAL-CHAR-S: SL*12*180*5
DOB: [redacted]
AGE: 45
DOB-S: SL*12*180*7
POB: [redacted]
POB-S: SL*12*180*5
PD-NO: [redacted]

PD-NO-S: SL*12*180*1A-2

P-D: SMITH*AL*-*3
QUICK-REF: PERSON-PERSON
CREATED: 01 MAY 1985
LAST-UPDATE: 23 MAY 1985
ENTERED-BY: LV
TYPE-PERSON: BOOKMAKER
TYPE-PERSON-S: LV*92*625*1041
TYPE-PERSON: MURDER VICTIM
TYPE-PERSON-S: LV*92*625*1041
SPECIAL-CHAR: KILLED/STUFFED IN CAR TRUNK
SPECIAL-CHAR-S: LV*92*625*1041
SPECIAL-CHAR: APPARENTLY BY LCN 4 BOOKMAKING
SPECIAL-CHAR-S: LV*92*625*1041
SPECIAL-CHAR: MURDER IN CHICAGO SOMETIME
SPECIAL-CHAR-S: LV*92*625*1041
SPECIAL-CHAR: WITHIN 6 MOS BEFORE 3/29/85
SPECIAL-CHAR-S: LV*92*625*1041

P-D: [redacted]-*4
QUICK-REF: PLACE
QUICK-REF: PERSON-ORG
FILE-SER: SC*12*292*211 LA
CREATED: 07 JUN 1985
LAST-UPDATE: 07 JUN 1985
ENTERED-BY: SC

b6
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P-D: [redacted]-*5
QUICK-REF: CONTACTS
QUICK-REF: PERSON-PERSON
QUICK-REF: PERSON-ORG
INTV-S: CG*183B*2200-H*225 INTV
CREATED: 28 MAR 1986
LAST-UPDATE: 27 JUL 1987
ENTERED-BY: CG
TYPE-PERSON: [redacted]
TYPE-PERSON-S: CG*183B*2200-H*225 INTV
PHY-DESC: 01
SEX: M
PHY-DESC-S: CG*92A*5297-C*32*A

P-D: [redacted]-*6
QUICK-REF: PERSON-ORG
CREATED: 19 JUN 1986
LAST-UPDATE: 19 JUN 1986
ENTERED-BY: [redacted]
TYPE-PERSON: [redacted]
TYPE-PERSON-S: [redacted]
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: NY*183A*2452*622 BQ
LOCAL-INFLU: NY*NEW YORK*LONG ISLAND
LOCAL-INFLU-S: NY*183A*2452*622 BQ

P-D: [redacted]-*7
FILE-SER: LV*183B*1507*34 SC
CREATED: 22 FEB 1988
LAST-UPDATE: 22 FEB 1988
ENTERED-BY: LV

b6
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P-D: [redacted]-*8
QUICK-REF: PERSON-PERSON
FILE-SER: NK*183B*68864*48
CREATED: 02 AUG 1991
LAST-UPDATE: 02 AUG 1991
ENTERED-BY: NK

P-D: [redacted]-*9
QUICK-REF: PHONES
FILE-SER: BF*183B*25672*193
CREATED: 02 APR 1992
LAST-UPDATE: 02 APR 1992
ENTERED-BY: BF
ALIAS: [redacted]
ALIAS-S: BF*183B*25672*193
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: NY
PHONE: [redacted]
ADDR-DATE: 03 DEC 1991
HOME-ADDR-S: BF*183B*25672*193
PHY-DESC: 01
SEX: M
RACE: BLACK
PHY-DESC-S: BF*183B*25672*193

P-D: [redacted]
QUICK-REF: [redacted]
QUICK-REF: PERSON-PERSON
CREATED: 18 MAY 1982
LAST-UPDATE: 18 OCT 1983
ENTERED-BY: BA
ALIAS: [redacted]
ALIAS-S: PH*166*2052-HH*117 BA*12*0-E*61
TYPE-PERSON: [redacted]
TYPE-PERSON-S: PH*166*2052-HH*117

P-D: [redacted]-*2
QUICK-REF: PHONES
CREATED: 26 OCT 1987
LAST-UPDATE: 02 NOV 1987
ENTERED-BY: NY
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: NY
PHONE: [redacted]
HOME-ADDR-S: NY*183A*3086-M*7 BQ

P-D: [redacted]*3
QUICK-REF: PERSON-PERSON
FILE-SER: LV*12*3*2432-1
CREATED: 21 SEP 1988
LAST-UPDATE: 21 SEP 1988
ENTERED-BY: LV
TYPE-PERSON: [redacted]
TYPE-PERSON-S: LV*12*3*2432-1
PHY-DESC: 01
HT: 510
SEX: M
RACE: WHITE

PHY-CHAR: THIN BUILD
PHY-DESC-S: LV*12*3*2432-1
SPECIAL-CHAR: DOB IS APPROX
SPECIAL-CHAR-S: LV*12*3*2432-1
DOB: [redacted]
AGE: [redacted]
DOB-S: LV*12*3*2432-1

P-D: [redacted]*5
QUICK-REF: PERSON-ORG
FILE-SER: PG*183B*1336*107
CREATED: 23 AUG 1990
LAST-UPDATE: 23 AUG 1990
ENTERED-BY: PG
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: PA
ADDR-DATE: 09 MAY 1990
HOME-ADDR-S: PG*183B*1336*107
DOB: [redacted]
AGE: [redacted]
DOB-S: PG*183B*1336*107
ID-NUMBER: [redacted]
ID-NUMBER-S: PG*183B*1336*107

P-D: [redacted]
QUICK-REF: PHONES
CREATED: 13 FEB 1987
LAST-UPDATE: 17 FEB 1987
ENTERED-BY: NY
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: CA
PHONE: [redacted]
HOME-ADDR-S: NY*245F*309-C*2 NY
SPECIAL-CHAR: NADDIS 1702274
SPECIAL-CHAR-S: NY*245F*309-C*2 NY
SPECIAL-CHAR: CADL U0015096
SPECIAL-CHAR-S: NY*245F*309-C*2 NY

P-D: [redacted]C*1
QUICK-REF: PHONES
QUICK-REF: PERSON-PERSON
CREATED: 03 FEB 1986
LAST-UPDATE: 06 FEB 1986
ENTERED-BY: SD
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: PA
PHONE: [redacted]
ADDR-DATE: 18 DEC 1985
HOME-ADDR-S: SD*245B*140-6*11

P-D: [redacted]1
QUICK-REF: PHONES
CREATED: 17 JAN 1983
LAST-UPDATE: 17 JAN 1983
ENTERED-BY: NO
HOME-ADDR: 01

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STREE[redacted]
CITY:[redacted]
STATE: LA
PHONE:[redacted]
ADDR-DATE: 09 DEC 1982
HOME-ADDR-S: NO*12*97-9*1A-16

P-D:[redacted]*1
QUICK-REF: PERSON-PERSON
CREATED: 21 NOV 1983
LAST-UPDATE: 21 NOV 1983
ENTERED-BY: AT
HOME-ADDR: 01
CITY:[redacted]
STATE: GA
HOME-ADDR-S: [redacted]
TYPE-PERSON:[redacted]
TYPE-PERSON-S: AT*245*76*1-76

P-D:[redacted]*1
QUICK-REF: PHONES
QUICK-REF: PERSON-ORG
QUICK-REF: PERSON-PERSON
CREATED: 09 MAY 1985
LAST-UPDATE: 09 MAY 1985
ENTERED-BY: BA
HOME-ADDR: 01
STREET:[redacted]
CITY:[redacted]
STATE: MD
PHONE:[redacted]
HOME-ADDR-S: BA*183*1230*36

P-D:[redacted]*1
QUICK-REF: PERSON-ORG
CREATED: 03 APR 1987
LAST-UPDATE: 03 APR 1987
ENTERED-BY: AT
TYPE-PERSON:[redacted]
TYPE-PERSON-S: AT*245F*121*587

P-D:[redacted]-*1
QUICK-REF: PERSON-PERSON
CREATED: 12 APR 1983
LAST-UPDATE: 14 APR 1983
ENTERED-BY: NH
HOME-ADDR: 01
STREET:[redacted]
CITY:[redacted]
STATE: CT
ADDR-DATE: 07 JAN 1983
HOME-ADDR-S: [redacted]
TYPE-PERSON:[redacted]
TYPE-PERSON-S: NH*183*632*1132
PHY-DESC: 01
HT: 510
SEX: M
RACE: BLACK
PHY-CHAR: THIN BUILD
PHY-DESC-S: NH*183*632*1132
PHY-CHAR: GLASSES
SPECIAL-CHAR: DOB APPROXIMATE

SPECIAL-CHAR-S: NH*183*632*1132
DOB: 01 JAN 1956
AGE: 36
DOB-S: NH*183*632*1132

P-D: [redacted]*2
CREATED: 24 MAR 1986
LAST-UPDATE: 24 MAR 1986
ENTERED-BY: BA

P-D: [redacted]-*3
QUICK-REF: PERSON-PERSON
CREATED: 29 OCT 1986
LAST-UPDATE: 29 OCT 1986
ENTERED-BY: AT
HOME-ADDR: 01
CITY: ATLANTA
STATE: GA
HOME-ADDR-S: AT*245D*221*183

P-D: [redacted]-*4
QUICK-REF: PERSON-PERSON
QUICK-REF: PHONES
CREATED: 23 JUL 1987
LAST-UPDATE: 23 JUL 1987
ENTERED-BY: SL
HOME-ADDR: [redacted]
STREET: [redacted]
CITY: [redacted]
STATE: MO
ZIP: [redacted]
PHONE [redacted]
ADDR-DATE: 22 JUN 1987
HOME-ADDR-S: SL*245A*134-E-5*117
TYPE-PERSON: [redacted]
TYPE-PERSON-S: SL*245A*134-E-5*117

P-D: [redacted]
QUICK-REF: [redacted]
QUICK-REF: PERSON-PERSON
CREATED: 13 AUG 1987
LAST-UPDATE: 18 AUG 1987
ENTERED-BY: SL
INVEST-INTEREST: [redacted]05
ALIAS: [redacted]
ALIAS-S: [redacted]
ALIAS: [redacted]
ALIAS-S: SL*245G*6*597
TYPE-PERSON: [redacted]
TYPE-PERSON-S: SL*245G*6*597
SPECIAL-CHAR: SSAN [redacted]
SPECIAL-CHAR-S: SL*245G*6*597
DOB: [redacted]
AGE: [redacted]
DOB-S: SL*245G*6*597
LOCAL-INFLU: MO*ST LOUIS*-
LOCAL-INFLU-S: SL*245G*6*597

P-D: [redacted]
QUICK-REF: [redacted]
QUICK-REF: PERSON-UNION

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FILE-SER: HQ*183*8533*407
CREATED: 15 JUN 1989
LAST-UPDATE: 15 JUN 1989
ENTERED-BY: [redacted]
TYPE-PERSON: [redacted]
TYPE-PERSON-S: HQ*183*8533*407

P-D: [redacted]*1
QUICK-REF: PERSON-ORG
QUICK-REF: PHONES
QUICK-REF: VEHICLES
QUICK-REF: PERSON-PERSON
INTV-S: AT*12*443*33
CREATED: 19 SEP 1984
LAST-UPDATE: 23 AUG 1985
ENTERED-BY: KC AT
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: FL
HOME-ADDR-S: KC*12*300*25 AT
PHY-DESC: 01
HT: 511
WT: 165
SEX: M
HAIR: GRAY
EYES: HAZEL
RACE: WHITE
PHY-CHAR: PARTIALLY BALD
PHY-DESC-S: KC*12*300*25 AT
PHY-CHAR: BEARD

P-D: [redacted]1
QUICK-REF: PERSON-PERSON
QUICK-REF: CONTACTS
QUICK-REF: PLACE
QUICK-REF: TRANSACTIONS
QUICK-REF: PERSON-ORG
FILE-SER: BS*92A*2557-B*595
CREATED: 17 AUG 1989
LAST-UPDATE: 04 APR 1990
ENTERED-BY: BS HQ
HOME-ADDR: 01
STREET: [redacted]
CITY: [redacted]
STATE: MA
ADDR-DATE: 27 JUL 1989
HOME-ADDR-S: BS*92A*2557-B*595
HOME-ADDR: 02
STREET: [redacted]
CITY: [redacted]
STATE: MA
ADDR-DATE: 01 JAN 1969
HOME-ADDR-S: [redacted]29
TYPE-PERSON: [redacted]
TYPE-PERSON [redacted]*700
TYPE-PERSON: [redacted]
TYPE-PERSON-S: BS*92A*2557-B*727
PHY-DESC: 01
HT: 511
WT: 170
SEX: M
HAIR: BLOND
EYES: BLUE

b6
b7C

RACE: WHITE
PHY-CHAR: SCARS RIGHT FOOT
PHY-DESC-S: BS*183B*1280*429
PHY-CHAR: BIRTHMARKS BREAST
SPECIAL-CHAR: ADDRESS 01 IS OFFICE
SPECIAL-CHAR-S: BS*92A*255Z-B*595
SPECIAL-CHAR: [redacted] b6 b7C
SPECIAL-CHAR-S: BS*92A*255Z-B*727
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: BS*183B*1280*429
SPECIAL-CHAR: FBI IDENT RECORD DATED 6/26/89
SPECIAL-CHAR-S: BS*183B*1280*429
SPECIAL-CHAR: [redacted]
SPECIAL-CHAR-S: BS*183B*1280*429
DOB: [redacted]
DOB-S: BS*183B*1280*429
POB [redacted]MA
POB-S: BS*183B*1280*429
DECEASED: X
DECEASED-S: B[redacted]B*782
ID-NUMBER: SSAN [redacted]
ID-NUMBER-S: [redacted]*429
ID-NUMBER: FB[redacted]
ID-NUMBER-S: BS*183B*1280*429

COMPLETED 279874.000 CTIME=08:07 STATUS 4984,27,27,27,4984

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

-435

29B-WF-171994 Main

SEARCHED ___ INDEXED ___
SERIALIZED SU FILED SU
SEP 6 1991
FBI - WASH. METRO FIELD OFFICE
SU/JR

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b7C

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCID) Date 9/2/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

On 9/2/92 SA [redacted] received the attached letter form JEFFREY L STARKWEATHER. At this point in time the letter is going to be reviewed and discussed to determine if the letter has any merit. b6 b7C

-4436

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

SEP 4 1992

[redacted] OFFICE b6 b7C

1 - 29B-WF-171994

RHM:rhm

1325015-000-6717

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 9/4/92

NMS From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

During the course of this investigation photographs of BCCI subjects and associates have been obtained. These photographs have been arranged in systematic order and are being kept in the bookcase in SSA [redacted] office. b6 b7C

This 'Photo Library' consists of four photo albums, labeled 1 through 4, and three BCCI International Magazines, volumes 40, 41, and 43, and labeled as such. Each album or magazine has a table of contents listing the name and page or pages on which that particular person appears. The table of contents will be kept inside the front cover of each album or magazine. A master list of the names, album and/or magazine that the individual appears in, and the page numbers, will be kept at the 'photo library'.

If an individual is identified that has not been previously identified, please make a notation in the album or magazine and add his or her name and page number to the table of contents of that album or magazine.

Pictures may be removed from the 'photo library', but if removed make a note of what pictures were removed, the date, the agent's name, and the purpose.

1-Each SA-BCCI Special
1-IIC [redacted] b6 b7C
1-SSA
1-SSA

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Touche Ross

Touche Ross & Co.
100 Leadenhall Street
LONDON EC3A 3AD

Telephone: National 071 283 8566
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Fax (Gp. 3): 071 626 1477

FAX TRANSMISSION

TO
(Individual) [redacted]

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(Organisation) U S Department of Justice

Fax Number 010 1 202 514 0409

Copies to

From [redacted] Floor No

Date 8 September 1992 Extn No

Re

Number of pages (including this page) 22

Message

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Deloitte Touche Tohmatsu International

If you do not receive all the pages, please telephone or fax immediately.

Authorised by the Institute of Chartered Accountants in England and Wales to carry on Investment Business

001 BCCI LEADENHALL ST.LDN 626 1477 15:01 08/09/92

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BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.
(IN COMPULSORY LIQUIDATION)
100 LEADENHALL STREET LONDON EC3A 3AD
TELEPHONE 071-283 8566 FACSIMILE 071-626 1477

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U S Department of Justice
Constitution Avenue
9/10 Street NW
Washington DC 20530
United States of America

7 September 1992

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Dear

National Commercial Bank

As part of our work we commissioned a background report on the above parties, a copy of which I enclose. Some of it makes interesting reading (whether it is right or wrong).

We believe that the "sources" described in the report are individuals either living in the Middle East or experts on Arab affairs. It should be noted that some of the information may represent the personal opinion of the particular source or may be based on third party rumour. However, the information has been further corroborated where possible by the preparers of the report.

I am sending you this information (for your team) in case it is of any help. Any comments that they may have will, of course, be most welcome.

Yours sincerely

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Joint Liquidators appointed by the UK Secretary of State : C Morris J P Richards S I Akers N R Lyle
Joint Liquidators appointed by the District Court of Luxembourg : B A Simmons G Daden J Roden

Registered in Luxembourg No B10370
Registered in England No FC7574 Regd Office 100 Leadenhall Street London EC3A 3AD

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Report to Touche Ross

for BCCI (In liquidation)

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Business History - Origins

[redacted] Shaikh Salim bin Ahmad Bin Mahfouz. The latter was of humble origins from the Hadhramaut region of present day Yemen. He arrived in Jeddah, Saudi Arabia, some time before 1920 and took service as a house-boy with the Kaaki family, who were one of the leading money-changers in the Jeddah Souk. Salim eventually married one of the Kaaki daughters and was accepted into the family business. By about 1924 he was already running a currency-exchange business for the pilgrim traffic. In 1951, Shaikh Salim persuaded King Abdulaziz Ibn Saud to allow him to set up the first institution to operate under the title of Bank in Saudi Arabia. (Previous banks had to pretend that they were trading companies). The new bank, the National Commercial Bank, was also the first bank to be entirely owned by Saudi Arabians, and the Kaaki family were also founder members. However, by the 1970's [redacted] Salim bin Ahmad Bin Mahfouz were [redacted]

The National Commercial Bank

The National Commercial Bank of Saudi Arabia remains by far the largest bank in Saudi Arabia, with a very strong branch and deposit base, and close links with practically every company and individual of importance in Saudi Arabia. But we know that the bank's profit performance has been poor in recent years, mainly because it was very badly hit by the financial slump in Saudi Arabia in 1985-87, when many of it's "blue chip" Saudi borrowers turned out to be immensly bankrupt, and the bank (like all other banks in the Kingdom) found that there were no effective ways to recover debts from prominent Saudi individuals.

Because of its status as a "partnership" bank (owned by just the Bin Mahfouz and Kaaki families), the bank was able to avoid giving too many details of its position. Indeed, it has published no accounts at all since the end of 1989. This secrecy means that it has not had to undertake the very public restructuring forced on some of the Saudi joint-stock banks, such as the Riyadh Bank, Bank al-Jazira and the Saudi Cairo Bank. But it probably also means that N.C.B. has had less success than these other banks in actually grappling with its bank debt problems. The consensus among all observers of the banking scene is that N.C.B. is far too important to be allowed to go under, but that the exposure of BCCI-related problems may now force the N.C.B. management into solving the underlying problems of the loan portfolio, probably with the help of SAMA.

It is thought that the departure of [redacted] at the NCB will help the other members of his family, especially [redacted] to gain support from SAMA in any rescue/restructuring. SAMA is widely believed to have disliked and distrusted [redacted] who had got NCB into some highly expensive losses (silver markets, BCCI, REDEC etc), and as someone who used the banks funds for his own wild ventures. There is no doubt that NCB would have got into difficulties in the 1980s even without any help from [redacted] The bank was by-virtue of its close links with the Saudi power elite, almost bound to end up lending to risky individuals who could offer no security apart from their "name" or family position. And, as many spectacular Saudi business collapses of the 1980s showed, "name" or family links often turned out to be no help when businesses went wrong.

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The facts of NCB's performance are as follows: Accounts for three years up to and including 1989 were qualified by the auditors on the grounds that the bank had granted advances to "clients, partners, parties related to the partner and directors, together with loans to officers, which constitute a contravention of Articles 8 and 9 of the banking Control Law". Interestingly SAMA seems to have made no effort to compel the bank to modify this lending (which apparently breached the Banking Control Law because it was over-concentrated among a few borrowers). This suggests that SAMA appreciated that the bank had made the loans for political pressure, rather than as strictly commercial loans.

As for profits, the bank placed its entire operating profits for both 1988 (6 months) and 1989 in general provisions for bad debts, meaning that there was a zero net profit for both years. The 1988 operating profit over 16 months came to SR 965.9 million. For 1989, the figure was SR 917.6 million. The bank now has very large general provisions (perhaps SR 4.5 billion as of mid-1989), but its recent actions suggest that it is still worried about the future. For example:

* The NCB's decision to close its London branch in May 1992 looks suspiciously like a panic reaction to the cost burden of the branch. The bank has said that this was a purely commercial decisions, because the branch had always lost money.

* The Bank has produced no account for 1990 or 1991. All that has happened after [redacted] b6 b7C was to issue of a short statement to the effect that the Bank's assets grew from SR79.7 billion at the end of 1990 to SR82.3 billion at the end of 1991, and that customer deposits rose from SR 73.5 billion to SR 75.6 billion in the same period. By publishing such incomplete information (and by saying nothing at all about profits), the general view is that the bank did itself more harm than good.

Even despite these signs of strain, it is universally agreed that NCB will pull through, probably with SAMA's help in mobilising a rescue package. Saudi International Bank in London (in which NCB has a small capital stake) is adamant that it continues to have full operating confidence in NCB. At the operational level, contacts in SIB point out that [redacted] did lead to some technical problems for NCB, as some correspondents were reluctant, in the next few days, to grant short-term deposit facilities. But, as NCB is a colossal net depositor of funds in the international market (rather than a borrower), there was never any suggestion of a serious difficulty for the Bank's day to day functioning because of the furore surrounding [redacted] b6 b7C

Share Holding Structure of NBC (C6)

"The largest partnership bank in the world", NBC (C8) is still a partnership between the Bin Mahfouz family and the Kaaki family. As of August 1988 [redacted] b6 b7C

NBC (C6) has always been regarded as under-capitalised relative to its loan/asset base. The bank's position is that it considers its partners are wealthy enough to provide confidence.

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The relative position of the Bin Mahfouz family in the bank's ownership structure must have been strengthened by the death in the mid 1986 of Abdul Aziz Kaaki, one of the founders of NBC. It is understood that his shares were split among thirty relatives. This fragmentation made it much harder for the Kaaki family to act together in the bank's affairs.

The 1986-87 accounts for NBC suggest that the bank bought back 10.75 per cent of its shares from a partner. Our source could not ascertain the name of the partner.

The Bin Mahfouz family currently dominates the management structure of NCB at the higher levels, the role of the Kaaki family having been relegated to that of passive shareholders. Despite his great age, [redacted] from an early stage seems to have had a close relationship with the leading members of the Royal Family, and particularly with the then Prince Fahd, now the King. As Crown Prince, Fahd had a well-established reputation as a colossal gambler, and used [redacted]

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Up until May 1989 there were [redacted]

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- [redacted]
- [redacted]

In May 1989 there was some adjustment to the powers of the [redacted]

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[redacted] BCCI matters, [redacted]

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[redacted] seems likely to play a more [redacted]

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NCB's handling of recent events - the closure of the London branch for unconvincing "commercial reasons", and the sale of silver - has made an extremely bad impression on the market and fuelled speculation that the Bank is in serious trouble. NCB has had to make heavy provisions for bad debts in recent years, and has had its accounts qualified by the auditors in each of the past three years. (NCB no longer operates in London as a bank, having scaled down to the status of a representative office).

What is certain is that NCB will not be allowed to go down, even though many of its loans are likely to be irrecoverable (particularly those involving leading members of the Saudi Royal Family, who are effectively immune from prosecution).

But the negative publicity from the BCCI scandal apparently means that many foreign correspondent banks have withdrawn their short-term deposit facilities for NCB. As NCB is overwhelmingly a net depositor with the international banking system this is

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more of a nuisance than a threat, unless loss of confidence escalates and depositors pull out.

The recent sale of silver by NCB is believed by one leading banking source (with Saudi interests) to have been a sale on behalf of a client and not a sale of NCB-owned silver. Others suggest that it was intended to be taken as a signal to the market, in that the silver was sold in one high profile operation, causing maximum disruption, when a discreet sale over several days would have achieved the objective without disrupting the price. The suggestion is that a similar tactic employed to unload property would cause more harm to financial institutions.

There is no doubt that NCB needs support (though this support will be given very discreetly). This is where the regulatory authority, the Saudi Arabian Monetary Authority (SAMA) comes in to play.

The Position of SAMA

The Saudi Arabian Monetary Agency (SAMA) carries out the functions of a central Bank in issuing currency, administering the reserves of the state, and supervising the banking sector. The agency does not have a proper charter from the king and acts as a subordinate arm of the Ministry of Finance and National Economy. Its independence of operation is therefore linked to the position of the Minister of Finance himself. If he is trusted by the King, and is allowed to operate without direct political pressure, then the SAMA is also able to operate with relative independence and effectiveness.

Since 1975 [redacted] b6 b7C

[redacted] When the king, for example, makes an extravagant promise which cannot be fulfil because no cash is available, it is [redacted] who pulls a long face an says that the king's promise is now inoperative.

Our belief is that SAMA has benefitted from [redacted] success in maintaining his independence from powerful princes and cronies of the King. SAMA itself has managed to achieve some quite difficult tasks, including the "managing" of the bad loan crisis in the Saudi banking sector in 1985-1987. The managing of the crisis took a characteristically Saudi form of moral persuasion on banks and certain debtors "behind closed doors": foreign bankers and observers lamented that SAMA had not in fact established proper legal procedures for debt recovery, or rules for bankruptcy, but had relied on secret negotiations. But the result was that no major bank actually went under, and that the funds were mobilised for three banks which did get into difficulties. b6 b7C

King Fahd undoubtedly realises the value of [redacted] and of SAMA to the functioning of the State. It is widely believed however, that the very large arms-for-oil deals arranged by, in particularlar, Prince Sultan were not popular with SAMA. Nor was it always possible to keep a minimal level of reserves behind the currency during the period of extraordinary financial pressure during the 1990-91 Gulf Crisis, but, at least the system has held together. It is worth noting that SAMA's present degree of independence lacks any legal/institutional basis. SAMA took a very dim view of NCB's involvement in the Bunker Hunt silver scandal and, more recently, of its involvement with BCCI. It is considered that the departure of [redacted] NCB will help the Bank in its relationship with SAMA, notwithstanding his continuing major shareholding in NCB. b6 b7C

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Deals Done

Through the National Commercial Bank the Bin Mahfouz family must have lent to virtually every firm and leading individual in Saudi Arabia at some time or another. But [redacted] seems particularly close to the following individuals: b6 b7C

Ghaith Pharaon [redacted] (Chairman of REDEC)

[redacted] Northern Telecom and otherleading companies)

The first three are, of course, deeply involved in BCCI; [redacted] is [redacted] BCCI.

NCB was reported in March 1986 to be the largest creditor of Ghaith Pharaon's REDEC company at a time when REDEC was in acute financial difficulty. In January 1991 NCB was acting as the agent of REDEC in the attempt to sell most of REDEC's hotel and property interests.

An important link between Ghaith Pharaon comes with the involvement of the Bin Mahfouz family in the attempt to buy out the Pakistani shareholding in a Saudi Arabian bank. Bank Al-Jazira: Ghaith Pharaon was a shareholder in Bank Al-Jazira at the time the deal was launched.

The Relationship between th[redacted] Ghaith Pharaon b6 b7C

This relationship, although difficult to trace and document is clearly central to the BCCI story.

It is obvious that both Ghaith Pharaon [redacted] were linked in the late 70s and 80s as friends of John Connolly, who introduced them both to [redacted] b6 b7C Both acted as a sheild for Crown Prince Fahd's dealings in the silver markets. Both were friends of [redacted] at this time: Indeed, [redacted] and and Ghaith Pharaon seemed to have worked together to help [redacted] out of a serious difficulty by buying into Bert Lance's National Bank of Georgia, which owed money [redacted] (First National of Chicago).

But problems seem to have developed in the relationship between Pharaon and [redacted] as Pharaon's own wealth declined sharply during the 80s. In December 1985, Pharaon's flagship company REDEC stopped paying principal on its very large debts (relating to property and hotel activity), and began discussing re-scheduling. Out of total REDEC debts of about USD 340 million, NCB was owed USD 21 million. What really annoye[redacted] and other creditors was that Pharaon did not seem to regard REDEC as his responsibility and carried on investing with other assets in the very large projects such as the Mirapolis theme park outside Paris, which opened in May 1987 (35 per cent owned by Arab investors). b6 b7C

It is reputed that Ghaith Pharaon [redacted] no longer speak to each other. They do appear throughout the BCCI story, and there are specific instances where their paths seem to cross. b6 b7C

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In September 1986 [redacted] BCCI coincided with Pharaon's reducing his stake in BCCI from 13 per cent to 6 per cent. Pharaon's spokesman in New York apparently denied that Pharaon had sold his seven per cent directly to the Bin Mahfouz family. It was all part of a complex capital increase for BCCI, and so no direct transfer was involved.

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In late 1986, the Bin Mahfouz family, following the purchase of the stake in BCCI, was reported to have an option to buy 10 per cent of the First American Bankshares (originally bought when it was still Bank of Commonwealth, by Pharaon in association with [redacted] A press comment of October 1986 was that "the option adds further mystery to a series of unexplained links between the [redacted] BCCI, FAB and Ghaith Pharaon". NCB, of course, denied in July 1992 that it had ever bought or owned shares in the FAB parent company, CCAH. But later reports allege that KBM himself did buy an interest in CCAH: first a payment of USD 135 million for shares held by the ruler of Fujairah, then a few months late in September 1986 another group of CCAH shares. The US Federal Reserve alleges that these shares were bought by [redacted] with the assistance of [redacted] and through the intermediary of NCB".

[redacted]

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Our sources have traced [redacted] since the early summer of 1983 [redacted] Mobil's petrol station network in Italy. His financial commitment to the project was always rather uncertain, and we believe that he soon divested himself of financial involvement. But his name lingers on in the company [redacted]

We know that he had been associated with Ghaith Pharaon [redacted] BCCI, for many years. In 1975, [redacted] Pharaon and [redacted] Bank of Commonwealth, which later became First American Bankshares.

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In recent years, [redacted] seems to have been involved in one scandal after another mainly in France and Lebanon. In France, the Banque de Participations et Placements went down in March 1989 with bad debts advanced to a number of companies linked with [redacted] More seriously, [redacted] French stock exchange in January 1989 during the Exchange enquiry into Pechiney's take over of the American Can Company, one of the major stock-exchange scandal of recent years in Paris. [redacted] to buy shares in the American parent company, Triangle.

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But even more extraordinary events were taking place in the Lebanon. In 1983, President Amin Gemayal appointed [redacted] Lebanese bank which had crashed so spectacularly in 1966. [redacted] soon quarrelled with the Lebanese Central bank about some of the activities of Intra's subsidiary Bank al-Mashraq [redacted] Intra [redacted] but stayed on at Bank al-Mashraq until 1989, when he apparently disappeared for his own safety into the Shouf mountains as Lebanon and his own financial empire crumbled. There are persistent half-revealed links between [redacted]

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Business Interests

Following are the know[redacted] Bin Mahfouz family:

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[redacted]

d Bin Mahfouz family: Nimr Petroleum (see below)
Sweden - Ross C & T (see below)

Bin Mahfouz Family and Yemen

Nimr Petroleum

Nimr is registered in Bermuda, and has offices in Sana'a (Yemen) and London. It is now owned by the Bin Mahfouz family, though the proportion of the shareholding is not known. Nor are the names of any other backers, but it is strongly rumoured that the Saudi royal family holds a significant proportion.

Last year Nimr purchased Yemen Block 4 in the Shabwa area of South Yemen for US$ 500 million. The purchase included all the data and the production facilities developed by the Russians, who were the previous owners. Of this sum, US$ 350 has already been paid to the Yemen Government. Nimr also has three exploration blocks in the eastern part of South Yemen, and these carry heavy investment commitments, perhaps up to a further US$ 100 million.

Nimr has recently been recruiting a number of senior staff from within the oil industry. They have employed Atlantic Richfield (ARCO) to operate Block 4, but there are currently problems over the further financial investment needed for oil production: Nimr seem reluctant to invest much more.Exploration and Development servies for the concession are being provided to Al Nimr by ARCO Yemen (part of Atlantic Richfield). Arco Yemen has an option to acquire an equity interest in Shabwa 4 on completion of a minimum works programme.

Nimr has three other licenses in the Yemen. More ambitiously, Nimr apparently wants to modernise the Aden Oil Refinery in return for an equity stake in the refinery. But the Yemen Government is apparently hostile to the idea, not wanting to surrender equity. Nimr's proposals for the refinery are ambitious: two phases, each costing USD 250-300 million.

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International Bank of Yemen and [redacted] b6 b7C

Yes

We have found two main elements in what appears to be a concerted effort by the Bin Mahfouz family to obtain a dominant position in the Yemen economy. In view of the enormous financial resources being committed to the Yemen, we are inclined to wonder whether the the Bin Mahfouz are acting on their own, or as the agents of the Saudi government (as part of a plan to build up Saudi influence in the newly united Yemen).

[redacted] International Bank of Yemen YSC, which was set up in 1979-80. The other foreign shareholder is the bank of America (20%). The remaining 55 per cent is held by Yemeni interests, including the Yemen Bank for reconstruction and development. b6 b7C

[redacted] International bank of Yemen and so is [redacted] b6 b7C

The whole Yemen episode is puzzling. Some have suggested that the Bin Mahfouz involvement is purely sentimental: the area around Shabwa is the traditional homeland of the Beni Seyyar tribe, who are connected to the Bin Mahfouz. But the investment proposed for the Aden refinery is too large a figure to be justified soley by sentiment. It may be that the family are being used as instruments of policy by the Saudi government. There have been suggestions that [redacted] b6 b7C

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Sweden

In September 1988 it became clear that the Mahfouz and Musallam families were the real owners of Ross Contracting and Trading Company. This is the Swedish-based company which in early 1987 bought ABV Rock group (the joint venture between ABV and Skandka) the main contractor for Saudi Arabia's underground oil storage programme.

There was a link between the [redacted] in that members of both families went on trial in Peru at one stage in the 1980s on charges arising out of a mining-related joint venture.

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Bahrain

Saudi National Commercial Bank (SNCB) and the Shobokshi Collapse:

[redacted] apparently engineered a consortium led by SNCB in Bahrain, which became the second largest lender to the Ali and Fahd Shobokshi Group. When the Shobokshi Group began talks with its creditors in 1985. SNCB was leading a consortium of 18 banks, with an exposure of US$ 75 million out of a total Shobokshi debt of US$ 320 million. b6 b7C

SNCB and the Arab Asian Bank of Bahrain:

The Bin Mahfouz family investment company Middle East Finance group (MEFG) had before 1985 been one of the shareholders in this Malaysian-focussed Bahrain off-shore Bank. The other shareholders were [redacted] Bahrain's ruling family), Husein Najadi, the Arab Malaysian development bank and [redacted] In 1985, the Bank effectively collapsed, [redacted] MEFG then bought all the capital of the bank, raising their stake from 20 per cent to 100 per cent. It would apear that no accounts were published by the Bank between 1985 and 1989. There was some link between the bank and CE Coates of London. (See section on MEFG on the following page) b6 b7C

Arab Financial Services

It has been learned that [redacted] Bahrain-based Arab Financial Services (AFS) who are reportedly owned by some 57 Arab financial institutions. Their declared profit in 1989 was USD 3.6 million. b6 b7C

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The Middle East Finance Group

The Middle East Finance Group (MEFG) is the Mahfouz family's investment vehicle. The company is based in Luxembourg, 90 per cent is owned by the Bin Mahfouz and 10 per cent by the Kaaki family. It has full control of the Arab Asian Bank of Bahrain since 11 April 1985.

Other subsidiaries of MEFG in early 1986 included:
International Trade and Investment Bank, Luxembourg
Coates and Company of London *
Arab Asian International bank of Hong Kong
Alexander Trust Company of Switzerland
Sedco of Jeddah
C and D International of Chile
United City Merchants, (UCM), a trading and financial services company, London

[redacted] MEFG included, in January 1986, b6 b7C

- [redacted]

The oddest deal which we have linked to MEFG arose out of the collapse of the Arabian Auto Agency (AAA - the Poclain and Kawasaki agent in Saudi Arabia), which was declared in default in September 1987 with debts of USD700 million. MEFG began buying up the debt of AAA during the Summer of 1987 at a very dep discount, ranging between 10 and 18 per cent of face value. by November 1987, it was believed to hold at least 25 percent and perhaps 40 per cent of the total debt.

The motive behind the apparently suicial purchase of debt seems to have been to delay putting AAA into default. The bank which sold the debts were apparently "friendly" banks (i.e. banks friendly to the owners of AAA), who were trying to delay a default for as long as possible. After AAA did default, it became clear that the company had, soon before defaulting, secretly transferred a large sum of money to its major owner, prince Zayid Subsidiary, a relative of king Fahd. The logical explanation must be that the purchase of debt was a "favour" by the bin Mafouz to prince Zayid, enabling him to leak the money out of the company before it went down the tube.

MEFG's takeover of the Arab-Asian bank

MEFG took full control of the Bahrain based Arab Asian bank on the 11 April 1985. MEFG had previously held a 20 per cent stake. When the take-over was completed, MEFG placed [redacted] SNCB of Bahrain in charge of the Arab Asian bank. MEFG also gave a key role to NCB's [redacted] MEFG subsidiary IIIB). b6 b7C

In April 985 MEFG claimed that AAB was "a bank in good shape". But in May 1985 [redacted] AAB [redacted] Bahrain on [redacted] The Bahrain Monetary Agency claimed that tens of

*According to Company records the Company is still trading. The Company was incorporated on the 13 December 1948.

The company information is contained in the attached appendices.

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millions of dollars could not be accounted for and charged [redacted] with exploiting his position, embezzling funds and transferring these funds to Europe. In December 1985 [redacted] got a three-year sentence for misappropriating $2.4 million. b6 b7C

MEFG appear to have acquire their full control of AAB at a nominal price but they soon face the fact that the bank had a lot of bad debts. In January 1986 AAB emerged as one of the largest creditors of the ARE Galadaris of Dubai and AAB's claim was to put USD.1 million. MEFG's reasons for such a costly take-over are difficult to fathom.

The wider Picture

In 1985, through a major acquisistion, [redacted] decided to expand the family controlled NCB banking operations. It was in 1986 that [redacted] began discussions with BCCI's President and Chief Executive, Agha Hassan Abedi [redacted] b6 b7C

The best starting point for an investigation of the alliances formed during the BCCI affair is surely the list of the main "troubled loans" (ie loans which there was no realistic chance of getting back) advanced by BCCI Holdings of Luxembourg. This list was prepared by Price Waterhouse, and give the situation at the end of 1989:

[redacted]	USD 313 million
	USD 150 million
Bin Mahfouz Family	USD 135 million
Ghaith Pharaon	USD 288 million
[redacted]	USD 121 million
	USD 132 milion
	USD 100 milion
Ruler of Fujairah	USD 186 million
Ruler of Ajman	USD 186 million
Gulf Group	
(Gokal family, including Sadikin)	USD 405 million
Offshore companies	USD 212 million

b6 b7C

At least some of the above entries are "fronts" for unidentified "friends" of BCCI. In particular, Saudi friends express near-total conviction that [redacted] does not exist. We suspect that he and others could be fronts for [redacted] Saudi Arabian Intelligence Service. [redacted] Saudi Intelligence. The names of [redacted] in the London-based futures broker CAPCOM Financial Services. CAPCOM was expelled from the London Association of Futures Brokers and Dealers in July 1989 because the regulators were unable to identify all CAPCOM's beneficial owners, and were therefore unable to judge whether CAPCOM was fit and proper to receive investment funds. There is no published reference to the involvement of the Bin Mahfouz in CAPCOM, but this is a line of enquiry to be pursued

b6 b7C

We have not found any published reference to involvement of the Bin Mahfouz in the CAPCOM affair, but consider that it merits investigation. Another share-holder of CAPCOM was [redacted] BCCI.

b6 b7C

08/09/92 15:08 BCCI LEADENHALL ST.LDN 636 1477 015 1325015-000-6733

[redacted] and BCCI

b6
b7C

- BCCI Shareholding

It is known that [redacted] BCCI in [redacted] Bermudan nominee companies. These were:

Windrush
Taynton Holdings
Sarsden Holdings
Shipston Investment
Bledington Investment

SNCB Securities

Our enquiries do not indicate any involvment on the part of SNCB Securities, 23 Chesham Street, London, SW1X 8NQ, tel 071 235 2828, in the BCCI scandal.

SNCB Securities describes itself as a company offering investment services for National Commercial Bank (NCB) clients. It appears to be wholly owned by the National Commercial Bank of Saudi Arabia. Bevis Marks House, 24 Bevis Marks, London EC3A 7HL tel 071 283 4233.

SNCB Securities was incorporated on the 30 September 1987 as Grasbrick Limited. The company changed its name on the 9th March 1988 to Saudi NCB Securities Limited and finally changed its name to SNCB Securities on the 18th Many 1990.

[redacted]

b6
b7C

1325015-000-6734

b6
b7C

The lawyers acting for the company are:

Norton Rose. Botterel & Roche
Kempson House
Camomile Street
London
EC3A 7AN

The auditors acting for the company are

Ernst and Young
Rolls House
7 Rolls Buildings
Fetter Lane
London
EC4A 1NH

Company notes are contained in the attached appendix

08/09/92 15:09 BCCI LEADENHALL ST.LDN 626 1477 017 1325015-000-6735

Haroon Rashid Kahlon

Haroon Rashid Kahlon was employed by [redacted] National Commercial Bank of Saudi.

b6
b7C

Haroon Kahlon owns a Hotel in Harrogate and lived at 4a Belgrave Mews West, London, SW1X 8HT. His wife Mrs H Kahlon still lives there. Haroon Kahlon is no longer in London. For the past month he has been in Pakistan, and appears to have no intention of returning to London for the foreseeable future. The property in Belgravia belongs to the Grosvenor Estates and is, as yet, unregistered. The property has remained unregistered since 1983. Our sources have been unable to ascertain any particulars about the lease arrangements.

Confidential enquiries have revealed that there are four telephone lines located at this address. All four are still active and the numbers are as follows:

071 259 6472 (incoming only)
071 235 0558
071 235 3039
(071.235 0563

All the outgoing numbers have modest bills that are always paid on time. Further confidential enquires have revealed that Kahlon has been drawing a Directors salary from Noble Manor Hotels Limited* which controls the Nidd Hall Hotel, Nidd, Near Harrowgate in North Yorkshire. A company search did not reveal Kahlon as a director, although he is know to have strong connections with the company.

A financial search revealed that there are no major credit cards registered under the name of either Mr or Mrs Kahlon. We have, however, learned that Mrs Kahlon has access to a bank account in the United kingdom, this account appears to be used for the payment of all United Kingdom domestic bills. Mr Kahlon has no United Kingdom bank accounts registered in his name.

* Details on this company are listed in the attached Appendix

08/09/92 15:09 BCCI LEADENHALL ST.LDN 626 1477 018

1325015-000-6736

[redacted] Silver Manipulation

b6
b7C

There seem to be three separate strands of involvement by the Arabs in the manipulation of the silver markets by the [redacted]

(*) The first dates from February 1978, when ex-Governor Connolly of Texas introduced the [redacted] at their request, to [redacted] Ghaith Pharaon in a hotel in Washington [redacted] objective was to persuade the Saudis of the merits of investment in silver.

(*) A second, this time to the Saudi Royal Family, dates from October 1978, when [redacted] at a racehorse auction in France. Through land dealings in South America Nahas had become involved with Mohamed Fustok, a Palestinian by origin but now holding a Saudi passport. His daughter Aida had become a wife of Prince Abdullah Ibn Abdulaziz, the thirteenth son of the founder of the Saudi dynasty. Mahmoud Fustok was a valued advisor to Prince Abdullah, then No.3 in the hierarchy (and now the Crown Prince), and at Nahas's instigation, Fustok also became interested.

(*) A third strand was the Dubai connection [redacted] This had begun in 1973, and later involved the Dubai [redacted] in February 1979.

Fustok's investment advisors in 1978 were Advisory and Financial Corporation SA, Advicor, formed by a small group of employees who had split off from the Geneva branch of Chase Manhattan, and who were sponsored by the Banque Populaire Suisse. The US broker wa[redacted] Conti Commodity Services and of Conti Capital Management. The latter had authority to operate special commodity funds, one of which was registered in the Bahamas as Conti Capital Limited. Among the shareholders of the latter were [redacted] himself, [redacted] and [redacted] of NCB. The involvement of the merchants of Jeddah meant that there were now channels through which the Saudi Royal Family could invest in silver without publicity, and which also involved the NCB.

b6
b7C

Similarly [redacted] avoided direct public linkage with the silver operation. On 15 July 1979 a company was established in Bermuda with the aim of dealing in precious metals. This was the International Metals Investment Company (IMIC). The [redacted] (through Profit and Investment Company) and 50% Saudi, the Saudi shareholders being [redacted] from a well-known Jeddah money and bullion family [redacted] from a substantial merchant family, and [redacted] man in London. [redacted] Company.

b6
b7C

Of the institutions involved in loans to th[redacted] and their fellow conspirators, intended to finance the speculation in silver, there were the US brokers, such as Bache, foreign banks, such as the Swiss Bank Corporation, and US Banks either directly or indirectly. An example of the latter was the First National Bank of Chicago, who lent to Bache to cover advances to the [redacted] of [redacted] Beirut, [redacted] contacts with the Saudi royal family. [redacted]

b6
b7C

On 14 March 1980 American Banks and branches of foreign banks in the USA, at the request of the Federal Reserve Bank, stopped lending money for speculation in silver and gold. [redacted] desperately tried to raise funds from Saudi Arabia, but the Saudi princes had decided that enough was enough. On 22 March 198[redacted] Fustok

b6
b7C

019 BCCI LEADENHALL ST.LDN 626 1477 15:09 08/09/92 1325015-000-6737

[redacted] were informed by Prince Abdullah's son Prince Faisal bin Abdullah, and by [redacted] and by [redacted] at the Saudi's had decided to withdraw from the market.

b6
b7C

08/09/92 15:10 BCCI LEADENHALL ST.LDN 626 1477 020

1325015-000-6738

Memorandum

To : SAC, WMFO

Date 9/9/92

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: LEAD #51 - [redacted] INTERTECT

b6
b7C
b7E

4, 5, 6, 7

On September 3, 1992 the writer faxed copies of the attached letters to SA [redacted] in the Tampa Division. On September 9, 1992 SA [redacted] contacted the writer to advise that SA [redacted] would be participating in an interview of [redacted] Also participating in the interview will be the AUSA Office, [redacted] and the US Customs.

b6
b7C

SA [redacted] advised he would not be leading the interview and that he would provide SA [redacted] with the interview report from US Customs. SA [redacted] was advised that SA [redacted] is interested in EASTBROOK LTD, USA and if possible SA [redacted] would like to get copies of or be able to review any information on EASTBROOK LTD, USA that [redacted] can provide. SA [redacted] stated he would advise [redacted] that the FBI may wish to speak with him at a later time, after said documents have been reviewed.

(1) - 29B-WF-171994

RHM:rhm

-440

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

SEP 09 1992

FBI — WASH. FIELD OFFICE

1325015-000-6750

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/10/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST
MAJOR CASE #38

For information, on 8/25/92 writer and TA [redacted] met with [redacted] b6 b7C was meeting with SA [redacted] on behalf of [redacted] and in an effort to arrange a meeting between [redacted] and team BCCI.

During the discussion, [redacted] was talking about the allegations concerning BCCI making payments to officials for favors and in that context stated that even [redacted] had made payments to foreign officials in the past. Upon further questioning, [redacted] clearified that these payments were made prior to the passing of the Foreign Corrupt Practices Act and were at the time made, not illegal. b6 b7C

[redacted] advised that he is on the UK creditors committee and is working towards obtaining money for the UK creditors. [redacted] advised that [redacted] would be willing to talk to the investigators, but only in Pakistan. b6 b7C

29B-WF-171994 - 441

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 14 1992
FBI — WASH. FIELD OFFICE

2-WMFO (29B-WF-171994)

1325015-000-6751

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
September 10, 1992

[redacted]
[redacted] Texas [redacted]

b6
b7C

Dear [redacted]

Reference is made to your letter and photographs you provided to SA [redacted]

b6
b7C

Upon review of the pictures, it does not appear the Washington Metropolitan Field Office can use them at this time. However, they have been forwarded to SA [redacted] San Antonio Division, Austin Resident Agency for consideration. SA [redacted] may be reached at [redacted]

b6
b7C

Thank you for your cooperation. If you have any questions, please call SA [redacted]

b6
b7C

Sincerely Yours,

Robert M. Bryant

[redacted]rge

b6
b7C

By: [redacted]

Supervisory Special Agent

WMFO
PCO/pco PCO

29B-WF-171994 - Main - 442

Searched [redacted]
Indexed [redacted]
Filed Sec

1325015-000-6752

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 9/14/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO:WMFO

RE: LEAD #39, JOURNALISTS/INVESTIGATORS/OTHER SOURCES

Referenced lead has been assigned to writer since 6/10/92. To date, writer has conducted an interview of [redacted] b6 b7C and may do a follow-up to this. Per discussion with SSA [redacted] this lead will be re-assigned to SA [redacted] Writer will brief SA [redacted] and provide materials regarding this lead to her.

29B-WF-171994 Main-443

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 14 1992
FBI — WASH. FIELD OFFICE

1325015-000-6753

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 9/14/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Lead Status: Lead # 4

Pursuant to a file review conducted on 8/16/92, **referenced lead is to be reassigned.**

For information of receiving agent, this lead requires an interview of [redacted] b6 b7C

2 - WMFO
(2 - 29B-WF-171994 -Main)
CWS
(2)

29B-WF-171994-444
Main

SEARCHED Sea INDEXED
SERIALIZED Sea FILED Sea
SEP 14 1992
FBI — WASH. FIELD OFFICE

1325013-000-6754

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 9/14/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Lead Status: Lead # 3

Pursuant to a file review conducted on 8/16/92, **referenced lead is to be reassigned to Team I.**

For information of Team I, this lead requires a [redacted]is of subjects/defendants CLARK M. CLIFFORD and [redacted]. b6 b7C

Status of Lead # 3

Documents received from the Department of Justice (DOJ) Task Force Attorneys included loan files regarding [redacted] personal residence; credit reports regarding CLIFFORD [redacted] and individual federal income tax returns for CLIFFORD [redacted] for the years 1984 through 1990, and 1982 through 1990, respectively. b6 b7C

Inasmuch as the DOJ indicted both subjects, follow-up subpoenas for additional financial information is no longer possible. Therefore, SA [redacted] prepared a lead for FA [redacted] to schedule the income tax return information in a manner that discloses the details and composition of the amounts reported by CLIFFORD [redacted] This lead was completed on 9/11/92. b6 b7C

29B-WF-171994
Main -445

2 - WMFO
(2 - 29B-WF-171994 -Main)

CWS
(2)

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW
SEP 14 1992
FBI — WASH. FIELD OFFICE

1325015-000-6755

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 9/14/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Re: Lead Status: Lead # 2

Pursuant to a file review conducted on 8/16/92, the above referenced lead is to be **discontinued.**

This lead required research as to the use of nominees in business transactions in the Middle East.

29B-WF-171994-446

Main

(1)- WMFO
(1- 29B-WF-171994 -Main)

CWS
(1)

SEARCHED SERIALIZED INDEXED FILED
SEP 14 1992
FBI — WASH. FIELD OFFICE

1325015-000-6756

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 9/15/92

To: [redacted] Principal Deputy Chief, DOJ Fraud b6 b7C

(Name and Address of USA)

From: ROBERT M. BRYANT

(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS

(Name of Subject) Age Sex

You are hereby advised of action authorized by _____ of USA or AUSA)

on information submitted by Special Agent [redacted] on 9/15/92

(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached is a copy of the 9/14/92 BCCI Interview Report.

29B-WF-171994 -447
Main

Searched _____
Su
Su
Indexed _____
Filed _____

1325015-000-6757

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/21/92
(ATTN: SSA [redacted]) b6 b7C

From : SA [redacted] (BCCI) SEB

Subject: HIDDEN INTEREST;
MAJOR CASE #38;
FIF - FAG;
OO: WMFO

RE Lead #50 [redacted], BCCI's illegal activities. b6 b7C

The purpose of this memo is to report the results of an extensive review of media articles about [redacted] b6 b7C National Security Council Chief Economist (NSC). The media articles on [redacted] covered a time span from 2/3/82 to 6/28/92. The source of the articles are from the LEXIS/NEXIS information data base.

In a Washington Post Article dated 9/6/91, [redacted] stated there is evidence that BCCI was involved in transfers of sensitive technology, embargo violations and the financing of guerrilla movements. [redacted] stated in the article, [redacted] b6 b7C

According to the article [redacted] had concerns about the above-mentioned allegations since 1984. [redacted] also recalled writing reports from 1981 through 1984 mentioning BCCI's illegal activities. b6 b7C

Writer will locate and interview [redacted] about BCCI's illegal activities. b6 b7C

29B-WF-171994
Main -448

1-WMFO
SEB:seb
(1)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 3 1992
FBI — WASH. FIELD OFFICE

1325015-000-6758

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 8/21/92

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: GHAITH R. PHARAON

Enclosed is one (1) revised synopsis report concerning PHARAON's biographical information.

The enclosed report has been prepared and updated through 8/21/92, to reflect the following additional information:

PHARAON's SSN: 060-60-1841

2-WMFO
(1 - 29B-WF-171994 Sub I)
(1 - SA [redacted]

MRM:mm
(2)

[redacted]

29B-WF-171994 Main

.b6
b7C

SEARCHED INDEXED
SERIALIZED FILED
AUG 2 1 1992
FBI - WMFO

448X1

[redacted]

OFFICE

1325015-000-6759

GHAITH R. PHARAON
BIOGRAPHICAL INFORMATION (NON-BUSINESS)

Revised 8/21/92

1. Present family (last) name:
PHARAON

2. Family name at birth or previous family name:
PHARAON

3. Forenames:
GHAITH RASHAD (also spelled RACHAD)

4. Aliases and nicknames:
Dr. GHAITH PHARAON; Doctor; Excellency

5. Sex:
Male

6. Date of birth:
September 7, 1940 (also reported as 1944 and 1939)

7. Place of birth:
Riyadh, Saudi Arabia (also reported as Jeddah)

8. [redacted] b6 b7C
King ABDUL AZIZ (founder of Saudi Arabia) [redacted] H. M. (the late) King FAISAL [redacted] King ABDUL AZIZ AL-SAUD.

9. [redacted] raised and educated in Jerusalem.

10. Nationality:
Saudi Arabian (Confirmed)

11. Identity:
Verified

12. Occupation:
Businessman

13. Areas, places, or countries subject may visit:
London, Paris, Argentina, Mexico, Morocco, Saudi Arabia, Pakistan, South Korea, India, Madrid, Caribbean

14. Identity documents:
Social Security No.: 060-60-1841 (Per 13D of CRS)
NCIC #W665764502
INS File #A21710537
Saudi Arabian Passport #100182/31
Saudi Arabian Passport #100178012902
Issued: 11/17/87
Expires: 11/17/92

Pharaon may have a Paraguayan Passport.

15. Detailed physical description:
White male, approximately 168 cm in height and 210 pounds, brpwn eyes, short and stocky build, with a plump, round face; wavy, graying hair that is thinning at the temples; normally wears a vandyke beard (goatee) but has been seen with only a mustache and also, clean shaven.

16. Characteristics:
Wears traditional Arab robe and headdress while in his native land, but wears conservative western clothing when out of his country. Enjoys smoking cigars.

17. Languages spoken:
Arabic, English, French and some Greek

1325015-000-6761

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/25/92
(ATTN: SSA [redacted]) b6 b7C

From : SA [redacted] (BCCI)

Subject: HIDDEN INTEREST;
MAJOR CASE #38;
FIF - FAG;
OO: WMFO

RE Lead #48 Texas City Refinery and Associates

The purpose of this memo is to report on the extensive review of [redacted] The review focused on Texas City Refinery (TCR) and related companies. The following are the results of the review: b7E

The review of the [redacted] revealed [redacted] dated 10/21/85 with the White & Case letter head. [redacted] sent the memorandum and a distribution list to the companies acquiring shares of TCR. b6 b7C b7E

The companies listed on the attached distribution list were as follows:

-Agway Inc.
333 Butternut Drive, Dewitt, New York 13214
[redacted]

-Southern States Cooperative, Inc.
6606 West Broard Street, Richmond, Virginia 23230
[redacted]

-Attock Oil Company Limited
Buchanan House, 3 St. James Square, London SW1Y 456
[redacted]

1-WMFO
SEB:seb
(1)

29B-WF-171994 - 449

Mam

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 3 1992
FBI — WASH. FIELD OFFICE

1325015-000-6762

-David M. Hayes, Esq.
7774 Mcdermott Road, Manlius, New York 13104

-Clifford & Warnke
815 Connecticut Avenue, Washington, D.C. 20006
[redacted] b6 b7C

-Bank of Credit and Commerce International, S.A.
320 Park Avenue- 20th Floor, New York, New York 10022
[redacted]

-Sutherland, Ashill & Brennan
3100 First Atlanta Tower, Atlanta, Georgia 30383
[redacted]

-White & Case
1155 Avenue of the Americas, New York, New York 10036
[redacted]

According to the memorandum dated 10/21/85, the contents of the above-mentioned memorandum were discussed at a meeting in NEW YORK at the office of White & Case. The scheduled meeting began on 10/30/85 and end the following day.

Further investigation revealed documentation about CLARK M. CLIFFORD's involvement with TCR. The source of the documentation came from statements made in response to questions posed in [redacted] CLIFFORD b6 b7C

CLIFFORD mentioned that Attock Oil approached Clifford & WARNKE for help in late 1985 with its efforts to acquire an oil refinery located in Texas. White & Case served as Attock Oil's principal counsel in connection with this proposed transactions. CLIFFORD claimed the proposed transaction was a short-lived effort on the part of Clifford & Warnke, and the transactions was never completed.

The review of the [redacted] did not reveal a memorandum about Nigerian crude oil and the shipping of personal to TCR, Nor was there a mention of CLIFFORD becoming chairperson of the TCR board. b7E

1325015-000-6763

Memorandum

To : SAC, WMFO (196B-WF-NEW) Date 9/23/92

From : SA [redacted] b6 b7C

Subject: [redacted]

OO:WMFO

On 9/21/92, Principal Deputy Chief (PDC) [redacted] b6 b7C [redacted] DOJ, requested that the BCCI task force at WMFO conduct an investigation into the allegations that [redacted] defrauded Daiwa Bank Ltd., Chicago Il. [redacted] is alleged to have provided false financial statements to Daiwa Bank in order to acquire a $9 million loan.

PDC [redacted] opined that [redacted] should be investigated under the umbrella of the BCCI investigation due to [redacted] close association to BCCI nominees and employees, and should [redacted] be found to have violated federal law, then DOJ would prosecute in the appropriate district. b6 b7C

As such, it is requested that above-captioned investigation be opened and assigned to SA [redacted] b6 b7C

6 - WMFO 182892
(2 - 196B-WF-~~NEW~~, (2) - 29B-WF-171994, 2 - 58C-WF-182413)

DBS/

29B-WF-171994 — 450

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 24 1992
FBI — WASH. FIELD OFFICE

1325015-000-6764

Memorandum

To : SAC, WMFO (29B-WF-171994) (BCCI) (P) Date 9/18/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: ASSET FORFEITURE

On September 15, 1992 SA [redacted] attended a meeting with the Department of Justice (DOJ) Attorneys from the Asset Forfeiture Office (AFO) and the Commercial Litigation, Civil Division (CL-CD), in order to determine the status of the forfeitures relating to HIDDEN INTERESTS. The following DOJ Attorneys were in attendance: LEE RADEK, Director AFO; [redacted] AFO; CHRISTOPHER KOHN, Director CL-CD; [redacted] CL-CD. b6 b7C

The meeting ended up only discussing what course of action needs to be taken in order to fight the L-Claim, which was placed on $ 93 million of the forfeited money from ICIC (Investments), by [redacted] Attached is an outline of the claim along with various ways the AFO Attorneys feel the claim could be challenged. b6 b7C

[redacted] b5 b6 b7C

29B-WF-[illegible]-457

2 - WMFO
(1) - 29B-WF-171994)
(1 - 29B-WF-171994 SUB FS)

RHM:rhm
(2)

Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 19 1992
FBI — WASH. FIELD OFFICE

[redacted] b6 b7C

A.G. Let's get together & discuss this. LMT

No FBI resources available - per mtg with LMT JRK & ABC 9/29/92

1325015-000-6765

7-1 (Rev. 4-26-78)

REPORT
of the

FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, WMFO (29B-WF-171994) (P) (C-5) September 30, 1992

FBI FILE NO. 29B-WF-171994

LAB NO. 20306026 D ZC

Re: HIDDEN INTERESTS
MAJOR CASE 38
OO: WMFO

YOUR NO.

Examination requested by: Addressee

Reference: Communication dated March 5, 1992

Examination requested: Magnetic Media

March 6, 1992

Specimens:

Q2 ALR computer system, S/N 0245462 and keyboard S/N 05251161 labelled "Room M"

Q3 80 Data computer system (no serial number) and 2001 keyboard labelled "Room G"

Q4 Intel computer system, S/N P70096330 and CSR keyboard labelled "Room J"

Q5 ALR computer system S/N 0230354 and keyboard S/N 00891191 labelled "Room L"

Q6 NEC computer system S/N 6700470 and IBM keyboard number 261013704 labelled "Room E"

Q6a One 5 1/4" floppy disk found in Q6

Q7 IBM PS2 model 30 computer system and IBM keyboard S/N 2014793 labelled "Room F"

Q8 IBM AT computer system, bar code # 5178-7253163 and keyboard S/N 6106755 labelled "Room O"

(over)

2- Atlanta

29B-WF-171994 Main - 452

1325015-000-6772

Results of Examination:

This laboratory report completes and supplements laboratory report dated August 10, 1992.

Directory listings have been produced for the Q4 computer system.

Hardcopy printouts of the requested data files have been produced.

No duplicate magnetic media copies or hardcopy printouts have been produced.

Q4 and Q5, directory listings and hardcopy printouts will be personally picked up by a representative of the Washington Metropolitan field office.

1325015-000-6773

7-1 (Rev. 4-26-78)

REPORT
of the
FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, WMFO (29B-WF-171994) (P) (C-5) September 30, 1992

FBI FILE NO. 29B-WF-171994

LAB NO. 20306026 D ZC

Re: HIDDEN INTERESTS
MAJOR CASE 38
OO: WMFO

YOUR NO.

Examination requested by: Addressee

Reference: Communication dated March 5, 1992

Examination requested: Magnetic Media

March 6, 1992

Specimens:

Q2 ALR computer system, S/N 0245462 and keyboard S/N 05251161 labelled "Room M"

Q3 80 Data computer system (no serial number) and 2001 keyboard labelled "Room G"

Q4 Intel computer system, S/N P70096330 and CSR keyboard labelled "Room J"

Q5 ALR computer system S/N 0230354 and keyboard S/N 00891191 labelled "Room L"

Q6 NEC computer system S/N 6700470 and IBM keyboard number 261013704 labelled "Room E"

Q6a One 5 1/4" floppy disk found in Q6

Q7 IBM PS2 model 30 computer system and IBM keyboard S/N 2014793 labelled "Room F"

29B-WF-171994 Main

Q8 IBM AT computer system, bar code # 5178-7253163 and keyboard S/N 6106755 labelled "Room O" -452

(over)

2- Atlanta

SEARCHED ____ INDEXED ____
SERIALIZED Su FILED Su
OCT - 1992
FBI/DOJ
b6 4
b7C

Results of Examination:

This laboratory report completes and supplements laboratory report dated August 10, 1992.

Directory listings have been produced for the Q4 computer system.

Hardcopy printouts of the requested data files have been produced.

No duplicate magnetic media copies or hardcopy printouts have been produced.

Q4 and Q5, directory listings and hardcopy printouts will be personally picked up by a representative of the Washington Metropolitan field office.

1325015-000-6775

MEMORANDUM

TO : SAC, WMFO DATE 9/21/92

FROM : SA [redacted] - WHITE HOUSE LIAISON b6 b7C

SUBJECT: [redacted]

[redacted] White House b6 b7C
Office, made the attached available to the FBI, as information contained within appears to have some connection with th[redacted] Contra investigation. The writer of this material, one [redacted] appears to be a Voice of America [redacted] and it appears that he may already be known to the FBI, and other investigative entities. The material was reviewed for any possible "threat", according to [redacted] by Secret Service, and was also reviewed by NSC. This material was provided for whatever purpose the FBI sees in it, and [redacted] does not need a reply or confirmation of receipt. She had previously told [redacted] that she was going to contact the FBI with his information.

attached filed
Sub C Ser 329

29B-[redacted]-171[redacted]-453

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 2 4 1992
[redacted] FIELD OFFICE

2-SAC, WMFO
1-SA [redacted] b6 b7C

SA [redacted]

1325015-000-6776

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/18/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST;
MAJOR CASE 38;
FIF; FAG
OO: WF

Reference lead number 32; BCCI (Jamaica)/International Monetary Fund/U. S Treasury.

Per discussion with SSA [redacted] it is recommended that the referenced lead be reassigned to SA [redacted] b6 b7C

SA [redacted] have been provided with all materials regarding this matter thus far obtained or prepared. It is expected that SAs [redacted] will first provide information to IMF needed for them to resolve some remaining issues. A meeting should then be had with trial attorney [redacted] to determine potential jurisdiction or lack thereof. b6 b7C

-454

29B-WF-171994 Main

DEV/kab
(2)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 5 1992
FBI — WASH. FIELD OFFICE

1325015-000-6777

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
October 5, 1992

Commander, 902nd MI Group
Attn: IA GPA-OP-O
Ft. Meade, MD 20755

RE: #92-0298-BPN

Dear Sir:

The Washington Metropolitan Field Office of the Federal Bureau of Investigation is conducting an investigation regarding the BANK OF COMMERCE AND CREDIT INTERNATIONAL (BCCI) and its related affiliates.

Pursuant to a telephone conversation today between Special Agent (SA) [redacted] of our office and [redacted] we request that your office provide a copy of certain computer data files and printouts that may be pertinent to our investigation. b6 b7C

If you have any questions regarding the foregoing, please contact Supervisory Special Agent [redacted] at telephone number 202/324-9300. Thank you for your assistance in this matter. b6 b7C

Robert M. Bryant
Special Agent In Charge

[redacted] b6 b7C

by: [redacted]
Supervisory Special Agent

29B-WF-171994 -455
Main

1 - Addressee
1 - WMFO
GLD
(2)

Su

S

NW825015-000-6778

Memorandum

To : SAC, WMFO (196B-WF-NEW) Date 9/23/92

From : SA [redacted] b6 b7C

Subject: [redacted]

OO:WMFO

On 9/21/92, Principal Deputy Chief (PDC) [redacted] b6 b7C [redacted] DOJ, requested that the BCCI task force at WMFO conduct an investigation into the allegations that [redacted] defrauded Daiwa Bank Ltd., Chicago Il. [redacted] is alleged to have provided false financial statements to Daiwa Bank in order to acquire a $9 million loan.

PDC [redacted] opined that [redacted] should be investigated under the umbrella of the BCCI investigation due to [redacted] close association to BCCI nominees and employees, and should [redacted] be found to have violated federal law, then DOJ would prosecute in the appropriate district. b6 b7C

As such, it is requested that above-captioned investigation be opened and assigned to SA [redacted] b6 b7C

182892 456

6 - WMFO
(2 - 196B-WF-~~NEW~~, (2) - 29B-WF-171994, 2 - 58C-WF-182413)

DBS/

"AGENTS COPY"

[redacted] b6 b7C

29B-WF-171994 - Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 2 4 1992
FBI/DOJ

Urgent

1325015-000-6779

Memorandum

To : SAC, WMFO (29B-WF-171994)(BCCI)(P) Date 10/9/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: ASSET FORFEITURE - REAL ESTATE OPERATIONS INC

Recently the Asset Forfeiture Office (AFO) of the Department of Justice (DOJ) has become interested in finding information about the company 'Real Estate Operations Inc.' (REO). REO is associated with the Bank of Credit and Commerce International (BCCI) and there could be forfeitable assets tied to REO or any of the associated companies.

The writer recalled taking notes on REO when reviewing documents in the BCCI vault in the Cayman Islands. The DOJ Attorney in the Cayman islands advised the writer those files should not be copied at that time. The following is a synopsis of the writers notes:

The files concerning REO were in the Savings Deposit Files, second drawer from the top (in the BCCI vault). The listing of Officers was: [redacted] b6 b7C

The description of REO was that it was a holding company comprised of 39 different companies with the following business address:

c/o [redacted] b6 b7C
Patton, Boggs and Blow
2550 M Street, N.W.
Washington, D.C.

[redacted] of the company.

Main - 457
Sub F5
29B-WF-171994 -78-

(1) - WMFO (29B-WF-171994 SUB F/S)
1 - DOJ-AFO [redacted]
RHM:rhm
(2)

Copy w/ endorsing filed in main file.

SEARCHED Su INDEXED Su
SERIALIZED
15

1326015-000-6780

The writer contacted [redacted] on 10/8/92 and asked if the New York liquidators had any information on REO. he advised that they did in fact have some files, and would make them available when needed. The New York liquidators also liquidated an asset tied to REO (330 Madison Ave). b6 b7C

The writer ran 'Real Estate Operations Inc.' and 'REO' through [redacted] for the following collections: BCCI, Cayman, Abu Dhabi, and [redacted] There was only one document found, which is not surprising since any documents containing just REO would not have been marked to be copied. b7D b7E

1325015-000-6781

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 10/2/92

TO : DIRECTOR, FBI
(ATTN: SSA [redacted] BCCI OFFSITE)

b6
b7C

FROM : LEGAT, LONDON [redacted] (P)

b3
b7E

SUBJECT : BCCI
MAJOR CASE #38
OO: WMFO

Enclosed for WMFO herewith is a package of optical discs containing information prepared by the BCCI Research Staff.

The enclosures were received by Legat, London, on 10/1/92 from Aspen Systems Corporation, telephone numbers 800-545-2327 or (301) 251-5441.

(3)-Bureau (Enc. 1)
(1-OLIA)
1-London [redacted]
RJT:jmb
(4)

b3
b7E

Enclosure removed and hand carried to DOJ for inclusion in ASPEN System
29B-WF 171994 - 458

Approved: RJT/RJT Transmitted _____ (Number) (Time) Per _____

1325015-000-6782

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/7/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST
MAJOR CASE #38

Reference lead #1 and lead #6 assigned to TEAM 1 on 9/28/92.

The purpose of this memo is to provide a current status of the investigation into BCCI'S use of nominees in acquiring ownership interest in U.S. banks. Some of the information contained in this memo was taken from a memo prepared by TA [redacted] b6 b7C

On 10/5/92, SA [redacted] to discuss the above listed leads assigned to Team 1. TA [redacted] advised that he is currently assigned to the NY District Attorneys Office preparing for the CLIFFORD [redacted] trial, but will continue to assist the FBI on the nominee investigation. Listed below is a short summary of the pertinent nominees and the known evidence against them:

1. [redacted] b6 b7C
wh [redacted] was present at the FED hearings in 1981 and admitted to having reviewed the application filed with the FED. Contrary to representations made in the application, [redacted] borrowed 30 million dollars from BCCI which was used as security for a 50 million dollar loan from BAII. This loan was used to purchase some of the original shares in Financial General. Shortly after the takeover of Financial General, [redacted] transferred 4000 shares of CCAH stock to ADHAM CORP. and left the rest of the shares in his own name. According to [redacted] was paid 16 million dollars for the shares left in his name, which represented his nominee shares. There is a 4/6/88 letter from [redacted] to ICIC overseas which sets forth the arrangement concerning [redacted] outstanding loans from ICIC and his CCAH stock. In addition, the Abu Dhabi documents include a "list of shareholder payments." which show [redacted] receiving $ 2,000,000 per year for holding CCAH shares and acting as lead shareholder for last 10 years.

29B-WF-171994 Main - 459

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 1 1992
FBI — WASH. FIELD OFFICE

2- WMFO (29B-WF-171994)

1325015-000-6783

2. [redacted] b6 b7C for BCCI whose original shares were purchased from money from [redacted] BCCI Geneva account. [redacted] did execute a memorandum of deposit and a undated letter similar to he 4/6/88 letter from [redacted] In addition, the above described "list of shreholder payments" reflect that [redacted] received $ 150,000 per year for holding CCAH shares. [redacted] has testified that he facilitated the payments to [redacted]

3. [redacted] b6 b7C Kuwait Airways [redacted] was also present at the 1981 FED hearings and executed a memorandum of deposit re his CCAH shares. There are numerous Abu Dhabi documents relating to [redacted] including a letter dated 11/22/82 from [redacted] that states that [redacted] CCAH investment was structured and financed so that he would have no liability as to the CCAH loans. In addition, the "list of shareholder payments" reflect that [redacted] received $ 100,000 for holding the CCAH shares. [redacted] facilitated the transfer of payments to [redacted]

4. [redacted] b6 b7C of Saudi Arabian Intelligence. [redacted] was also present at the FED hearing in 1981 [redacted] BCCI. There is a undated letter from [redacted] to ICIC which states that ICIC provided the funding for the CCAH purchase and has the power to transfer the stock. In addition, [redacted] is recorded on the "list of shareholder payments" as having been paid a one time payment of 15 million dollars as profit to him to acquire his holdings in CCAH.

5. [redacted] b6 b7C Abu Dhabi. [redacted] did execute a memorandum of deposit which was identified by [redacted] There is a 6/30/87 letter to ICIC Overseas which states that [redacted] is to receive 15% return on the book value of 500 shares of CCAH stock. In addition, the "list of shareholders payments" reflects [redacted] corporation, DUA Establishment received $ 300,000 per year for holding BCC/CCAH stock. [redacted] facilitated the above payments.

1325015-000-6784

6. [redacted] MASHRIQ HOLDING CO.)- Mashriq Holding Co. (MASHRIQ) is purportedly [redacted] The Abu Dhabi documents contain an agreement between MASHRIQ and ICIC Overseas dated 7/31/85, which provides for a fixed profit of 15 percent per year on the book value of the CCAH stock held by MASHRIQ. A list of Shareholder payments referred to above states that [redacted] was paid $ 400,000 per year for holding CCAH shares and loans. MASHRIQ waived its right to the CCAH shares that CLIFFORD [redacted] purchased at book value and within days, purchased other CCAH shares at almost two times book value from [redacted]

b6
b7C

7. [redacted] executed an undated memorandum of deposit, which can be identified by [redacted] In addition, [redacted] ICIC on 9/2/83 which gives ICIC all powers to purchase or sell his CCAH shares. The agreement also provides that he has no obligation to repay the loans used to purchase the shares. The list of shareholders payments reflects that [redacted] received a one-time payment of 6.5 million dollars as profit to acquire his entire shareholding in CCAH. This is supported by a undated letter acknowledging receipt of the payment and the transfer of the stock to ICIC.

b6
b7C

Of the above listed nominees, [redacted] have been indicted in New York. In addition, [redacted] have pled guilty to both federal and local charges in NY and WDC.

b6
b7C

TA[redacted] advised that [redacted] futher advised that [redacted] are also indicted in NY and that all NY indictments are solid indictments which they intend to pursue.

b6
b7C
b7D

Given the fact that [redacted] have pled guilty, [redacted] have been indicted by NY, it is requested that a prosecutive opinion regarding the the nominees be rendered. Additionally, it is requested that the prosecutive opinion detail if the charges that are contemplated are felonies or misdemeanors.

b6
b7C

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 10/15/92

To: [redacted] Principal Deputy Chief, DOJ Fraud b6 b7C
(Name and Address of USA)

From: ROBERT M. BRYANT
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] 10/15/92
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached are copies of the following FD-302's:

INTERVIEWEE	DATE
[redacted]	...5/26/92, 6/12/92
	...5/9/91
	...7/2/92
	...3/3/92
	...6/11/92
	...11/14/91
	...9/18/92
	...7/3/92
	...10/1/92
	...3/3/92

b6 b7C

460

Main

29B-WF171994 Sub

SEARCHED INDEXED
SERIALIZED FILED
Searched
Serialized OCT 15 1992
Indexed FBI—WASH. FIELD OFFICE
Filed Su/1R

1325015-000-6786

6

INTERVIEWEE	DATE
	.....9/17/92
	.....7/1/92
	.....5/28/92
	.....10/5/92
	.....4/20/92
	.....7/2/92

b6
b7C

Doc'ts Received.....9/25/92
Investigative Insert.....10/1/92
BCCI Interveiw Report.....10/15/92

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 10/16/92

TO : DIRECTOR, FBI
ATTN: SECTION CHIEF THOMAS KUBIC, WCC, CID

FROM : SAC, WMFO (29B-WF-171994)

SUBJECT : MAJOR CASE #38
HIDDEN INTERESTS
OO:WMFO

Reference is made to a meeting with Section Chief THOMAS KUBIC and Inspector-in-Charge (IIC) [redacted] and SSA [redacted] on October 14, 1992. b6 b7C

As requested in the referenced meetings set forth as follows is an estimated budget for travel and associated costs of the BCCI Special. This estimated budget is based on current investigative expectations and is dependent upon Department of Justice (DOJ) prosecutive opinions. Therefore this estimate becomes more speculative the further out in time that estimates are being made. For the information of FBIHQ the Special as of this date consists of 19 Special Agents (SAs), 2 SSAs, 1 IIC and 9 Financial Analysts (FAs), 8 of the FAs are on temporary duty assignments from other Field Divisions. Two of the 8 are scheduled to return home at the end of October. The other 6 are presently scheduled to return at the end of November. Estimated costs by month are:

October: $71,620 (includes 6 FAs in London for the month of October, Foreign Travel by 7 other SAs, Foreign Travel by 2 FAs and Domestic Travel.)

29B-171994 Maj 2 - 461

2-Bureau
1-WMFO

LMT:dml
(3)

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-6788

November: $38,620 (include 6 FAs in London for 11 days of November, Foreign and Domestic Travel by SAs and FAs.)

December: $38,920 (includes no FAs, but does include significant Foreign and Domestic Travel by SAs.)

January, February & March, 1993: $21,620 each month (this includes a limited amount of Foreign Travel and some Domestic Travel by SAs. It assumes no FAs are needed.)

[redacted] Should any questions arise, please contact IIC [redacted] on extension [redacted] or SSA [redacted] on extension [redacted] b6 b7C

1325015-000-6789

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 10/16/92

TO : DIRECTOR, FBI
ATTN: [redacted] WCCS, CID

b6
b7C

FROM : SAC, WMFO (29B-WF-171994)

SUBJECT : MAJOR CASE #38
HIDDEN INTERESTS
OO:WMFO

Reference is made to telcal from SSA [redacted] on October 7, 1992.

b6
b7C

As discussed in the referenced telcal Financial Analysts (FAs) [redacted] Minneapolis Division and [redacted] Memphis Division will return to their respective Field Division during the week of October 19, 1992.

b6
b7C

WMFO requests that FAs [redacted] (New Orleans), [redacted] (Houston), [redacted] (Los Angeles) [redacted] (Chicago), [redacted] (Baltimore), [redacted] (Miami) be extended in their temporary duty status for a period of one month. These six FAs are presently in London, U.K. reviewing records of BCCI Headquarters. It is anticipated that this record review will be completed by late November.

b6
b7C

For the information of FBIHQ a determination was made to review only those records most likely to yield positive information thereby cutting the review process to as little time as is necessary for a complete investigation.

2-Bureau
(1)-WMFO

ABL:dml
(3)

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b7C

-462

29B-WF-171994

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Serialized Su
Indexed
Filed Su

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-6790

WMFO is most appreciative of the excellent assistance that has been given by all of the FAs.

1325015-000-6791

FD-320 (Rev. 4-1-85)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 10/16/92

To: [redacted] Principal Deputy Chief, DOJ Fraud b6 b7C
(Name and Address of USA)

From: ROBERT M. BRYANT
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] on 10/16/92
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached are copies of the following FD-302's:

INTERVIEWEE	DATE
[redacted]	....5/26/92, 6/12/92
	....5/9/91
	....7/2/92
	....3/3/92
	....6/11/92
	....11/14/91
	....9/18/92
	....7/3/92
	....10/1/92
	....3/3/92

b6 b7C

29B-WF-171994 — 463 Main

Searched
Serialized
Indexed
Filed

1325015-000-6792

INTERVIEWEE	DATE
	9/17/92
	7/1/92
	5/28/92
	10/5/92
	4/20/92
	7/2/92

b6
b7C

Doc'ts Received.....9/25/92
Investigative Insert.....10/1/92
BCCI Interveiw Report.....10/16/92

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 10/6/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS; MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: Lead #28 - REDEC Restructuring

On 9/28/92, above referenced lead was reassigned to SA [redacted] b6 b7C

2-WMFO
(1-29B-WF-171994 Sub I)

MRM:mm
(2)

-464
29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 1992
FBI — WASH. FIELD OFFICE

VIC FAZIO
4TH DISTRICT, CALIFORNIA
VICE CHAIR-DEMOCRATIC CAUCUS

COMMITTEES:
APPROPRIATIONS
SELECT COMMITTEE ON HUNGER
DEMOCRATIC STEERING AND POLICY

Congress of the United States

House of Representatives

Washington, DC 20515-0504

PLEASE RESPOND TO:
2113 RAYBURN HOUSE
OFFICE BUILDING
☐ WASHINGTON, DC 20515
(202) 225-5716

2525 NATOMAS PARK DRIVE
SUITE 330
☐ SACRAMENTO, CA 95833
(916) 978-4381

844 B UNION AVENUE
☐ FAIRFIELD, CA 94533
(707) 426-4333

August 21, 1992

[redacted] b6 b7C

Office of Public and Congressional Services
Federal Bureau of Investigations
9th and Pennsylvania Ave, N.W.
Washington, D.C. 20535

Dear [redacted] b6 b7C

Enclosed you will find a letter that I recently received from a constituent. As you can see, [redacted] is concerned about the Department of Justice's treatment of the Inslaw case, and is requesting a investigation of this matter. I would greatly appreciate any information you might be able to offer which would assist me in responding to my constituent.

Thank you for your consideration.

Sincerely,

VIC FAZIO
Member of Congress

VF/kas
enclosure

-465
29B-WF-171994 Main

SEARCHED ___ INDEXED ___
SERIALIZED SU FILED SU
OCT 21 1992
FBI - WASH. METRO FIELD OFFICE
SU

THIS STATIONERY PRINTED ON PAPER MADE OF RECYCLED FIBERS

1325015-000-6795

JUL 22 1992

Dear Representative Fazio
RE: FBI investigation of death
of Danny Casolaro - Inslaw Case.

I urge you to support FBI
investigation into the death/murder
of investigative reporter
Danny Casolaro. He was
investigating computer theft
of [redacted] b6 b7C
Promis. It was
used in tracking court cases
through offices of U.S attorneys.
The program was purchased
by the Justice Department.
The contract for purchase was
broken and two courts found
the government had stolen
Promis. Attorney Generals Meese
and Thornburgh have stonewalled
Senate hearings.

FBI/DOJ-000-6796

Apparently Casolaros investigation gave him reason to believe that Onslow was part of criminal activities in high places including BCCI and the savings and loan scandal.

Without permission from anyone West Virginia officials ordered a hasty embalming of Casolaro. Casolaros death has been ruled suicide however he was positive, enthusiastic and close to completion of the case of his life. Suicide is an unreasonable verdict.

Onslow has asked the FBI for a full blown investigation, I urge you to do so. Please write and let me know.

Sincerely [redacted]

b6
b7C

1325015-000-6797

October 7, 1992

Honorable Vic Fazio
House of Representatives
Washington, D.C. 20515

Dear Congressman Fazio:

I am writing in further reply to your August 21st correspondence on behalf of [redacted] requests your support in prompting an FBI investigation into the death of Joseph Daniel Casolaro. b6 b7C

The Martinsburg, West Virginia, Police Department, conducted a thorough investigation into the circumstances surrounding the death of Mr. Casolaro. On January 25, 1992, that Department ruled his death a suicide. The FBI did not investigate Mr. Casolaro's death since there was no evidence that he was the victim of foul play or that a Federal law within our investigative jurisdiction had been violated. To date, no subsequent information has been received to indicate that such a violation has occurred, and, accordingly, the FBI is unable to conduct an investigation into this matter.

I hope this information will be helpful to you in responding to [redacted] b6 b7C

Sincerely yours,

[redacted] b6 b7C

Inspector in Charge
Office of Public and
Congressional Services

1 - Pittsburgh - Enclosures (2)
ReBucal 9-30-92 from [redacted] OPCS, to SSRA [redacted] b6 b7C
Martinsburg RA, and return call 10-1-92.
1 - WMFO - Enclosures (2)

- 466
29B-WF-171494 Main

SEARCHED INDEXED
SERIALIZED FILED
OCT 9 1992
FBI

[redacted]

1325015-000-6798

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/27/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

Re: [redacted] White House Chief of Staff.

Baltimore teletype dated July 17, 1992, advised that a Baltimore source provided information that [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

DBS

SSA [redacted] PCU, FBIHQ, telephone number 324-5701 of the above facts, whereby SSA [redacted] discussed them with DOJ-Office of Public Integrity (OPI). DOJ-OPI opined that the allegation [redacted] b6 b7C

Therefore, WMFO will conduct no further investigation into this matter.

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2-WMFO

DBS:dml
(2)

29B-WF-171994 Main

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
OCT 23 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6799

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 10/9/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
(OO: WMFO)

Re lead #36, on INSLAW case and DANIEL CASOLARO.

Re lead was to determine whether or not there is any connection between the BCCI scandal and the death of DANIEL CASOLARO. The possibility of a connection between BCCI and CASOLARO was brought to the attention of the FBI through several newspaper articles. The first article was from the 6/14/92 Washington Post Magazine. The article was titled, "ELLIOT RICHARDSON's Last Crusade." In this article there are three quotes that connect either INSLAW or DANIEL CASOLARO to BCCI. The first quote made by ELLIOT RICHARDSON is, "The wider case touches upon suspicions held by the HAMILTONs and others that the trail of the pirated Promis Software could lead to some of the most convoluted scandals of the post-war era: From BCCI to the October Surprise." This quote was made by ELLIOT RICHARDSON when he was discussing the allegations that the DEPARTMENT OF JUSTICE (DOJ) had caused INSLAW to go bankrupt in an attempt to steal the computer software developed by the HAMILTONs, the owners of INSLAW.

The second quote during this article was made by BILL HAMILTON. HAMILTON stated that "the CIA installed Promis as a deposit tracking system in BCCI", and that "many foreign governments have bought pirated copies."

The third mention of BCCI in this article is not a quote, but from the body of the article. The author of the article states that RON ROSENBAUM, of Vanity Fair, called INSLAW the "missing link" between the BCCI and October Surprise scandals.

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29B-WF-171994 Main

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
OCT 21 1992
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2-WMFO
NMS:gf
(2)

NMS

1325015-000-6800

However, during this article, at no time did any of the people quoted or the authors of the article explain how BCCI was involved in this whole affair, or how BCCI was involved in the death of DANIEL CASOLARO.

The second article that brought this CASOLARO/BCCI connection to the attention of the FBI was another Washington Post article, an editorial, in fact, by JACK ANDERSON and MICHAEL BINSTEIN. In this editorial ANDERSON and BINSTEIN stated, "In the course of his probe, CASOLARO stumbled across evidence that he believed linked the INSLAW dispute to deeper intrigues, including the Iran/Contra scandal, the BCCI affair, and the Persian Gulf War arming of Iraq." Again, nowhere in this article did ANDERSON or BINSTEIN explain how BCCI was involved with the other affairs or with the death of DANIEL CASOLARO.

For review of this investigative lead, SA [redacted] spoke with SA [redacted] who had spoken with DANIEL CASOLARO [redacted] stated that he received no positive information from [redacted] regarding any connection between BCCI and the death [redacted] stated that the only statement that [redacted] could make regarding BCCI was that [redacted] believed that BCCI had been used in some manner during a foreign arms deal. However, [redacted] had no evidence that he could produce to verify this statement made by [redacted] b6 b7C

SA [redacted] also spoke with SA [redacted] on 9/9/92, as [redacted] was familiar with DANIEL CASOLARO and has a source who had been in contact with DANIEL CASOLARO prior to his death. SA [redacted] provided SA [redacted] with details on how the INSLAW allegations against the DOJ had come about. SA [redacted] was able to state that this matter began back in the late seventies when INSLAW was given a contract to produce computer software that would assist law enforcement nationwide. However, during this recanting of this matter from the late seventies to the present, at no time was SA [redacted] able to advise how BCCI was involved in the INSLAW case or in the death of DANIEL CASOLARO. SA [redacted] provided to SA [redacted] a booklet detailing the hearing before the Subcommittee on Economic and Commercial Law of the Committee of the Judiciary House of Representatives, regarding the Attorney General's refusal to provide congressional access to privileged INSLAW documents. The Committee's findings appeared to support the [redacted] claims that the DOJ acted illegaly in obtaining their computer software. However, there was no mention in this report of BCCI having any connection with the INSLAW case. In addition, there was no mention in this report of any investigation being conducted by DANIEL CASOLARO of the INSLAW b6 b7C

1325015-000-6801

case or of the BCCI scandal. Let it be noted that this hearing was conducted on 12/5/90, which was prior to the death of DANIEL CASOLARO.

Further leads will be conducted regarding this matter of BCCI and any connection with DANIEL CA[redacted]ne of the interviews to be conducted will be of [redacted] INSLAW, [redacted] DOJ illegally obtained their software program, Promis. An interview with the [redacted] is set up for 9/15/92, but during the telephone call with SA [redacted] to arrange for this interview, [redacted] advised that during his dealings with DANIEL CASOLARO, CASOLARO stated that five ranking Republicans were all behind the INSLAW case, the BCCI scandal, the Iran/Contra affair, the October Surprise scandal, and the failure of the nation's savings and loans.

b6
b7C

LEADS

1. Interview [redacted] on 9/15/92, regarding any connection between BCCI and the death of DANIEL CASOLARO.

b6
b7C

2. Interview [redacted] of the Washington Post regarding their editorial which connected CASOLARO's investigation with the BCCI affair.

3. Interview SA [redacted] of the Los Angeles Division, as the editorial of [redacted] stated that [redacted] knew CASOLARO and does not believe that CASOLARO's death is a suicide.

4. Arrange for an interview of SA [redacted] Confidential Source, who is familiar with DANIEL CASOLARO, and supposedly has knowledge of the INSLAW case and the supposed connection between BCCI and the death of DANIEL CASOLARO.

5. Contact and interview [redacted] ist [redacted] who has been in contact with [redacted] and states that he has information concerning DANIEL CASOLARO's death.

1325015-000-6802

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, WMFO

SUBJECT:
HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

29-HQ-116176
Bureau File Number

29B-WF-171994
Field Office File Number

BCCI
Squad or RA Number

Agent's Social Security No.

Date 10/9/92

b6
b7C

☐ X if a joint operation with:
(identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help
2 = Helped, but only minimally
3 = Helped, substantially
4 = Absolutely essential

1. Acctg Tech Assistance		8. Eng. Sect. Tape Exams		15. Photographic Coverage		22. Telephone Toll Recs	
2. Aircraft Assistance		9. Hypnosis Assistance		16. Polygraph Assistance		23. UCO Group I	
3. Computer Assistance		10. Ident Div Assistance		17. Search Warra Executed		24. UCO Group II	
4. Consensual Monitoring		11. Informant Information		18. Show Money Usage		25. UCO Other	
5. ELSUR FISC		12. Lab Div Exams		19. Surveil Sqd (SOG) Asst		26. NCAVC/ VI-CAP	
6. ELSUR Title III		13. Lab Div Field Support		20. SWAT Team Action		27. Visual Inves Analysis (VI	
7. Eng. Sect. Field Suppo		14. Pen Registers		21. Tech. Agt. or Tech Equip			

b6
b7C
b7E

A. Preliminary Judicial Process (Number of subjects)

Complaints	Informations	Indictments
	2	

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority*			
	A	B	C	
FBI Arrests -				Subpoenas Served
FBI Locates -				Criminal Summons
Local Arrests -				Local Crim. Summons

FBI Subj. Resisted_____; Armed_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
1	$	$ 95,000,000.00		$
	$	$		$
	$	$		$

E. Civil Matters

		Government Defendant	Government Plaintiff
RICO -Civil Convictions	Civil Suits Amount of Suit	$	$
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

b7E

F. Administrative Sanctions

Subject 1 Subject Description Code* -

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
ARABIAN INDUSTRIAL & COMMERCIAL COMPANY, LTD.					
(Saudi Arabian Corporation)					
BNK HOLDINGS S.A.					
(Panamanian Corporation)					

Explanation of accomplishment claimed:

*** SEE ATTACHMENT ***

29B-WF-171994 Main -469

SEARCHED_____ INDEXED_____
SERIALIZED_____ FILED_____

OCT 13 1992

FBI — WASH. FIELD OFFICE

2 - Bureau
2 - Field Office - WMFO
* See codes on reverse side.

CWS

1325015-000-6803

Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes*

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
23	Counterfeit or Pirated Sound Recordings or Motion Pictures
24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
26	Theft from, or Fraud Against, Government Scheme Aborted
27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

Subject Description Codes*

- Enter Description Code Only When Reporting a Conviction -

Organized Crime Subjects (Include Family Name Or Group):
- 1A Boss, Underboss or Consigliere
- 1B Capodecina or Soldier
- 1C Possible LCN Member or Associate
- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

Instructions

Subject Priorities for FBI Arrest or Locates:

A - Subject wanted for crimes of violence (i.e. murder, manslaughter, forcible rape, robbery and aggravated assault) or convicted of such crimes in the past five years.

B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

Reporting Convictions:

Convictions should not be reported until the sentence has been issued. There are two exceptions to this rule. The conviction information can be submitted by itself if:

1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = White

*U.S. Government Printing Office: 1991 — 282-066/44227

1325015-000-6804

Attachment to FD-515

29B-WF-171994

On July 29, 1992, **ARABIAN INDUSTRIAL & COMMERCIAL COMPANY, LTD. (AICCL)** and **BNK HOLDINGS S.A. (BHSA)** entered into a plea agreement with the UNITED STATES DEPARTMENT OF JUSTICE (USDOJ) in connection with the ongoing investigation of the **BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).**

On September 14, 1992, an information was filed by the USDOJ in the U.S. District Court for the District of Columbia, Washington, D.C. charging AICCL and BHSA with one count each for violation of Title 18 USC Section 1005 entitled False Entries.

On September 14, 1992, AICCL and BHSA were sentenced. AICCL was ordered to pay restitution totalling $95,000,000.00 as follows: (1) $45 million to the FEDERAL RESERVE BOARD (FRB) in connection with the illegal acquisition of FIRST AMERICAN BANK, Washington, D.C.; and (2) $50 million to the World-Wide Liquidator for BCCI. Both AICCL and BHSA were also placed on four (4) years supervised probation and ordered to pay a Special Assessment of $200.00 each.

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 04-10-2018 BY [redacted]

b6 b7C b7E

TO: Director, FBI

FROM: SAC, WMFO

SUBJECT:

HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

29-HQ-116176
Bureau File Number

29B-WF-171994
Field Office File Number

BCCI
Squad or RA Number

Date 10/9/92

☐ X if a joint operation with:

(identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help
2 = Helped, but only minimally
3 = Helped, substantially
4 = Absolutely essential

1. Acctg Tech Assistance		8. Eng. Sect. Tape Exams		15. Photographic Coverage		22. Telephone Toll Recs	
2. Aircraft Assistance		9. Hypnosis Assistance		16. Polygraph Assistance		23. UCO Group I	
3. Computer Assistance		10. Ident Div Assistance		17. Search Warran Executed		24. UCO Group II	
4. Consensual Monitonng		11. Informant Information		18. Show Money Usage		25. UCO Other	
5. ELSUR FISC		12. Lab Div Exams		19. Surveil Sqd (SOG) Asst		26. NCAVC/ VI-CAP	
6. ELSUR Title III		13. Lab Div Field Support		20. SWAT Team Action		27. Visual Invest - Analysis (VIA)	
7. Eng. Sect. Field Suppo		14. Pen Registers		21. Tech. Agt. or Tech Equip			

A. Preliminary Judicial Process (Number of subjects)	Complaints	Informations	Indictments
		2	

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
1	$	$ 95,000,000.00		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions

No. of Subj.

Civil Suits Amount of Suit

Settlement of Award

Government Defendant	Government Plaintiff
$	$
$	$ Enter AFA Payment Here b7E

F. Administrative Sanctions

Subject 1 Subject Description Code* -

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
ARABIAN INDUSTRIAL & COMMERCIAL COMPANY, LTD.					
(Saudi Arabian Corporation)					
BNK HOLDINGS S.A.					
(Panamanian Corporation)					

Explanation of accomplishment claimed:

*** SEE ATTACHMENT ***

29B-WF-171994

SEARCHED_____ INDEXED_____
SERIALIZED_____ FILED_____

OCT 13 1992

FBI — WASH. FIELD OFFICE

Bureau
Field Office — WMFO
* See codes on reverse side.

CWS

1325015-000-6806

FD-515 (Rev. 7-19-91)
Accomplishment Report
(Submit within 30 days from date of accomplishment)

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY

TO: Director, FBI

FROM: SAC, WMFO
SUBJECT:
HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

29-HQ-116176
Bureau File Number

29B-WF-171994
Field Office File Number

BCCI
Squad or RA Number

Agent's Social Security No.

☐ X if a joint operation with:

(Identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 10/9/92

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 3 = Helped, substantially
2 = Helped, but only minimally 4 = Absolutely essential

1. Acctg Tech Assistance		8. Eng. Sect. Tape Exams		15. Photographic Coverage		22. Telephone Toll Recs	
2. Aircraft Assistance		9. Hypnosis Assistance		16. Polygraph Assistance		23. UCO Group I	
3. Computer Assistance		10. Ident Div Assistance		17. Search Warrants Executed		24. UCO Group II	
4. Consensual Monitoring		11. Informant Information		18. Show Money Usage		25. UCO Other	
5. ELSUR FISC		12. Lab Div Exams		19. Surveil Sqd (SOG) Asst		26. NCAVC/ VI-CAP	
6. ELSUR Title III		13. Lab Div Field Support		20. SWAT Team Action		27. Visual Invest Analysis (VIA)	
7. Eng. Sect. Field Suppo		14. Pen Registers		21. Tech. Agt. or Tech Equip			

b6
b7C
b7E

A. Preliminary Judicial Process (Number of subjects)	Complaints	Informations	Indictments
		2	

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____
Criminal Summons_____
Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____
Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
1	$	$ 95,000,000.00		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions	Civil Suits Amount of Suit	Government Defendant	Government Plaintiff
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

F. Administrative Sanctions*

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District DC 9-14-92 9-14-92 No. of

b7E

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
ARABIAN INDUSTRIAL & COMMERCIAL COMPANY, LTD.					
(Saudi Arabian Corporation)					
BNK HOLDINGS S.A.					
(Panamanian Corporation)					

Explanation of accomplishment claimed:

*** SEE ATTACHMENT ***

SEARCHED_____ INDEXED_____
SERIALIZED_____ FILED_____
OCT 15 1992
FBI — WASH. FIELD OFFICE

Bureau
Field Office — WMFO
* See codes on reverse side.

CWS

1325015-000-6809

Memorandum

To : SSA [redacted] Date 10/19/92

From : SA [redacted]

Subject: MAJOR CASE #38; HIDDEN INTERESTS; FIF; FAG; OO: WMFO

RE: STATUS REPORT, LEAD #51; FT. MEADE

10/5/92 Interviewed [redacted] Military Intelligence Battalion (Counter-Intelligence), U.S. Army, Ft. Meade regarding erased BCCI information found in a seized personal computer. [redacted] provided a 5.5 inch diskette containing the BCCI information. (See FD-302 dated 10/8/92)

10/13/92 Interviewed [redacted] ITEM INC. (Office Equipment Specialists) of Alexandria, Virginia. ITEM INC. owns and leases out the computer that contained the erased BCCI information. ITEM INC. purchased the computer two years ago from an office equipment distributor in California named ZEMAITIS. Interviewee will provide information on ZEMAITIS and a listing of all the previous clients that have used computer #90009505 who may have imputed the BCCI information. (See FD-302 dated 10/14/92)

10/15/92 Made liaison with ISA [redacted] (A-5/NVMRA), EXT. [redacted] for technical assistance in decoding/retrieving portions of erased information that was not retrieved by [redacted]

10/16/92 Received a FAX from ITEM INC. containing a chronological listing of the previous users/clients of computer #90009505 and the address of ZEMAITIS. Will obtain background information and interview previous clients.

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b6 b7C

b6 b7C

b6 b7C

29B-WF-171994 Main 470

SEARCHED SERIALIZED INDEXED FILED

OCT 19 1992

FBI — WASH. FIELD OFFICE

1325015-000-6812

-471

29B-WF-171994 Main

SEARCHED See INDEXED See
SERIALIZED See FILED See

OCT 23 1992

FBI — WASH. FIELD OFFICE

1325015-000-6813

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/22/92

From : SA [redacted] b6 b7C
SA

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO

PURPOSE: To report results of interview with [redacted] b6 b7C
[redacted] of the International Monetary Fund (IMF).

RECOMMENDATION: That no further action be taken with the IMF to pursue them to be a victim in possible collusion between the Bank of Jamaica (BOJ) and the Bank of Credit and Commerce International (BCCI).

DETAILS: On 10/22/92 [redacted] was interviewed by DOJ b6 b7C
Attorney [redacted] The purpose of the interview was to determine if the IMF would be willing to be the victim in a possible fraud against them by collusion between BCCI and the BOJ.

The IMF consists of 22 Directors from various countries representing almost all the countries in the world. The Canadian Director represents Jamaica. To obtain action on any issue the board must vote and obtain at least an 85% approval before any action can be taken. The United States has a 19% vote. The US director is a Presidential appointee who is approved by the Senate and whose salary is paid by the IMF. The US government deposits money on a quarterly basis and this money is co-mingled with other money to countries in need. Once money is given to a country there is no way to determine how much of the money was US money.

When the IMF is presented with a petition from a government requesting loans, the IMF staff travels to that country to work out a loan or a "program" as the IMF refers to a loan. For a country to receive monies from the IMF they must meet certain criteria in regards to their budget, international reserve accounts, monetary policy, etc. Once these requirements are met, the country and the IMF will draw up a Memorandum of

Understanding in regards to repayment. The country will have to be able to fulfill target dates of 3-6 months in which to repay the "programs."

If a country violates IMF rules, such as fails to repay or falsifies accounts, the IMF will administer its own remedial action. The country could possibly be expelled or be cut off from receiving new loans. The country could be required to repay its "programs" immediately. According to [redacted] he could not remember the board taking action on any countries in the recent past, and he recalled there never being a problem with Jamaica. b6 b7C

When specifically advised that BCCI had given the BOJ money on short-term loans, [redacted] advised that the IMF referred to this as "window dressing." [redacted] further advised that these short-term loans could only effect the net international reserve status, however, could not effect this on any long-term situation inasmuch as the BOJ still must make payments to IMF and the short-term loans would not help BOJ's case to IMF for "programs." b6 b7C

[redacted] advised that the IMF has never taken action against a country for "window dressing" and doubted that it ever would. Such action would strike at the heart of IMF functioning which is government to government lending. The IMF does not concern itself with how the governments obtain their money. The IMF is basically only concerned with being paid back. If the IMF were not paid back for their loans, then the IMF might consider being a "victim", however, Jamaica is and always has been current of their loans. At the present time, there are 11 countries in default of their loans, and the IMF will not take any action against them. [redacted] advised that the directors consider their fund, and their employees, to be "immune" to government action and that the fund is a "non-political" institution. b6 b7C

[redacted] advised that if any action would be taken against BOJ and BCCI for any type of violation, the Department of Treasury must advise [redacted] to bring this matter to the attention of the IMF board and then a vote will take place. [redacted] advised that Treasury will most likely support the opinion that the fund will not be involved and the Treasury will not be involved in foreign policy matters. Also for any action to take place, the State Department must become involved due to the involvements of foreign governments. b6 b7C

1325015-000-6815

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 10/22/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 62

Lead # 62 deals with reviewing the assets, both financial and real estate investments, of the major shareholders and the front-men of BCCI.

Should any of the BCCI agents have knowledge of assets belonging to either the shareholders or front-men of BCCI advise the writer.

The following is a list of some of the individuals who are of a concern:

1. [redacted] b6 b7C
2.
3.
4.
5.
6.
7.
8.
9.
10.
11.
12. GHAITH PHARAON

23 - WMFO
(1-29B-WF-171994)
(1-Each BCCI Agent)

29B-WF-171994 -472
Main
Su Su

RHM:rhm
(23)

1325015-000-6816

The following is a list of some of the companies that can be tied in with some of the above individuals and will also be looked at for assets held in the United States:

1. Interedec (PHARAON company)
2. Attock Oil (PHARAON company)
3. Abu Dhabi Investme[redacted]hority (ADIA)
4. Adham Corporation [redacted] company)
5. Mashriq Holdings Co. [redacted] company)
6. Linden Investments [redacted] company)
7. Investrade, Inc. [redacted] company)
8. Carlson Farms, Inc. [redacted] company)
9. Middle East Credit and Investment Co. [redacted] co.)

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The two lists are not all inclusive, so please advise the writer if you have information on an individual or a company (not listed) whom you feel has assets in the United States which would need to be reviewed.

1325015-000-6817

Memorandum

To : SSA [redacted] Date 9/24/92

From : SA [redacted]

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF;FAG
OO: WMFO

PURPOSE: For information only.

DETAILS: On 9/23/92 [redacted] Spy Magazine, office: [redacted] called me regarding DANIEL CASOLARO's death. He received my name from [redacted] CNBC whom I had previously interviewed. [redacted] has been researching CASOLARO's death and he uncovered what he believes to be another suspicious suicide in Martinsburg, West Virginia. Both VELEZ and CASOLARO were embalmed at the same funeral home, BROWN's, in Martinsburg, West Virginia.

On 8/29/91, twenty days after CASOLARO's suicide, CARLOS VELEZ, committed suicide with a .22 rifle to his left temple. According to a Martinsburg inn restaurant waitress, CASOLARO, the day prior to his death, met with a dark skinned, Hispanic or Arabic male, about 5'7" tall and weighing 160-170 pounds and meeting VELEZ' description.

[redacted] thinks the circumstances surrounding VELEZ' death are suspicious inasmuch [redacted] gave an address of [redacted] West Virginia, and according to [redacted] research there is no such address. The night before his death, neighbors advised [redacted] that [redacted] VELEZ. According to the obituary VELEZ [redacted] West Virginia. Again, according to [redacted] there is no such number.

[redacted] also advised that VELEZ had two associates, [redacted] research disclosed that the [redacted] implied that he believes these [redacted]

1 - WMFO (29B-WF-171994)
JVJ:jvj
(1)

[redacted]

29B-WF-171994 Main -474

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SERIALIZED FILED
SEP 24 1992
FBI — WASH. FIELD OFFICE

b6 b7C

1325015-000-6831

[redacted] was asked on two occasions if he had located any of the alleged missing documents of CASOLARO's or uncovered any connection to these deaths and BCCI and he advised that he had not.

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RECOMMENDATION: That no investigation be made of these allegations in connection with the investigation to BCCI.

1325015-000-6832

SKADDEN, ARPS, SLATE, MEAGHER & FLOM

1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107

(202) 371-7000

FAX: (202) 393-5760

DIRECT DIAL
(202) 371-

BOSTON
BRUSSELS
CHICAGO
FRANKFURT
HONG KONG
LONDON
LOS ANGELES
NEW YORK
PARIS
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

September 29, 1992

BY HAND

[redacted] b6 b7C

Criminal Division
United States Department of Justice
10th & Constitution Avenue, N.W.
Room 2212
Washington, D.C. 20530

Re: United States v. Clifford & Altman

Dear [redacted] b6 b7C

We are writing to advise you of certain information that recently has come to [redacted] During the week of September 14, 1992, [redacted] Clifford & Warnke law firm, tried repeatedly to contact [redacted] who was out of the office for the week. [redacted] eventually contacted [redacted] at his residence on the evening of Friday, September 18, 1992. [redacted] explained that he wanted to meet with [redacted] immediately to discuss a matter of importance to [redacted] Clifford and [redacted] agreed to meet with [redacted] the following afternoon at his residence in Maryland.

The story related by [redacted] the following day, September 19, 1992, was nothing short of extraordinary. He reported that in [redacted] he was approached by two FBI agents. According to [redacted] the agents contacted him for the purpose of gaining his assistance in what was described as an ongoing investigation into the affairs of [redacted] & Warnke. Essentially, the agents requested that [redacted] become the FBI's "eyes and ears" at the law firm. b6 b7C

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29B-WF-171994 Main

Rec'd from [redacted] SSA

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 1 1992
FBI — WASH. FIELD OFFICE

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[redacted]

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In return for [redacted] cooperation, the agents reportedly promised that the pending Immigration and Naturalization Service ("INS") deportation action against him would be resolved in his favor. The FBI, he said, also agreed to expunge [redacted] criminal record and to guarantee him United States citizenship. Finally, the FBI reportedly offered [redacted] money for his services, and allegedly paid him more than $25,000.00 over the next two years. As proof of such payments, [redacted] claimed to have copies of two checks received from the federal government.

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[redacted] stated that he followed the FBI's direction to release the counsel retained to represent him in the INS matter and that he proceeded pro se. He further reported that after hearing the evidence in the case, the Administrative Law Judge ruled from the bench in his favor. [redacted] said that this ruling convinced him that the FBI honored its commitment to provide a favorable outcome before the INS and that, as a result, he felt obligated to provide the assistance requested.

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[redacted] reported that in the latter part of January 1989, he provided the FBI with access to Clifford & Warnke's offices at 815 Connecticut Avenue, N.W. The FBI agents are said to have wired for sound the firm's two conference rooms and placed electronic listening devices in the offices of Mr. Clifford. [redacted] also claimed to have provided the FBI with access to the two automobiles used by Clifford & Warnke. The FBI, he said, placed voice-activated recording devices under the front seats of both vehicles to tape record telephone conversations of Clifford & Warnke attorneys. [redacted] further claimed that he removed the tapes at regular intervals and provided them to the Department of Justice. He reportedly retained copies of some or all of the tapes that he provided to the government.

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[redacted] also asserted that on three or four occasions he provided the FBI with access to Security Storage, Inc., Clifford & Warnke's off-site document storage facility located in Washington, D.C. On each of these occasions, the FBI reportedly reviewed many of the

1325015-000-6834

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law firm's files maintained there. In addition, he claimed to have provided the Department of Justice with copies of approximately four boxes of documents either received by the firm from BCCI or CCAH or which constitute the law firm's work product relating to its representation of these entities.

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[redacted] also claimed to have met with AUSA [redacted] during the fall of 1989. He alleged that AUSA [redacted] encouraged him to surreptitiously remove documents from the law firm and provide them to the Department of Justice. For example, [redacted] stated that he provided AUSA [redacted] with a copy of the draft speech prepared for Senator Hatch by Clifford & Warnke on the same day that the materials were delivered to the Senator's office. As with the tape recordings referenced above, [redacted] claimed to have kept a copy of the documents provided to the Department of Justice.

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The FBI's relationship with [redacted] is said to have continued through May 1990, when his employment at Clifford & Warnke abruptly ended after he was accused of attempting to steal money from the law firm. [redacted] believes that the FBI abandoned him when these accusations arose and claimed that that served as his motivation for bringing this information to our attention.

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[redacted] agreed to permit us to review the documents and tapes that he had supposedly compiled at the direction of the FBI. His promise to provide access to these materials was unconditional. In this regard, he expressly denied that he would demand or solicit any compensation from either Clifford & Warnke or Messrs. Clifford [redacted] He noted that he was currently attempting to arrange a sale of the information to the news media.

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On September 22, 1992, [redacted] travelled to Fort Lauderdale, Florida, accompanied by a Skadden, Arps paralegal for the purpose of meeting with [redacted] and reviewing the documents and tapes he claimed to possess. When [redacted] met with [redacted] and our paralegal on the morning of September 23, 1992, he did not have the materials in his possession. [redacted] stated that before

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he would provide access to the materials, he wanted a guarantee from Clifford & Warnke that it would compensate him for his efforts. He reasoned that the firm would have been required to expend considerable sums to verify his allegations and compile the evidence that he possessed. We declined to discuss with [redacted] the prospect of compensating him for providing such materials and left. We have had no further contacts with [redacted]

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We bring this information to your attention for two reasons. First, if the government in fact engaged in any portion of the conduct alleged by [redacted] the Department of Justice should advise defense counsel immediately of the scope and duration of the covert operations conducted. The implications of such conduct to the pending federal and state criminal cases are far reaching. We also want access to any documents, recordings or other information provided to the government by [redacted] regardless of how such materials were obtained by the government. Conversely, if the allegations are untrue, we felt that the Department of Justice should be made aware of the information that [redacted] is circulating, so that it could take whatever action it deemed appropriate.

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With best regards.

Sincerely,

[redacted]

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Memorandum

To : SAC, WMFO (29B-WF-171994) Date 10/2/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO: WMFO

RE: LEAD #31; REGULATOR/AUDITOR INTERVIEWS.

The purpose of this memo is to provide an outline of investigative measures intended regarding Price Waterhouse and related auditors.

I. Analysis of potential witnesses.

In order to better select for interview auditors, directors, and other possible witnesses, an analysis is currently being conducted to determine the background of each potential witness, their role in the audits or investigation, and potential usefulness to the case. It is hoped that the reviewing agents can cull out only witnesses who have something to contribute to the investigation so that the number of interviews and travel will be limited to what is necessary. Without this review, there remain dozens of directors and auditors throughout the world who could be interviewed.

SA [redacted] has ben assigned to review the directors and SA [redacted] has been assigned to review the auditors. The agents will rely upon existing FD-302's, audit reports, and [redacted] b6 b7C b7E

II. Contact with [redacted] b6 b7C b7D

DEV/dev
1-29B-WF-171994
1-ea. involved SA [redacted]

29B-WF-171994 Main 475

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 6 1992
FBI — WASH. FIELD OFFICE

1325015-000-6837

III. Conduct Interviews.

After the above steps have been completed, a number of interviews need to be conducted. Those are as follows:

1. Sources of allegations--SSA [redacted] has information regarding specific individuals who have made allegations of wrongdoing involving auditors. These names will be obtained from SSA [redacted] and the interviews conducted. b6 b7C

2. [redacted]--This individual is with Price Waterhouse U.S. and was reportedly involved in audits of BCCI Miami. Depending on the information provided, this may provide another avenue to obtain jurisdiction under U.S. law.

3. [redacted] the Cayman Islands whom [redacted] recently identified as having stated the auditors "had been taken care of" with homes and non-recourse loans.

4. Directors--after the above analysis, key directors of BCCI will be interviewed regarding their dealings with auditors. One of these should include [redacted] Grand Cayman.

5. Auditors--after the analysis by SA [redacted] key auditors will be interviewed. Several have already been interviewed and some may require re-interview due to the limited nature of initial interviews.

IV. Obtain access to Cayman records.

[redacted] b7D

It is not known if the request will be processed in time for the trip scheduled for mid-October. It is hoped that authorization to review the records will be had prior to the end of the currently scheduled trip or access to the documents will be allowed with the limited purpose of looking at the records without copying.

1325015-000-6838

V. Review VISA account records.

One of the allegations is that auditors associated with BCCI have enjoyed the use of VISA cards with BCCI making the payments regardless of type of expense, personal or business. In order to investigate these allegations, three steps will be taken.

1. Credit reports will be obtained on suspected auditors.

2. The computer system for BCCI VISA cards will be queried. This system is maintained by the liquidators.

3. The records of the Card Center for BCCI VISA will be reviewed.

1325015-000-6839

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 10/27/92

To: [redacted], Principal Deputy Chief, DOJ Fraud b6 b7C
(Name and Address of USA)

From: ROBERT M. BRYANT
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] 10/27/92
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached are copies of the following FD-302's:

INTERVIEWEE	DATE
[redacted]	2/19/92
	11/12/91
	1/8/92
	9/1/92
	5/26/92
	1/29/92
	11/13/91
	7/8/92
	1/2/92
	1/9/92

b6 b7C

29B-WF-171994-Main 476

SEARCHED ... INDEXED ... SERIALIZED ... FILED ...
Serialized
Indexed 2-7-1992
Filed WASH. FIELD OFFICE

132-015-000-6840

INTERVIEWEE	DATE
[redacted]	6/19/92
	10/2/91
	5/4/92
CI	8/6/91
CI	1/21/92
CI	12/18/91
CI	1/3/92
[redacted]	6/4/92, 4/30/92
	12/30/91
	5/12/92
	1/13/92
	7/15/92
	5/29/92
	11/14/91
	5/13/92
	1/2/92
	6/9/92
	3/11/92, 6/6/92
	1/2/92
	1/30/92
	2/21/92
	5/11/92
	1/9/92
	1/6/92
	1/29/92
	5/13/92, 5/16/90
	10/24/91
	3/24/92
	1/16/92
	1/30/92
	2/4/92
	6/22/92
	2/6/92
	6/3/92
	1/20/92
	4/22/92, 3/31/92
	4/9/92, 4/9/92
	1/29/92
	9/30/91
	6/1/92
	12/31/91
	1/10/92
	5/13/92
	7/14/92
	11/14/91
	10/29/91, 2/10/92
	11/12/91
	6/19/92
	3/30/92
	1/8/92
	11/12/91
	4/22/91
	11/12/91

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INTERVIEWEE	DATE
	2/12/92
	7/14/92
	5/30/91
	4/2/92
	2/10/92
	6/2/92
	11/13/91
	2/4/92
	3/16/92
	5/6-7/92
	5/4/92
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	4/8/92
	5/20/92
	5/12/92
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	6/25/92
	6/15/92
	6/25/92
	1/6/92
	5/13/92
	10/23/91

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Documents Received.....11/18/91
Documents Received.....7/14/92
Documents Received.....10/28/91
Document Inventory, BCCI.....11/4/91
Document Inventory, USCS.....11/4/91
Document Inventory, Bankers Trust Co.....11/4/91
Document Inventory, USCS.....6/21/91
Document Inventory, Goldman Sachs.....11/4/91
Document Inventory, Clifford and Warnke.....11/15/91
Document Inventory, Schwalb and Donnenfeld.....11/15/91
Document Inventory, Kidder Peabody.....11/4/91
Document Inventory, Nussbaum and Wald.....11/20/91
Cassette Reveiw, '85 BCCI Jamboree.....2/10/92
Subpoena Service, [redacted].....10/24/91
Subpoena Service, [redacted].....10/24/91
Search Warrant.....4/24/92

Memorandum

To : SAC WMFO (29B-WF-171994)(P)(BCCI) Date 10/27/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

On 10/27/92 the writer telephonically contacted the New Haven rotor who handles 29B matters, in order to determine the status of a lead set out in a teletype dated 8/29/92.

The rotor advised the leads were being set at that time (10/27/92).

Lead #30

2 - WMFO
(1 - 29B-WF-171994)
(1 - 29B-WF-171994) SUB F/S
RHM:rhm

-477
29B-WF-171994 Main

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW
OCT 28 1992
FBI — WASH. FIELD OFFICE

1325015-000-6843

U.S. Department of Justice

Washington, D.C. 20530

October 28, 1992

MEMORANDUM

TO: File

FROM: [redacted] sdc
Trial Attorney
Asset Forfeiture Office

b6
b7C

SUBJECT: **Meeting with** [redacted]

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b7C

[redacted] for approximately 90 minutes on October 27, 1992. The purpose of the meeting was to go over an agenda of old and new business.

Documents at Leadenhall Street

[redacted] confirmed that he had seen and reviewed, to some extent, records of ICIC Overseas and ICIC Investments that are located on the seventh floor of the BCCI office building on Leadenhall Street in London. He said that most of the records on that floor belonged to ICIC Foundation, a charitable organization, but that the offices were also used by [redacted] and that there were approximately 10 boxes of ICIC-O and ICIC-I records there. These are the only records of these two entities in London, and are the records to which the FBI was denied access.

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[redacted] says that the records have been secured since July, 1991, although ICIC-F representatives have had access to them. He doubts if [redacted] has gone through them. In his estimation, it would take two people three or four days to go through the records thoroughly.

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b7D

[redacted] said that progress is being made in getting the liquidators unilaterally to accept the existing PACE order as broad enough to cover these records so that we may review them. Once the liquidators have made that determination, which should occur within a few weeks, they will be willing to assist us in our review. [redacted] suggested that [redacted] Touche Ross are quite familiar with the records and could guide us through them. British counsel to the liquidators, [redacted] may want to be present during this process to some extent.

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-478
29B-WF-171994 Main
Sec Sec

1325015-000-6844
Sec JR

(We did not discuss the progress we are making in setting up an interview of [redacted] in England, but it would be convenient if the review of the records and the [redacted] interview could coincide so that we could show [redacted] documents and he could guide us to others, if he is so inclined.) b6 b7C

SPROUT N.V.

[redacted] explained that SPROUT is an investment holding company of some sort that was set up by the investment firm of Donaldson, Lufkin and Jenrette ("DLJ") in the Netherlands Antilles. Apparently, DLJ issued shares of stock in the company, including 500 shares to BCCI Overseas at $1,000 per share. These are the shares that were held in a custodial account at Citibank and were turned over to the Marshals by Citibank sua sponte earlier this year. b6 b7C

The liquidators do not know if the [redacted] shares are shares in the management company itself or in the assets that the company invested in as some kind of mutual fund. Apparently, DLJ still controls SPROUT, however, and would be able to answer this question and also tell us if the shares have any current value. b6 b7C

The liquidators suggest that we use our investigative resources to obtain all SPROUT records from DLJ in order to determine the actual value of the asset. I am asking [redacted] to obtain whatever background the liquidators have on this and to pass it on to [redacted] with a request that the FBI pursue this lead in the course of its effort to locate all BCCI assets that may be subject to forfeiture. b6 b7C

Avon

[redacted] suggested that BCCI may also have held some interest in the Avon corporation through Kemper Clearing Corp. We previously forfeited some BCCI Overseas assets at Kemper Securities, but may not have picked up assets that may be controlled by Kemper Clearing Corp. which is a related but separate entity. [redacted] will also follow up on this either by contacting Kemper Clearing directly, or by referring this to [redacted] b6 b7C

[redacted] said that the liquidators think that the [redacted] who owe BCCI more than one billion dollars from loans to their shipping business, have assets in the United States against which the liquidators might be able to levy. [redacted] had a list of seven bank accounts held in various corporate names at French American Bancorp and Security Pacific that may be [redacted] controlled and may contain as much as $350 million dollars. I agreed to have [redacted] pass this list to the FBI for the purpose of determining whether the accounts are indeed still in existence,

1325015-000-6845

whether they contain substantial funds, and whether they are controlled by the [redacted] b6 b7C

I do not know at this point what means we would use to forfeit these funds, since they belong not to a defendant but rather to a person who owes a debt to the defendant. The debt is a BCCI asset that is forfeitable; but the debtor is not necessarily obligated to use these particular funds to satisfy that debt. Perhaps, if the FBI confirms the liquidators' suspicions, we or the liquidators could get a civil judgment against the [redacted] and levy against these accounts, which would make them subject to forfeiture. b6 b7C

1200 Reading Drive

We advised the liquidators that we are close to a resolution on this matter and will have a letter to them shortly.

Philippine Bonds

We advised the liquidators that we are not close to a resolution on this matter, but that we have it under review. They reiterated their position that neither the $33 million nor the 1/8 point fee are "assets located in the United States."

cc: [redacted] b6 b7C

1325015-000-6846

Memorandum

To : SAC WMFO (29B-WF-171994)(P)(BCCI) Date 10/28/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

On 10/28/92 SA [redacted] met with [redacted] DOJ Trail Attorney, Asset Forfeiture Office (AFO) to discuss the status of various forfeiture matters. b6 b7C

Attached is a memo from [redacted] Trail Attorney, AFO regarding a meeting they (AFO) had with the BCCI liquidators on 10/27/92. SA [redacted] meeting with [redacted] concerned the results of the meeting of 10/27/92. b6 b7C

The following is summary of each area discussed between SA [redacted] b6 b7C

1. DOCUMENTS AT LEADENHALL STREET

The documents in question are documents which the FBI had been denied access to previously. The documents relate to ICIC (Overseas) and ICIC (Investment). These documents need to be reviewed in order to determine if there is any information which would benefit the United States government in the forfeiture of $ 97 million of ICIC (Inv) assets. The offices in which the documents were located were [redacted] b6 b7C ICIC and had significant contact with high level BCCI employees (i.e. [redacted] advised they (AFO) would like to have [redacted] DOJ, Attorney and the writer review the documents once permission has been granted.

2. SPROUT N.V.

Sprout N.V. is an investment holding company which may have assets in the name of BCCI [redacted] provided all available documents he possessed to SA [redacted] and requested that the FBI pursue the lead in the course of its effort to locate all BCCI assets that may be subject to forfeiture. b6 b7C

29B-WF-171994 Main

1 - WMFO (29B-WF-171994 SUB F/S)

RHM:rhm

1325015-000-6847

3. AVON

BCCI may have held some interest in the Avon corporation through Kemper Clearing Corp. and may be party to a class action lawsuit. If BCCI wins the lawsuit the proceeds would most likely be forfeitable. [redacted] will be following up on this matter. b6 b7C

4. [redacted] may owe BCCI more than $ 1 billion from loans. It is believed that the [redacted] have assets in the United States which may be forfeitable through a civil judgement. [redacted] requested help in determining whether there are assets held in seven accounts which are (or were) at the French American Bank Corp. and Security Pacific International Bank, both of which are in New York, New York. b6 b7C

5. 1200 READING DRIVE

The AFO is going advise the liquidators to sell the property.

6. PHILIPPINE BONDS

The Philippine bonds were not discussed.

7. NEW ORLEANS PROPERTY

The property in New Orleans has an offer on it to be sold. The AFO, along with the US Marshals, is handling the sale. The offer is at 100 % of the value.

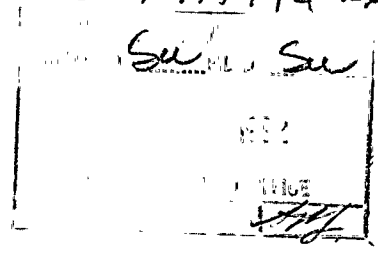
8. LOBAR PROPERTIES

The LOBAR properties need to be analyzed by the end of November, in order to determine if [redacted] will receive any special consideration in his sentencing.

1325015-000-6848

480

218-WF-171994 Serial Scope



U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
October 29, 1992

b6
b7C

Drug Enforcement Administration
700 Army Navy Drive
Arlington, VA 22202

RE: BCCI - NADDIS CHECKS

Dear

Regarding the previous telephone conversation on 10/28/92 with Special Agent (SA) the Federal Bureau of Investigation (FBI) is requesting assistance from the Drug Enforcement Administration (DEA) in conducting NADDIS checks on claimants to the liquidation proceedings of the Bank of Credit and Commerce International (BCCI).

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By prior agreement with the Department of Justice (DOJ) and the liquidators for BCCI, Touche Ross, Inc. it was decided that the liquidators would furnish available information on those persons making claims against BCCI to the DOJ. DOJ would in turn determine to the extent feasible if the money claimed was derived from illegal activities. It was further decided that the FBI would conduct indices checks and that the DEA would conduct NADDIS checks on the names provided. The claimants are both individuals and companies.

Accompanying this letter is the first set of claimant names. At this point in time it is not known if the FBI will receive any additional claimant names. When the NADDIS checks [redacted] completed, or if there are any questions, contact SA [redacted] at (202) 324-9315.

b6
b7C

Sincerely yours,

Robert M. Bryant
Special Agent in Charge

b6
b7C

Supervisory Special Agent

1-29B-WF-171994

1325015-000-6850

[redacted]

VA [redacted]

[redacted]

[redacted]

THE GRAND HOTEL
2350 M STREET, N.W.
WASHINGTON, D.C.
(202) 429-0100

b6
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1
DBS

-481

29B-WF-171994 Main

INDEXED
SEARCHED
SERIALIZED
FILED

1325015-000-6851

C-5 BCCI

[redacted]

b6
b7C
b7E

0707 56253 1007
DMV REPLY

[redacted]

END OF NAME GROUP
** NOTICE **
INFORMATION OBTAINED FROM VCIN MAY BE USED FOR
CRIMINAL JUSTICE PURPOSES ONLY.
#056257

LIST OF NAMES FROM REGISTRATION OWNER FILE

NAME	DOB	ADDRESS	LIC	VMA

b6
b7C

NO MORE RECORDS TO DISPLAY, TO END <CLEAR>

0707 59960 1027 NLET
DR.DCMPD0000
07:25 07/07/92 00899 [redacted]
07:26 07/07/92 02358
TXT
NOT ON FILE
.NAM [redacted] SEX/M.PUR/.ATN/
#059960

b6
b7C
b7E

0707 59982 1028 NLET
RR.DCMPD0000
07:25 07/07/92 00901 [redacted]
07:26 07/07/92 02361
TXT
[redacted]
#059982

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b7C
b7E

0707 60230 1029
NCIC REPLY

VAFBINVOO
NO NCIC WANT DOB/[redacted] SEX/M RAC/U

b6
b7C

#060232

0707 60229 1029
VCIN REPLY

[redacted]

b6
b7C
b7E

[redacted] SEX/M.RAC/U.DOB/[redacted]

NO MATCH FOUND USING ABOVE IDENTIFIERS

#060245

0707 60231 1029
NCIC REPLY

[redacted]

b6
b7C
b7E

NO IDENTIFIABLE RECORD IN THE NCIC INTERSTATE IDENTIFICATION INDEX
(III) FOR NAM/[redacted] SEX/M.RAC/U.DOB/[redacted] UR/C.
NOTICE -- THIS DOES NOT PRECLUDE THE POSSIBLE EXISTENCE OF MATCHING
RECORDS IN LOCAL, STATE, OR FBI IDENTIFICATION DIVISION FILES THAT ARE
NOT INDEXED IN THE NCIC III. IF YOU DESIRE A SEARCH OF THE FBI
IDENTIFICATION DIVISION FILES, A FINGERPRINT CARD SHOULD BE SUBMITTED.
END

#060265

0707 60250 1030 NLET
SM.NLSRVCMSG
07:28 07/07/92 00027 [redacted]
07:28 07/07/92 02404
TXT
[redacted] SERVICE FOR MESSAGE TYPE DG, MESSAGE WILL NOT BE DELIVERED TO KY
KY
TXT
NAM [redacted] SEX/M
#060250

b6
b7C
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0707 60228 1030
VCIN REPLY

[redacted]

b6
b7C
b7E

RE: NAM [redacted] SEX/M RAC/U DOB [redacted]
NO WANT ON THE VCIN FILE
#060257

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 9/23/92

From : SA [redacted] (BCCI) b6 b7C

Subject: [redacted]

Based upon DOJ Attorney, [redacted] prosecutive opinion, an investigation will be conducted of [redacted] relating to allegations that he defrauded Daiwa Bank in Chicago, Illinois. Allegations are that [redacted] prepared false or misleading financial statements to acquire a multi-million dollar loan from Daiwa, a non-federally insured institution, for his Texas real estate ventures. b6 b7C

(K)
PM

482
29B-WF-171994 Main
Su Su

Su

Memorandum

To : IIC [redacted] (29B-WF-171994) (P) Date 10/30/92

From : SA [redacted]

Subject: HIDDEN INTEREST
MAJOR CASE #38
STATUS REPORT

Reference is made to lead #1, lead #6, lead #21, and lead #67.

LEAD #1 and LEAD #6: Reference a memo from writer to SAC WMFO, dated 10/7/92, and the team leader meeting on 10/30/92. Pursuant to the 10/29/92 meeting between [redacted] and the FBI, lead #1 and lead #6 are considered closed due to the prosecutive declination provided by [redacted] in captioned meeting. The memo referenced above provides the current summary pertaining to the nominees

LEAD #21 and #67 (PHARAON/NBG): The status of leads #21 and #67 are that we are waiting on a prosecutive opinion from DOJ re the indictment/prosecution of Pharaon as a nominee owner of NBG. TA [redacted] is the prosecuting attorney on NBG/Pharaon and is [redacted] in Georgia preparing for the trial of [redacted] Writer spoke with TA [redacted] on today's date and was advised that it is anticipated that the Pharaon/NBG prosecution will be added to the existing BCCI RICO indictment at some time in the future. TA [redacted] advised that currently there is no investigation into the Pharaon/NBG aspect of the case that needs to be addressed. SA [redacted] will prepare a memo summarizing the investigation to date and what areas will need further investigation.

b6 b7C

b6 b7C

b6 b7C

(K)

— 483

2-WMFO (29B-WF-171994)

29B-WF-171994 Main

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FBI — WASH. FIELD OFFICE

1325015-000-6858

- 484

29B-WF-171994 Main (X)

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SERIALIZED ___ FILED ___

OCT 30 1992

FBI — WASH. FIELD OFFICE

Memorandum

To : SSA [redacted] Date 10/30/92

From : SA [redacted]

Subject: MAJOR CASE #38; HIDDEN INTERESTS; FIF; FAG; OO: WMFO

RE: STATUS REPORT, LEAD #51; FT. MEADE

10/5/92 Interviewed [redacted] Military Intelligence Battalion (Counter-Intelligence), U.S. Army, Ft. Meade regarding erased BCCI information found in a seized personal computer. [redacted] provided a 5.5 inch diskette containing the BCCI information. (See FD-302 dated 10/8/92)

10/13/92 Interviewed [redacted] ITEM INC. (Office Equipment Specialists) of Alexandria, Virginia. ITEM INC. owns and leases out the computer that contained the erased BCCI information. ITEM INC. purchased the computer two years ago from an office equipment distributor in California named ZEMAITIS. Interviewee will provide information on ZEMAITIS and a listing of all the previous clients that have used computer #90009505 who may have imputed the BCCI information. (See FD-302 dated 10/14/92)

10/15/92 Made liaison with ISA [redacted] (A-5/NVMRA), EXT. [redacted] for technical assistance in decoding/retrieving portions of erased information that was not retrieved by [redacted]

10/16/92 Received a FAX from ITEM INC. containing a chronological listing of the previous users/clients of computer #90009505 and the address of ZEMAITIS. Will obtain background information and interview previous clients.

10/30/92 Interviewed [redacted] ALTA ANALYTICS of Arlington, Virginia. ALTA ANALYTICS (AA) is 1 of 4 clients that leased computer #90009505 from ITEM INC. AA produces and sells an analytical software system called the "Netmap" system. The "Netmap" is a workstation-based, analytical software system developed to allow analysts to locate, graphically display and plot communication patterns, interactions, and networks. AA was the source of the BCCI information

b6 b7C

found in the seized computer. For purposes of the "Netmap" system, AA used the ITEM INC. rental computer to enter public source BCCI information, to see if "Netmap" could produce meaningful correlations/intelligent analysis for prospective government/law enforcement agencies that might want to purchase their product. (See FD-302 dated 10/30/92)

Based on the ALTA ANALYTICS interview, this lead is considered covered. Memorandum to follow.

1325015-000-6861

Memorandum

To : SAC, WMFO (~~29B-WF-171994~~) (P) Date 10/30/92
(Attn: SSA [redacted]) b6 b7C

From : SA [redacted]

Subject: BCCI LEAD #73
STATUS REPORT

Re: Lead #73

Lead #73 will handled by SSA [redacted] due to writers extended leave beginning 10/30/92. b6 b7C

4-WMFO
1-SSA [redacted]
1-SSA b6 b7C
1-SA
1-SA [redacted]

(4)
MW/mw

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29B-WF-171994 Main - 485

SEARCHED SERIALIZED INDEXED FILED
OCT 30 1992
FBI — WASH. FIELD OFFICE

1325015-000-6862

Memorandum

To : SAC, WMFO

Date 11/9/92

From : SSA [redacted] b6 b7C

Subject: OFFICE SECURITY MATTER:
500-1ST ST., NW, WDC

At approximately 9:00a.m. on 11/7/92, unassisted entry to 500 First Street, NW, Suite 400, Washington, D.C., which is the off-site location of the "BCCI Special" (29B-WF-171994), was accomplished by six people, who subsequently identified themselves as members of "Judge Lacey's staff." The group was lead by [redacted] b6 b7C

According to [redacted], he and the others had been directed to come to the off-site by two DOJ employees: Deputy Assistant Attorney General [redacted] (position unknown). [redacted] as the person who had given him and the other members of his party the combination to the off-site's perimeter doors, in addition to the codes for controlling the alarm system. [redacted] said that only he had the codes for the alarm. b6 b7C

On 11/9/92, SSA [redacted], was notified of the security breach. SSA [redacted] said he would discuss with TSS SSA [redacted] whether a code-change is required. b6 b7C

Also on 11/9/92, it was learned from SA [redacted] (newly assigned to the "BNL Special" from the "BCCI Special") that, on 11/6/92, after being shown credentials, SA [redacted] admitted five DOJ employees to the captioned space. In a subsequent telephone conversation with ASAC DONALD W. THOMPSON, JR., SA [redacted] was instructed to give the DOJ personnel the door and alarm codes. SA [redacted] did as instructed. b6 b7C

It is therefore recommended that, other than at the captioned location, an office-wide code-change be accomplished.

4-WMFO
1-SAC BRYANT
1-SSA [redacted]
1-SSA
1-29B-WF-171994

JNR:jnr
(4)

[redacted]

29B-WF-171994 Main -486

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SERIALIZED [redacted] FILED [redacted]
NOV 1992
FBI — WASH. FIELD OFFICE

1325015-000-6863

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
November 9, 1992

b6
b7C

Office of Legal Adviser
Dept. of State

Dear

As discussed in a telephone conversation on Nov. 5, 1992, with SA below are four short paragraphs pertaining to four individuals involved in the illegal activities of BCCI. Each paragraph contains the latest information received by the FBI on the individuals whereabouts and/or status.

b6
b7C

Currently in prison in France awaiting a decision by the French government on whether to extradite to the U.S. or England, both of whom have sent an extradition request to France. of the U.S. Attorney's office in Tampa, Florida has made a proffer to attorney and has forwarded same to the French government by letter Rogatory.

b6
b7C

AGHA HASAN ABEDI; Presently residing in Pakistan. Possibly ill of health due to recent heart attack. Leads have been set forth in an effort to verify residency and physical condition.

In prison in Abu Dhabi awaiting decision of Abu Dhabi government on whether or not to prosecute for illegal activities in connection with BCCI. The U.S. has requested expulsion of so as U.S. officials can apprehend for charges brought against by the U.S. government.

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29B-WF-171994 main

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1-Sub Fug 3
1-Sub Fug 4
1-main

1325015-000-6864

GHAITH PHARAON; Possibly seeking citizenship to Pakistan. Reportedly still traveling with impunity between Abu Dhabi, Saudi Arabia, and Pakistan. Personal yacht "Le Pharaon" recently docked in Larnica, Cyprus. No sighting of PHARAON on the yacht.

For inclusion in our files please advise on what request have been made, and what future request will be made, to these foreign governments re the arrest and/or extradition of these subjects.

Sincerely yours,

Robert M. Bryant
Special Agent in Charge

By [redacted]
Supervisory Special Agent

b6
b7C

1325015-000-6865

FD-320 (Rev. 4-11-86)

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 11/9/92

To: [redacted] Principal Deputy Chief, DOJ Fraud b6 b7C
(Name and Address of USA)

From: ROBERT M. BRYANT
(Name of Official in Charge and Field Division) (Signature of Official in Charge)

RE: HIDDEN INTERESTS
(Name of Subject) Age Sex

You are hereby advised of action authorized by
(Name of USA or AUSA)

on information submitted by Special Agent [redacted] on 11/9/92
(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18, USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached is a copy of the 11/9/92 BCCI Interview Report and the following FD-302's:

b6 b7C

[redacted]	DATE
	10/30/92
	1/31/92
	10/13/92
	1/31/92
	10/22/92

-488

29B-WF-171994 Main

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NOV 9 1992
FBI — WASH. FIELD OFFICE

VOL 6

1325015-000-6866

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
November 10, 1992

[redacted] b6 b7C

Drug Enforcement Administration
700 Army Navy Drive
Arlington, VA 22202

RE: BCCI - NADDIS CHECKS

Dear [redacted]

Regarding the previous cover letter dated 10/29/92 and the accompanying set of names to be checked through NADDIS, the Federal Bureau of Investigation (FBI) is requesting further assistance from the Drug Enforcement Administration (DEA) in conducting NADDIS checks on additional claimants to the liquidation proceedings of the Bank of Credit and Commerce International (BCCI).

Accompanying this letter is the second set of claimant names. There should be no additional claimant names forthcoming. When the NADDIS checks have been completed, or if there are any questions, contact Special Agent [redacted] at (202) 324-9315. b6 b7C

Sincerely yours,

Robert M. Bryant
Special Agent in Charge

[redacted] b6 b7C

Supervisory Special Agent

2-WMFO
(1) 29B-WF-171994
1- 29B-WF-171994 SUB BB
RMM: rhm

29B-WF-171994-489
SU SU

1325015-000-6867

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 11/12/92

To: Office Services Manager

Requested SA

Ext. 9316 | Squad: Bank I | File No. 29B-WF-171994

b6
b7C

Subject

Social Security Account #

Aliases

Address | | INDIA | Race | Sex ☐ Male ☐ Female

- ☐ Exact Spelling
- ☒ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☐ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

General Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **ISIS:** ☐ NEG ☐ POS	Searched by / Date
Confidential Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **OCIS:** ☐ NEG ☐ POS	Searched by / Date
ELSUR Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **IIS:** ☐ NEG ☐ POS	Searched by / Date
☒ **FOIMS:** ☐ NEG ☐ POS	Searched by / Date	☐ **MICRO:** ☐ NEG ☐ POS	Searched by / Date
☒ **GLOBAL:** ☐ NEG ☐ POS	Searched by / Date	☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by / Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
			- 490

Consolidated by Date

Reviewed by Date

29B-WF-171994 Main

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NOV 4 - 1992
FBI - WASH. METRO FIELD OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6868

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
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☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-6869

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date 11/12/92

Request SA [redacted]

Ext. 9316 | Squad: BCCI | File No. 29B-WF-171994

Subject [redacted]

Aliases

Soc [redacted]

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female
	08/15/40			

- ☐ Exact Spelling
- ☒ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☐ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

General Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **ISIS:** ☐ NEG ☐ POS	Searched by / Date
Confidential Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **OCIS:** ☐ NEG ☐ POS	Searched by / Date
ELSUR Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **IIS:** ☐ NEG ☐ POS	Searched by / Date
☒ **FOIMS:** ☐ NEG ☐ POS	Searched by / Date	☐ **MICRO:** ☐ NEG ☐ POS	Searched by / Date
☒ **GLOBAL:** ☐ NEG ☐ POS	Searched by / Date	☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by / Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
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Central
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- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
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- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

- 491
29B-WF-171994 main

Consolidated by / Date

Reviewed by / Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
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62-325015-000-6870

MICRO COMPUTER *(Continued)*

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☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-6871

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date 11/12/92

Requested by: SR [redacted] b6 b7C

Ext. 9316 | Squad: Duty | File No. 29B-WF-171994

Subject [redacted]

Aliases

Social Security Account #

Address | Birth Place | Race | Sex ☐ Male ☐ Female

☐ Exact Spelling
☒ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

General Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **ISIS:** ☐ NEG ☐ POS	Searched by / Date
Confidential Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **OCIS:** ☐ NEG ☐ POS	Searched by / Date
ELSUR Indices: ☐ NEG ☐ POS	Searched by / Date	☐ **IIS:** ☐ NEG ☐ POS	Searched by / Date
☒ **FOIMS:** ☐ NEG ☐ POS	Searched by / Date	☐ **MICRO:** ☐ NEG ☐ POS	Searched by / Date
☒ **GLOBAL:** ☐ NEG ☐ POS	Searched by / Date	☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by / Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-492
29B-WF-171994 Main

Consolidated by ____ Date ____

Reviewed by ____ Date ____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED ____ INDEXED ____
SERIALIZED SW FILED SW
NOV 17 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-6872

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date

☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-687

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 8/6/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

RE: LEAD # 40, [redacted] b7E

[redacted] Per discussion on 8/6/92 between writer and SSA during writer's file review, this matter should now be considered covered. b6 b7C

Writer obtained a copy of the teletype sent to this Division from New Orleans, in which they outlined information obtained during their [redacted] b6 b7C b7E

Therefore, as requested during writer's file review of 8/6/92, this lead is considered **COVERED.**

1-29B-WF-171994
1-IIC
1-SSA [redacted] b6 b7C

DEV/dev

Q2 -493

29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 11 1992
FBI — WASH. FIELD OFFICE

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

Office of the Legal Attache
58 Bis, Rue de La Boetie
75008 Paris
August 14, 1992

[redacted] b6 b7C

Office of International Affairs
U.S. Department of Justice
Washington, D.C.

Dear [redacted]

RE: BCCI commission rogatory to interview [redacted] b6 b7C in France.

As you know the U.S. has submitted a letter rogatory to the French for an interview of [redacted] b6 b7C My understanding is that he is a key witness, and that he could provide assistance to the various prosecutors handling all the different aspects of the BCCI investigation.

Given the complexity of the investigation, it is normal that the interview of [redacted] b6 b7C would be done by several prosecutors or investigators from the U.S. However, you might keep in mind the probable reluctance of the French Judge of Instruction to allow more than two or three Americans to participate. I have spoken to the French Police organization which is handling the matter, and they tell me that once they get the message from the U.S. proposing the mission they will make contact with the French Judge. The final decision is his. I only suggest to you that it is quite likely he will insist on a very reduced American delegation.

Yours truly,

[redacted] b6 b7C

Legal Attache

29B-WF-171994
494

[redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted]
AUG 17 1992

1325015-000-6875

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/28/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

RE: Lead #45: BCCI WDC REP OFFICE

Lead was initiated due to a Time Magazine article by [redacted] dated July 29, 1991, which stated that according to a BCCI source, a representative of the BCCI WDC Rep Office was distributing millions of dollars in payoffs to U.S. officials. Supporting this allegation is the knowledge, gained through investigation, that BCCI routinely made payoffs to government officials in other countries to acquire or open banks. b6 b7C

Investigation to date has included interviews of [redacted] WDC Office. [redacted] BCCI made in other countries, but neither have any knowledge of political payoffs in the U.S. The [redacted] is currently located in Costa Rico. [redacted] is under indictment in Peru for making these political payoffs. Peru is attempting to extradite [redacted] from Costa Rico. SA [redacted] Miami Division, Legat, telephone number (305) 787-6784 is attempting to locate [redacted] and arrange an interview by WMFO agents. b6 b7C

Furthermore, recent investigation leads [redacted] that the source for the Time Magazine article could be [redacted] Investigation has determined that [redacted] b6 b7C b7D

3-WMFO
(2-29B-WF-171994)
(1-SA [redacted])

DBS:dml
(2)

-495
29B-WF-171994 Main

b6 b7C b7D

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 1 1992
FBI — WASH. FIELD OFFICE

1325015-000-6876

[redacted] information and documents regarding BCCI. SA [redacted] has been in contact with [redacted] the articles author, and has learned that [redacted] will divulge one of his sources to the article. Therefore, it is requested that the following lead be set to SA [redacted]

b6
b7C

Contact [redacted] Time Magazines article [redacted] to determine the source of the allegation that millions of dollars in payoffs to U.S. officials were made by a representative in the BCCI WDC Rep Office. Further determine if [redacted]

b6
b7C
b7D

1325015-000-6877

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 9/11/92

To: Office Services Manager

Requested by: SA

Ext. (202) 324-9339 | Squad: BCCI | File No. 199-WF-177974

Subject: Kissinger Associates

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☒ Exact Spelling
☐ All References
☐ Main Security Case File
☐ Security References Only

☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*

☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS Searched by 9/11/92 Date	☐ **ISIS:** ☐ NEG ☐ POS Searched by Date
☐ **Confidential Indices:** ☐ NEG ☐ POS Searched by Date	☐ **OCIS:** ☐ NEG ☐ POS Searched by Date
☒ **ELSUR Indices:** ☒ NEG ☐ POS Searched by 9/16 Date	☐ **IIS:** ☐ NEG ☐ POS Searched by Date
9/11/92 Date	☐ **MICRO:** ☐ NEG ☐ POS Searched by Date
9/11/92 Date	☐ **REGIONAL:** ☐ NEG ☐ POS Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast	Mid-Atlantic		Central		Western
☐ Albany	☐ Atlanta	☐ New Orleans	☐ Buffalo	☐ Little Rock	☐ Albuquerque
☐ Bern Switzerland	☐ Baltimore	☐ Norfolk	☐ Chicago	☐ Louisville	☐ Anchorage
☐ Bonn Germany	☐ Birmingham	☐ Quantico	☐ Cincinnati	☐ Milwaukee	☐ Butte
☐ Boston	☐ Charlotte	☐ Richmond	☐ Cleveland	☐ Minneapolis	☐ Honolulu
☐ London England	☐ Jackson	☐ San Juan	☐ Dallas	☐ Oklahoma City	☐ Las Vegas
☐ Mexico City Mexico	☐ Jacksonville	☐ Savannah	☐ Denver	☐ Omaha	☐ Los Angeles
☐ New York City	☐ Knoxville	☐ Tampa	☐ Detroit	☐ Pittsburgh	☐ Phoenix
☐ Newark	☐ Memphis	☐ Washington Field	☐ El Paso	☐ San Antonio	☐ Portland
☐ Paris France	☐ Miami	☐ All above	☐ Houston	☐ Springfield	☐ Sacramento
☐ Philadelphia	☐ Mobile		☐ Indianapolis	☐ St. Louis	☐ Salt Lake City
☐ Rome Italy			☐ Kansas City	☐ All above	☐ San Diego
☐ All above					☐ San Francisco
					☐ Seattle
					☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-496 Main

Consolidated by Date

Reviewed by Date

SEARCHED SU INDEXED SU
SERIALIZED SU FILED 30

1325015-000-6878

SU JR

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

b6
b7C

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date

☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-6879

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 9/11/92

To: Office Services Manager

Requested [redacted] SA [redacted]

b6
b7C

Ext. (202) 324-9339 | Squad: BCCI | File No. 29B-WF-171994

Subject [redacted]

Aliases

Social Security Account #

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☒ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

[redacted] 9/11/92 Date

☐ **ISIS:** ☐ NEG ☐ POS
Searched by Date

☐ **Confidential Indices:** ☐ NEG ☐ POS
Searched by Date

☐ **OCIS:** ☐ NEG ☐ POS
Searched by Date

☒ **ELSUR Indices:** ☒ NEG ☐ POS
Searched by [redacted] 9/10/92 Date

☐ **IIS:** ☐ NEG ☐ POS
Searched by Date

[redacted] 9/11/92 Date

☐ **MICRO:** ☐ NEG ☐ POS
Searched by Date

[redacted] 9/11/92 Date

☐ **REGIONAL:** ☐ NEG ☐ POS
Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

29B-WF-171991-4997

Consolidated by Date

Reviewed by Date

Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
30
FBI - WASH. METRO FIELD OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

132-90150-6880

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 10/16/92

To: Office Services Manager

Request [redacted] b6 b7C

Ext. 9300 or 9336 | Squad: BCC1 | File No.: 29B-WF-171994

Subject [redacted]

Alias

Social Security Account #

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

[redacted] Searched by 10/29/92 Date

☑ **Confidential Indices:** ☐ NEG ☐ POS
Searched by Date

☑ **ELSUR Indices:** ☐ NEG ☐ POS
Date

11-4-92 Date

11-4-92 Date

☐ **ISIS:** ☐ NEG ☐ POS
Searched by Date

☐ **OCIS:** ☐ NEG ☐ POS
Searched by Date

☐ **IIS:** ☐ NEG ☐ POS
Searched by Date

☐ **MICRO:** ☐ NEG ☐ POS
Searched by Date

☐ **REGIONAL:** ☐ NEG ☐ POS
Searched by Date

[redacted] the Field Office(s) to Query for Regional Searches.

ic

- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central

- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western

- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

[redacted] ☐ Pos ☐ Neg

[redacted] ☐ Neg

29B-WF-171994 — 498

Consolidated by Date

[redacted] ☐ Pos ☐ Neg

Reviewed by Date

SEARCHED ____ INDEXED ____
SERIALIZED SW FILED SW
1992
FBI - WASH. METRO FIELD OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

132-HQ-1087685

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-6882

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 04-10-2018 BY: [redacted]

b3
b6
b7C
b7E

F2- [redacted]
WF CASE NO [redacted] MAIN-REF: R RACE: U SEX: M
(U) (S) CLASS: [redacted] INDEXED: 072092 NAME TYPE: EVENT DATE: DOB:
F3- [redacted]
CASE NO [redacted] MAIN-REF: R RACE: U SEX: M
(U) (S) CLASS: [redacted] INDEXED: 041092 NAME TYPE: EVENT DATE: DOB:
F4- [redacted]
CASE NO [redacted] MAIN-REF: R RACE: U SEX: M
(U) (S) CLASS: [redacted] INDEXED: 030392 NAME TYPE: EVENT DATE: DOB:
F5- [redacted]
CASE NO: [redacted] MAIN-REF: R RACE: U SEX: M
(U) (S) INDEXED: 072589 NAME TYPE: EVENT DATE: DOB:
F6- [redacted]
CASE NO: 256- 0000001 MAIN-REF: R RACE: U SEX: U
(S) [redacted] INDEXED: 041887 NAME TYPE: EVENT DATE: DOB:
F7- [redacted]
CASE NO: [redacted] MAIN-REF: R RACE: U SEX: U
(U) (S) [redacted] INDEXED: 072092 NAME TYPE: EVENT DATE: DOB:
F8- [redacted]
CASE NO: [redacted] MAIN-REF: M RACE: U SEX: M
(U) (S) CLASS: [redacted] INDEXED: 030392 NAME TYPE: A EVENT DATE: DOB:
<GO> - CONTINUE WITH TRANSACTION F10 - RETURN TO INDEX MENU
F1 - REQUERY F9 - QUERY AX SHIFT-F10 - RETURN TO FOIMS MENU
4Ãý á 33

1325015-000-6883

[redacted]

~~SECRET~~

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MODIFIED: b7E
VIOLATION: [redacted] SPECIAL:
SERIALS: 15PI;

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:
MISCELLANEOUS: [redacted] b6 b7C

CLASSIFICATION LEVEL: ~~S~~ CLASSIFIED BY: ~~C-3~~ DECLASSIFY ON: ~~OADR~~
<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS
F1 -REQUERY F8 -DELETE F10 -INDEX
SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS
4Ãý á 33

1325015-000-6884

[redacted]

~~SECRET~~

NO: 001
REC-NO: 001

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TRUE:
FO: WF CASE NO: [redacted] CLASS: [redacted]
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 030392
MODIFIED:
VIOLATION: [redacted] SPECIAL:
SERIALS: 1P2;

b3
b6
b7C
b7E

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:

MISCELLANEOUS: [redacted]

CLASSIFICATION LEVEL: ~~S~~ CLASSIFIED BY: ~~C-3~~ DECLASSIFY ON: ~~OADR~~

<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS
F1 -REQUERY F8 -DELETE F10 -INDEX
SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS
4Ãý á 33

1325015-000-6885

[redacted]

~~SECRET~~

b3
NO: 00 b6
REC-NO: 00 b7C
b7E

DDN:
TRUE:
FO: WF CASE NO: [redacted]
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OO: OO CASE NO: MODIFIED:
VIOLATION: ITIR SPECIAL:
SERIALS: 500P3;

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:

MISCELLANEOUS:

CLASSIFICATION LEVEL: S CLASSIFIED BY: G-3 DECLASSIFY ON: OADR

<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS
F1 -REQUERY F2 -ALIASES F8 -DELETE F10 -INDEX
SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS
4Ãý á 33

1325015-000-6886

[redacted]

SENSITIVE

b6
NO: 001 b7C
REC-NO: 001

DDN:
TRUE:
FO: WF CASE NO: 256-0000001
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 041887
OO: OO CASE NO: MODIFIED:
VIOLATION: HTT SPECIAL:
SERIALS: 73P3

RACE: U SEX: U ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:

MISCELLANEOUS:

CLASSIFICATION LEVEL: SN CLASSIFIED BY: DECLASSIFY ON:

<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS
F1 -REQUERY F8 -DELETE F10 -INDEX
SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS

4Ãý á 33

1325015-000-6887

U.S. Department of Justice

Washington, D.C. 20530

October 20, 1992

MEMORANDUM

TO: [redacted] b6 b7C

FROM:

RE: FD 302s

I have highlighted the FD 302's that I have which are listed on your printout of existing FD 302s. The other list consists of FD 302s that I have in my files. I have highlighted the ones that you do not have on your printout. If you have any questions, you can reach me on 514-0847.

FD-302's SENT TO DOS ON 10/27/92. EBD 11/23/92

ok - Vandell

29B-WF-171994 Main - 499

SEARCHED INDEXED
SERIALIZED FILED
OCT 21 1992
FIELD OFFICE

[redacted] b6 b7C

1325015-000-6888

FD-302s (WMFO) (Without Attachments)

[redacted]

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b7D

Baker, Sowerbutts and Davies (8/21/91)
Bank of New York Document Review (10/2-4/91)
[redacted]
BCCI Document Review (8/2/91; 8/22/91; 8/23/91)
[redacted]
Clifford & Warnke Document Review, 12 boxes (10/24/91)
Clifford & Warnke Document Review, 24 boxes (10/24/91)
Confidential Informant (5/2/91)
[redacted] (5/14/91)
[redacted] (4/2/92; 4/7/92)
(4/21/92; 5/4/92; 5/12/92; 6/2/92)
[redacted]
Customs, U.S. (6/21/91)
[redacted]

[redacted]

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[redacted]

520 Fifth Ave - Document Review (8/2/91; 8/16/91)

[redacted]

FBI Document Review (4/26/91)

[redacted]

NBG and BCCI Document Review (9/24/91)
New York Grand Jury Transcripts (7/15/92)
New York State Banking Department (7/25/91)
[redacted] b6 b7C
Nussbaum & Wald Review of Documents (9/12/91; 11/1/91)
[redacted]
Perpetual Savings Bank (7/3/91)
[redacted]
Schwalb & Donnenfeld Document Review (8 boxes)(10/24/91)
[redacted]
Skadden, Arps Document Review (9/24/92)
Skadden, Arps Document Review (SEC litigation files)(9/9/91)
[redacted]

1325015-000-6892

FD-320 (Rev. 4-11-86)

COPY

Auth 10-13-92 PP

In Reply, Please Refer to

File No. 29B-WF-171994

FBI CASE STATUS FORM

Date: 9/15/92

To: [redacted] Principal Deputy Chief, DOJ Fraud

(Name and Address of USA)

From: ROBERT M. BRYANT

(Name of Official in Charge and Field Division)

(Signature of Official in Charge)

RE: HIDDEN INTERESTS

(Name of Subject) Age Sex

You are hereby advised of action authorized by _____ of USA or AUSA)

on information submitted by Special Agent [redacted] on 9/15/92

(Name) (Date)

(Check One)

- [X] Request further investigation
- [ ] Immediate declination
- [ ] Filing of complaint
- [ ] Presentation to Federal Grand Jury
- [ ] Filing of information
- [ ] Other

For violation of Title 18 . USC, Section(s) 371; 1005; 1344

Synopsis of case: Attached is a copy of the 9/14/92 BCCI Interview Report.

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BCCI - Interview Report

Run Date: 09/14/92

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
/91 10/23/1				FAB	Y
03/12/92				FAB;	✓ N 243
08/05/92				Reference 10/22-3/91 302	Y
10/22/91				FAB; NBG; CAP;	Y
07/08/92				FGB; NBG; CAP; FAB; MED	N
01/10/92				Arrest	✓ 177
92 19 2/				FAB; Gen Bribe Matters	Y
03/24/92				IND	✓ N 283
11/07/91				FAB; NBG;	Y
11/12/91				CEN;	✓ 192
11/15/91					✓ Y 315
01/08/92				CEN;	✓ 155
07/10/91				FGB; FAB	N

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PAGE * 1*

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1325015-000-6895

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE	
07/11/91				MED	Y	b6 b7C
11/07/91				FAB;	✓ N	234
06/03/91				FAB; NBG; IND;	Y	
08/30/91				FAB;	✓ N	217
11/05/91				IND	✓ Y	274
11/19/91					✓ Y	319
09/01/92				Public Corruption	✗	448
03/03/92					✓ Y	327
05/26/92				FAB Tax out	(Y	433)
06/12/92				FAB	✗	477
05/05/92				FAB	✓ Y	389
05/15/92				FAB	Y	
02/19/92				CEN	✓ Y	369

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1325015-000-6896

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
01/29/92				CEN;	Y 195 b6 b7C
02/24/92					Y 326
01/16/92				NBG	Y 374
02/12/92				NBG; IND; FAB;	Y
02/12/92				NBG; RIVEREDGE	N
02/12/92				NBG	Y
02/21/92					N 374
02/12/92					Y
11/13/91				CEN;	Y 186
07/08/92				FAB	Y 421
01/02/92				CEN;	Y 147
04/13/92				CEN	Y 363
06/30/92				FAB	Y 420

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1325015-000-6897

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE	
00/30/91				MED:	y	b6 b7C
9/						
05/09/91					N	
08/28/91				FAB;	✓ N	214
01/31/92					N	
09/12/91				FAB;	y	
11/21/91					✓ Y	316
02/26/92				FAB	Y	
~~07/30/91~~ 1/30/9				FGB; NBG;	y	
03/17/92				BAII	Y	
01/29/91					✓ Y	325
01/09/92				CEN	✓ Y	157
12/10/91					✓ Y	324
06/19/92				Metrobank	✓	414

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1325015-000-6898

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE	
04/07/92				NBG	Y	b6 b7C
06/08/92				BCCI WDC REP OFFICE; PC	Y	
09/18/91					Y	
04/17/91				MED	Y	
04/04/91				MED	Y	
04/22/92					Y	
10/17/91					Y	
08/20/91 8/20/91					Y	
09/04/91				FAB; NBG;	✓ N	221
04/30/92				Caribank Failure	✓ N	372
01/08/92				CEN	✓ Y	359
10/03/91				IND	Y	
10/02/91				FGB; FAB; NBG	✗	182

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1325015-000-6899

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
03/~~21~~/92				FAB; NBG; IND; CEN;	✓ N 248 b6 b7C
3					
05/04/92				FAB	Y 392
01/13/92				AFRICA	Y
01/09/92				Jamaica	Y
01/09/92				CEN; NBG;	Y
08/28/91				FGB;	Y
01/21/92	CI			FAB;	Y 165
02/13/92 5/13/92	CI			MED	Y 395
12/18/91	CI			FAB; NBG;	Y 142
05/02/91	CI			Pharaon	Y
01/03/92	CI			FAB;	Y 150
05/16/92	CI			MED	Y 396
06/04/92				A/F	Y 403

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1325015-000-6900

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
04/30/92				A/F	✓ 355 b6 b7C
09/05/91				FAB; NBG;	✓ N 224
12/30/91				CEN;	✓ 143
03/27/92				FAB; NBG; IND; CEN; CAP;	✓ N 246
03/26/92				IND	✓ N 302
01/08/92				NBG	Y
12/19/91					✓ Y 304
08/14/91					✓ Y 303
05/12/92				NBG; Riveredge	✓ 387
01/13/92				MED	✓ 162
07/30/91				CEN;	Y
08/30/91				FAB;	✓ N 219
07/02/92				FAB	✓ Y 422

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1325015-000-6901

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11/07/91	[redacted]	[redacted]	[redacted]	CEN;	Y
07/15/92				A/F	Y 409
09/27/91				NBG; IND;	Y
05/14/92				NBG; Riveredge	Y
05/29/92				MED	Y 416
05/16/91				MED	Y
08/20/91				MED;	Y
12/12/91				FAB	Y
03/03/92				FAB; NBG	Y 428
05/05/92				FAB	Y N 388
09/19/91				IND	Y Y 288
11/05/91					Y Y 313
11/04/91					Y Y 320

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1325015-000-6902

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11/14/91				CEN;	✓ 190 b6 b7C
01/29/92				FAB;	✓ N 237
08/01/91				FAB; NBG;	Y
08/14/91				FAB; NBG;	Y
05/29/91				FAB;	Y
12/06/91				FAB; Lancet Loan	Y
11/21/90				CEN;	Y
06/17/91				CEN;	Y
01/11/91				CEN;	Y
04/13/92				CEN	✓ Y 360
06/11/92				FAB	✓ 430/474
08/22/91				IND	Y
06/05/91				CEN;	Y

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1325015-000-6903

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11/14/91					N 25 b6 b7C
11/26/91				NBG	Y
02/19/92				CEN	Y 368
03/19/91					Y
11/13/91				NBG	Y
02/26/92				FAB; FGB;	Y
05/13/92				NBG; Riveredge	Y 382
11/20/91				NBG	Y
01/02/92				CEN	Y 149
09/04/91				FAB; NBG;	N 220
08/14/91					Y 333
05/12/92				NBG; Riveredge	Y
06/09/92				FAB	Y 401

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1325015-000-6904

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	-302 DONE
02/21/92				NBG	Y
04/04/91				MED	Y
10/30/91				CEN;	Y
11/26/91				FAB	Y
11/15/91				FAB	Y
03/11/92				MED	Y 356
06/06/92				A/F	Y 406
03/11/92				MED;	N
09/04/91				IND	Y
11/04/91				IND	N 276
01/02/92				FGB	Y 145
12/12/91				FAB	Y
01/08/92				CEN;	Y 197

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1325015-000-6905

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
01/15/92					✓ Y 330 b6 b7C
01/21/92					✓ Y 331
03/18/91				CEN; Pharaon;	Y
04/16/91				CEN;	Y
03/31/92				FAB; NBG; IND; CEN;	✓ N 247
11/19/91				NBG;	Y
06/28/91				CEN;	Y
~~02/21/92~~ 2/21/9				NBG; RIVEREDGE; IND	✓ 209
11/21/91				MED;	✓ Y 204
03/18/92				FAB;	✓ N 244
01/30/92				FAB;	✓ N 238
06/24/90				CEN;	Y
05/11/92				NBG; Riveredge	✓ 393

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1325015-000-6906

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
01/09/92				CEN	Y 160 b6 b7C
01/06/92				CEN	Y 152
04/28/92				FAB; NBG	N 371
02/06/92					Y 340
02/24/92				NBG	Y
07/03/92				FAB	Y 425/473
12/11/91				Hatch	y
~~03/17/92~~ 3/17				IND	N 299
10/22/91				IND; NBG;	y
01/29/92				FAB; IND;	N 166 ?
01/29/92				IND; [redacted] NBG;	y b6 b7C
10/04/91				NBG; IND; FAB;	y
10/09/91				CEN;	Y

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1325015-000-6907

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
03/09/92					Y 342
08/28/91				MED	Y
10/23/91					Y 308
08/28/91				NBG;	Y 54
08/29/91				MED	Y
08/28/91					Y 307
01/20/92					Y 318
12/02/91					Y 317
10/24/91				Centrust Sub Compliance	97
03/16/92				IND	N 301
03/18/92				IND	N 300
03/24/92				CEN;	201
01/16/92					377

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1325015-000-6908

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11/12/91				NBG; CEN;	Y
09/05/91				ALL	Y
11/11/91					✓ N 252
12/02/91				FAB; NBG; CEN; IND; MED	✓ N 394
07/10/92				NBG; FAB	N
01/16/92				NBG	✓ N 377
01/30/92				MED	✓ N 168
10/23/91				CCAH; FAB	Y
03/10/92				FAB;	✓ N 242
11/19/91				NBG;	Y
11/06/91				IND	Y
04/16/91				FAB;	Y
04/15/92					N

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1325015-000-6909

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
08/09/91					✓ Y 310 b6 b7C
09/26/91					✓ Y 311
02/04/92				InterRedec Docs	✓ 169
09/25/91				MED;	Y
03/18/91				CEN;	Y
03/18/91				CEN	Y
06/22/92				A/F	✓ 408
08/~~29~~/91 8/29				Receipt of BCCI Doc's	y
09/03/91				Receipt of BCCI Doc's	y
10/22/91				FAB; NBG; MED;	y
02/27/92				IND	✓ N 275
11/21/91				NBG;	y
09/05/91				FAB; NBG;	✓ N 225

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1325015-000-6910

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
07/ /91				FAB;	✓ N 215 b6 b7C
12/12/91					✓ Y 323
02/06/92				CEN	✓ Y 171
12/19/91				FAB; MED;	✓ N 235
11/06/91				CEN;	Y
02/26/92				FGB	Y
06/03/92				FAB	✓ Y 411
05/06/92				FAB; Fraud aganinst C&W	Y
06/27/91					Y
03/13/92					N
05/01/91				FAB; FGB;	Y
10/17/91				IND	Y
01/20/92				CEN;	✓ Y 200

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1325015-000-6911

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
07/[illegible]/92				RIVEREDGE;	Y
11/07/91				IND	Y 289
03/19/92				FAB;	N 245
09/07/91				NBG; FAB;	y
03/19/92				IND	N 285
04/22/92				Given Inv list BCCI-LACRO	X 346
03/31/92				MED	X 181
01/[illegible]/92				CEN;	X 199
08/08/91				FAB; FGB;	y
07/13/92				FAB; NBG	N
01/09/92				FAB; NBG	Y
09/30/91				Pharaon	X 77
12/11/91				FAB;	y

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1325015-000-6912

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
12/16/91				Hatch	Y
10/08/91				Pakistan	Y
04/14/92				MED;	N
04/14/92				MED; FAB;	N
06/01/92				A/F	Y 405
05/04/92				FAB	Y 390
03/25/92				A/F;	Y 185
07/22/91				NBG;	Y
08/01/91				FAB; FGB; NBG;	Y
10/01/91				FAB;	Y
09/19/91				FGB;	Y
11/25/91				NBG	Y
10/03/91				FAB:	N 229

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1325015-000-6913

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
12/[illegible]/91				MED - BCCI NY	Y 144 b6 b7C
03/20/92					N 261
01/10/92				CEN;	Y 198
09/20/91				FAB;	Y
07/10/92				FAB	Y
02/11/92				FGB;	Y
12/05/91				NBG;	Y
05/13/92				NBG; Riveredge	Y 383
07/14/92				GRP	Y 437
04/01/92					N
04/28/92				CEN	Y 366
11/05/91				IND	Y 278
10/30/91			(FLA)	CEN;	Y

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1325015-000-6914

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302-DONE
03/09/92				CEN	Y 367 b6 b7C
02/24/92				RIVEREDGE; NBG;	Y
09/24/91				FAB;	Y
11/14/91				CEN;	Y 194
04/18/91				CEN;	Y
02/10/92				CEN;	Y 173
10/29/91				CEN;	Y 103
08/30/91				FAB;	N 218
04/13/92				CEN	Y 364
08/22/91					Y 306
11/04/91				IND	N 296
08/27/91				FAB;	Y
12/06/91					Y 321

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1325015-000-6915

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11/13/91				CEN;	Y 193 b6 b7C
08/22/91					Y 309
06/19/92				MED	Y 400
06/30/92				FAB	Y 419
01/03/92				FGB	Y
10/23/91				IND	Y 297
05/05/92				FAB; Represent. to OCC	Y
09/05/91					Y 336
11/20/91					Y
09/05/91				FAB; NBG;	N 223
09/04/91				IND	Y
05/14/92				NBG; Riveredge	Y
12/06/91					Y 322

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1325015-000-6916

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
03/30/92				CEN	X 354 b6 b7C
02/26/92				NBG; MED	Y
09/19/91				IND	Y 271
03/02/92					Y 328
11/07/91				IND	Y 268
10/09/91				IND	N 294
09/27/91				FGB; FAB; NBG;	Y
03/92				FAB	X 429
02/12/92				FAB;	N 240
01/29/92				FAB; FAB-NY	Y
01/08/92				CEN;	X 196
09/19/92					Y 341
09/17/91				FAB;	Y

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1325015-000-6917

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11 [illegible]/91				NBG	Y
08/29/91				FAB;	N 216
10/24/91				FAB;	N 233
09/19/91				IND	Y 291
11/12/91				CEN;	X 187
04/18/91				MED	X 17
04/11/91				MED	Y
11/15/91					Y 314
11/15					
03/18/92				IND	N 298
03/17/92				IND	N 282
11/12/91				CEN;	X 189
02/12/92				Clifford & Warnke	X 176
07/14/92				GRP; [redacted] ISI	X 438

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1325015-000-6918

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
05/30/91				CEN;	Y 26 b6 b7C
02/20/92				IND	Y 277
08/09/91				FAB; NBG; CAP; FGB;	Y
04/02/92				A/F;	Y 184
07/12/91				MED	Y
07/06/92				MED	Y
10/21/91				FAB:	Y 230
02/10/92				CEN;	Y 172
08/23/91				IND	Y
06/02/92				A/F	Y 404
11/13/91				CEN;	Y 191
11/07/91				NBG; CEN;	Y
05/29/91				FAB;	Y

-- This report is property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency. **

1325015-000-6919

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
02/04/92				CEN	Y 170 b6 b7C
07/01/92				FAB	Y 423
11/06/91				IND	Y 293
01/16/92				FGB; FAB; Tampa;	Y
08/14/91				FAB; NBG; IND;	Y
08/28/91					Y 334
08/15/91				MED;	Y
07/31/91				IND; FAB; NBG;	Y
10/22/91				FAB: IND; NBG;	N 231
05/28/92				FAB	Y 430/476
10/08/91				IND	Y
10/18/91				IND;	Y
01/31/92					N 253

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1325015-000-6920

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	DONE
07/28/92				FGB; FAB; NBG	Y
03/17/92				IND	Y N 284
09/19/91				IND	Y Y 273
10/03/91				FAB;	Y
03/16/92					X
03/16/92				MED	X 376
03/23/92				IND	✓ N 280
10/3/91					✓ Y 338
10/23/91				FAB;	✓ N 232
04/15/92				CEN	✓ Y 362
09/19/91				FAB;	Y
08/09/90				CEN;	Y
06/26/92				MED; FAB; NBG	✓ N 417

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1325015-000-6921

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302-DONE
05/ 4/92				IND; MED	✓ 415 b6 b7C
5					
05/04/92				FAB	✓ 391
10/18/91				MED;	Y
12/05/91				NBG	Y
06/04/91				CEN;	Y
11/21/91				MED;	✓ Y 203
06/03/92				FAB	✓ 412
04/08/92				consent to search (Mia)	✓ 349
08/07/91				MED;	✓ N 213
03/19/92				IND	✓ N 279
10/01/91				FAB;	Y
09/04/91				FAB; NBG;	✓ N 222
11/20/91				NBG	Y

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1325015-000-6922

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
04/05/92 6/5				FAB; NBG; Riveredge	✓ N 418 b6 b7C
12/13/91				NBG	Y
05/20/92				NBG; Riveredge	✓ 378
04/14/92				FAB; NBG; MED;	Y
05/10/91				FAB; FGB; NBG;	Y
03/30/92					N
05/12/92				NBG; Riveredge	✓ 386
04/26/91 4/4				CEN	Y
06/03/92				FAB	✓ 413
05/13/92				NBG; Riveredge	✓ 381
12/04/91				IND	✓ Y 295
04/20/92				FAB	✓ 434/478
10/18/90				CEN;	Y

This report is property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency. **

1325015-000-6923

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
[illegible]/92				CEN	Y 365 b6 b7C
4/					
01/13/92				MED	Y
04/03/92				Receipt of doct's only	N
12/10/90				CEN;	Y
03/11/92					Y
03/27/92					Y
09/21/91				MED:	N 228
01/15/92				FAB; NBG;	N
04/28/92				FAB; NBG	N 370
10/18/91				NBG	Y
07/02/92				FAB	Y 414/472
11/05/91					Y 312
09/06/91				FAB; NBG;	N 226

** This report is property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency. **

1325015-000-6924

-302

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	DONE
09/06/91				FAB; NBG;	N 227
9/6					
06/25/92				FAB	449
05/22/92				FAB	Y
09/27/91				MED;	Y
06/25/92				MED	439
06/15/92				A/F	402
03/19/92					N 263
03/17/92				IND	N 281
04/27/92				CEN	Y 361
08/21/91					Y 335
09/03/91				NBG;	Y
01/06/92				CEN;	153
02/26/92				FAB	Y

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b7C

This report is property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency. **

1325015-000-6925

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
08/13/92				NBG; Riveredge	Y 384 b6 b7C
5/1					
10/03/91				FAB; NBG;	Y
10/23/91				FGB	Y 93
03/26/92					Y 332
11/06/91				CEN;	Y
03/01/92				MED;	N 241
09/09/91		Ukleja & Castor & Rosinus Berry & Smith		Review of docs @ Skadden	Y
10/28/91				Doc's from [redacted]	Y 102
10/24/91				Doc's from Cliff/Warnke	Y
10/28/91				Subp. Serv on [redacted]	Y
04/26/91				FRB Record Review	Y
06/21/91				Receipt of 44 audio tapes	Y 345

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1325015-000-6926

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11/01/91 11/1/91				[redacted] - Doc. Inv.	Y
01/02/92				Subp served [redacted]	X 148
					Y
02/10/92				Review '85 Jamboree tapes	X 373
11/20/91				Doc's from Nusbaum\Wald	X 126
08/06/91				FAB	X 44
07/24/91				Subpoena- [redacted]	Y
07/91 7/25/91				Subpoena- [redacted]	Y
09/24/91				Doc's from Skadden/Arps	Y
09/12/91				23 Boxes fro[redacted]	Y
07/03/91				Bk records [redacted]	Y
10/24/91				Doc's from Schwalb/Donnen	Y

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b7C

This report is property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency. **

1325015-000-6927

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
11/04/91 11/4/91				BCCI - Doc. Inv.	y 109 b6 b7C b7D
09/24/91				Docs rec from AUSA Atl.	y
11/18/91				10 Tapes Rec'd from [redacted]	y 122
10/02/91				Doc's fr[redacted]re: NBG	y
10/24/91				Doc's from Cliff/Warnke-a	y
01/02/92				Doc's from Hse. Bk. Comm.	y
11/04/91 11/4/91				Bankers Trust Doc. Inv.	y 108
11/04/91				Goldman Sachs - Doc. Inv.	y 107
11/04/91				Kidder Peabody - Doc. Inv	y 111
10/03/91				Subp. serv on [redacted]	y

This report is property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency. **

1325015-000-6928

Interview Date	Interview Subject	Interviewing Agents	Interviewing Attys	Interview Topics	302 DONE
[illegible]/92				amend. srch wrnt mia doct	✓ 348 b6 b7C
07/15/92				Document pick-up	Y
04/09/92				search warrent (Mia)	✓ 350
07/14/92				Document pick-up	✓ 442
11/15/91				Doc's from Schwalb/Donnen	✓ 120
11/15/91				Doc's from Cliff\Warnke	✓ 121
04/24/92				Inv list of Fortress doct	✓ 347
11/04/91				Doc's from US Cust Serv	✓ 110
10/24/91				Subp. Served [redacted]	✓ 98
10/24/91				Subp. Served - [redacted]	✓ 95

4/9/92

4/24/92

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END OF REPORT I

1325015-000-6929

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 10 | 16 | 92

To: Office Services Manager

Requested (SA) [redacted] b6 b7C

Ext. 9300 or 9336 | Squad: BCC1 | File No. 29B-WF-171994

Subject (O) | Social Security Account #

SOUTHERN DISTRICT OF NEW YORK 1987 TITLE III

Aliases (O) SDNY

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling ☐ Main Criminal Case Files Only ☐ Restrict Locality of
☐ All References ☐ Criminal References Only
☐ Main Security Case Files Only ☐ Main Security *(If no Main, list all Security References)*
☐ Security References Only ☐ Main Criminal *(if no Main, list all Criminal References)*

[redacted]

☐ **ISIS:** ☐ NEG ☐ POS — Searched by — Date

10/29/92 Date

☑ **Confidential Indices:** ☐ NEG ☐ POS — Searched by — Date

☐ **OCIS:** ☐ NEG ☐ POS — Searched by — Date

☑ **ELSUR Indices:** ☐ NEG ☐ POS — Date

☐ **IIS:** ☐ NEG ☐ POS — Searched by — Date

11-4-92 Date

☐ **MICRO:** ☐ NEG ☐ POS — Searched by — Date

11-4-92 Date

☐ **REGIONAL:** ☐ NEG ☐ POS — Searched by — Date

[redacted] y the Field Office(s) to Query for Regional Searches.

Northeast

- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic

- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central

- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western

- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
	[redacted] ☐ Pos ☐ Neg		
	[redacted] INDICES:		
	[redacted] search		
	[redacted] AX: ☐ Pos ☐ Neg		-500
	[redacted]		29B-WF-171994 SW SW NOV - 4 1992

Consolidated by [redacted] ☐ NEG AX: ☐ Pos ☐ NeDate

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1329015-000-6931

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
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☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-6932

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 10-22-92

To: Office Services Manager

Reques SA [redacted] b6 b7C

Ext. 9338 | Squad BCCI | File No. 29B-WF-171994

Social Security Account # UNK

Aliases

Address	Birth Date	Birth Place	Race	Sex
UNK	UNK	UNK	UNK	☒ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*
☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **ISIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **OCIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **IIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **FOIMS:** ☐ NEG ☐ POS	Date	☐ **MICRO:** ☐ NEG ☐ POS	Searched by / Date
[redacted] 12-7-92	Date	☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by / Date

[redacted] by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
Global Search No Record			

[redacted] ☐ Pos ☐ Neg
GENERAL INDICES:
☑ Automated Search
WF: ☐ Pos ☐ Neg TAX: ☐ Pos ☐ Neg
☐ Manual Search
WF: ☐ Pos ☐ Neg Date TAX: ☐ Pos ☐ Neg

29B-WF-171994-501

Consolidated by

Reviewed by Date

SEARCHED Su INDEXED Su
SERIALIZED Su FILED Su
DEC 9 1992
FBI — WASH. FIELD OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015F000-6933

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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1325015-000-6934

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 10/22/92

Reques SA

Ext. 9338

BCCI | 29B-WF-171994

Social Security Account # UNK

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Address	Birth Date	Birth Place	Race	Sex
North Dade Co. Detention Center Miami	UNK	UNK	UNK	☒ Male ☐ Female

- ☐ Exact Spelling
- ☒ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☐ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ISIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **OCIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ELSUR Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **IIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **FOIMS:** ☐ NEG ☐ POS	12-1-92 Date		
☐ **MICRO:** ☐ NEG ☐ POS	Searched by	Date	
		☐ **REGIONAL:** ☐ NEG ☐ POS	
		Searched by	Date

[redacted]

y the Field Office(s) to Query for Regional Searches.

tic

- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central

- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western

- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
Global			
Teach			
No Record			

[redacted]

Consolidated by

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

-502

29B-WF-171994

SEARCHED SW INDEXED
SERIALIZED SW FILED SW

DEC 9 1992

FBI — WASH. FIELD OFFICE

132501540000-6935

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
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☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-693

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

b6
b7C

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 10/28/92

From : **SA** [redacted]

b6
b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Re: **BANCA NAZIONALE DEL LAVORO** aka **BNL**

On 10/28/92, [redacted] **NEW YORK DEPARTMENT OF BANKING (NYDB)**, 630 Fifth Avenue, New York, New York 10036, telephone number [redacted] telephonically contacted the Washington Metropolitan Field Office of the **FEDERAL BUREAU OF INVESTIGATION (FBI)** regarding captioned/referenced matters.

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[redacted] advised that in his capacity [redacted] from the NYDB, he is [redacted] **BANK OF CREDIT AND COMMERCE INTERNATIONAL - NEW YORK AGENCY (BCCI-NY)** pursuant to the closing of BCCI-NY by regulatory authorities. In this capacity, he has discovered a loan transaction that may be relevant to captioned BCCI case and involving the **BANCA NAZIONALE DEL LAVORO (BNL)** as reported in the media as **IRAQGATE**. [redacted] explained that **FENTEX INTERNATIONAL CORPORATION**, Empire State Building, 350 Fifth Avenue, Suite 2525, New York, NY 10116 sold hot rolled steel in 3/89 to the **STATE TRADING COMPANY FOR CONSTRUCTION MATERIALS-STEEL DEPARTMENT** in Baghdad, Iraq for $10 million. The loans (totaling $10 million) were at significantly higher interest rates than the going rates at that time, which is indicative of a higher risk. Further, the loans had maturity dates in 10/89 and 1/90. [redacted] has determined that the loan arrangements for Iraq were made by the London office of BCCI, but funded or "booked" at the New York agency (BCCI-NY). The funding of the loan went directly to **RAFIDAIN BANK** in Iraq. [redacted] advised that he is uncertain as to whether the steel purchase had anything to do with Iraq's weapons manufacturing but found that the circumstances involving BCCI and the government of Iraq was similar to the events reported in the media regarding BNL.

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b7C

-503

2 - WMFO (1 - 29B-WF-171994-Main)
(1 - 72 -WF-183138)
CWS
(2)

[redacted]
Lead 68

29B-WF-171994 Main

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW

OCT 28 1992

FBI — WASH. FIELD OFFICE

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1325015-000-6937

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

b6
b7C

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 10/28/92

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

RE: LEAD #58 / Syria and Soviet support of Terrorism

Per discussion on 10/28/92 between writer and [redacted] regarding captioned lead, this matter should now be considered covered. SA [redacted] who is assigned this lead has completed a review of the appropriate sections of the Kerry Report and the lead. As noted by [redacted] during referenced discussion with writer, it would be imposssible to review any BCCI records in Syria and the United States would not have jurisdiction in this matter.

b6
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Therefore, as requested by [redacted] this lead is considered **COVERED.**

b6
b7C

1-29B-WF-171994
1-IIC [redacted]
1-SA [redacted]
DEV/dev

b6
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504

29B-WF-171994 Main

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
1992
FBI — [illegible] FIELD OFFICE

1325015-000-6938

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/28/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

Re: Conference with [redacted] on 10/28/92 b6 b7C

Lead # 23 - [redacted]: METROBANK

Pursuant to referenced conference, the following is submitted regarding the status of lead #23:

Background

Lead requires a determination as to allegations that BCCI acquired stock ownership in METROBANK, Los Angeles, California, through GHAITH PHARAON acting in a nominee capacity.

Status

Per SA [redacted] memo dated 9/29/92, PHARAON acquired 5% of the METROBANK stock in 1988. The money for the purchase came from BCCI, but there is no evidence to determine that the money was not PHARAON's or that PHARAON acted as a nominee for BCCI. Contacts with DEPARTMENT OF JUSTICE attorneys [redacted] has determined that there is no evidence to support the allegation. Further, FBI-Los Angeles has a pending investigation of PHARAON, BCCI and the failure of INDEPENDENCE BANK. Any information relevant to another California bank such as METROBANK and PHAROAN would logically be included in their case. b6 b7C

Recommendation

Based on the foregoing, it is recommended that Lead #23 be considered "Covered."

29B-WF-171994 Sub T 504X1

2 - WMFO (1 - 29B-WF-171994 Main)
(1 - IIC [redacted])
CWS
(2)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 12 1992
FBI — WASH. FIELD OFFICE

b6 b7C

1325015-000-6939

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 10/29/92

From : SA [redacted] GB b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

RE: [redacted] #74 - MONEY LAUNDERING CASE INVOLVING [redacted] b6 b7C

Per discussion on 10/28/92 between SA [redacted] b6 b7C
and [redacted] regarding captioned lead, this matter should now be considered covered.

The [redacted] and the [redacted] b6 b7C b7E
were contacted to determine whether the actions of [redacted] a Chicago based BCCI employee, warranted further investigation by the FBI. [redacted] on September 4, 1986, was arrested pursuant to a federal arrest warrant, but because the appeals court decided that the law [redacted] had been indicted under was unconstitutional and needed to be changed, the case was dismissed. This information indicated that there is no further FBI interest in [redacted]

Therefore, as requested by [redacted] this lead is considered covered. b6 b7C

1-29B-WF-171994
1-IIC
1-SSA [redacted]
1-SA

GJB/gjb
(4)

GB b6 b7C

29B-WF-171994 Main -505

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DATE 04-10-2018 BY

Indices Search Slip
FD-160 (Rev. 7-28-89)

BCT

Date 10/29/92

To: Office Services Manager

Requested by

Ext. 9338 Squad. File No. 29B-WF-171994

Subj

Alia

Add

Social Security Account #

Birth Date 2-6-29 Birth Place Race Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(If no Main, list all Criminal References)*
☐ Restrict Locality of

☐ NEG ☐ POS ☑ NEG ☐ POS 10-29-92 Date Searched by	☐ ISIS: ☐ NEG ☐ POS Searched by Date	
☐ NEG ☐ POS Searched by Date	☐ OCIS: ☐ NEG ☐ POS Searched by Date	
☐ ELSUR Indices: ☐ NEG ☐ POS Date	☐ IIS: ☐ NEG ☐ POS Searched by Date	
10-29-92 Date	☐ MICRO: ☐ NEG ☐ POS Searched by Date	
11-2-92 11-2-92 Date	☐ REGIONAL: ☐ NEG ☐ POS Searched by Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☑ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

506

29B-WF-171994

Consolidated by Date

Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED SW INDEXED SW
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NOV 1992
FBI — WASH. FIELD OFFICE

1325015-000-6941

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 10/29/92

To: Office

Requested

Ext. 9338

Subject

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex
				☐ Male ☐ Female

☐ Exact Spelling
☐ All References
☐ Main Security Case Files Only
☐ Security References Only
☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(If no Main, list all Criminal References)*
☐ Restrict Locality of

10-29-92 Date

Date

☐ ELSUR Indices: ☐ NEG ☐ POS

Date

10-29-92 Date

1/2/92 Date

☐ ISIS: ☐ NEG ☐ POS
Searched by Date

☐ OCIS: ☐ NEG ☐ POS
Searched by Date

☐ IIS: ☐ NEG ☐ POS
Searched by Date

☐ MICRO: ☐ NEG ☐ POS
Searched by Date

☐ REGIONAL: ☐ NEG ☐ POS
Searched by Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

Consolidated by

Date

Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

FBI/DOJ

1325015-000-6942

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 04-10-2018 BY: [redacted]

b6
b7C

[redacted]

~~SECRET~~

NO: 001
REC-NO: 001

DDN:
TRUE:
FO: WF CASE NO: 262-0000023-O
NAME TYPE: MAIN REF: R EVENT DATE: INDEXED: 041691
OO: OO CASE NO: MODIFIED:
VIOLATION: OHAHT SPECIAL:
SERIALS: 130P2;

RACE: U SEX: M ID-NO:
DOB: POB:
STREET NO: NAME:
CITY: ST: COUNTRY: ZIP:
LOC:

MISCELLANEOUS:

CLASSIFICATION LEVEL: ~~S~~ CLASSIFIED BY: G-3 DECLASSIFY ON: ~~OADR~~

<GO> -NEXT INDEX F4 -QUERY AX F7 -ADD ALIAS
F1 -REQUERY F8 -DELETE F10 -INDEX
SHIFT-F1 -CASE INFO F3 -SUMMARY F6 -ADD INDEX F9 -MODIFY SHIFT-F10 -FOIMS
4β NUM ↑ — 31

1325015-000-6943

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

INDEX LISTING FOR: [redacted]

11/02/92
IDXPSR14

MID-ATLANTIC

(DOB RANGE: 1941 -- 1959, RACE: U, SEX: M)

FO	NAME(S)	N-I	M-R	S R	DOB	IDX DATE	FILE NUMBER
(SN) BB	[redacted]		R	U U	[redacted]	06/12/86	012D-0000389-M

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b7C

MID-ATLANTIC

INDEX RECORD FOR: [redacted]

(DOB RANGE: 1941 - 1959, RACE: U, SEX: M)

11/02/92
IDXPSR14

b6
b7C

	FO	NAME(S)	N-I	M-R	S	R	DOB	IDX DATE	FILE NUMBER
(SN)	BA	[redacted]		R	U	U	[redacted]	06/12/86	012D-0000389-M

5

SENSITIVE

CLASSIFIED BY:
DECLASSIFY ON:

1325015-000-6945

MID-ATLANTIC

INDEX LISTING FOR: [redacted]
(DOB RANGE: 1931 - 1949, RACE: U, SEX: M)

11/02/92
IDXPGR14

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b7C

FO	NAME(S)	N-F	M-R	S	R	DOB	IDX DATE	FILE NUMBER
(SN) BA [redacted]			R	U	U	[redacted]	06/12/85	012D-0000389-M

SENSITIVE

CLASSIFIED BY:
DECLASSIFY ON:

MID-ATLANTIC

INDEX LISTING FOR: [redacted]
(DOB RANGE: 1931 - 1949, RACE: U, SEX: M)

11/02/92
IDXPSR14

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	FO	NAME(S)	N-F	M-R	S	R	DOB	IDX DATE	FILE NUMBER
(SN)	BA	[redacted]		R	U	U	[redacted]	6/12/85	012D-0000389-M

SENSITIVE

CLASSIFIED BY:
DECLASSIFY ON:

1325015-000-6947
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DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 04-10-2018 BY [redacted]

NORTHEAST

INDEX LISTING FOR: [redacted]
(DOB RANGE: 1941 - 1959, RACE: U, SEX: M)

11/02/92
IDXPGR14

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b7C

	FO	NAME(S)	N-I	M-R	S	R	DOB	IDX DATE	FILE NUMBER
(U) (S)	BR	[redacted]		R	M	U	[redacted]	07/20/92	262/WF-0000023
(SN)	MD	[redacted]	V	R	M	U	[redacted]	07/29/92	262/WF-0000023

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CLASSIFIED BY: G-3
DECLASSIFY ON: OADR

NORTHEAST

INDEX LISTING FOR: [redacted]

(DOB RANGE: 1941 - 1959, RACE: U, SEX: M)

11/02/92
IDKPGR14

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FO	NAME(S)	N-P	M-R	S	R	DOB	IDX DATE	FILE NUMBER
(U) ~~(X)~~	BR [redacted]		R	M	U	[redacted]	07/20/92	262/WF-0000023
(SN) MD	[redacted]	V	R	M	U	[redacted]	07/29/92	262/WF-0000023

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~~DECLASSIFY ON: OADR~~

NORTHEAST

INDEX LISTING FOR: [redacted]

(DOB RANGE: 1951 - 1949, RACE: U, SEX: M)

11/02/92
IDXPGR14

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	FO	NAME(S)	N-T	M-R	S	R	DOB	IDX DATE	FILE NUMBER
(U) (X)	BR	[redacted]		R	M	U	[redacted]	07/20/92	262/WF-0000023
(SN)	MD	[redacted]	V	R	M	U	[redacted]	07/29/92	262/WF-0000023

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DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 04-10-2018 BY: [redacted]

NORTHEAST

INDEX LISTING FOR: [redacted]
(DOB RANGE: 1931 - 1949, RACE: U, SEX: M)

11/02/92
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	FO	NAME(S)	N-F	M-R	S	R	DOB	IDX DATE	FILE NUMBER
(U) (S)	BE	[redacted]		R	M	U	[redacted]	07/20/92	262/WF-0000023
(SN)	MI	[redacted]	V	R	M	U	[redacted]	07/29/92	262/WF-0000023

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~~CLASSIFIED BY: G-3~~
~~DECLASSIFY ON: OADR~~

1325015-000-6951

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/29/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

Re: Conference with [redacted] on 10/28/92 b6 b7C

Lead # 25 - [redacted] : COMMONWEALTH BANK

Pursuant to referenced conference, the following is submitted regarding the status of lead #25:

Background

GHAITH PHARAON had ownership in COMMONWEALTH BANK, Detroit, Michigan at one time. Lead #25 requires background information regarding PHARAON's ownership, stock acquisition, whether PHARAON was a nominee for BCCI, and details regarding the subsequent sale of the stock. The lead also requires investigation regarding [redacted] who may have been involved with COMMONWEALTH BANK. b6 b7C

Status

Per SA [redacted] received a teletype response from FBI-Detroit dated 9/11/92 which reported that COMERICA, INCORPORATED took over COMMONWEALTH in 1983 and no documentation regarding PHARAON's 1975 stock purchase exists. FBI-Detroit also contacted officials from the FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC) in an attempt to locate additional information with negative results. b6 b7C

2 - WMFO (1 - 29B-WF-171994-Main)
(1 - IIC [redacted]) b6 b7C
CWS
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29B-WF-171994 Sub T - 506X1

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 12 1992
FBI — WASH. FIELD OFFICE

1325015-000-6952

On 11/2/92, WMFO received an airtel from Detroit dated 10/26/92 reporting the results of its investigation. In summary, a former bank examiner recalled the purchase of COMMONWEALTH stock by PHARAON from the [redacted] family in the early 1970s. [redacted] FIRST ARABIAN CORPORATION (FAC), initially interested PHARAON in the bank, and subsequently purchased the stock from PHARAON. Subsequently, FAC sold its interest in COMMONWEALTH to COAMERICA BANK in 1983. All of the stock transactions were closely monitored and approved by the FEDERAL DEPOSIT INSURANCE CORPORATION (FDIC). Inquiries to COAMERICA, INCORPORATED were negative regarding the stock transactions involving PHARAON. Further, no records are available to corroborate the recollection of individuals interviewed.

b6
b7C

Recommendation

Inasmuch as PHARAON's involvement at COMMONWEALTH BANK was in the 1970s and no additional details are available, it is recommended that no additional resources be devoted to this matter and Lead #24 be considered "Covered."

1325015-000-6953

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 10/29/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

Re: Conference with IIC [redacted] on 10/28/92 b6 b7C

Lead # 24 [redacted] MAIN BANK

Pursuant to referenced conference, the following is submitted regarding the status of lead #24:

Background

Lead requires a determination as to allegations that:

(1) BCCI may have acquired stock ownership in MAIN BANK, Houston, Texas, through GHAITH PHARAON acting in a nominee capacity;

(2) Former Texas Governor JOHN CONNALLY may have had dealings as a MAIN BANK stockholder with PHARAON and BCCI; b6 b7C

(3) [redacted] MAIN BANK stock and may have been involved with PHARAON's stock acquisition.

Status

Per SA [redacted] memo dated 10/13/92, PHARAON acquired 20% of the MAIN BANK stock in 1977. DOJ Trail Attorney [redacted] advised that PHARAON did not pledge any MAIN BANK stock to BCCI as collateral and there is no evidence to indicate that PHARAON acted as a nominee for the benefit of BCCI. Further, all records regarding MAIN BANK have been destroyed pursuant to the bank's document retention policy. b6 b7C

29B-WF-171994 Sub T - 506X2

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 12 1992
FBI — WASH. FIELD OFFICE

2 - WMFO (1 - 29B-WF-171994-Main)
(1 - IIC [redacted])
CWS
(2)

b6 b7C

1325015-000-6954

In addition to the foregoing, no information has been developed to indicate that [redacted] had any relationship with PHARAON or BCCI, nor that any improprieties existed involving [redacted] Owning stock in a corporation is not necessary indicative of a close business relationship with other stockholders. Also, since PHARAON was involved in the bank's ownership in 1977 and no existing and ongoing conspiracy has been established, the statute of limitations has expired thus precluding any criminal charges, whether it involved [redacted] or [redacted] alleged ownership can not be determined due to the bank destroying its records and venue for any violations would appear to be in Texas. b6 b7C

Recommendation

Based on the foregoing, it is recommended that no additional resources be devoted to this matter and Lead #24 be considered "Covered."

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 11/2/92

To: Office Services Manager

Requested SA [redacted] b6 b7C

Ext. 9338 | BCCI | 29B-WF-171994

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex
UNK	UNK	UNK	UNK	☐ Male ☐ Female

- ☐ Exact Spelling
- ☐ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☒ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **ISIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by / Date	☐ **OCIS:** ☐ NEG ☐ POS	Searched by / Date
☒ **ELSUR Indices:** ☒ NEG ☐ POS	Searched by / Date 11/4/92	☐ **IIS:** ☐ NEG ☐ POS	Searched by / Date
☐ **FOIMS:** ☐ NEG ☐ POS	Searched by / Date	☐ **MICRO:** ☐ NEG ☐ POS	Searched by / Date
☐ **GLOBAL:** ☐ NEG ☐ POS	Searched by / Date	☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by / Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
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- ☒ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
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- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

- 508

29B-WF-171994

Consolidated by / Date

Reviewed by / Date

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV [redacted] 1992
FBI — WASH. FIELD OFFICE

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6966

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☆ U.S.G.P.O.: 1990- 262-209/15354

Indices Search Slip
FD-160 (Rev. 7-28-89)

To: Office Services Manager

Date	11/2/92
Requested	SA
Ext.	9338
Squad:	BCCI
File No.	29B-WF-171994
Social Security Account #	UNK

b6
b7C

Address	Birth Date	Birth Place	Race	Sex
North Dade Detention Center Miami FL	2/6/29	UNK	W	☒ Male ☐ Female

- ☐ Exact Spelling
- ☐ All References
- ☐ Main Security Case Files Only
- ☐ Security References Only
- ☐ Main Criminal Case Files Only
- ☒ Criminal References Only
- ☐ Main Security *(If no Main, list all Security References)*
- ☐ Main Criminal *(if no Main, list all Criminal References)*
- ☐ Restrict Locality of

☐ **General Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **ISIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **Confidential Indices:** ☐ NEG ☐ POS	Searched by	Date	
☐ **OCIS:** ☐ NEG ☐ POS	Searched by	Date	
☒ **ELSUR Indices:** ☒ NEG ☐ POS	Searched by	Date	11/4
☐ **IIS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **FOIMS:** ☐ NEG ☐ POS	Searched by	Date	
☐ **MICRO:** ☐ NEG ☐ POS	Searched by	Date	
☐ **GLOBAL:** ☐ NEG ☐ POS	Searched by	Date	
☐ **REGIONAL:** ☐ NEG ☐ POS	Searched by	Date	

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks

-509
29B-WF-171994

Consolidated by _____ Date _____

Reviewed by _____ Date _____

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

SEARCHED SW INDEXED
SERIALIZED SW FILED SW
NOV 1992
FBI — WASH. FIELD OFFICE

132501-000-6968

MICRO COMPUTER *(Continued)*

☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐POS Date Base Searched by Date
☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date	☐ **MICRO:** ☐ NEG ☐ POS Date Base Searched by Date
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☆ U.S.G.P.O.: 1990- 262-209/15354

1325015-000-6969

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 2 ~ b6; b7C; b7E;
Page 3 ~ b3; b6; b7C; b7D; b7E;

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X Deleted Page(s) X
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X For this Page X
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ALL FBI INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY [redacted]

~~SECRET~~

POWERCURV DB

REF: 1311*04
UPD-DT: 19OCT87
UPD-TYPE: AREF1 AREF2
UPD-BY: FMTFMP FMTFMP
UPD-DT: 04DEC87
UPD-TYPE: CREF1
UPD-BY: WFTMAB
NAME: [redacted]
ETHNIC: MEXICAN
DESC-CODES: DEPARTMENT OF STATE - EMPLOYEES FORMER EMPLOYEE
COMMENTS: FIRED
IDENT-NAME: PACIFIC ARCHITECTS ENGR
FILE-NUM: [redacted]

b6 (Per FBI)
b7C
b6 (Per DOS)
b7C
b7E
b3 (Per FBI)
b7E

REF: 1860*12
UPD-DT: 12APR88
UPD-TYPE: AREF1 AREF2 AREF3 CREF1
UPD-BY: WRTJRM WRTJRM WRTJRM WRTJRM
NAME: [redacted]
TITLE/POSITION: CONSTRUCTION WORKER
DESC-CODES: DEPARTMENT OF STATE - EMPLOYEES CONTRACTORS MOSCOW GIRLFRIEND
[redacted]
IDENT-NAME: PACIFIC ARCHITECTS ENGR
ADDR-NO: 01
CITY: MOSCOW
COUNTRY: UR
FO-COVERING: LG
ADDR-PTR: PP
FILE-NUM: [redacted]

b6 (Per DOS)
b7C
b7E
b3 (Per FBI)
b7E

~~SECRET~~
CLASSIFIED BY 9912
DECLASSIFY ON 08/21/012

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-10-2018 BY

Indices Search Slip
FD-160 (Rev. 7-28-89)

Date 8-3-92

To: Office Services Manager

Requ[illegible]

Ext. 9300 | Squad: 8CC1 | File No. 29B-WF-171994

Subject

Social Security Account #

Aliases

Address	Birth Date	Birth Place	Race	Sex ☐ Male ☐ Female

☐ Exact Spelling
☑ All References
☐ Main Security Case Files Only
☐ Security References Only

☐ Main Criminal Case Files Only
☐ Criminal References Only
☐ Main Security *(If no Main, list all Security References)*
☐ Main Criminal *(if no Main, list all Criminal References)*

☐ Restrict Locality of

b6 (Per FBI)
b7C
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[redacted] 8/13/92 LD Date

☑ ISIS: ☐ NEG ☐ POS 10/1/92 Date

☐ Confidential Indices: ☐ NEG ☐ POS
Searched by Date

9/1/92 Date

☑ ELSUR Indices: ☐ NEG ☑ POS
Searched by 8/14/92 Date

see attached
8-21-92 Date

[redacted] 13/92 Date

Searched by Date

☐ REGIONAL: ☐ NEG ☐ POS
Searched by Date

[redacted] 8/13/92 Date

Place an "X" by the Field Office(s) to Query for Regional Searches.

Northeast
- ☐ Albany
- ☐ Bern Switzerland
- ☐ Bonn Germany
- ☐ Boston
- ☐ London England
- ☐ Mexico City Mexico
- ☐ New York City
- ☐ Newark
- ☐ Paris France
- ☐ Philadelphia
- ☐ Rome Italy
- ☐ All above

Mid-Atlantic
- ☐ Atlanta
- ☐ Baltimore
- ☐ Birmingham
- ☐ Charlotte
- ☐ Jackson
- ☐ Jacksonville
- ☐ Knoxville
- ☐ Memphis
- ☐ Miami
- ☐ Mobile
- ☐ New Orleans
- ☐ Norfolk
- ☐ Quantico
- ☐ Richmond
- ☐ San Juan
- ☐ Savannah
- ☐ Tampa
- ☐ Washington Field
- ☐ All above

Central
- ☐ Buffalo
- ☐ Chicago
- ☐ Cincinnati
- ☐ Cleveland
- ☐ Dallas
- ☐ Denver
- ☐ Detroit
- ☐ El Paso
- ☐ Houston
- ☐ Indianapolis
- ☐ Kansas City
- ☐ Little Rock
- ☐ Louisville
- ☐ Milwaukee
- ☐ Minneapolis
- ☐ Oklahoma City
- ☐ Omaha
- ☐ Pittsburgh
- ☐ San Antonio
- ☐ Springfield
- ☐ St. Louis
- ☐ All above

Western
- ☐ Albuquerque
- ☐ Anchorage
- ☐ Butte
- ☐ Honolulu
- ☐ Las Vegas
- ☐ Los Angeles
- ☐ Phoenix
- ☐ Portland
- ☐ Sacramento
- ☐ Salt Lake City
- ☐ San Diego
- ☐ San Francisco
- ☐ Seattle
- ☐ All above

File & Serial Number	Remarks	File & Serial Number	Remarks
see attached			

29B-WF-171994 4/34 18

[illegible] OFFICE

Consolidated by Date

Reviewed by Date

File Review Symbols
I - Identical
NI - Not identical
? - Not identifiable
U - Unavailable reference

1325015-000-6673

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
ENFORCEMENT

October 3, 1991

Mr. Robert M. Bryant
Special Agent in Charge
U.S. Department of Justice
Federal Bureau of Investigation
1900 Half Street
Washington, D.C. 20535

Re: *In the Matter of CenTrust Bank (HO-2360)*

Dear Mr. Bryant:

Your request, by letter dated September 25, 1991, for access to Commission files has been granted. In granting access, the Commission has relied upon your assurances that, except as set forth in your letter, your agency will:

provide such safeguards as are necessary and appropriate to protect the confidentiality of these files;

make no public use of these files or information derived therefrom without prior approval of our staff;

notify us of any legally enforceable demand for the files or information prior to complying with the demand, and assert such legal exemptions or privileges on our behalf as we may request; and

not grant any other demand or request for the files or information without prior notice or over our objection.

28B-171894 -

The files in this matter contain financial records transferred to you pursuant to Section 21(h)(9)(B) of the Securities Exchange Act of 1934. Briefly, that section permits the Commission to transfer such records to your agency without providing a customer notice pursuant to Section 1112 of the Right to Financial Privacy Act, 12 U.S.C. 3412. Section 21(h)(9)(B) places certain limitations upon your use of such records and, pursuant to Section 21(h)(10) of the Securities Exchange Act of 1934,

MAIN

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SERIALIZED FILED
OCT 09 1991
FBI

b6 Per FBI
b7C

1325015-000-7593

OFFICE

violation of those limitations may subject your agency to the penalties of Section 21(h)(7)(A). A copy of these provisions is enclosed.

The Commission makes no recommendation with respect to investigation or prosecution by your agency. In addition, until this matter is closed, the Commission continues to have an interest and will take such further investigatory or other steps as it considers necessary in the discharge of its duties and responsibilities.

The files to which access has been granted are being retained by the Home Office of the Commission. Your representative should contact [redacted] at [redacted] to make arrangements to review the files. I would also appreciate it if you would inform us in the event that your agency institutes public proceedings based upon information that you obtain as a result of this grant of access.

b6 Per SEC
b7C

Sincerely,

[redacted]

b6 Per SEC
b7C

Enclosure: Excerpts from Section 21(h) of the
Securities Exchange Act of 1934

Excerpts from Section 21(h) of the Securities Exchange Act of 1934

(7)(A) Following the expiration of the period of delay of notification ordered by the court pursuant to paragraph (4) of this subsection, the customer may, upon motion, reopen the proceeding in the district court which issued the order. If the presiding judge or magistrate finds that the movant is the customer to whom the records obtained by the Commission pertain, and that the Commission has obtained financial records or information contained therein in violation of this subsection, other than paragraph (1), it may order that the customer be granted civil penalties against the Commission in an amount equal to the sum of --

(i) $100 without regard to the volume of records involved;

(ii) any out-of-pocket damages sustained by the customer as a direct result of the disclosure; and

(iii) if the violation is found to have been willful, intentional, and without good faith, such punitive damages as the court may allow, together with the costs of the action and reasonable attorneys' fees as determined by the court.

(9)(B) The Commission may, without notice to the customer pursuant to Section 1112 of the Right to Financial Privacy Act of 1978, transfer financial records or the information contained therein to . . . to the Department of Justice. Financial records or information transferred by the Commission to the Department of Justice . . . pursuant to the provisions of this subparagraph may be disclosed or used only in an administrative, civil, or criminal action or investigation by the Department of Justice . . . which arises out of or relates to the acts, practices, or courses of conduct investigated by the Commission, except that if the Department of Justice . . . determines that the information should be disclosed or used for any other purpose, it may do so if it notifies the customer, except as otherwise provided in the Right to Financial Privacy Act of 1978, within 30 days of its determination, or complies with the requirements of Section 1109 of such Act regarding delay of notice.

(10) Any government authority violating paragraph (9) shall be subject to the procedures and penalties applicable to the Commission under paragraph (7)(A) with respect to a violation by the Commission in obtaining financial records.

[redacted] to make arrangements to review the files. I would also appreciate it if you would inform us in the event that your agency institutes public proceedings based upon information that you obtain as a result of this grant of access.

b6 Per SEC
b7C

Sincerely,

[redacted]

b6 Per SEC
b7C

a customer notice pursuant to Section 1112 of the Right to Financial Privacy Act, 12 U.S.C. 3412. Section 21(h)(9)(B) places certain limitations upon your use of such records and, pursuant to Section 21(h)(10) of the Securities Exchange Act of 1934, violation of those limitations may subject your agency to the penalties of Section 21(h)(7)(A). A copy of these provisions is enclosed.

The Commission makes no recommendation with respect to investigation or prosecution by your agency. In addition, until this matter is closed, the Commission continues to have an interest and will take such further investigatory or other steps as it considers necessary in the discharge of its duties and responsibilities.

The files to which access has been granted are being retained by the Home Office of the Commission. Your representative should contact [redacted] at [redacted] to make arrangements to review the files. I would also appreciate it if you would inform us in the event that your agency institutes public proceedings based upon information that you obtain as a result of this grant of access.

b6 Per SEC
b7C

Sincerely,

[redacted]

b6 Per SEC
b7C

Enclosure: Excerpts from Section 21(h) of the
Securities Exchange Act of 1934

Excerpts from Section 21(h) of the Securities Exchange Act of 1934

(7)(A) Following the expiration of the period of delay of notification ordered by the court pursuant to paragraph (4) of this subsection, the customer may, upon motion, reopen the proceeding in the district court which issued the order. If the presiding judge or magistrate finds that the movant is the customer to whom the records obtained by the Commission pertain, and that the Commission has obtained financial records or information contained therein in violation of this subsection, other than paragraph (1), it may order that the customer be granted civil penalties against the Commission in an amount equal to the sum of --

(i) $100 without regard to the volume of records involved;

(ii) any out-of-pocket damages sustained by the customer as a direct result of the disclosure; and

(iii) if the violation is found to have been willful, intentional, and without good faith, such punitive damages as the court may allow, together with the costs of the action and reasonable attorneys' fees as determined by the court.

(9)(B) The Commission may, without notice to the customer pursuant to Section 1112 of the Right to Financial Privacy Act of 1978, transfer financial records or the information contained therein to . . . to the Department of Justice. Financial records or information transferred by the Commission to the Department of Justice . . . pursuant to the provisions of this subparagraph may be disclosed or used only in an administrative, civil, or criminal action or investigation by the Department of Justice . . . which arises out of or relates to the acts, practices, or courses of conduct investigated by the Commission, except that if the Department of Justice . . . determines that the information should be disclosed or used for any other purpose, it may do so if it notifies the customer, except as otherwise provided in the Right to Financial Privacy Act of 1978, within 30 days of its determination, or complies with the requirements of Section 1109 of such Act regarding delay of notice.

(10) Any government authority violating paragraph (9) shall be subject to the procedures and penalties applicable to the Commission under paragraph (7)(A) with respect to a violation by the Commission in obtaining financial records.

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
ENFORCEMENT

October 3, 1991

SSA [redacted]

b6 Per FBI
b7C

Mr. Robert M. Bryant
Special Agent in Charge
U.S. Department of Justice
Federal Bureau of Investigation
1900 Half Street
Washington, D.C. 20535

Re: In the Matter of IMO Financial General Bankshares, Inc. (HO-1068)

Dear Mr. Bryant:

Your request, by letter dated September 25, 1991, for access to Commission files has been granted. In granting access, the Commission has relied upon your assurances that, except as set forth in your letter, your agency will:

provide such safeguards as are necessary and appropriate to protect the confidentiality of these files;

make no public use of these files or information derived therefrom without prior approval of our staff;

notify us of any legally enforceable demand for the files or information prior to complying with the demand, and assert such legal exemptions or privileges on our behalf as we may request; and

not grant any other demand or request for the files or information without prior notice or over our objection.

The Commission makes no recommendation with respect to investigation or prosecution by your agency.

The files to which access has been granted are being retained by the Home Office of the Commission. Your representative should contact [redacted] at

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[redacted]

b6 Per FBI
b7C

29B-WF-171994 - MAIN
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SERIALIZED ____ FILED ____
OCT 0 8 1991
FBI/DOJ OFFICE
1325015-000-7599

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
ENFORCEMENT

October 3, 1991

Mr. Robert M. Bryant
Special Agent in Charge
U.S. Department of Justice
Federal Bureau of Investigation
1900 Half Street
Washington, D.C. 20535

Re: *In the Matter of IMO Transactions Between and Among Certain Individuals and Entities, Involving or Related to Bank of Credit and Commerce International, S.A. (HO-2512)*

Dear Mr. Bryant:

Your request, by letter dated September 25, 1991, for access to Commission files has been granted. In granting access, the Commission has relied upon your assurances that, except as set forth in your letter, your agency will:

provide such safeguards as are necessary and appropriate to protect the confidentiality of these files;

make no public use of these files or information derived therefrom without prior approval of our staff;

notify us of any legally enforceable demand for the files or information prior to complying with the demand, and assert such legal exemptions or privileges on our behalf as we may request; and

not grant any other demand or request for the files or information without prior notice or over our objection.

29B-WF-171994

The files in this matter contain financial records transferred to you pursuant to Section 21(h)(9)(B) of the Securities Exchange Act of 1934. Briefly, that section permits the Commission to transfer such records to your agency without providing

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SERIALIZED
FILED
OCT 09 1991
FBI

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1325015-000-7596

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 50
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Page 3 ~ b6 - Per EOUSA, ICE; b7C - Per ICE; b7E - Per ICE; b7F - Per ICE;
Page 4 ~ b6 - Per ICE; b7C; b7E; b7F;
Page 5 ~ b6 - Per ICE; b7C; b7E; b7F;
Page 6 ~ b6 - Per ICE; b7C; b7E; b7F;
Page 7 ~ b6 - Per ICE; b7C; b7E; b7F;
Page 8 ~ b6 - Per ICE, FBI; b7C - Per ICE, FBI; b7E - Per ICE; b7F - Per ICE;
Page 9 ~ b5 - Per EOUSA; b6;
Page 10 ~ b5 - Per EOUSA; b6;
Page 12 ~ b5 - Per EOUSA; b6; b7C;
Page 13 ~ b5 - Per EOUSA; b6; b7C;
Page 14 ~ b5 - Per EOUSA; b6; b7C;
Page 15 ~ b5 - Per EOUSA; b6; b7C;
Page 16 ~ b5 - Per EOUSA; b6; b7C;
Page 17 ~ b5 - Per EOUSA; b6 - Per EOUSA, FBI; b7C - Per FBI;
Page 20 ~ b5 - Per EOUSA; b6; b7C;
Page 21 ~ b5 - Per EOUSA; b6; b7C;
Page 22 ~ b5 - Per EOUSA; b6; b7C;
Page 23 ~ b5 - Per EOUSA; b6; b7C;
Page 24 ~ b5 - Per EOUSA; b6; b7C;
Page 25 ~ b5 - Per EOUSA; b6; b7C;
Page 26 ~ b5 - Per EOUSA; b6; b7C;
Page 27 ~ b5 - Per EOUSA; b6; b7C;
Page 28 ~ b5 - Per EOUSA; b6; b7C;
Page 29 ~ b5 - Per EOUSA; b6; b7C;
Page 30 ~ b5 - Per EOUSA; b6; b7C;
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Page 42 ~ b5 - Per EOUSA; b6; b7C;
Page 43 ~ b5 - Per EOUSA; b6; b7C;
Page 44 ~ b5 - Per EOUSA; b6; b7C;
Page 45 ~ b5 - Per EOUSA; b6; b7C;
Page 46 ~ b5 - Per EOUSA; b6; b7C;
Page 47 ~ b5 - Per EOUSA; b6; b7C;
Page 48 ~ b5 - Per EOUSA; b6; b7C;
Page 49 ~ b5 - Per EOUSA; b6; b7C;

Page 50 ~ b5 - Per EOUSA; b6; b7C;
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Page 52 ~ b5 - Per EOUSA; b6; b7C;
Page 53 ~ b5 - Per EOUSA; b6; b7C;
Page 54 ~ b5 - Per EOUSA; b6; b7C;

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X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 9/20/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38
(OO: WMFO)

Attached are:

--a memorandum, dated 9/16/91, from DOJ Fraud Section [redacted] to Lawrence A. Urgenson, et al; b6 b7C

--a memorandum, dated 9/18/91, from AUSAs [redacted] and [redacted] to Lawrence A. Urgenson.

Documents were received from AUSA [redacted]. b6 b7C

att. pp 3, 13-16, 32-33

1-WMFO (Att. 2)

JNR:jnr
(1)

This commo also filed in:
Jug 1
" 2
" 3
" 4

[redacted] b6 b7C

29B-WF-171994-233 X1

Su Su Su

1325015-000-7533

United States Attorney
Southern District of Florida

155 South Miami Avenue, Suite 700
Miami, Florida 33130

DATE: 9/17/91

NAME: [redacted] AUSA

TELEPHONE: _____

AGENCY/CITY: _____

FACSIMILE #: ( ) _____

b6 Per EOUSA

NAME: [redacted] AUSA

CONTACT #: FTS [redacted]

AGENCY/CITY: USAO

NUMBER OF PAGES: 10 (INCLUDING COVER)

COMMENTS: _____

60*

1325015-000-7587

INDEPENDANT 9-11-91

BCCI gets new acting chief after arrests

By Nick Fielding

CHRISTIAN HOLLANDER, former head of the international division of Bank of Credit and Commerce International, has taken over as acting chief executive officer following the arrest of 35 senior executives of the collapsed bank in Abu Dhabi on Sunday.

In Abu Dhabi yesterday Mr Hollander, the only senior executive of the bank not detained there, declined to comment on his status.

"That issue is in the hands of the board and the majority shareholders," he said. "I'm the only senior manager who has remained in the office over the past couple of days."

Mr Hollander joined BCCI in 1988 as head of planning and strategy. He later became regional general manager for France and Francophone Africa before taking over the international division 18 months ago.

Ten of those arrested on Sunday were released on Monday night, including Aijaz Afridi, deputy head of Far East operations, Mazhar Abbas, head of human resources, and several junior members of staff who were arrested by mistake.

Those still in detention include the following:

Swaleh Naqvi, former acting chief executive officer, and four members of his private office, Arjoman Naqvi, Mohammed Azmaruuun, Nadim Habibullah and [illegible] Askari; Zafar Iqbal, chief executive officer; Amir Siddiki, head of the American operation; Shahed Siddiqui, deputy head of Americas; Selim Siddiqui, in charge of credit, former head of internal inspection; Imtiaz Ahmed, head of South-east Asia and Far East; Iqbal Rizvi, head of Africa; Abdul Hafeez, secretary to the BCCI board; Bashir Ahmad of the computer division; Fakhar Hussein, former head of BCCI Cayman; Amir Siddiqui, joint executive in charge of credit; Ashaqur Rahman Khan, in charge of accounts; Aftab Shaikh, in charge of bad loans; Bashir Tahir, managing director of BCC Emirates; Alla Rakhia, in charge of accounts at BCC Emirates, and six others.

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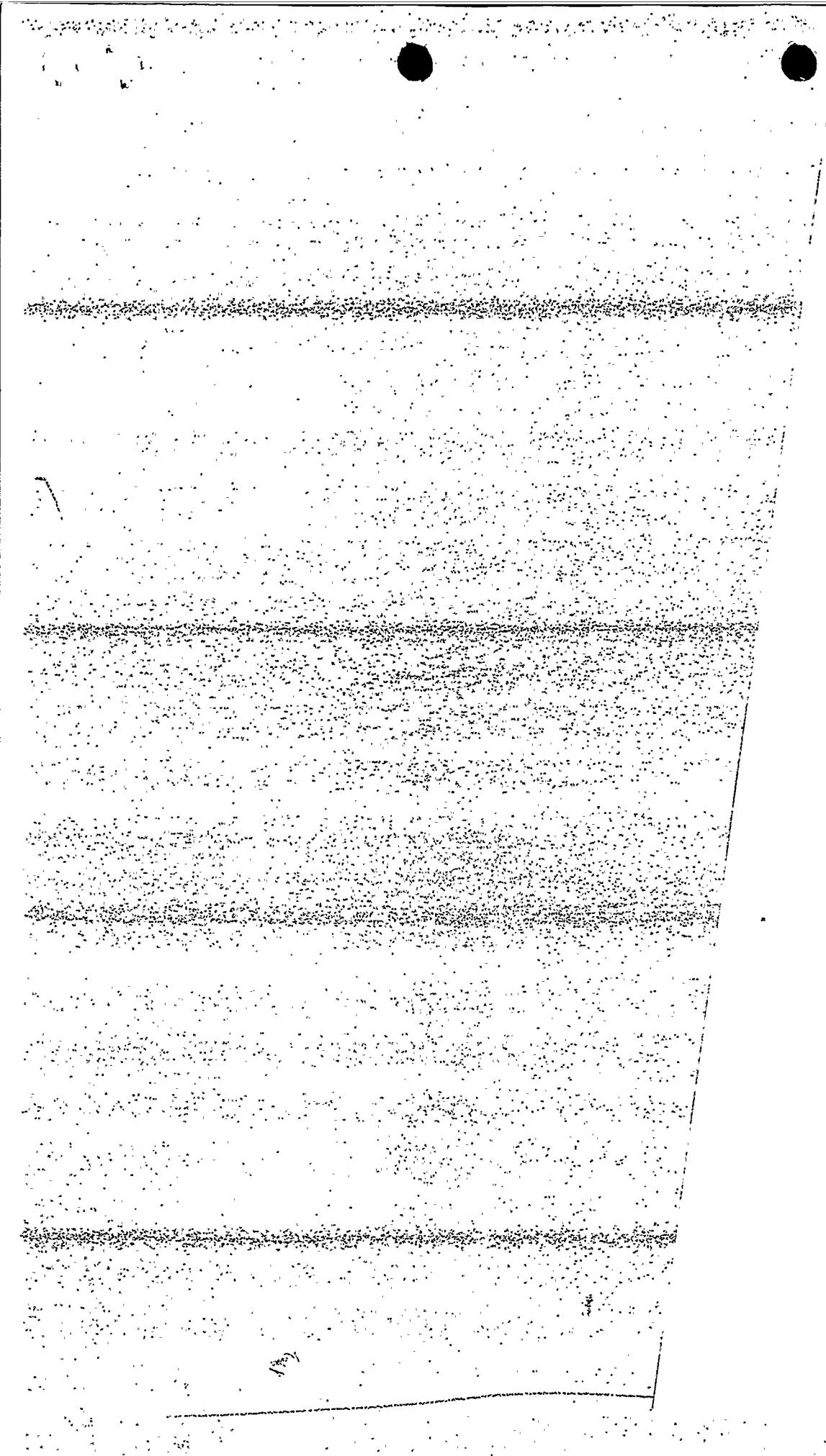

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cc: Robert S. Mue
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Peter B. Clark
Deputy Chief, F
Criminal Divisio

John Harris
Deputy Director
Office of Interna

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
ENFORCEMENT

September 17, 1991

Mr. [redacted], Special Agent
Federal Bureau of Investigation
7799 Leesburg Pike, Suite 200 South
Falls Church, Virginia 22043-2431

b6 Per FBI
b7C

Re: Joseph Daniel Casolaro

Dear [redacted]

b6 Per FBI
b7C

Pursuant to our conversation I am enclosing a copy of a letter sent to the Commission regarding Joseph Daniel Casolaro. Since there has been extensive publicity concerning the circumstances of Mr. Casolaro's death we feel that the enclosed information should be forwarded to the appropriate law enforcement authorities. We would appreciate your forwarding the enclosure to any concerned local law enforcement agencies.

We have reviewed our files and find no current information or investigations related to Mr. Casolaro.

If we may be of further assistance to your agency or anyone else, please let me know.

Sincerely,

[redacted]

b6 Per SEC
b7C

Enclosure:

[redacted]

b6 Per FBI
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29B-WF-171994 Main — 219

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NEWSMAKERS

BEHIND THE SCENES WITH PEOPLE IN THE HEADLINES

Writer's death gets 2nd look

By Maria Puente
USA TODAY

West Virginia officials are expected to announce today the preliminary results of an autopsy on a writer who was investigating a number of government scandals.

Joseph Daniel Casolaro, 44, a Fairfax, Va., free-lance writer and author of several books, was found dead in a Martinsburg, W.Va., motel bathtub on Saturday, his wrists slashed, a broken beer bottle nearby. Police found a note reading, "I'm sorry, especially to my son."

Police initially assumed he killed himself. They did not reach the dead man's brother, Dr. Anthony Casolaro of Alexandria, Va., until Monday.

In the meantime, the body was embalmed — without the family's permission and against standard police procedures, said Ric Nawcome, spokesman for the Martinsburg police.

"We don't know why it was embalmed, we're still waiting for an answer from the coroner and the funeral home," Nawcome he said.

The handling of the body added to the suspicions. The dead man was working on a book about INSLAW Inc., a Washington-based computer software company that has fought an eight-year legal battle over allegations that Reagan administration officials stole its software and then tried to drive the firm out of business.

Former U.S. attorney general Elliot Richardson, a lawyer who represents INSLAW, called for a federal investigation of Casolaro's death. Richardson and Casolaro's relatives believe he may have been murdered because he was close to connecting the Inslaw affair with other scandals of the Reagan and Bush presidencies, including:

▶ The Iran-contra scandal of the Reagan years.

▶ The scandal over Bank of Credit and Commerce International, which supposedly laundered money for drug traffickers, terrorists and the CIA.

▶ The "October surprise" scandal, in which members of the Reagan-Bush presidential campaign are alleged to have traded arms to Iran for a promise that 52 American hostages would not be released until after the 1980 presidential election. The idea allegedly was to ensure President Jimmy Carter would not benefit politically from an "October surprise" homecoming of the hostages.

WRC-TV Washington via AP

CASOLARO: Was investigating several scandals

"Of all the people investigating this he's the first one who (told others) he was on the verge of a major breakthrough, and no sooner had he done so than he's dead," Richardson said. "It's impossible to dismiss this as coincidence."

Dr. Casolaro told *The Boston Globe* that his brother had warned his family before leaving for West Virginia that, if he turned up dead, not to believe it was an accident.

▶ BCCI founder, 8B

CLARIFICATION: There are 2,614 voting delegates at the Fraternal Order of Police convention in Pittsburgh. The organization has about 220,000 members nationwide.

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Journey to a New Frontier... Collect

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MR. RICHARD C. BREEDEN, CHAIRMAN
SECURITY EXCHANGE COMMISSION
450 5TH ST. N.W.
WASHINGTON, D.C. 20549

Main 79911-JM-892

[redacted]

b6 Per FBI
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FEDERAL BUREAU OF INVESTIGATION
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O 301900Z JUL 91

FM FBI SAN ANTONIO (29B-WF-171994) (SQ. 3) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3770//

PASS: FIFU, WCCS, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND

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29B-WF-171994
SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

121

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COMMERCE INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE TELETYPE FROM FBIHQ TO ALL FIELD OFFICES, DATED JULY 26, 1991.

SAN ANTONIO CASE [redacted] REFLECTS AN [redacted] REFERENCED IN HOUSTON TELETYPE, DATED JULY 28, 1988 (HOUSTON CASE [redacted].

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INDICES ON ALL OTHER NAMES AND COMPANIES ARE NEGATIVE.

NO FURTHER INVESTIGATION REMAINS FOR SAN ANTONIO, THEREFORE, THIS MATTER IS CONSIDERED RUC.

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0000 MRI 02289

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DE FBICG #0016 2121056

ZNR UUUUU

O 302243Z JUL 91

FM FBI CHICAGO (29B-WF-171994)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3150:S07//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION, RE BUTELETYPE TO ALL FIELD OFFICES DATED 7/26/91.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; ET AL; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GAITH PHARAON; FIF: FAG. OO: WMFO.

ON 7/30/91, CHICAGO INDICES WERE CHECKED AND REVEALED CLARK MCADAMS CLIFFORD WAS A SUBJECT OF A SPECIAL INQUIRY INVESTIGATION (SPIN), CHICAGO FILE NUMBER 161281, INDICES

29B-WF-171994

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JUL 31 1991
FBI/DOJ OFFICE

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1325015-000-6989

CARD DATED 5/61. THIS FILE WAS DESTROYED MAY, 1978. NO OTHER NAMES OR COMPANIES WERE IDENTIFIABLE WITH NAMES IN REFERENCE TELETYPE.

THERE ARE NO KNOWN INVESTIGATIONS INVOLVING BCCI AND/OR OTHERS NAMES HEREIN WHICH IS PRESENTLY BEING CONDUCTED BY OTHER FEDERAL, STATE OR LOCAL LAW ENFORCEMENT AGENCIES.

CHICAGO CONSIDERS THIS MATTER RUC.

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#0016

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/READ/MRI 2385/211
0000 MRI 02385

PP RUCNFB FBIWMFO

DE FBISJ #0010 2120936

ZNR UUUUU

P 302328Z JUL 91

FM FBI SAN JUAN (~~29B~~-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3800//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M CLIFFORD, CLARK CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N V NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]; SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

29B-WF-171994 -123

JUL 3 1991

1325015-000-6991

PAGE TWO DE FBISJ 0010 UNCLAS

BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR GHAITH PHARAON; FIF; FAG; OO: WMFO.

GENERAL AND FOIMS CHECKS WERE CONDUCTED IN THE SAN JUAN DIVISION ON 7/30/91 WITH NEGATIVE RESULTS.

NO FURTHER INVESTIGATION WILL BE CONDUCTED IN THE SAN JUAN DIVISION. THIS MATTER IS CONSIDERED RUC'D.

BT

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1325015-000-6992

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/READ MRI 1637/210
0000 MRI 01637

PP RUCNFB FBIWMFO

DE FBICI #0018 2110313

ZNR UUUUU

P 292215Z JUL 91

FM FBI CINCINNATI (29B-WF-R-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //3160//

PASS: ATTENTION FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; FIF; FAG.

OO:WMFO.

RE BUREAU TELETYPE TO ALL OFFICES, JULY 26, 1991.

CINCINNATI DIVISION OFFICE INDICES, BOTH AUTOMATED AND MANUAL, NEGATIVE REGARDING SUBJECTS AND COMPANIES IDENTIFIED IN TITLE OF REFERENCED BUREAU TELETYPE, AS WELL AS INDIVIDUALS ADDITIONALLY SET OUT IN BODY OF REFERENCED TELETYPE.

29B-WF-171994 — 124

SEARCHED Su INDEXED Su
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1991.
FBI - WASH. METRO FIELD OFFICE

1325015-000-6993

CINCINNATI HAS NO KNOWLEDGE OF ANY INVESTIGATIONS BEING CONDUCTED BY FEDERAL, STATE OR LOCAL LAW ENFORCEMENT AGENCIES REGARDING THE ABOVE INDIVIDUALS OR COMPANIES.

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/READ/MRI 1733/210
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OO P12 FBIWMFO

DE FBIME #0002 2110311

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O 292304Z JUL 91

FM FBI MEMPHIS (29B-WF-R171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

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UNCLAS E F T O

CITE: //3440//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WCC SECTION, FBIHQ.

SUBJECT: CLARK MC ADAMS CLIFFORD; ET AL; FIF; FAG; OO: WMFO.

RE BUTEL JUL. 26, 1991.

ON JUL. 29, 1991, MEMPHIS INDICES WERE SEARCHED AND WERE FOUND TO CONTAIN NO REFERENCES IDENTIFIABLE WITH NAMES OF INDIVIDUALS AND BUSINESSES IN REFERENCED TELETYPE.

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1991.
FBI - WASH. METRO FIELD OFFICE

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O 300017Z JUL 91

FM FBI EL PASO (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3240//

PASS: WHITE COLLAR CRIME SECTION, FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG;

OO: WMFO.

RE TELETYPE OF ALL FIELD OFFICES, JULY 26, 1991.

SEARCH OF EL PASO DIVISION GENERAL, FOIMS, SECURE AND ELSUR INDICES FAILED TO DISCLOSE AN OFFICE OF ORIGIN REFERENCE FOR ANY COMPANY OR INDIVIDUAL IDENTIFIED IN REFERENCED COMMUNICATION. EL PASO DIVISION IS UNAWARE OF ANY LOCAL

1325015-000-6996

PAGE TWO DE FBIEP 0002 UNCLAS

INVESTIGATION INVOLVING BANK OF CREDIT AND COMMERCE

INTERNATIONAL (BCCI) AND/OR OTHER REFERENCED COMPANY OR

INDIVIDUAL WHICH IS PRESENTLY BEING CONDUCTED BY ANY OTHER LAW

ENFORCEMENT AGENCY.

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DE FBIDN #0001 2121152

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O 310002Z JUL 91

FM FBI DENVER (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3210//

PASS: FINANCIAL INSTITUTIONAL FRAUD UNIT, WHITE COLLAR CRIMES SECTION, FBIHQ.

SUBJECT: CLARK MCADMAS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD, [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK XAYED

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29B-WF-171994-126

SEARCHED See INDEXED
SERIALIZED See FILED
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-6998

BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; OO: WMFO.

RE BUREAU TELETYPE TO ALL FBI FIELD OFFICES, DATED JULY 26, 1991.

DENVER INDICES HAS THE FOLLOWING TWO REFERENCES FOR BANK OF CREDIT AND COMMERCE INTERNATIONAL:

DENVER FILE 12B-TP-997 SERIAL 3, PAGE 10. THIS COMMUNICATION IS A BUREAU TELETYPE TO ALL FBI FIELD OFFICES, DATED JANUARY 29, 1990, CAPTIONED "STARBANK, MANUEL ANTONIO NORIEGA; [redacted]; DRUG MATTERS; OO: TAMPA." A REVIEW OF THIS COMMUNICATION INDICATES THAT ALL FBI FIELD OFFICES WERE REQUESTED TO CONDUCT A SEARCH OF INDICES, INCLUDING OCIS, ISIS, IIS, ELSUR, AND INFORMANT INDICES FOR NUMEROUS NAMES INCLUDING BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). ON FEBRUARY 1, 1990, DENVER RESPONDED BY AIRTEL TO BUREAU, ADVISING A SEARCH OF DENVER RECORDS DETERMINED THERE WAS NO RECORD IDENTIFIABLE WITH BANK OF CREDIT AND COMMERCE INTERNATIONAL.

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DENVER FILE 12B-TP-997 SERIAL 10, PAGE 6. THIS COMMUNICATION IS A TAMPA TELETYPE TO THE BUREAU, DATED JANUARY

31, 1990, CAPTIONED "STARBANK; GENERAL MANUEL ANTONIO NORIEGA, AKA; ENRIQUE A. PRETELT, AKA; DRUGS - COLOMBIAN/SOUTH AMERICAN DRUG TRAFFICKING ORGANIZATIONS - MARIJUANA; OO: TAMPA." TAMPA FILE NUMBER IS 12B-997 AND BUREAU FILES ARE 12-19707 AND 12-19286. A REVIEW OF THIS COMMUNICATION SET FORTH INFORMATION ONLY FOR RECIPIENTS. NO INVESTIGATION WAS REQUIRED OF DENVER.

DENVER INDICES NEGATIVE ON ALL OTHER COMPANIES AND NAMES SHOWN IN TITLE AND PAGE FIVE OF REFERENCED TELETYPE.

SINCE THERE ARE NO FURTHER LEADS FOR THE DENVER DIVISION, THIS MATTER IS BEING PLACED IN RUC STATUS.

BT

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O 262243Z JUL 91

FM DIRECTOR FBI

TO ALL FBI FIELD OFFICES/IMMEDIATE/

ALL LEGATS/IMMEDIATE/

BT

UNCLAS

CITE: //0624//

PASS: PERSONAL ATTENTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND

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29B-WF-171994 -
127

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 1991
FBI - WASH. METRO FIELD OFFICE

[redacted]

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1325015-000-7001

COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

CAPTIONED MATTER INVOLVES INVESTIGATION OF FALSE STATEMENTS MADE OVER MORE THAN 10 YEARS TO THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (BGFRS), WASHINGTON, D.C. (WDC), BY SUBJECTS TO HIDE TRUE OWNERSHIP AND CONTROL OF CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. (CCAH), NETHERLANDS, ANTILLES, AND ITS SUBSIDIARIES, BY BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). IN 1982, BASED ON REPRESENTATIONS MADE BY CLARK MCADAMS CLIFFORD, [redacted] AND FOUR MIDDLE EASTERN "INVESTORS," THE BGFRS APPROVED CCAH AS A BANK HOLDING COMPANY TO OWN FIRST AMERICAN BANKSHARES (FABS), WDC. INVESTIGATION TO DATE INDICATES THAT THE "INVESTORS" WERE MERELY NOMINEES FOR BCCI, A LUXEMBOURG-BASED BANK WHICH WAS UNACCEPTABLE TO THE BGFRS FOR ANY OWNERSHIP OR CONTROL OF ANY AMERICAN BANK. YEARLY CCAH FILINGS TO BGFRS SINCE 1982 HAVE DENIED EXISTENCE OF ANY BCCI ROLE IN ITS OPERATIONS. SUBSEQUENTLY, BCCI HAS ALLEGEDLY USED SIMILAR NOMINEE TRANSACTIONS TO OBTAIN CONTROL OF BANKS IN GEORGIA AND CALIFORNIA.

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ON 2/7/91, WMFO INITIATED A FINANCIAL INSTITUTION FRAUD

INVESTIGATION CONCERNING CAPTIONED MATTER BASED ON A CRIMINAL REFERRAL FROM THE BGFRS, ALLEGING THAT CLIFFORD AND [redacted] HAD MADE FALSE AND FRAUDULENT STATEMENTS CONCERNING BCCI'S OWNERSHIP AND CONTROL OF CCAH, THE PARENT-HOLDING COMPANY OF FABS WHICH OWNS FIRST AMERICAN BANK, WDC. CLIFFORD, A NOTED WASHINGTON ATTORNEY AND FORMER SECRETARY OF DEFENSE, IS THE CHAIRMAN OF FABS AND HIS LAW PARTNER, [redacted] CLIFFORD AND [redacted] ALSO SERVE ON THE BOARD OF DIRECTORS OF CCAH. FABS IS THE LARGEST BANK-HOLDING COMPANY IN THE WDC AREA WITH $11.5 BILLION IN ASSETS. IN THE 1982 TAKEOVER OF FINANCIAL GENERAL BANKSHARES (FGB), THE PREDECESSOR TO FABS, BY A GROUP OF ARAB INVESTORS, CLIFFORD AND [redacted] ASSERTED THAT BCCI HAD NO ROLE IN THE TAKEOVER OTHER THAN THAT OF AN INVESTMENT ADVISOR. THE BGFRS APPROVED THE TAKEOVER OF FGB BASED ON THE REPRESENTATION THAT BCCI WOULD HAVE NO INVOLVEMENT WITH THE MANAGEMENT OR OTHER AFFAIRS OF FGB, NOW KNOWN AS FABS. THE BGFRS NOW ALLEGES THAT FABS MADE FALSE STATEMENTS IN REGULATORY REPORTS AND FILINGS CONCERNING THE ROLE OF BCCI IN THE 1982 TAKEOVER AND SUBSEQUENT OWNERSHIP OF FABS.

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ON 5/21/91, WMFO RECEIVED THREE ADDITIONAL CRIMINAL REFERRALS FROM THE BGFRS CONCERNING BCCI AND DR. GHAITH

PHARAON WHICH ALLEGGGED THAT PHARAON ACTED AS NOMINEE FOR BCCI IN THE PURCHASE OF TWO BANKS IN GEORGIA AND CALIFORNIA IN 1978 AND 1984, BEING THE NATIONAL BANK OF GEORGIA (NOW THE FIRST AMERICAN BANK OF GEORGIA), ATLANTA, GEORGIA, AND THE INDEPENDENCE BANK, ENCINO, CALIFORNIA. THE REFERRALS FURTHER ALLEGE THAT FALSE STATEMENTS WERE MADE TO THE BGFRS CONCERNING THE OWNERSHIP AND CONTROL OF THESE TWO BANKS.

SHEIK ZAYED, THE RULER OF ABU DHABI AND PRESIDENT OF THE UNITED ARAB EMIRATES, WAS A MAJOR INVESTOR IN BCCI IN THE 1970'S AND ACQUIRED CONTROL OF BCCI IN 1990. ON 7/5/91, AS A RESULT OF THE ALLEGED FRAUDULENT CONDUCT BY BCCI, BANK REGULATORS IN BRITAIN, LUXEMBOURG, THE UNITED STATES, SWITZERLAND, SPAIN, FRANCE, AND THE CAYMAN ISLANDS CLOSED DOWN BRANCHES OF BCCI WITHIN THEIR RESPECTIVE JURISDICTIONS. THE BCCI MATTER HAS RECENTLY RECEIVED EXTENSIVE MEDIA COVERAGE ALLEGING BCCI'S CONNECTIONS WITH NUMEROUS INTERNATIONAL ILLEGAL ACTIVITIES. MEDIA REPORTS ALSO INDICATE POSSIBLE RELATED CONGRESSIONAL HEARINGS IN THE NEAR FUTURE.

IN ADDITION TO THE SUBJECTS AND INDIVIDUALS NAMED ABOVE, THE FOLLOWING NAMES ARE BEING PROVIDED IN THAT THESE INDIVIDUALS

RELATE TO THIS MATTER AND SHOULD BE INCLUDED IN INDICES SEARCHES:

1. [redacted] FORMER BCCI OFFICIAL; b6 b7C

2. [redacted] (DOB: [redacted] FORMERLY BCCI'S CHIEF FINANCIAL OFFICER;

3. [redacted] (DOB: [redacted], SSAN: [redacted]) WIFE OF [redacted]

4. [redacted] SHEIK ZAYED'S b6 b7C DEPARTMENT OF PRIVATE AFFAIRS AND [redacted] SHEIK'S FINANCIAL INVESTMENTS;

5. [redacted] (PAKISTANI NATIONAL; DOB: [redacted] b6 b7C POB: BHOPAL, INDIA) FORMERLY [redacted] BCCI; AND,

6. [redacted] (U.S. CITIZEN, DOB: [redacted] b6 b7C PRESENTLY RESIDING GENEVA, SWITZERLAND) [redacted]

ALL RECIPIENTS ARE TO CONDUCT IMMEDIATE INDICES SEARCHES FOR COMPANIES AND INDIVIDUALS IDENTIFIED HEREIN. SUTEL RESULTS IMMEDIATELY BY TELETYPE NO LATER THAN COB 7/31/91 TO BOTH WMFO (29B-WF-171994) AND THE FINANCIAL INSTITUTION FRAUD UNIT, WHITE-COLLAR CRIMES SECTION, FBIHQ. REPORTS OF POSITIVE REFERENCES ARE TO INCLUDE A SYNOPSIS OF INFORMATION OBTAINED, SUMMARY OF ANY ACTION TAKEN IN RESPONSE, AND RESULTS OF ANY INVESTIGATION

THAT HAVE BEEN OR ARE CURRENTLY BEING CONDUCTED BY THE FBI.
RESPONSE SHOULD ALSO ADVISE OF ANY KNOWN INVESTIGATION(S)
INVOLVING BCCI AND/OR OTHERS NAMED HEREIN WHICH IS PRESENTLY
BEING CONDUCTED BY OTHER FEDERAL, STATE, OR LOCAL LAW
ENFORCEMENT AGENCIES.

BT

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OO P12 FBIWMFO

DE FBILR #0001 2101516

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O 291506Z JUL 91

FM FBI LITTLE ROCK (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3390//

PASS: "FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ETAL; FIF; FAG;

OO: WMFO.

RE BUTEL TO ALL FIELD OFFICES, JULY 26, 1991.

FOR INFORMATION OF THE BUREAU AND WMFO, LITTLE ROCK INDICES WERE ENTIRELY NEGATIVE FOR SUBJECTS AND PERSONS SET FORTH IN REFERENCED TELETYPE.

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29B WF 171994 —

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JUL 29 1991
FBI - WASH. METRO FIELD OFFICE

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O 290701Z JUL 91

FM LEGAT TOKYO (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS E F T O

CITE: //5400:TOK334.210//

PASS: HQ, ATTN: FINANCIAL INSTITUTION FRAUD UNIT, WCCS, CID.

X

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; ET AL.; FIF; FAG; OO: WMFO.

REHQTEL DATED JULY 26, 1991.

LEGAT, TOKYO, HAS CONDUCTED A THOROUGH SEARCH OF BOTH ITS COMPUTER AND MANUAL INDICES FOR COMPANIES AND INDIVIDUALS IDENTIFIED IN RETEL WITH NEGATIVES RESULTS. THIS MATTER IS CONSIDERED RUC'D.

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0002 MRI 01420

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FM FBI BIRMINGHAM (29B-WF-R-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3070//

PASS: THE FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR

CRIMES SECTION, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK

CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN

HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

[redacted] SHAUKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

130

29B-WF-171994 -

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
FBI - WASH. METRO FIELD OFFICE

1325015-000-7009

[redacted] b6 b7C

BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PARAON; FIF; FAG; OO:WMFO.

RE TELETYPE FROM THE BUREAU DATED JULY 26, 1991, TO AFO.

BIRMINGHAM ELSUR, CONFIDENTIAL, GENERAL AND ZY (SPECIALIZED INDICES REGARDING VANPAC) WERE NEGATIVE REGARDING SUBJECTS, COMPANIES AND INDIVIDUALS IDENTIFIED IN REFERENCED TELETYPE.

BIRMINGHAM ELSUR INDICES SEARCHED BY FA [redacted] ON JULY 29, 1991; BIRMINGHAM CONFIDENTIAL INDICES WERE SEARCHED BY CA [redacted] ON JULY 29, 1991; AND BIRMINGHAM GENERAL AND ZY INDICES WERE SEARCHED BY IA [redacted] ON JULY 29, 1991.

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O 292005Z JUL 91

FM FBI LOUISVILLE (29-0)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3420//

PASS: CID-WCCS-FIFU.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT

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29B-WF-171994 -

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
1991
FBI - WASH. METRO FIELD OFFICE

[redacted]

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b7C

AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE 7/26/91 TELETYPE TO ALL FBI FIELD OFFICES.

PER REQUEST IN RE TELETYPE, INDICES SEARCHES WERE CONDUCTED WITH NEGATIVE RESULTS. LOUISVILLE IS NOT AWARE OF ANY INVESTIGATION CONCERNING BCCI AND/OR OTHERS NAMED IN RE TELETYPE BEING CONDUCTED BY ANY OTHER LAW ENFORCEMENT AGENCY.

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P 302113Z JUL 91

FM FBI CHARLOTTE (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //3140//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE-COLLAR CRIMES SECTION, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; ET AL; FIF; FAG; OO: WMFO.

REBUTEL ALL FIELD OFFICES, JULY 26, 1991.

29B-WF-171994-132

CHARLOTTE OFFICE GENERAL INDICES AND FOIMS SEARCHED WITH NEGATIVE RESULTS CONCERNING ALL COMPANIES AND INDIVIDUALS NAMED IN REFERENCED TELETYPE.

JUL 31 1991
CI-WASH. METRO FIELD OFFICE

BT

#0011

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 04-11-2018 BY: [redacted]

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Enter message id (MRI): 1274

Retrieval completed at 1624
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Results are: 0001 found

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FM FBI HOUSTON (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

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S E C R E T

SITE: 77290//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WCC SECTION, FBIHQ.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; [redacted]

b6
b7C

AKA; [redacted]

[redacted]

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS,
ANTILLES; AGHA HASAN ABEDI; [redacted]; SHAYKH ZAUID BIN
SULTAN AL-NUHAYYAN, AKA; DBA BANK OF CREDIT AND COMMERCE,
INTERNATIONAL; GHAITH PHARAON, AKA; FIF; FAG; OO: WMFO.

29B-WF-171994-133

RE BUREAU TELETYPE TO ALL FBI FIELD OFFICES AND LEGATS,

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

SECRET

7/26/91.

SEARCH OF HOUSTON GENERAL AND FOIMS INDICES NEGATIVE FOR INDIVIDUALS AND COMPANIES CONTAINED IN TITLE AND BODY OF RE TELETYPE WITH FOLLOWING EXCEPTIONS.

REFERENCES TO BANK OF CREDIT AND COMMERCE, INTERNATICNAL : HO FILE 196A-2907. CAPTIONED [redacted] b6 b7C [redacted] GOLDEN JAGUAR CORP., HOUSTON, TEXAS AND LOS ANGELES, CALIFORNIA; FBW; MF: CONSPIRACY; BILLS OF LADING ACT; OO: HOUSTON. [redacted] FRAUDULENTLY OBTAINED FUNDS TOTALLING OVER $400,000.00 WHICH WERE WIRE TRANSFERRED TO TWO BANKS IN THE LOS ANGELES AREA ON OR ABOUT 10/30/88 FROM TEXAS FIRST NATIONAL BANK, HOUSTON, TEXAS. FRAUDULENT SHIPPING/BILLS OF LADING CONTAINED NAME AND SIGNATURE OF [redacted] APPEARING ON A SOLTEX PRODUCT QUALITY CERTIFICATION. A LETTER FROM BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., 501 WEST 6TH STREET, LOS ANGELES, CALIFORNIA 90014, AND AN EXPENSE VOUCHER FOR FEES ON ACCOUNT OF ACCORD SYSTEMS. [redacted] BCCI BANK OFFICER IN LOS ANGELES, CALIFORNIA INTERVIEWED ON 5/2/89 AND CLAIMED THAT HIS SIGNATURE ON THE SOLTEX PRODUCT QUALITY CERTIFICATION WAS A FORGERY. BCCI OFFICIAL [redacted] INTERVIEWED ON

5/2/89 IN THE PRESENCE OF [redacted] AND ANOTHER BCCI BANK OFFICER, [redacted] ADVISED THAT BCCI HAD ONLY ACTED AS THE INTERMEDIARY BANK FOR THE TRANSFER OF FUNDS FROM THE BANK OF COMMUNICATION, HONG KONG, TO GOLDEN JAGUAR CORPORATION THROUGH TEXAS FIRST NATIONAL BANK. [redacted] NOTED THAT SOME DOCUMENTS CONTAINED DISCREPANCIES WHICH WERE NOTED AND WAIVED BY THE HONG KONG CORPORATION. [redacted] AND [redacted] NOT FURTHER IDENTIFIED BY LA. [redacted] INDICTED IN THE SOUTHERN DISTRICT OF TEXAS ON 7/23/90 ON MULTIPLE COUNTS OF VIOLATIONS OF [redacted] ARRESTED [redacted] IN SAN FRANCISCO; [redacted] IS EXPECTED TO ENTER GUILTY PLEA IN NORTHERN DISTRICT OF CALIFORNIA.

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HO FILE 29A-HO-26368 CAPTIONED [redacted] COMMUNITY BANK N.A., PINEHURST, TEXAS; FIF; OO: HOUSTON.

b6
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INITIAL INDICATION BY OFFICE OF THE CONTROLLER OF THE CURRENCY, DALLAS, TEXAS WAS THAT [redacted] (A FORMER COMMUNITY BANK LOAN OFFICER) AND ASSOCIATES WERE INVOLVED IN HOLDING FALSE ACCOUNTS, CREDIT CARD SCAMS, MISAPPLICATION OF FUNDS, FORGED LOANS, AND POSSIBLY MONEY LAUNDERING WHICH CAUSED TO BE LOST

b6
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THREE TO FOUR MILLION DOLLARS OF COMMUNITY BANK N.A. FUNDS.

CONTACT WITH [redacted] IN HOUSTON FOUND THAT

THEY HAD DEVELOPED INFORMATION THAT A [redacted], A

CLOSE ASSOCIATE OF [redacted] RECEIVED NARCOTICS FROM COLOMBIA

THROUGH LOS ANGELES AND TAMPA, FLORIDA. DRUG PROCEEDS WERE

DEPOSITED AT COMMUNITY BANK, N.A., THEREAFTER WIRED TO CONROE

NATIONAL BANK, CONROE, TEXAS, AND SUBSEQUENTLY WIRED TO BANK

OF CREDIT AND COMMERCE, PANAMA, AND BANK OF CREDIT AND

COMMERCE, COLOMBIA. [redacted] IS IDENTIFIED AS A

PAKISTANI MALE, DATE OF BIRTH [redacted] SOCIAL SECURITY NUMBER

[redacted] RESIDING AT [redacted] HOUSTON, TEXAS.

INVESTIGATION ONGOING.

HO FILE 12B-HO-26639 CAPTIONED [redacted] AKA

[redacted] DRUGS-MONEY LAUNDERING; COLOMBIA;

OO: HOUSTON, INVESTIGATION INITIATED IN RESPONSE TO BUREAU

TELETYPE 10/2/89 PROVIDING INFORMATION THAT [redacted] RESIDENT

OF HOUSTON, TEXAS HAD DEPOSITED 1.5 MILLION DOLLARS AT BCCI

OFFICES IN LONDON, ENGLAND. INVESTIGATION AT HOUSTON

DETERMINED SUBJECT COULD NOT PAY ROUTINE BILLS IN 1988.

MATTER CLOSED ADMINISTRATIVELY VIA TELETYPE TO BUREAU 1/22/91

AS BUREAU WAS NON RESPONSIVE TO HOUSTON REQUEST TO IDENTIFY

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SOURCE INFORMATION TO DETERMINE IF APPROPRIATE WITNESSES AND RECORDS COULD BE OBTAINED.

HO FILE 245B-TP-273 CAPTIONED [redacted] OCDETF; OO: TP. HO LEADS SET OUT BY TP IN ITS BCCI INVESTIGATION. INFORMATION PROVIDED BY HOUSTON RESIDENT [redacted] REGARDING [redacted] AND RELATING TO BCCI OPERATIONS PROVIDED TO TAMPA. b6 b7C b7E

HO FILE 265G-HO-27413 CAPTIONED BAKTEC; AOT; IT; DRUG TRAFFICKING; OO: HOUSTON. BASED ON INFORMATION PROVIDED BY [redacted] (SUPRA, HO FILE 245B-TP-273), HO OPENED CASE 2/6/90 REGARDING MORPHINE BASE PRODUCTION IN THE BAKKA VALLEY, LEBANON, AND MONEY LAUNDERING ACTIVITIES OF BILLIONS OF DOLLARS THROUGH BCCI EACH YEAR TO SUPPORT SYRIAN INTERESTS. CASE CLOSED 7/5/91 AS BUREAU ADVISED THAT 265 MATTER NOT PREDICATED BY [redacted] MATTER SHOULD BE ADMINISTRATIVELY CLOSED. b3 b6 b7C b7E

HO FILE [redacted] CAPTIONED [redacted], AKA; IT-INDIA; OO: HOUSTON, TELEPHONE NUMBER [redacted] LISTED TO BCCI, [redacted] STREET, SAN FRANCISCO, CALIFORNIA IDENTIFIED AS NUMBER DIALED BY TARGET. b3 b6 b7C b7E

HO FILE 245E-LA-428 CAPTIONED:

[redacted] OCDETF CASE OO: TP. [redacted] OCDETF CASE OO:

LA. FILE REFERENCE SETS OUT BACKGROUND INFORMATION RE TP

INVESTIGATION INTO BCCI MONEY LAUNDERING OPERATIONS.

REFERENCE TO INDEPENDENCE BANK: HO FILE 145B-563

CAPTIONED [redacted] MAJOR CASE 95; [redacted] AKA

[redacted] PHOENIX'S ASSOCIATES

MANAGEMENT; SAXET INC; ET AL; ITOM; OO: CLEVELAND. SUBJECTS

IN THIS MATTER MAINTAINED A SAXET INC; SPECIAL PURPOSE ACCOUNT

AT INDEPENDENCE BANK, CANOGA PARK OFFICE. CANOJA PARK, CA.

[redacted] ET AL INDICTED IN SOUTHERN DISTRICT OF TEXAS AWAITING

TRIAL.

UACB, HOUSTON CONSIDERS MATTER RUCD.

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Retrieval completed at 1711
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FM LEGAT LONDON (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI MIAMI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //5200:LON144.212 31 JUL 1991//

PASS: HQ FOR OLIA, I/FPCU, ROOM 7458; WHITE COLLAR CRIME SECTION, FINANCIAL CRIMES UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO: WMFO.

AS FBIHQ IS AWARE, LONDON IS ONE OF THE MAJOR FINANCIAL CENTERS OF THE WORLD. WITH THE ADVENT OF ELECTRONIC BANKING AND THE RESULTING EASE WITH WHICH HUGE AMOUNTS OF MONEY ARE MOVED AROUND THE WORLD. IT IS APPARENT THAT THE NUMBER AND THE SIGNIFICANCE OF FBI WHITE COLLAR CRIME (WCC) CASES WHICH HAVE A

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FBI - WASH. METRO FIELD OFFICE

NEXUS IN LONDON, WILL CONTINUE TO INCREASE DRAMATICALLY. LEGAT, LONDON, HAS RECOGNIZED THAT AND HAS TAKEN A VERY PROACTIVE APPROACH TO SUPPORTING THE BUREAU'S WCC PROGRAM IN THIS TERRITORY, AS EVIDENCED BY LEGAT'S RECOMMENDATION THAT AN FBI OFFICIAL FROM THE WCC SECTION SPEND A 30-DAY TDY AT [redacted] LONDON, TO ASSESS NOT ONLY THEIR METHODOLOGY FOR ATTACKING SERIOUS FRAUD CASES, BUT ALSO THE EXTENT TO WHICH IT WOULD BE ADVISABLE TO ASSIGN AN FBI AGENT TO [redacted] ON AN EXTENDED TDY BASIS TO SUPPORT PURELY WCC MATTERS IN LONDON. ASSISTANT SECTION CHIEF (ASC) [redacted] COMPLETED THAT 30-DAY TDY ON JULY 17, 1991, AND APPEARS TO BE IN FULL AGREEMENT THAT SUCH AN ASSIGNMENT WOULD BE ADVANTAGEOUS IN SUPPORTING THE FBI'S WCC PROGRAM.

b6
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b7D

THE PURPOSE OF THIS COMMUNICATION IS TO ADVISE FBIHQ THAT INVESTIGATIVE REQUIREMENTS FOLLOWING THE RECENT FAILURE OF THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) ARE SO SIGNIFICANT THAT, IN ORDER TO ADEQUATELY COORDINATE AND ADDRESS INVESTIGATIVE LEADS BETWEEN THE U.S. AND UK, CERTAIN STEPS SHOULD BE TAKEN BY FBIHQ. LEGAT, LONDON, HAS ALREADY COORDINATED TRAVEL TO LONDON FOR SPECIAL AGENTS FROM WMFO INVESTIGATING THE CLARK

PAGE THREE LON 29B-WF-171994 UNCLAS

CLIFFORD ASPECT OF THE BCCI CASE. THEY WERE PUT IN CONTACT WITH [redacted] THE BANK OF ENGLAND, [redacted] b6 b7C b7D APPOINTED FOR BCCI, AND PRICE WATERHOUSE. ADDITIONALLY, SEVERAL INTERVIEWS OF FORMER BCCI EMPLOYEES WERE CONDUCTED. IN THE MEANTIME, LEGAT, LONDON, HAS BEEN CONTACTED BY THE MIAMI DIVISION, THE TAMPA DIVISION, AND THE ATLANTA DIVISION CONCERNING VARIOUS ASPECTS OF THE BCCI CASE. IT HAS ALSO COME TO OUR ATTENTION THAT NEW YORK STATE AUTHORITIES UNDER THE DIRECTION OF THE MANHATTAN DISTRICT ATTORNEY'S OFFICE ARE MAKING INQUIRIES IN THE UK. IT IS REASONABLE TO ASSUME THAT SEVERAL OTHER FBI DIVISIONS, AS WELL AS VARIOUS OTHER INVESTIGATIVE AGENCIES, WILL BE ATTEMPTING TO CONDUCT INVESTIGATIONS WITHIN THE UK IN THE NEAR FUTURE.

THE SITUATION, AS IT EXISTS TODAY, REQUIRES THAT FBIHQ TAKE DECISIVE ACTION TO ENSURE THAT THE INVESTIGATIONS CONDUCTED CONCERNING THE FAILURE OF BCCI AND RELATED CASES ARE COORDINATED IN THE MOST EFFICIENT MANNER POSSIBLE. THE SITUATION ALSO OFFERS SOME EXCELLENT OPPORTUNITIES FOR THE FBI. LEGAT, LONDON, RECOMMENDS THAT THE FOLLOWING ACTIONS BE CONSIDERED BY THE WCC

SECTION, FBIHQ:

(1) UTILIZE SOME TIME DURING THE ALREADY-SCHEDULED WCC SEMINAR AUGUST 26 - 30, TO BRING TOGETHER SUPERVISORY PERSONNEL FROM THOSE OFFICES WHO HAVE AN IDENTIFIED INTEREST IN THE BCCI FAILURE TO DISCUSS INVESTIGATIVE STRATEGIES INVOLVING LONDON. THOSE DISCUSSIONS NEED NOT NECESSARILY BE PART OF THE OVERALL AGENDA, BUT COULD TAKE THE FORM OF A SIDE BAR MEETING.

(2) LEGAT, LONDON, WILL BE REPRESENTED AT THE SEMINAR, AS WELL AS THE METROPOLITAN POLICE AND THE [redacted] IT IS RECOMMENDED THAT FBIHQ APPROVE THE ATTENDANCE OF A SENIOR REPRESENTATIVE FROM THE [redacted], LONDON, TO ATTEND THE SEMINAR. b7D

(3) SERIOUS CONSIDERATION SHOULD BE GIVEN AT THIS TIME TO ASSIGNING, ON AN EXTENDED TDY BASIS, AN EXPERIENCED FINANCIAL CRIMES AGENT TO THE [redacted] THAT AGENT WOULD RECEIVE ADMINISTRATIVE b7D AND COMMUNICATIONS SUPPORT FROM LEGAT, LONDON, AND WOULD NOMINALLY FALL UNDER THE SUPERVISION OF LEGAT, LONDON, AS FAR AS THE UNITED STATES EMBASSY, LONDON, AND UK AUTHORITIES ARE CONCERNED. IN REALITY, HE WOULD WORK EXCLUSIVELY ON MATTERS RELATING TO THE BCCI INVESTIGATION.

LEGAT, LONDON, WOULD LIKE TO EMPHASIZE THE OPPORTUNITY THAT

WE HAVE AT THIS TIME TO DEMONSTRATE OUR COMPETENCE AND

PROFESSIONALISM IN THE WCC AREA. [redacted] HAS ALREADY ASSIGNED ITS ASSISTANT DIRECTOR, [redacted], TO HEAD UP THE BCCI INVESTIGATION. THEY HAVE CURRENTLY ALLOCATED THREE ATTORNEYS, 14 POLICE OFFICERS, AND A SUPPORTING STAFF OF ACCOUNTANTS TO ADDRESS THE BCCI FAILURE. THAT FAILURE WILL HAVE PROFOUND AFFECTS ON THE BANK OF ENGLAND AND THE BANKING INDUSTRY IN GENERAL. AT THIS POINT, THE FBI HAS AN OPPORTUNITY TO ACT AT THE OUTSET OF THE INVESTIGATION TO ENSURE A THOROUGH AND PROFESSIONAL APPROACH. THE CREATION OF A TASK FORCE SUPPORTED BY A TDY AGENT AT [redacted] TO COORDINATE OUR INTERESTS IN THE UK ON A FULL-TIME BASIS WOULD BE AN EXCELLENT APPROACH. THE ALTERNATIVE APPEARS TO BE AN ENDLESS PROCESSION OF INVESTIGATIVE AGENTS, AUSAS, AND VARIOUS STATE AND LOCAL INVESTIGATORS CAUSING HAVOC AND DUPLICATING EFFORTS OF [redacted] INVESTIGATIVE PERSONNEL IN LONDON.

b6
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b7D

LEGAT, LONDON, WOULD WELCOME THE WCC SECTION'S VIEWS ON THESE PROPOSALS, AS WELL AS ANY OTHER SUGGESTIONS FOR ACTIONS WHICH COULD BE TAKEN IN LONDON TO FACILITATE AND COORDINATE THIS INVESTIGATION.

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FM LEGAT BERN (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //5550:BER289.212 31 JUL 91//

PASS: HQ FOR ATTN FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO: WMFO.

REBUTEL, DATED 7/26/91.

INDICES SEARCHES BY LEGAT, BERN FOR ALL COMPANIES AND INDIVIDUALS IDENTIFIED IN REFERENCED TEL PROVED NEGATIVE WITH THE EXCEPTION OF ONE REFERENCE FROM 10/82 TO A [redacted] b6 b7C NO DOB, BERN FILE 62-0-293. THIS FILE HAS BEEN STORED AT FBIHQ SINCE 3/22/89 AND LEGAT, BERN CANNOT CONFIRM WHETHER REFERENCE IS

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FBI - WASH. METRO FIELD OFFICE

IDENTICAL TO THE [redacted] DOB [redacted] LISTED IN REFERENCED TEL. b6 b7C

LEGAT, BERN HAS NO ADDITIONAL POSITIVE INFORMATION TO PROVIDE AND RUCS.

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FIND /MRI 1198
Results are: 0001 found

/READ
0007 MRI 01198

OO P12 FBIWMFO

DE FBIBF #0006 2121617

ZNR UUUUU

O 311511Z JUL 91

FM FBI BUFFALO (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3110//

PASS: WHITE COLLAR CRIMES SECTION, FINANCIAL INSTITUTION

FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA ET AL; FIF; FAG; OO:

WMFO.

RE BUREAU TEL TO ALL FBI FIELD OFFICES, JULY 26, 1991.

BUFFALO INDICES NEGATIVE FOR COMPANIES AND INDIVIDUALS

IDENTIFIED IN REFERENCED TEL.

BT

#0006

29B-WF-171994-136

SEARCHED ____ INDEXED ____
SERIALIZED SU ... SU
JUL 31 1991
FBI - Wash. METRO FIELD OFFICE

1325015-000-7028

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Enter message id (MRI): 1239

Retrieval completed at 1621
FIND /MRI 1239
Results are: 0001 found

/READ
0010 MRI 01239

OO P12 FBIWMFO

DE FBIOC #0013 2121621

ZNR UUUUU

O 311525Z JUL 91

FM FBI OKLAHOMA CITY (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3580//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WCC SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLESS; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND

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137
29B-WF-171994-

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SERIALIZED SU FILED SU
JUL 31 1991
OKLAHOMA CITY METRO FIELD OFFICE

1325015-000-7029

COMMERCE INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE WMFO TEL TO DIRECTOR DATED JULY 26, 1991.

OKLAHOMA CITY INDICES CHECK REGARDING NAMES OF INDIVIDUALS AND COMPANIES PROVIDED IN RE TEL MET WITH NEGATIVE RESULTS.

NO FURTHER INVESTIGATION REMAINS IN THE OKLAHOMA CITY DIVISION, THEREFORE THIS MATTER IS BEING CONSIDERED RUC.

BT

#0013

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C-5

Enter message id (MRI): 1145

Retrieval completed at 1626
FIND /MRI 1145
Results are: 0001 found

/READ
0013 MRI 01145

PP RUCNFB FBIWMFO MEX

DE PAN #0001 2121626

ZNR UUUUU

P 311438Z JUL 91

FM LEGAT PANAMA CITY (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

LEGAT MEXICO CITY/PRIORITY/

BT

UNCLAS

CITE: //5460:PAN166.210//

PASS: HQ FOR FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR

CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD,

CLARK CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS,

N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

29B-WF-171994-138

SEARCHED Su INDEXED Su
SERIALIZED Su FILED Su
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-7031

SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

REFERENCE BUTEL TO ALL FBI FIELD OFFICES AND ALL LEGATS, DATED JULY 26, 1991, CAPTIONED AS ABOVE.

PANAMA CITY INDICES SEARCH OF COMPANIES AND INDIVIDUALS IDENTIFIED IN REFERENCED BUTEL IS NEGATIVE.

IT SHOULD BE NOTED THAT SINCE LEGAT, PANAMA CITY NO LONGER HAS REGIONAL RESPONSIBILITY FOR CENTRAL AMERICA, ALL MANUAL INDEX RECORDS WERE TRANSFERRED TO LEGAT, MEXICO CITY, WHO HAS ASSUMED THAT RESPONSIBILITY.

IT IS REQUESTED THAT LEGAT, MEXICO CITY SEARCH LEGAT, PANAMA CITY'S MANUAL INDEX RECORDS REGARDING NAMES SET FURTH IN ABOVE REFERENCED TELETYPE AND SUBMIT RESULTS TO FBIHQ.

BT

#0001

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/FIND

Enter message id (MRI): 1163

Retrieval completed at 1627
FIND /MRI 1163
Results are: 0001 found

/READ
0014 MRI 01163

OO P12 FBIWMFO

DE FBINH #0005 2121627

ZNR UUUUU

O 311455Z JUL 91

FM FBI NEW HAVEN (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3520//

PASS: HQ FOR FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA ET AL; FIF; FAG; OO: WMFO.

RE: FBIHQ TEL TO ALL OFFICES DATED 7/26/91.

NEW HAVEN INDICES WERE SEARCHED FOR COMPANIES AND INDIVIDUALS IDENTIFIED IN ABOVE-MENTIONED TEL. IDENTIFIABLE REFERENCES EXISTED ONLY FOR THE NATIONAL BANK OF GEORGIA AND FIRST AMERICAN BANK. THESE REFERENCES WERE ALL FOR 91

29B-WF-171994-139

SEARCHED SW INDEXED SW
JUL 31 1991

1325015-000-7033

MATTERS; HOWEVER, A SYNOPSIS OF INFORMATION IS NOT AVAILABLE SINCE ALL OF REFERENCED FILES WERE DESTROYED.

SINCE ALL LOGICAL INVESTIGATIONS HAVE BEEN CONDUCTED IN THE NEW HAVEN DIVISION, THIS MATTER IS BEING RUC'D.

BT

#0005

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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-11-2018 BY [redacted]

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/READ 340/212
COOO MRI 00340

PP RUCNFB FBIWMFO

DE FBIPX #0001 2121448

ZNR UUUUU

P 310323Z JUL 91

FM FBI PHOENIX (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3630:0004//

PASS: FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA ET AL; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE DIRECTOR TELETYPE TO ALL OFFICES AND LEGATS DATED 7/26/91.

FOR INFO OF WMFO AND FBIHQ, THE ONLY REFERENCE TO NAMES AAND COMPANIES IN REFERENCED TELETYPE REVEALED A REFERENCE TO A [redacted] IN PX FILE [redacted] THE INFORMATION WAS

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29B-WF-171994-140

SEARCHED Sw INDEXED Sw FILED
JUL 31 1991
FBI-WASH. METRO FIELD OFFICE

1325015-000-7035

PAGE TWO DE FBIPX 0001 UNCLAS

CONTAINED IN A TELETYPE FROM SAN FRANCISCO DIVISION [redacted] TO THE BUREAU, NEWARK [redacted] PHILADELPHIA AND PHOENIX DATED 4/13/89. b3 b7E

THIS TELETYPE REVEALS THE NAME [redacted] TO BE AN ALIAS OF [redacted] WAS INDICTED AND A WARRANT ISSUED ON 1/13/83 BY A SAN FRANCISCO GRAND JURY ON NUMEROUS COUNTS INCLUDING [redacted] ON 4/12/83, A UFAP WARRANT WAS FILED BY SAN FRANCISCO FBI FOR [redacted] HE WAS ARRESTED BY PX AGENTS ON [redacted] IN SCOTTSDALE, ARIZONA. b6 b7C

[redacted] HAS BEEN DESCRIBED AS A CON MAN AND IS KNOWN TO USE MANY ALIASES INCLUDING [redacted] b6 b7C

[redacted] IS DESCRIBED AS CAUCASIAN, POB NEW YORK CITY, NEW YORK, DOB [redacted] OR [redacted], 6'4" TALL, 210 TO 259 POUNDS, GREY, HAZEL OR GREEN EYES, BROWN/BLACK/GREY HAIR, BALD ON TOP, [redacted] AND [redacted] b6 b7C

[redacted] FBI NUMBER [redacted] SSN [redacted] OR [redacted] IS REPORTEDLY A [redacted]

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b7C

PHOENIX CONSIDERS THIS MATTER RUC.

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#0001

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C-5

/READ 378/212
0000 MRI 00378

PP RUCNFB FBIWMFO

DE FBIDL #0002 2121445

ZNR UUUUU

P 310402Z JUL 91

FM FBI DALLAS (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //3190:SQUAD 5 //

PASS: FBIHQ: FIF UNIT, WCC SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO:
WMFO.

RE BUREAU TELETYPE TO ALL FIELD OFFICES AND LEGATS DATED 7/26/91.

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DALLAS INDICES ARE NEGATIVE WITH RESPECT TO ALL NAMES LISTED IN THE REFERENCED TELETYPE, EXCEPT FOR A SINGLE REFERENCE TO [redacted]

UNDER DALLAS FILE [redacted] DALLAS RESPONDED TO

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29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - WASH. METRO FIELD Office

PAGE TWO DE FBIDL 0002 UNCLAS

DIRECTOR'S TELETYPE REQUEST DATED 8/29/74, IN WHICH DALLAS ADVISED FBIHQ [redacted] IS THE SON-IN-LAW OF [redacted] A WEALTHY DALLAS BUSINESSMAN WITH WIDESPREAD HOLDINGS IN THE OIL AND GAS INDUSTRY." FURTHER, THE TELETYPE TO FBIHQ FROM DALLAS, DATED 8/30/74, ADVISES [redacted] WIFE IS [redacted] DAUGHTER, AND HE IS DESCRIBED AS A WHITE MALE, APPROXIMATELY 34 YEARS OLD, 6'1" AND 175 POUNDS. DALLAS IS NOT SURE THE [redacted] DESCRIBED IN THE 1974 TELETYPE IS IDENTICAL TO THE NAMED IN REFERENCED TELETYPE.

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FINALLY, DALLAS IS UNAWARE OF ANY FEDERAL, STATE, OR LOCAL AGENCIES INVESTIGATING CAPTIONED MATTER.

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#0002

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/READ/MRI 2162/212
0000 MRI 02162

OO P12 FBIWMFO

DE FBISF #0018 2130035

ZNR UUUUU

O 312208Z JUL 91

FM FBI SAN FRANCISCO (29B-WF-171994) (P) (SQ 5)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3790//

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N V NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-HUHAYYAN, AKA, SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR GHAITH PHARAON; FIF;

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b7C

29B-WF-171994-142

SEARCHED ... INDEXED ... SERIALIZED ... FILED ...
JUL 31 1991
FBI - SAN FRANCISCO

1325015-000-7040

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FAG; OO: WMFO.

RE: TELETYPE SENT TO ALL FIEID OFFICES FROM DIRECTOR DATED 7/26/91.

AN INDICES SEARCH FOR THIS DIVISION WAS CONDUCTED ON ABOVE REFERENCED SUBJECTS ON 7/30/91. THE FOLLOWING ARE THE CASES THAT COULD BE REFERENCED TO ABOVE SUBJECTS:

FILE # SF 29A-10013 (REFERENCED 9/21/88) BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) IN SAN FRANCISCO ALLEGEDLY LOST APPROXIMATELY $1 MILLION DOLLARS TO A [redacted] b6 b7C [redacted] PACIFIC ATLANTIC TRADING COMPANY (PATC) WHICH WAS LOCATED AT 3 EMBARCADERO CENTER IN SAN FRANCISCO. PATC SUBMITTED FALSE BILL OF LADINGS TO VARIOUS BANKS LOCATED IN SAN FRANCISCO (INCLUDING BCCI) TO COVER DIVERSION OF COMMERCIAL CREDIT FUNDS.

FILE [redacted] (REFERENCED APRIL OF 1979) CLARK CLIFFORD WAS b3 b7E LISTED AS CO-CHAIRMAN OF "AMERICANS FOR SALT" (AS). CLIFFORD WAS NOT A SUSPECT OF ANY ESPIONAGE IN THIS CASE.

BT

#0018

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/READ/MRI 2040/212
0000 MRI 02040

PP RUCNFB FBIAT FBIWMFO

DE FBISL #0024 2130307

ZNR UUUUU

F 312134Z JUL 91

FM FBI ST LOUIS (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI ATLANTA/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3730//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WCC SECTION, FBIHQ.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO:
WMFO.

REFERENCE BUREAU TELETYPE TO ALL FIELD OFFICES, DATED JULY 26, 1991.

ST. LOUIS GENERAL INDICES AND FOIMS SEARCHES FOUND INFORMATION ON TWO OF THE ABOVE NAMED REFERENCED SUBJECTS.

A REFERENCE TO BANK OF CREDIT AND COMMERCE INTERNATIONAL

29B-WF-171994-143

SEARCHED SERIALIZED FILED
JUL 31 1991
FBI - ST. LOUIS

1325015-000-7042

SA (BCCI), [redacted] LONDON W.1, UK, WAS FOUND IN ST. LOUIS FILE NUMBER [redacted] AS ADDRESS BEING USED BY [redacted] THIS INFORMATION WAS CONTAINED IN A TELETYPE FROM FBIHQ ON JANUARY 28, 1988, AND WAS DIRECTED TO VARIOUS FIELD OFFICES. THE TELETYPE SET FORTH INFORMATION REGARDING [redacted] THAT WAS INITIALLY PROVIDED BY THE [redacted] ABU NIDAL ORGANIZATION WAS THE [redacted] OF RADIO PAGING DEVICES DELIVERED TO THE GENEVA, SWITZERLAND AIRPORT FOR AIR FREIGHT FORWARDING.

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GHAITH PHARAON IS LISTED IN ST. LOUIS FILE NUMBER 9A-3153 AS A VICTIM. PHARAON RECEIVED A LETTER FROM SAUDI ARABIA DEMANDING $1 MILLION IN RETURN FOR HIS FAMILY'S SAFETY. SAVANNAH WAS OFFICE OF ORIGIN AND THEIR FILE WAS 9A-150).

A LEAD WAS SET OUT FOR ST. LOUIS TO TRANSLATE THE DEMAND LETTER, BUT TRANSLATOR HAD BEEN TRANSFERRED TO KANSAS CITY AND LEAD WAS SENT TO KANSAS CITY.

NO OTHER REFERENCES TO NAMES CONTAINED IN REFERENCED TELETYPE WERE LOCATED.

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#0024

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/REEAD/MRI 2208/212
0000 MRI 02208

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DE FBIBS #0015 2130038

ZNR UUUUU

O 3122222 JUL 91

FM FBI BOSTON (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3090//

PASS: ATTN: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR

CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK

CLIFFORD, [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS,

N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDJ. [redacted]

SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK /AYED BIN SULTAN

29B-WF-171994-144

JUL 31 1991

1325015-000-7044

AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FF; FA3; OO: WMFO.

RE BU TELETYPE TO ALL FBI FIELD OFFICES AND ALL LEGATS DATED 7/27/91, CAPTIONED AS ABOVE.

BOSTON INDICES REVEALED REFERENCES FOR [redacted] CASE NUMBER 245E-0000009 THE OFFICE OF ORIGIN FOR THIS CASE WAS NORFOLK, AND BANK OF CREDIT AND COMMERCE INTERNATIONAL, (BCCI) CASE NUMBER 196A-0002123, THE OFFICE OF ORIGIN FOR THIS CASE WAS MIAMI. NO FURTHER ACTION WAS TAKEN ON THESE REFERENCES AS THEY WILL BE REPORTED BY THE OFFICES OF ORIGIN. b6 b7C

BOSTON INDICES ALSO REVEALED A REFERENCE FOR (BCCI) CASE NUMBER 87A-0021437. (BCCI) WAS MENTIONED DURING THE COURSE OF AN INTERVIEW OF [redacted] ON 8/12/86 AT DANBURY, CT. [redacted] REFERRED TO HIS ACCESS TO LETTERS OF CREDIT AND CERTIFICATES OF DEPOSIT DRAWN ON (BCCI). b6 b7C

THERE WERE NO OTHER POSITIVE REFERENCES ON THE SUBJECTS AND INDIVIDUALS IN THE ABOVE REFERENCED TELETYPE.

BT

#0015

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CT

/READ/MRI 1863/212
0048 MRI 01863

OO P12 FBIWMFO

DE FBICV #0018 2122205

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FM FBI CLEVELAND (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3170//

PASS: ATTN: FINANCIAL INSTITUTION FRAUD UNIT, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA ET AL; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE

AMERICAN HOLDINGS, NV NETHERLANDS, ANTILLES; AGHA HASAN ABEDI;

[redacted]; SHAYKH ZAYID BIN SULTAN AL-NUNHAYYAN, AKA; DBA

BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON,

AKA DR GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE BUREAU TELETYPE TO CLEVELAND DATED JULY 27, 1991.

29B-WF-171994-145

FBI - WFO

JUL 31 1991

FBI - WFO, METRO FIELD OFFICE

1325015-000-7046

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SEARCHES OF CLEVELAND GENERAL INDICES (MANUAL AND AUTOMATED) FOR ABOVE NAMES LISTED IN REFERENCED TELETYPE, ALONG WITH COMPANIES, ALL MET WITH NEGATIVE RESULTS.

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1325015-000-7047

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 04-11-2018 BY [redacted]

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FM FBI SALT LAKE CITY (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

S E C R E T

CITE: //3750//

PASS: FBIHQ, FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR

CRIME SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK

CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN

HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

[redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

-146

29B-WF-171994

SEARCHED ____ INDEXED ____
SERIALIZED SU FILED SU
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-7048

SECRET

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BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO:WMFO.

THIS COMMUNICATION IS CLASSIFIED "SECRET" IN ITS ENTIRETY.

RE BUTEL TO ALL OFFICES, 7/26/91.

INDICES SEARCHES WERE CONDUCTED AT THE SALT LAKE CITY DIVISION FOR INDIVIDUALS LISTED AS SUBJECTS, AS WELL AS ADDITIONAL INDIVIDUALS LISTED IN THE BODY OF THE REFERENCED COMMUNICATION. SEVERAL REFERENCES WERE LOCATED, HOWEVER A REVIEW OF THE FILES INDICATED THEY ARE OF NO USE IN CAPTIONED MATTER.

IN KEEPING WITH INSTRUCTIONS OF THE LEAD IN REFERENCED COMMUNICATION, THE FOLLOWING IS A SUMMARY OF THESE REFERENCES:

1. CLARK CLIFFORD WAS REFERENCED IN BUTTE FILE 100-8871, "VIETNAM MORATORIUM COMMITTEE (VMC)(IS-MISCELLANEOUS)". THIS CASE WAS OPENED 9/24/69, AND RUC'D 6/23/70. CLIFFORD'S NAME APPEARS IN A NEWSPAPER ARTICLE QUOTING A STATEMENT HE MADE REGARDING THE VIETNAM WAR.

2. [redacted] IS REFERENCED TO BUTTE FILE [redacted] "HIZBALLAH; IT - LEBANON; OO: DETROIT". THIS WAS A

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BUTTE DIVISION DEAD FILE WITH NO WORK DONE IN THE TERRITORY OF THE BUTTE DIVISION.

3. [redacted] WAS A REFERENCE IN A TELETYPE IN A DEAD FILE IN SALT LAKE CITY ENTITLED "PALESTINE LIBERATION FRONT; IT-PLF: OO:HOUSTON". b6 b7C

4. GHAITH PHARAON WAS REFERENCED TO SALT LAKE CITY FILE 9A-1223, "UNSUB, AKA [redacted] GHAITH PHARAON - VICTIM; EXTORTION (A); OO:SAVANNAH". b6 b7C

THE SALT LAKE CITY DIVISION HAS NO OTHER REFERENCES TO ANY OF THE INDIVIDUALS LISTED IN THE REFERENCED COMMUNICATION.

SALT LAKE CITY DIVISION CONSIDERS THIS MATTER RUC.

~~C BY 6629; D ON 0AUR.~~

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ALL FBI INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-11-2018 BY [redacted]

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FM FBI KANSAS CITY (29B-WF-171994) (SQ3) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

S E C R E T

SECTION ONE OF TWO SECTIONS

CITE: //3350: SQ3//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME

SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK

CLIFFORD; [redacted]

b6
b7C

[redacted] CREDIT AND COMMERCE AMERICAN

HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

29B-WF-171994-147

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

SECRET

1525015-000-7051

[redacted]; SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO:WFMO. b6 b7C

THIS COMMUNICATION IS CLASSIFIED "SECRET" IN ITS ENTIRETY.

RE FBIHQ TEL TO ALL FIELD OFFICES, DATED JULY 26, 1991.

PURSUANT TO LEAD SET FORTH IN ABOVE REBUTEL, KC FOIMS AND GENERAL INDICES WERE SEARCHED FOR REFERENCES TO SUBJECT INDIVIDUALS AND ENTITIES IN THIS MATTER. ALL NAMES WERE NEGATIVE EXCEPT AS FOLLOWS:

[redacted], WAS REFERENCED IN KC FILE NO. [redacted] (BUFILE [redacted]. THIS REFERENCE WAS CONTAINED IN A JULY 28, 1988, BUTEL TO ALL FIELD OFFICES. b3 b6 b7C b7E

COMMUNICATION STATED THAT [redacted], WAS BELIEVED BY HOUSTON TO BE IDENT. WITH [redacted] PALESTINE LIBERATION FRONT, [redacted] OPERATIONS, STATIONED IN NICOCEA, CYPRESS. BETWEEN NOV., 1986 AND APR., 1988, [redacted] HAD SENT 10 TRANSFERS OF CASH, TOTALING $70,000. FROM NICOCEA TO THE ACCOUNT OF [redacted] IN HOUSTON, TX.

1325015-000-7052

A [redacted] WAS REFERENCED IN KC FILE NUMBER [redacted] (BUFILE [redacted]. REFERENCE WAS CONTAINED IN A LETTER ATTACHED TO A MAY 13, 1971, BUAIRTEL TO DALLAS. THAT APR. 26, 1971, LETTER CAME FROM [redacted] TO A [redacted] SOURCE ALLEGING THAT AN INDIVIDUAL, REFERRED TO AS [redacted], HAD BEEN EMPLOYED BY [redacted] THROUGH A LETTER FROM [redacted] TO [redacted] AND EXPRESSED THE OPINION THAT PEOPLE LIKE [redacted] SHOULD NOT INTERFERE WITH MOVEMENTS ORGANIZATIONS.

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AN [redacted] WAS REFERENCED IN KC FILE NO. [redacted] (BUFILE [redacted]. REFERENCE WAS CONTAINED IN DEC. 4, 1982, DETROIT LHM REGARDING NAMES AND TEL. NUMBERS OBTAINED FROM [redacted] AKA WHO WAS DETAINED OCT. 4, 1981, AT DETROIT METROPOLITAN AIRPORT BY U.S. CUSTOMS AND ISA AGENTS FOR POSSESSION OF ALTERED PASSPORTS. [redacted] WAS IDENTIFIED AS BEING INVOLVED IN A [redacted] GENERAL UNION OF STUDENTS OF LYBIA (AN ANTI-QADHAFI STUDENT GROUP IN U.S.). [redacted] WAS IDENTIFIED AS HAVING TEL. NUMBER [redacted]

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BANK OF CREDIT AND COMMERCE, INTERNATIONAL WAS REFERENCED

IN KC FILE NUMBER 196A-KC-68350. THIS CASE IS CAPTIONED [redacted] UNIVERSAL NAVIGATION, INC.; [redacted] MINGI CORPORATION; [redacted] CLEDELL NIGERIA INVESTMENTS; [redacted] COMMONWEALTH PETROLEUM CORPORATION (CPC)-VICTIM; FBW; MF; OO:KC. b6 b7C

THIS CASE WAS INITIATED AS THE RESULT OF A COMPLAINT RECEIVED ON FEB. 1, 1991, FROM [redacted] AN ATTORNEY WITH LAW FIRM OF SHOOK, HARDY, AND BACON IN KANSAS CITY. b6 b7C DEAL'S CLIENT WAS IDENTIFIED AS A [redacted] AN [redacted] COMMONWEALTH PETROLEUM CORPORATION (CBC). [redacted] WAS IDENTIFIED AS [redacted] CDC. [redacted] HAD PROVIDED [redacted] FOR THE CORPORATION, TOTALING OVER ONE MILLION DOLLARS. ON OR ABOUT AUG. 4 OR 5, 1990, [redacted] HAD APPROACHED [redacted] RE AN INVESTMENT IN NIGERIAN OIL, INVOLVING A FLORIDA COMPANY KNOWN AS TERMINALS, INC. ALTHOUGH NEGOTIATIONS OCCURRED, NO FUNDS WERE PAID OUT AND THE DEAL WAS NOT COMPLETED.

IN APPROX. SEPT. 1990, [redacted] APPROACHED [redacted] WITH ANOTHER PROPOSAL INVOLVING A DR. [redacted] MINGI CORPORATION. [redacted] PROPOSED TO SELL CPC NIGERIAN CRUDE OIL b6 b7C

1325015-000-7054

AT A DISCOUNT OF $3.00 UNDER THE PRICE FOR WEST TEXAS CRUDE OIL. [redacted] ADVISED [redacted] THAT CPC WOULD HAVE TO MAKE AN UP FRONT PAYMENT FOR PORT CHARGES, WITH MINGI CORPORATION TO EVENTUALLY REIMBURSE THOSE COSTS. ON APPROX. OCT. 4, 1990, CPC ENGAGED [redacted] UNIVERSAL NAVIGATION INC., TO BE [redacted] ON OR ABOUT OCT. 24, 1990, [redacted] SUPPOSEDLY [redacted] AND REQUESTED $307,000 IN PREPAID SHIPPING FEES. ON APPROX. OCT. 28, 1990, $217,000 WAS WIRE TRANSFERRED TO [redacted] ACCOUNT IN HOUSTON, TX, FROM BANK IV IN HUTCHINSON, KS. CPC LATER LEARNED THE SHIP NAMED IN THE SHIPPING AGREEMENT WAS IN FACT A CAR CARRIER AND NOT A TANKER, AND THEREFORE REQUESTED RETURN OF THE MONEY. [redacted] WIRED BACK $100,000 AND SENT A CHECK FOR A SECOND $100,000 DRAWN ON UNIVERSAL NAVIGATION ACCOUNT, BUT PLACED A STOP PAYMENT ON THAT CHECK PRIOR TO IT BEING CASHED.

b6
b7C

IN NOV., 1990, [redacted] OF MINGI CORPORATION, AND AN INDIVIDUAL IDENTIFIED AS [redacted] A LYBIAN REFUGEE, FLEW TO NIGERIA TO SUPPOSEDLY SECURE ANOTHER VESSEL AND OIL SHIPMENT FOR CPC. A NIGERIAN, IDENTIFIED AS [redacted] CALLED CLEDELL NIGERIA INVESTMENTS.

b6
b7C

1325015-000-7055

OFFERED TO PURCHASE FOR [redacted] AND CPC A "SPECIAL ALLOCATION" OF NIGERIAN OIL. THIS WAS TO BE SHIPPED ON A VESSEL IDENTIFIED AS "KNOCK DAVIE", A SHIP OF LIBERIAN/PANAMANIAN REGISTRY OWNED BY A NORWEGIAN FIRM, BURGHLY PARK SHIPPING COMPANY. CPC WAS TOLD, HOWEVER, THAT THE SHIP COULD ONLY BE SECURED THROUGH AN UP FRONT PAYMENT TO THE SHIP OWNERS.

[redacted] CONTACTED [redacted] AND INFORMED HIM THAT THE FEES WOULD BE PAID TO THE SHIP OWNER AND THAT CPC WOULD WORK OUT A REPAYMENT DEAL WITH [redacted] AND [redacted] b6 b7C

A WIRE TRANSFER IN THE AMOUNT OF $250,000 WAS MADE THROUGH BANK IV IN HUTCHINSON, KS, BY [redacted] THIS WAS IN NATURE OF A LOAN FROM [redacted] TO [redacted]. THE WIRE WAS SENT TO BARCLAYS BANK FOR TRANSFER TO [redacted] ACCOUNT AT BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). BAYSWATER BRANCH, 62/64 QUEENSWAY, LONDON, W2 3RL (SORT CODE 60 93 38) ACCOUNT NUMBER [redacted] b6 b7C

WHEN $250,000 WAS WIRED, SHIPPING DOCUMENTS WERE GIVEN TO [redacted] [redacted] BY [redacted] b6 b7C

3T

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NNNN

1325015-000-7056

SECRET

ALL FBI INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-11-2018 BY [redacted]

b6
b7C

DO P12 FBIWMFO

DE FBIKC #0006 2130037

ZNY SSSSS

O 312116Z JUL 91

FM FBI KANSAS CITY (29B-WF-171994) (SQ3) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

S E C R E T

SECTION TWO OF TWO SECTIONS

CITE: //3350: SQ3//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

b6
b7C

29B-WF-171994-

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - WFO, METRO FIELD OFFICE

1325015-000-7057

SECRET

[redacted]; SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO:WFMO. b6 b7C

TEXT CONTINUES:

WHEN THE VESSEL FAILED TO ARRIVE IN HOUSTON, CPC CONTACTED THEIR ATTORNEYS, SHOOK, HARDY, AND BACON OF KANSAS CITY, MO, WHO BEGAN TO MAKE INQUIRIES. LAW FIRM DETERMINED THAT SHIPPING DOCUMENTS THAT HAD BEEN PROVIDED WERE FRAUDULENT. SHIP HAD ACTUALLY BEEN LEASED TO SHELL OIL, INTERNATIONAL, FOR AN OIL SHIPMENT TO GENOA, ITALY.

SUBSEQUENT TO THAT, [redacted] TOLD [redacted] THAT HE WAS SORRY THE DEAL HAD FALLEN THROUGH BUT WOULD TRY TO GET ANOTHER LOAD OF OIL FOR CPC. THIS WOULD, OF COURSE, REQUIRE ANOTHER UP FRONT PAYMENT OF SHIPPING CHARGES, AND CPC DECLINED THE OFFER. b6 b7C

SHOOK, HARDY, AND BACON HAS BEEN UNABLE TO OBTAIN THE RETURN OF ANY FUNDS SENT TO LONDON TO [redacted] ACCOUNT. THE ONLY INFO. DISCOVERED ABOUT [redacted] WAS THAT HE ALLEGEDLY WAS A CAR DEALER IN NIGERIA AND SUPPOSEDLY HAD A BROTHER LIVING AND WORKING IN NEW YORK CITY. b6 b7C

INVESTIGATION OF THIS MATTER IS CONTINUING.

1325015-000-7058

TTOFF DE FBIKC 0006 S E C R E T

CHECKS WITH U.S. SECRET SERVICE, KANSAS SECURITIES COMMISSIONER, AND MO ATTORNEY GENERAL WERE NEGATIVE AS TO INVESTIGATIONS INVOLVING BCCI OR OTHERS IN THIS MATTER.

NO FURTHER INVESTIGATION REMAINING IN KANSAS CITY, THIS MATTER IS BEING CONSIDERED RUC.

C BY G-3; D ON DADR

BT

#0006

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1325015-000-7059

/READ/MRI 2402/212
0000 MRI 02402

OO P12 FBIWMFO

DE FBIJN #0002 2130340

/NR UUUJU

O 312340Z JUL 91

FM FBI JACKSON (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3320:SQ 3//

PASS: WHITE COLLAR CRIMES SECTION, FBIHQ; FINANCIAL INSTITUTION FRAUD UNIT, WMFO.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; DBA CREDIT AND COMMERCE AMERICAN HOLDINGS, N. V. NETHERLANDS, ANTILLES; ET AL; FIF; FAG; OO: WMFO.

RE BUREAU TELETYPE TO ALL FIELD OFFICES AND ALL LEGATS DATED 7/26/91.

A REVIEW OF JACKSON GENERAL (MANUAL AND AUTOMATED) INDICES UTILIZING THE NAMES OF SUBJECTS AND THEIR BUSINESSES

29B-WF-171994-148

SEARCHED ___ INDEXED ___
SERIALIZED SU FILED SU
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-7060

[illegible] FBI JN 0002 UNCLAS

WHICH WERE SET OUT IN REFERENCED TELETYPE MET WITH NEGATIVE RESULTS.

DUE TO THE FACT NO FURTHER INVESTIGATION REMAINS IN THE JACKSON DIVISION, THIS CASE IS BEING PLACED IN AN RUC STATUS.

BT

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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-13-2018 BY [redacted]

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b7C

/READ/MRI 1874/212
0000 MRI 01874

RR RUCNFB FBIWMFO

DE FBINY #0055 2130300

ZNR UUUUU

R 312048Z JUL 91

FM FBI NEW YORK (29B-WF-171994) (P) (C-2)

TO DIRECTOR FBI (29B-WF-171994)/ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

BT

UNCLAS

CITE: //3540//

PASS: HQ FOR FINANCIAL INSTITUTION FRAUD, WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI, [redacted]; SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN

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29B-WF-171994-149

SEARCHED [redacted] INDEXED [redacted]
JUL 31 1991
FBI - NEW YORK METRO FIELD OFFICE

1325015-000-7062

~~SECRET~~

AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE DIRECTOR'S TELETYPE TO ALL FIELD OFFICES, DATED JULY 26, 1991.

A REVIEW OF NEW YORK INDICES REVEALED THE FOLLOWING INFORMATION:

1. BANK OF CREDIT AND COMMERCE, INTERNATIONAL (BCCI)

[redacted] - COMPLAINT FROM BCCI, 100, LEADENHALL STREET, LONDON, ENGLAND TO METROPOLITIAN AND CITY POLICE FRAUD DEPARTMENT, [redacted] REGARDING INTER-CURREX LIMITED ATTEMPTING TO OBTAIN 1.6 MILLION DOLLARS BY DECEPTION. [redacted] [redacted] INTER-CURREX LIMITED. b3 b6 b7C b7D b7E

29-15544-898 - COMPLAINT BY [redacted], BCCI REGARDING TWO COUNTERFEIT CHECKS WHICH WERE CASHED AT BCCI. LOSS TO BCCI WAS $1,040.00. b6 b7C

87D-86062-SUB E 8-65 - SERVICE OF SUBPOENA ON [redacted], BCCI, REQUESTING DOCUMENTS ON MCD, INCORPORATED. b6 b7C

[redacted] - CORRESPONDENCE TO [redacted] OF U.S.S.R. TO THE UNITED NATIONS FROM BCCI IN JUNE, 1987. b3 b6 b7C b7E

[redacted] - CORRESPONDENCE TO [redacted] b3 b6 b7C b7E
[redacted] OF U.S.S.R. TO THE UNITED NATIONS
FROM BCCI IN JANUARY, 1988.

87-81237-110 - NEW YORK DIVISION INVESTIGATION OF 5 MILLION DOLLARS WORTH OF STOLEN SECURITIES FROM BRADFORD SECURITY, 80 PINE STREET, NEW YORK, NEW YORK. [redacted] b6 b7C
[redacted]. TRANS WORLD PRODUCTIONS, LAS VEGAS, NV ADVISED THAT HE ATTEMPTED TO PUT TOGETHER A PACKAGE WITH BCCI, LONDON, ENGLAND FOR A $5000,000. LOAN FOR A GAMBLING CASINO. [redacted] CONTACT AT BCCI WAS [redacted]

255A-6-111P5 - LOS ANGELES DIVISION INVESTIGATION INVOLVING [redacted] AND OTHERS ASSOCIATED WITH [redacted] REGARDING b6 b7C
FRAUDULENT CERTIFICATES OF DEPOSITS TO CITY NATIONAL BANK, LOS ANGELES, CALIFORNIA. [redacted] AND BUSINESS ASSOCIATE [redacted] [redacted] MET WITH BCCI REPRESENTATIVES IN LUXENBOURG IN SEPTEMBER 1986 REGARDING A $300,000 LETTER OR CREDIT. BCCI WANTED NO PART OF THE DEAL.

29B-NY-201122, 255A-NY-202176 - NEW YORK DIVISION INVESTIGATIONS REGARDING THE PASSING OF BOGUS NEGOTIABLE REGISTERED TRUST RECEIPT WHICH WAS PURPORTEDLY BACKED BY BCCI.

BEVERLY HILLS, CALIFORNIA.

200-4868-SUB2 - DUNN AND BRADSTREET REPORT FOR BCCI. NO INDICATION AS TO WHY BCCI WAS CONNECTED TO THIS CASE.

87D-NY-1896797-9 - NEW YORK DIVISION INVESTIGATION INTO NIGERIAN FRAUD MATTERS. SOURCE ADVISED THAT BCCI WAS INVOLVED IN A $1 BILLION FRAUD IN NIGERIA.

12A-63-8140 - SOURCE INFORMATION THAT THE BANK OF CREDIT AND COMMERCE CONDUCTS BUSINESS WITH LATIN AMERICAN DRUG TRAFFICKERS.

2. CLARK CLIFFORD

190-253-105P3 - FREEDOM OF INFORMATION PRIVACY ACT BY GILBERT GREEN, REGARDING PROSECUTION OF GREEN BY THE U.S. (U.S. VS DENNIS, JULY 1948). MANY GOVERNMENT AGENCIES AND INDIVIDUALS ARE LISTED IN THIS REQUEST.

196-560-C-6-23 - [redacted] AND CLARK CLIFFORD WERE INVOLVED IN A DEMONSTRATION TO SELL MACHINE GUNS IN PANAMA. THIS CASE ORIGINATED WITHIN THE LOS ANGELES DIVISION.

b6
b7C

3. [redacted] - IRAQI BA'ATH PARTY. [redacted] ATTENDED A AL-BA'ATH MEETING ON JANUARY 13 AND 14, 1979, IN DENTON, TEXAS. ITEMS DISCUSSED AT THE MEETING WERE A NEW SECRET AGREEMENT

b3
b6
b7C
b7E

BETWEEN SYRIA AND IRAQ, AND THE FACT IRAQI STUDENTS AT TULSA WERE ASSOCIATING TOO FREELY WITH A GROUP OF AMERICAN GIRLS WHO ARE BELIEVED TO BE WORKING FOR THE FBI.

4. NATIONAL BANK OF GEORGIA (NBG)

29-14506 - ATLANTA DIVISION INVESTIGATION INTO [redacted] b6 b7C [redacted] NBG, CONCERNING THE USE OF BANK OWNED AND BANK-CHARTED AIRCRAFT BY [redacted] AND HIS ACQUISTION OF PERSONAL LOANS FROM MANUFACTURERS HANOVER TRUST AND CHEMICAL BANK, BOTH OF NEW YORK CITY.

THE BUREAU SHOULD NOTE THAT REFERENCES TO [redacted] b6 b7C [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AND BCCI WERE NOTED IN NEW YORK INDICES, HOWEVER, FILES CANNOT BE LOCATED AT THE PRESENT TIME. FILES HAVE BEEN PLACED ON SPECIAL SEARCH AND NEW YORK WILL SUBMIT BY TELETYPE RESULTS OF SEARCH. ALL OTHER INDIVIDUALS AND COMPANIES IN REFERENCE TELETYPE WERE NEGATIVE IN NEW YORK INDICES.

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1325015-000-7066

/READ/MRI 1910/212
0000 MRI 01910

RR RUCNFB FBIWMFO

DE FBIBA #0027 2130300

ZNR UUUUU

R 312057Z JUL 91

FM FBI BALTIMORE (29-0)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //3050:SQ 7//

PASS: FINANCIAL INSTITUTION FRAUD UNIT-CIII.

SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; FIF; FAG; OO:WMFO.

REFERENCE BUREAU TELETYPE TO ALL OFFICES DATED JULY 26, 1991.

A SEARCH OF BALTIMORE INDICES REGARDING INDIVIDUALS AND ENTITIES LISTED IN REFERENCED TELETYPE WAS NEGATIVE EXCEPT FOR ONE REFERENCE TO THE BANK OF CREDIT AND COMMERCE INTERNATIONAL. THIS REFERENCE WAS IN FILE 12B-TP-99700 ENTITLED, "STARBANK; MANUEL ANTONIO NORIEGA; DRUG MATTERS;

29B-WF-171994-150

SEARCHED Sec INDEXED Sec

JUL 31 1991

FBI-WASH. METRO FIELD OFFICE

1325015-000-7067

OO:TAMPA." THE REFERENCE IS IN AN INCOMING TELETYPE FROM FBIHQ FILE 12-19286 DATED JANUARY 29, 1990. THIS COMMUNICATION ALSO REQUESTED AN INDICES CHECK BY BALTIMORE.

WMFO AT WASHINGTON, D.C.-ADVISE BALTIMORE IF THE FIRST AMERICAN BANK OF MARYLAND OR ITS OFFICERS BECOME A TARGET OF THIS INVESTIGATION.

BT

#0027

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1325015-000-7068

/READ/MRI 1798/213
0000 MRI 01798

OO P12 FBIWMFO

DE OTT #0006 2140404

ZNR UUUUU

O 012112Z AUG 91

FM LEGAT OTTAWA (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //5150//

PASS: HQ: FIFU/WCC/CID.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; ETC; FIF; FAG;

OO: WMFO.

REBUTEL JULY 26, 1991, AND OTTEL JULY 30, 1991.

[redacted]

b6
b7C
b7D

29B-WF-171994 - 151

Sec Sec

AUG 01 1991

[redacted]

1325015-000-7069

[redacted] b7D

INASMUCH AS THERE IS NO OUTSTANDING INVESTIGATION IN CANADA, LEGAT, OTTAWA, IS PLACING THIS CASE IN AN RUC STATUS.

BT

#0006

NNNN

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-11-2018 BY [redacted]

b6
b7C

/READ/MRI 1650/212
0000 MRI 01650

PP RUCNFB FBIWMFO

DE FBIPH #0010 2130259

ZNR UUUUU

P 311928Z JUL 91

FM FBI PHILADELPHIA (29B-WF-171994) (SQ 9) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //3620:SQ9//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION.

SUBJECT: CLARK MC ADAMS CLIFFORD; ET AL; FIF; FAG; OO: WMFO.

INDICES SEARCHES FOR COMPANIES AND INDIVIDUALS IDENTIFIED FROM SUBJECT CASE WERE POSITIVE FOR [redacted] CASE 88-0- 1308 INDICATED THAT [redacted] USED THE ALIAS [redacted] " AMONG OTHERS. [redacted] WAS INDICTED ON JANUARY 12, 1983 FOR [redacted] ALSO, ON APRIL 14, 1983, HE WAS CHARGED WITH [redacted]

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29B-WF-171994-152

SEARCHED [redacted] INDEXED [redacted]
FILED [redacted]
JUL 31 1991
FBI PHILADELPHIA FIELD OFFICE

1325015-000-7071

ALL OF THESE CHARGES WERE IN THE STATE OF CALIFORNIA.

PER TELEPHONE CONVERSATION WITH WMFO CASE AGENT [redacted] b6 b7C ON JULY 30, 1991, THIS INDIVIDUAL IS NOT LIKELY THE SAME AS THE SUBJECT OF THE WMFO CASE.

ANOTHER ALIAS OF [redacted], THAT OF [redacted] b3 b6 b7C b7E [redacted] CASE [redacted] WAS REFERENCED FROM THE INDICES CHECK. AGAIN, AS PER TELEPHONE CONVERSATION WITH WMFO CASE AGENT [redacted], THIS IS UNLIKELY THE SUBJECT OF REFERENCED CASE.

THE THIRD POSSIBLE REFERENCE FROM THE INDICES [redacted] WMFO SUBJECT [redacted], PHILADELPHIA CASE [redacted] b3 b6 b7C b7E IDENTIFIED AN INDIVIDUAL NAMED [redacted], WHO IS POSSIBLY ALSO KNOWN AS [redacted] THE FILE INDICATES THAT [redacted] MAY BE IDENTICAL TO [redacted] THE PALESTINE LIBERATION FRONT'S [redacted] OVERSEAS OPERATIONS.

THE ONLY ACTION TAKEN CONCERNING POSITIVE INDICES REFERENCES WAS THE TELEPHONE CONVERSATION WITH WMFO CASE AGENT ON JULY 30, 1991. THERE IS NO CURRENT INVESTIGATION BEING CONDUCTED INVOLVING BCCI AND/OR OTHERS NAMED IN SUBJECT TELETYPE.

BT

#0010

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[illegible]/212

0000 MRI 02432

PP RUCNFB FBIWMFO

DE BRI #0006 2140404

ZNR UUUUU

P 312358Z JUL 91

FM LEGAT BRIDGETOWN (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //5500:BRI296W.212//

PASS: CID, WCC SECTION, FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO: WMFO.

RE BUREAU TELETYPE DATED JULY 26, 1991.

A COMPLETE INDICES SEARCH REQUESTED BY REFERENCED TELETYPE DISCLOSES ONLY ONE HIT, A TIME MAGAZINE ARTICLE DATED MARCH 4, 1991 ON THE BANK OF CREDIT AND COMMERCE INTERNATIONAL FILED IN 29-0 CONTAINS INFORMATION ABOUT THIS MATTER.

NEWSPAPER ARTICLES READ BY LEGAT HAVE BEEN REPORTING THIS MATTER AND SEVERAL RELATED BANKS HAVE BEEN CLOSED BY THE

29B-WF-171994-153

[illegible] Su Su

AUG 01 1991

[illegible]

1325015-000-7073

CARIBBEAN HOST GOVERNMENT. NONE OF THESE MATTERS HAVE BEEN OFFICIALLY BROUGHT TO LEGAT'S ATTENTION.

IN VIEW OF THE ABOVE, BRIDGETOWN IS PLACING THIS MATTER IN A RUC STATUS.

BT

#0006

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1325015-000-7074

C-5

/FIND

Enter message id (MRI): 1589

Retrieval completed at 2021
FIND /MRI 1589
Results are: 0001 found

/READ
0047 MRI 01589

PP RUCNFB FBIWMFO

DE FBIPG #0003 2122021

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P 311844Z JUL 91

FM FBI PITTSBURGH (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3650:SQ 5//

PASS: FIFU, WCCS, CID, FBIHQ.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA CLARK M. CLIFFORD,

CLARK CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE

AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN

ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN,

AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED, DBA BANK

29B-WF-171994-154

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JUL 31 1991

1325015-000-7075

PAGE TWO DE FBIPG 0003 UNCLAS

OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA

DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE FBIHQ TELETYPE DATED JULY 26, 1991.

PITTSBURGH INDICES NEGATIVE REGARDING CAPTIONED

SUBJECTS AND RELATED INDIVIDUALS.

BT

#0003

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1325015-000-7076

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Retrieval completed at 2021
FIND /MRI 1608
Results are: 0001 found

/READ
0048 MRI 01608

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DE FBIAT #0026 2122021

ZNR UUUUU

R 311906Z JUL 91

FM FBI ATLANTA (29A-WF-171994) (F)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //3040:SQ 10//

PASS: WHITE COLLAR CRIMES SECTION, FINANCIAL INSTITUTION FRAUD UNIT.

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SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDING, N.V. NETHERLANDS, ANTILLES, AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED;

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b7C

29B-WF-171994-155

SW SW

JUL 31 1991

1325015-000-7077

PAGE TWO DE FBIAT 0026 UNCLAS

DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITH PHARAON, AKA DR. GAITH PHARAON; FIF; FAG; OO: WMFO.

RE BUTEL TO ALL OFFICES, 7/26/91, AND TELCALL OF SSA [redacted] ATLANTA, TO SA [redacted] WMFO, 7/30/91. b6 b7C

FOR INFORMATION OF WMFO, ATLANTA HAS OPENED A SEPARATE CASE TITLED "UNSUBS; POSSIBLE CORRUPTION OF GEORGIA STATE LEGISLATORS; ESLPO; OO: ATLANTA 194A-AT-67917." THIS INVESTIGATION WILL DEAL WITH THE ALLEGATION OF PAYOFFS IN 1987 TO GEORGIA POLITICIANS TO FACILITATE THE PASSAGE OF ENABLING LEGISLATION ALLOWING THE PURCHASE OF NATIONAL BANK OF GEORGIA (NBG) BY FIRST AMERICAN BANK (FAB). NBG WAS OWNED BY GHAITH PHARAON, WHO HAS BEEN IDENTIFIED AS A FRONT MAN FOR BCCI. NBG HIRED [redacted] A HINESVILLE, GA. ATTORNEY TO HANDLE THE LOBBYING EFFORT RELATED TO THIS LEGISLATION. [redacted] IS ONE OF PHARAON'S [redacted] HE WAS PAID OVER ONE MILLION DOLLARS DURING A SIX MONTH PERIOD FOR THIS EFFORT. b6 b7C

ATLANTA INDICES CHECK WAS NEGATIVE ON ALL NAMES MENTIONED IN RE TEL WITH TWO EXCEPTIONS: THE ATLANTA FILE MENTIONED ABOVE, WHICH DEALS WITH BCCI, AND A REFERENCE TO MIAMI; FILE 196A-MM-50289 REGARDING PHARAON. MIAMI FILE IS TITLE [redacted] CENTRUST BANK; [redacted] b6 b7C

[redacted] GHAITH PHARAON, CEO OF INTER REDEC, [redacted] b6 b7C

[redacted]

THE ATLANTA ASPECT OF THIS INVESTIGATION WAS VERY BRIEF. MIAMI FORWARDED A SUBPOENA TO BE SERVED AT THE RICHMOND HILL, GEORGIA ESTATE OF PHARAON ON [redacted] THIS SUBJECT b6 b7C WAS SUPPOSED TO BE VISITING PHARAON'S ESTATE AT THE TIME (1/91), BUT APPARENTLY NEVER ARRIVED, OR HAD ALREADY DEPARTED, AND THE SUBPOENA WAS NOT SERVED.

BT

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FIND /MRI 1473
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/READ
0045 MRI 01473

OO P12 FBIWMFO

DE FBILV #0013 2122019

ZNR UUUUU

O 311722Z JUL 91

FM FBI LAS VEGAS (29B-WF-R-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3380:S04//

PASS: BUREAU ATTENTION, FINANCIAL INSTITUTION FRAUD UNIT,

WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

29B-WF-171994 - 156

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
[redacted]

1325015-000-7080

PAGE TWO DE FBILV 0013 UNCLAS

BIN SULTAN AL-NAHAYAN, SHEIK ZAYAD; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE DIRECTOR TELETYPE TO ALL FIELD OFFICES, JULY 26, 1991.

IN REFERENCED TELETYPE, FBIHQ REQUESTED INDICES SEARCHED ON CAPTIONED SUBJECT NAMES AND COMPANIES AS WELL AS NAMES AND COMPANIES LISTED THROUGHOUT REFERENCED TELETYPE.

A REVIEW OF LAS VEGAS INDICES, BOTH FOIMS AND MANUAL, MET WITH NEGATIVE RESULTS FOR ANY REFERENCE TO THE ABOVE.

BT

#0013

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[redacted]/212

0000 MRI 02390

OO P12 FBIWMFO

DE FBINO #0015 2130405

ZNR UUUUU

O 312336Z JUL 91

FM FBI NEW ORLEANS (29A-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

SECTION ONE OF TWO SECTIONS

CITE: //3530//

PASS: HQ FOR FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

29B-WF-171994-157

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-7082

BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON, FIF; FAG; OO: WMFO.

ON JULY 30, 1991, NEW ORLEANS INDICES WERE CHECKED FOR ANY REFERENCE ON THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI), THE RESULTS OF WHICH DISCLOSED BCCI WAS INDEXED TO NO FILE 29A-4802 CAPTIONED "[redacted] CUSTOMER, GUARANTEE BANK AND TRUST, ZACHARY, LOUISIANA; BFLE (A); OO: NEW ORLEANS." b6 b7C

A REVIEW OF THIS FILE DISCLOSED BCCI WAS MENTIONED IN A NEWSPAPER ARTICLE APPEARING IN THE "STATE-TIMES" OF BATON ROUGE, LOUISIANA, ON OCTOBER 12, 1988. THE ARTICLE WAS CARRIED BY THE ASSOCIATED PRESS AS ORIGINATING IN TAMPA, FLORIDA. IN SUMMARY, THIS ARTICLE DISCLOSED FEDERAL AGENTS SMASHED A $32 MILLION GLOBAL MONEY-LAUNDERING RING, WHICH ROUTED DRUG PROFITS THROUGH A BANK TO COLOMBIAN COCAINE CARTELS. CHARGES RESULTED FROM A TWO-YEAR INVESTIGATION DUBBED "OPERATION [redacted]" NAMED AMONG THE DEFENDANTS WERE BCCI HOLDINGS, WHICH IS A LUXEMBOURG - BASED BANK HOLDING COMPANY WITH BRANCHES IN 72 COUNTRIES, ALONG WITH NINE BANK OFFICIALS. NAMED ALONG WITH BCCI HOLDINGS WERE TWO b7E

SUBSIDIARIES: BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., WITH OPERATIONS IN THE UNITED STATES AND LONDON; AND BANK OF CREDIT AND COMMERCE INTERNATIONAL LTD. ACCORDING TO THIS ARTICLE, INDICTMENTS WERE RETURNED IN TAMPA, NEW YORK, CHICAGO, DETROIT, PHILADELPHIA AND HOUSTON. WARRANTS WERE ISSUED IN MIAMI, LOS ANGELES, LONDON AND PARIS.

A REVIEW OF NO FILE 29A-4802 DISCLOSED SUBJECT [redacted] [redacted] WAS THE SUBJECT OF NUMEROUS INSURANCE FRAUD-RELATED INVESTIGATIONS IN THE NEW ORLEANS DIVISION. ON ONE OCCASION, [redacted] AND ASSOCIATES ATTEMPTED TO OBTAIN FUNDS, BELIEVING THESE FUNDS WERE LAUNDERED DRUG PROFITS. THESE FUNDS WERE NECESSARY TO SATISFY THE STATUTORY CAPITAL REQUIREMENT NECESSARY TO FORM THEIR INSURANCE COMPANY. b6 b7C

DURING THE INVESTIGATION OF THIS SCHEME, IT WAS DISCOVERED THAT [redacted] AND ASSOCIATES PAID ONE [redacted] $35,000 AS AN ADVANCED FEE FOR A LOAN. THE PROCEEDS OF THIS LOAN WERE TO BE USED TO FUND THEIR INSURANCE COMPANY. IT IS TO BE NOTED THAT SUBSEQUENTLY, [redacted] WAS INDICTED FOR [redacted] [redacted] b6 b7C

DURING AN INTERVIEW OF AN INDIVIDUAL IDENTIFIED AS [redacted] b6 b7C

[redacted] WHO IS AN ASSOCIATE OF [redacted] AND WHO WAS b6 b7C
INVOLVED WITH [redacted] IN LATER INSURANCE-RELATED SCHEMES,
[redacted] IS BELIEVED TO HAVE MENTIONED THE BANK OF CREDIT AND
COMMERCE INTERNATIONAL-BCCI. THERE ARE NO OTHER CIRCUMSTANCES
WHICH EXPLAIN [redacted] OR [redacted] ASSOCIATION WITH
BCCI. BECAUSE OF [redacted] MENTIONING BCCI, A COPY OF THIS
AFORESAID NEWSPAPER ARTICLE WAS PLACED IN NO FILE 29A-4802 AND
INDEXED.

NEW ORLEANS INDICES ALSO DISCLOSED THAT GHAITH R. PHARAON
WAS INDEXED TO NO FILE 196B-20 CAPTIONED [redacted] b6 b7C
[redacted] A AND M GLASS COMPANY,
BEMM OIL AND GAS COMPANY, BRIAN INVESTMENTS, CONDO
CORPORATION, CONDOMINIUMS INCORPORATED, COURTNEY CORPORATION,
EVANS REALTY, MASSACHUSETTS PLAZA INCORPORATED, MONY OIL AND
GAS, ONE WALNUT PLAZA, QUAD MINERALS, SYNDICATED MINERAL
INVESTMENTS, NEW ORLEANS, LOUISIANA; ITSP; MF; FBW; OO: NEW
ORLEANS."

A REVIEW OF THIS FILE DISCLOSED PHARAON WAS MENTIONED IN
A FRONT PAGE NEWSPAPER ARTICLE APPEARING IN THE "TIMES-
PICAYUNE" OF NEW ORLEANS, LOUISIANA ON JANUARY 3, 1978. IN
SUMMARY THIS ARTICLE DISCLOSED THAT SEVERAL NEW ORLEANS

INVESTORS PURCHASED A $10 MILLION TRACT OF LAND NEAR LAKE MAUREPAS (BETWEEN NEW ORLEANS AND BATON ROUGE) WITH THE AID OF A SAUDI ARABIAN MULTI-MILLIONAIRE NAMED GHAITH R. PHARAON. PHARAON WAS IDENTIFIED AS BEING THE HEAD OF IMAN INVESTMENTS, AN INTERNATIONAL COMPANY BASED IN THE NETHERLAND ANTILLES FOR TAX PURPOSES. PHARAON WAS FURTHER IDENTIFIED AS BEING IN THE PROCESS OF BUYING CONTROLLING INTEREST IN THE NATIONAL BANK OF GEORGIA, BERT LANCES' BANK.

THE NEW ORLEANS INVESTORS WERE OPERATING UNDER THE NAME ASCANTIA INC. AND INCLUDED TWO LOCAL ATTORNEY'S MICHAEL H. ELLIS AND JULIAN MURRAY JR., AND AN UNNAMED LOCAL DENTIST. MURRAY IS CREDITED WITH ARRANGING THE LOAN FROM IMAN INVESTMENTS THROUGH AN UNIDENTIFIED FRIEND WHO WAS A LOCAL REPRESENTATIVE FOR PHARAON. THE ASCANTIA INVESTORS CLAIMED THAT THEIR MAIN INTEREST IN THE LAND WAS FOR MINERAL EXPLORATION. THE ARTICLE REVEALED THAT NEW ORLEANS DEVELOPER SAM J. RECILE WAS THE PRESIDENT AND ON THE BOARD OF DIRECTORS FOR ASCANTIA INC., ALTHOUGH HE COULD NOT BE REACHED FOR COMMENT ON HIS CONNECTION WITH ASCANTIA INC.

A REVIEW OF NO FILE 1963-20 DISCLOSED THAT SUBJECTS [redacted] b6 b7C

[redacted] SET UP

b6
b7C

VARIOUS CORPORATIONS WITH THE PURPOSE TO EXPLORE AND DRILL FOR OIL. INVESTORS WERE SOUGHT OUT TO BUY LIMITED PARTNERSHIP INTEREST IN THESE WELLS. ALLEGEDLY MOST OF THE WELLS WERE NEVER DRILLED AND EVEN THE ONES THAT WERE, NEVER PRODUCED A SIGNIFICANT AMOUNT OF OIL. THE CORPORATIONS APPARENTLY TOOK IN MORE MONEY THAN WAS NECESSARY TO DRILL THE NUMBER OF WELLS THAT THEY DRILLED AND THIS MONEY WAS SHIFTED AROUND THE VARIOUS COMPANIES AND SIPHONED OUT BY THE SUBJECTS. [redacted] WAS THE MAIN FORCE BEHIND THIS SCHEME AND WAS THE SUBJECT OF NUMEROUS OTHER INVESTIGATIONS IN THE NEW ORLEANS DIVISION. PROSECUTION WAS DECLINED IN THIS MATTER BY THE UNITED STATES ATTORNEY'S OFFICE, EASTERN DISTRICT OF LOUISIANA ON DECEMBER 2, 1980. PROSECUTION WAS DECLINED BECAUSE IT WAS FELT THE FRAUD WOULD BE DIFFICULT TO PROVE BECAUSE OF THE INTRICACIES OF THE TRANSACTIONS AND THE FACT THAT INVESTING IN OIL WELLS IS TO BEGIN WITH VERY RISKY AND SPECULATIVE.

BECAUSE OF RECILE BEING MENTIONED IN THE NEWSPAPER

BT

#0015

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[redacted]

DE FBINO #0016 2130304

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O 312336Z JUL 91

FM FBI NEW ORLEANS (29A-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

ET

UNCLAS

SECTION TWO OF TWO SECTIONS

CITE: //3530//

PASS: HQ FOR FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAY HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]; SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

b6
b7C

29A-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI/DOJ FIELD OFFICE

1325015-000-7088

BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON, FIF; FAG; OO: WMFO.

TEXT CONTINUES:

ARTICLE. A COPY OF IT WAS PLACED IN NO FILE 196B-20, AND ALL NAMES INCLUDING PHARAON WERE INDEXED. DURING THE COURSE OF THE INVESTIGATION, [redacted] WAS INTERVIEWED CONCERNING HIS BUSINESS TIES TO [redacted] AND ALSO MENTIONED PHARAON. [redacted] INDICATED THAT PHARAON DID FINANCE THE LAND ACQUISITION BY ASCANTIA INC AND THAT IT WOULD TAKE $7.3 MILLION TO PAY HIM OFF. [redacted] DID NOT INDICATE HOW HE KNEW OR CAME IN CONTACT WITH PHARAON. NO OTHER INFORMATION CONCERNING PHARAON WAS CONTAINED IN THE FILE.

b6
b7C

ALL OTHER NAMES WERE CHECKED WITH NEGATIVE RESULTS.

BT

#0016

NNNN

/READ/MRI 2319/212
0000 MRI 02319

OO P12 FBIWMFO

DE FBILA #0047 2130307

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O 312302Z JUL 91

FM FBI LOS ANGELES (29B-LA-126283) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3410:WCC-6//

PASS: SSA GAIL WILKES, FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO: WMFO.

RE BUREAU TELETYPE TO ALL OFFICES DATED JULY 26, 1991.

INDICES CHECK FOR ALL NAMES LISTED IN REFERENCED TELETYPE WAS NEGATIVE WITH THE EXCEPTION OF BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). LOS ANGELES HAS TWO CASES INVOLVING BCCI. THE FIRST CASE INVOLVED A CRIMINAL REFERRAL FROM BCCI

29B-WF-171994-158

SEARCHED ___ INDEXED ___
SERIALIZED SU FILED SU
JUL 31 1991
FBI - LOS ANGELES FIELD OFFICE

1325015-000-7090

CONCERNING ALLEGATIONS THAT A FORMER EMPLOYEE, [redacted] b6 b7C [redacted] HAD USED HIS POSITION AS A BANK REPRESENTATIVE TO CREATE COUNTERFEIT SECURITIES. THESE SECURITIES WERE THEN USED BY AN ASSOCIATE OF [redacted] TO ATTEMPT TO OBTAIN LOANS FROM A BCCI AFFILIATE IN COLUMBIA. [redacted] THEN ATTEMPTED TO USE THESE SECURITIES AS COLLATERAL FOR LOANS FROM VARIOUS INDIVIDUALS IN THE NEW YORK/NEW JERSEY AREA. THIS CASE WAS CLOSED IN LOS ANGELES AS NEW YORK OFFICE IS PURSUING IT AS A WIRE FRAUD INVESTIGATION. FOR INFORMATION, LOS ANGELES FILE NUMBER IS 29B-LA-129420.

THE SECOND CASE INVOLVES BOTH BCCI AND INDEPENDENCE BANK. THIS CASE WAS OPENED TO INVESTIGATE THE CURRENT SITUATION INVOLVING BCCI AND INDEPENDENCE BANK. THE FOCUS OF THE CASE IS WHETHER OR NOT INDEPENDENCE BANK'S CURRENT UNSATISFACTORY FINANCIAL CONDITION IS RELATED TO THE CURRENT EVENTS INVOLVING BCCI, GHAITH PHARAON AND OTHERS. CURRENT INVESTIGATIVE ACTIVITIES ARE PRIMARILY FOCUSED ON OBTAINING INFORMATION FROM THE RECENT BANK EXAMINATION OF INDEPENDENCE BANK CONDUCTED BY STATE AUTHORITIES. AUSA [redacted] MAJOR FRAUDS UNIT, UNITED STATES ATTORNEY'S OFFICE, LOS ANGELES, HAS REQUESTED THAT THE INVESTIGATION CONTINUE IN AN EFFORT TO b6 b7C

DETERMINE IF ANY CRIMINAL ACTIVITY HAS OCCURRED. THE LOS ANGELES CASE FILE IS 29E-LA-126283, CAPTIONED "INDEPENDENCE BANK, ENCINO, CALIFORNIA; BANK OF CREDIT AND COMMERCE INTERNATIONAL; FIF-MONEY LAUNDERING; OO: LOS ANGELES." LOS ANGELES FIF SUPERVISOR HAS BEEN IN CONTACT WITH WMFO SUPERVISOR CONCERNING THIS MATTER.

LOS ANGELES IS NOT AWARE OF ANY CRIMINAL INVESTIGATION BEING CONDUCTED BY STATE OR LOCAL AUTHORITIES. LOS ANGELES IS AWARE THE STATE BANKING AUTHORITIES ARE LOOKING INTO THIS MATTER. LOS ANGELES IS ESTABLISHING LIAISON WITH APPROPRIATE LOCAL, STATE AND FEDERAL REGULATORY AGENCIES.

BT

#0047

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C-5

Enter message id (MRI): 1552

Retrieval completed at 1852
FIND /MRI 1552
Results are: 0001 found

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O 311806Z JUL 91

FM FBI COLUMBIA (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3180//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WCC SECTION, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, ET AL; FIF; FAC: QQ:WMFO.

REFERENCE TELETYPE FROM DIRECTOR TO ALL FIELD OFFICES ON 7/27/91.

COLUMBIA INDICES SEARCH FOR ALL COMPANIES AND INDIVIDUALS IDENTIFIED IN ABOVE REFERENCED TELETYPE WERE NEGATIVE.

BT

#0004

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29B-WF-171994-159

SEARCHED ___ INDEXED ___
SERIALIZED Su FILED Su
JUL 31 1991
FBI - [illegible] METRO FIELD OFFICE

1325015-000-7093

C-5

/FIND

Enter message id (MRI): 1564

Retrieval completed at 1854
FIND /MRI 1564
Results are: 0001 found

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DE FBIJK #0003 2121854

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O 311823Z JUL 91

FM FBI JACKSONVILLE (29B-WF-R-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3330//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME

SECTION, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK

CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN

HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

29B-WF-171994-160

[redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 31 1991
FBI - JACKSONVILLE

1325015-000-7094

BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE BUREAU TEL TO ALL OFFICES DATED JULY 26, 1991.

A REVIEW OF THE JACKSONVILLE CENTRAL INDEX SYSTEM FAILED TO REVEAL ANY INFORMATION IDENTIFIABLE WITH CAPTIONED SUBJECTS, ALL INDIVIDUALS AND COMPANIES IN REFERENCED TELETYPE WITH THE EXCEPTION OF A PREVIOUS 161 INVESTIGATION (SPECIAL INQUIRY - WHITE HOUSE) ON SUBJECT CLARK MCADAMS CLIFFORD IN MAY, 1961. REVIEW OF THIS FILE REVEALED AN ACQUAINTANCE OF CLIFFORD, [redacted] ATTORNEY, ST. LOUIS, MISSOURI, WHO WAS VACATIONING AT HOMOSASSA SPRINGS, FLORIDA, WAS INTERVIEWED AND HIGHLY RECOMMENDED HIM FOR A POSITION OF TRUST AND CONFIDENCE WITH THE GOVERNMENT. b6 b7C

ALSO JK INDICES REVEALED THE FOLLOWING FIVE REFERENCES ON NATIONAL BANK OF GEORGIA:

29B-AT-4697 CAPTIONED, [redacted] AKA; NATIONAL BANK OF GEORGIA - VICTIM." BF&E; OO: AT, (JK RUC'D 3/8/91). b6 b7C

192-61-26 CAPTIONED, [redacted] NATIONAL BANK OF GEORGIA, b6 b7C

1430 WEST PEACHTREE STREET, ATLANTA, GEORGIA. HOBBS ACT -
FINANCIAL INSTITUTION; OO: AT." PLACED IN CONTROL FILE
MARCH, 1984.

91-8164 CAPTIONED, [redacted]; AKA - b6 b7C
FUGITIVE (A); [redacted] NATIONAL BANK OF GEORGIA,
756 CONCORD ROAD, SMYRNA, GEORGIA; 11/5/84; BR (A); OO: AT,"
AT FILE 91A-1156. JK RUC'D 3/14/85.

194-56-SUB A-652 AND 194-56-SUB O-63 P 3, CAPTIONED,
"RESFIX", OO: JK. [redacted] WAS PROSECUTED IN PUBLIC b6 b7C
CORRUPTION CASE AND HE UTILIZED AMERICAN NATIONAL BANK IN
JACKSONVILLE, FLORIDA, FOR SOME OF HIS TRANSACTIONS. CASE
CLOSED IN 1982.

BT

#0003

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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-11-2018 BY [redacted]

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Enter message id (MRI): 1555

Retrieval completed at 2020
FIND /MRI 1555
Results are: 0001 found

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RR RUCNFB FBIWMFO

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FM FBI RICHMOND (29B WF-171994) (RUC)

TO DIRECTOR FBI ()/ROUTINE/

FBI WMFO (29B WF-171994)/ROUTINE/

BT

UNCLAS

CITE: //3710//

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG;

OO: WMFO.

RE BUREAU TELETYPE TO ALL OFFICES DATED JULY 26, 1991.

ON JULY 30, 1991, THE INDICES OF THE RICHMOND DIVISION WERE REVIEWED CONCERNING ALL NAMES MENTIONED IN THE REFERENCED TELETYPE WITH NEGATIVE RESULTS EXCEPT FOR ONE REFERENCE TO UNITED ARAB EMIRATES IN RICHMOND FILE [redacted] CAPTIONED [redacted] - TERRORISM," WMFO FILE [redacted] WMFO TELETYPE TO THE BUREAU DATED MARCH 10,

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29B-WF-171994 -
161

SEARCHED ... INDEXED ... SERIALIZED ... FILED ...
JUL 31 1991
Richmond Field Office

1325015-000-7097

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FM FBI SEATTLE (29B-WF-R-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3840:SQ. 6//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; [redacted] b6 b7C

AKA; [redacted]

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]; SAYKH ZAYID BIN SULTAN ALNUHAYYAN, AKA. DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITH PHARAON; FIF; FAG; OO: WMFO.

29B-WF-171994-162

SEARCHED ... INDEXED ... SERIALIZED ... FILED ...

JUL 31 1991

FBI-WMFO, METRO FIELD OFFICE

1325015-000-7099

RE BUREAU TELETYPE, DATED JULY 26, 1991.

SEATTLE GENERAL INDICES CHECKS CONDUCTED REGARDING ALL NAMES OF INDIVIDUALS AND COMPANIES FURNISHED IN REFERENCED TELETYPE, AND NO RECORD WAS LOCATED WITH THE FOLLOWING EXCEPTIONS:

SE FILE 196B-SE-57712-24. REVIEW OF THIS SERIAL INDICATES THAT [redacted] ACHIEVE, INC., P.O. BOX 590403, SAN FRANCISCO, CALIFORNIA REPORTED TO THE FBI ON OCTOBER 2, 1989, THAT HE AND HIS PARTNER, [redacted], HAD BEEN DEFRAUDED OF $4,500.00 VIA THE LOAN FRAUD ASSOCIATED WITH [redacted] FAR EAST, INC. [redacted] AND FAR EAST INVESTMENTS, INC. WERE MAIN SUBJECTS IN THIS CASE AND [redacted] WAS SUBSEQUENTLY CONVICTED ON JANUARY 18, 1990, OF FRAUD BY WIRE VIOLATIONS. THERE IS NO FURTHER IDENTIFYING DATA IN THIS FILE AVAILABLE ON [redacted] AND IT IS NOT KNOWN WHETHER HE IS IDENTICAL TO SUBJECT LISTED IN REFERENCED TELETYPE. b6 b7C

SE FILE 196-0-438. REVIEW OF THIS SERIAL INDICATES COMPLAINANT CONTACTED FBI, SEATTLE ON MARCH 20, 1987, AND ADVISED OF CONTACT BY SUBJECTS [redacted] WHEREIN THEY OFFERED TO SELL COMPLAINANT 250 MILLION DOLLARS b6 b7C

WORTH OF KOREAN YEN THROUGH BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). THE MANAGER OF BCCI TOLD COMPLAINANT THAT HE WAS FAMILIAR WITH SUBJECTS AND THAT IT WAS A FRAUDULENT SCHEME. COMPLAINANT FURNISHED THE FBI THIS INFORMATION FOR INDEXING PURPOSES AND INASMUCH AS NO LOSS HAD BEEN SUSTAINED, NO FURTHER INVESTIGATION WAS CONDUCTED BY FBI, SEATTLE.

BT

#0002

NNNN

ALL FBI INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-12-2018 BY [redacted]

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/READ/MRI 1770/213
0000 MRI 01770

RR RUCNFB FBIWMFO

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FM FBI TAMPA (29B-WF-171994) (SQ 3) (RUC)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //3880//

SUBJECT: CLARK MCADAMS CLIFFORD, AKA ET AL; FIF; FAG;

(OO:WMFO).

RE HQ TELETYPE TO ALL FIELD OFFICES, 7/27/91.

TAMPA INDICES CHECK ON CLARK CLIFFORD REVEALED TAMPA SERIAL 29-0-565, WHICH WAS A TELETYPE FROM WMFO TO TAMPA, DATED 5/3/91, WMFO FILE 29B-WF-171994, ADVISING OF WMFO SA'S [redacted] TRAVEL TO TAMPA FROM 5/7-10/91, TO INTERVIEW FORMER BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) OFFICIALS CONVICTED IN U.S. CUSTOMS MONEY

b6
b7C

29B-WF-171994-163

Sw Sw

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1325015-000-7102

LAUNDERING CASE, IN THE MIDDLE DISTRICT OF FLORIDA.

TAMPA INDICES CHECK ON BCCI REVEALED TAMPA FILE 245B-273, ENTITLED, [redacted] OCDETF; OO:TAMPA." THIS CASE INVOLVES A NUMBER OF ORGANIZATIONS WHICH HAVE BEEN ENGAGED IN LARGE-SCALE MONEY LAUNDERING ACTIVITY ASSOCIATED WITH COLOMBIAN DRUG TRAFFICKING CARTELS. UNDERCOVER U.S. CUSTOMS AGENTS BECAME ASSOCIATED WITH THE DRUG MONEY LAUNDERERS AND SUBSEQUENTLY LAUNDERED MILLIONS OF DOLLARS THROUGH THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). DURING OCTOBER 1988, BCCI, A NUMBER OF ITS OFFICERS, AND A NUMBER OF INDIVIDUALS INVOLVED IN THE MONEY LAUNDERING OPERATIONS WERE INDICTED IN THE MIDDLE DISTRICT OF FLORIDA. SINCE THAT TIME, NUMEROUS BCCI MANAGERS, A COLOMBIAN AIRCRAFT BROKER, AND COLOMBIAN DRUG TRAFFICKERS HAVE BEEN CONVICTED IN FEDERAL DISTRICT COURT, TAMPA, FLORIDA. BCCI BANKING RECORDS IN SEVERAL COUNTRIES HAVE BEEN REVIEWED PURSUANT TO A PLEA AGREEMENT ENTERED INTO BY THE BANK IN THE MIDDLE DISTRICT OF FLORIDA. SINCE THAT INSTITUTION WAS THE PRINCIPAL BANK UTILIZED BY PANAMANIAN GENERAL MANUEL ANTONIO NORIEGA, ALL OF THOSE ACCOUNTS HAVE BEEN ANALYZED IN CONNECTION WITH THE ONGOING NORIEGA INVESTIGATION.

b7E

EFFORTS HAVE BEEN DIRECTED AT ATTEMPTING TO SOLICIT THE

COOPERATION OF CERTAIN OF THE BCCI MANAGERS WHO HAVE BEEN CONVICTED AND SENTENCED. THOSE INCLUDE [redacted] FORMERLY b6 b7C PERSONAL BANKER FOR FORMER PANAMANIAN LEADER MANUEL ANTONIO NORIEGA; [redacted] WHO WAS CONNECTED WITH BCCI'S MIAMI BRANCH; AND [redacted], WHO WAS CONVICTED AND SENTENCED IN LONDON, ENGLAND, WHERE HE [redacted] BCCI BRANCH IN THAT CITY. TO DATE, THE INDIVIDUALS TARGETED HAVE RESISTED OVERTURES FOR THEIR COOPERATION. HOWEVER, SUCH EFFORTS WILL BE CONTINUED SINCE THE INFORMATION THOSE INDIVIDUALS CAN PROVIDE WOULD IMPACT ON THE CASES AGAINST NORIEGA IN BOTH THE MIDDLE DISTRICT OF FLORIDA AND THE SOUTHERN DISTRICT OF FLORIDA.

THE FBI CONTINUES TO MAINTAIN CLOSE LIAISON WITH THE U.S. CUSTOMS SERVICE, THE [redacted] DEA, AND THE U.S. ATTORNEYS'S OFFICE b7E IN THE MIDDLE DISTRICT OF FLORIDA, IN ORDER TO INSURE BUREAU RESOURCES ARE EFFECTIVELY AND APPROPRIATELY UTILIZED RELATIVE TO THIS INVESTIGATION. TAMPA WILL PARTICIPATE IN A NEW 245B OCDETF INVESTIGATION, CODE NAME [redacted] WITH DEA, TAMPA AS LEAD AGENCY. [redacted] AND CUSTOMS, TAMPA, WILL ALSO PARTICIPATE IN TTHIS NEW INVESTIGATION WHICH WILL TARGET [redacted] BCCI

OFFICIALS AND THEIR DRUG CLIENTS FOR POTENTIAL TITLE 21 AND 18 VIOLATIONS. DEVELOPMENTS IN THE [redacted] ESPECIALLY AS TO b7E THE COOPERATION OF BCCI OFFICIALS, WILL BE FOLLOWED CLOSELY IN ORDER TO INSURE INFORMATION WHICH IMPACTS ON THE NORIEGA INVESTIGATION IS HANDLED EXPEDITIOUSLY.

TAMPA INDICES CHECKS ON THE FOLLOWING INDIVIDUALS AND/OR COMPANIES IN REFERENCED 7/27/91 TELETYPE ARE NEGATIVE:

[redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; GHAITH PHARAON, AKA DR. GHAITH PHARAON; [redacted]

AS ALL INVESTIGATION IN THIS 29 MATTER HAS BEEN COMPLETED, IT IS BEING PLACED IN AN RUC STATUS.

BT

#0010

NNNN

/READ/MRI 1798/213
0000 MRI 01798

OO P12 FBIWMFO

DE OTT #0006 2140951

ZNR UUUUU

O 012112Z AUG 91

FM LEGAT OTTAWA (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //5150//

PASS: HQ: FIFU/WCC/CID.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; ETC; FIF; FAG;

OO: WMFO.

REBUTEL JULY 26, 1991, AND OTTEL JULY 30, 1991.

[redacted]

b6
b7C
b7D

29B-WF-171994 -164

AUG 0 2 1991

1325015-000-7106

7-1 (Rev. 2-21-91)

FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

Date: July 1, 1991

To: SAC, Washington Metropolitan Field Office

FBI File No. 29-116176

Lab No. 10508046 P AI

Reference: Communication dated May 7, 1991

Your No. 29B-WF-171994 C-5 NVMRA

Re: CLARK M. CLIFFORD, aka;
Et. al;
BF&E; FAG

OO: Washington Metropolitan Field Office

Specimens received: May 8, 1991

Specimens:

Q1 One Panasonic Super Hi-Fi VHS T-120 videocassette

ALSO SUBMITTED:

10 Polaroid Prints

Result of examination:

The Q1 video tape cassette specimen was reviewed and the pertinent video segments located. Prepared from specimen Q1 were forty five 3.5 x 5 inch and forty four 5 x 7 inch enlarged photographic prints.

1325015-000-7108

This Report Is Furnished For Official Use Only 29B-WF-171994 -165

The submitted Q1 specimen, the ten ALSO SUBMITTED Polaroid prints and the eighty nine prepared photographic prints are being returned under separate cover.

The negatives used to prepare the photographs are being retained in the Laboratory.

1325015-000-7109

7-1 (Rev. 2-21-91)

C5

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

b6
b7C

Date: July 1, 1991

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Page 1 (over)

29B-WF-171994-165

b6
b7C

UCFN ☑ Pos ☐ Neg

GENERAL INDICES:

☐ Automated Search

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

☐ Manual Search

WF: ☐ Pos ☐ Neg AX: ☐ Pos ☐ Neg

This Report Is Furnished For Official Use Only

C-5

HEAD 626/214
0000 MRI 00626

OO P12 FBIWMFO

DE BON #0002 2141534

ZNR UUUUU

O 020906Z AUG 91

FM LEGAT BONN (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //5300:BON071.213 1 AUG 91//

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO:
WMFO.

RE FBIHQ TEL TO ALL FIELD OFFICES, JULY 26, 1991.

INDICES AT LEGAT BONN NEGATIVE RE ANY OF THE NAMES IN RE TEL OF JULY 26, 1991. OFFICIALS AT [redacted] b7D
ADVISE NO CURRENT INVESTIGATION OF BANK OF CREDIT AND COMMERCE IN GERMANY.

BT

#0002

29B-WF-171994—166
SEARCHED INDEXED

NNNN

1325015-000-7111

C.5

0002 MRI 00888

OO P12 FBIWMFO

DE PAR #0005 2141550

ZNY EEEEE

O 021300Z AUG 91

FM LEGAT PARIS (29-O)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS E F T O

CITE: //5250:PAR150.214 2 AUGUST 1991//

PASS: HQ FOR FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE

b6
b7C

29B-WF-171994-167

SEL SEL

1325015-000-7112

AS E F T O

INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

REBUTEL DATED JULY 26, 1991 CAPTIONED AS ABOVE.

REVIEW OF LEGAT PARIS FOIMS CONCERNING NAMES LISTED IN ABOVE CAPTIONED TELETYPE, AS WELL AS NAMES LISTED ON PAGE FIVE OF REFERENCED TELETYPE, WERE NEGATIVE WITH THE FOLLOWING EXCEPTION:

BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) AND AFFILIATES WAS ONE OF THE NAMES LISTED IN DIRECTOR'S TELETYPE DATED JANUARY 29, 1990 CAPTIONED "STARBANK; MANUEL ANTONIO NORIEGA; [redacted]; DRUG MATTERS; OO: TP (12-19286)". THIS COMMUNICATION REQUESTED INDICES, OCIS, ISIS, IIS, ELSUR AND INFORMANT INDICES SEARCHES ON BCCI AND NUMEROUS OTHER NAMES. RESPONSE WAS PROVIDED BY LEGAT PARIS TELETYPE DATED 2/2/90. b6 b7C

LEGAT PARIS INDICES SEARCH ALSO REVEALED THE EXISTENCE OF MAIN FILE 12F-75 CAPTIONED "BANK OF CREDIT AND COMMERCE INTERNATIONAL". LEGAT PARIS FORWARDED IN MAY 1991 FOREGOING FILE TO THE CONSOLIDATION AND RECORDS PROCESSING UNIT, RECORDS SECTION, RECORDS MANAGEMENT DIVISION.

FOR THE INFORMATION OF FBIHQ AND WMFO, ON 8/1/91 LEGAT PARIS RECEIVED A TELEPHONE CALL FROM THE OFFICE OF INTERNATIONAL AFFAIRS (OIA), U.S. DEPARTMENT OF JUSTICE, CONCERNING THE STATUS

1325015-000-7113

OF BCCI IN FRANCE AND WHO WITHIN THE FRENCH GOVERNMENT HAD CONTROL OF THESE RECORDS. LEGAT PARIS REQUESTED INFORMATION FROM THE FRENCH BRIGADE FINANCIERE WHO ADVISED THAT BCCI CLOSED TEMPORARILY ON 7/23/91 TO STRAIGHTEN OUT ADMINISTRATIVELY THIS BANK (REDRESSMENT JUDICIAIRE). MR. [redacted] ESQ. HAS BEEN APPOINTED [redacted] TO ATTEMPT TO REVIEW THE BANK ACCOUNTS AND MAKE A DETERMINATION ON THE FUTURE OF THE BANK, OR TO SEARCH FOR NEW INVESTORS. LEGAT PARIS WAS ADVISED THAT AT THIS TIME A CRIMINAL INVESTIGATION IS NOT BEING CONDUCTED IN FRANCE. THIS INFORMATION WILL BE RELAYED BY LEGAT PARIS TO OIA.

b6
b7C

FOREGOING INDICES SEARCHES WERE CONDUCTED FOR LEGATS PARIS, BRUSSELS, AND MADRID.

BT

#0005

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C.5

MRI 00887

PP RUCNFB FBINY FBIWMFO LON

DE PAR #0004 2141535

ZNY EEEEE

P 021300Z AUG 91

FM LEGAT PARIS (BRUSSELS) (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI NEW YORK/PRIORITY/

FBI WMFO/PRIORITY/

LEGAT LONDON/PRIORITY/

BT

UNCLAS E F T O

CITE: //5250:PAR149.214 2 AUGUST 1991//

PASS: OLIA; WHITE COLLAR CRIME SECTION, CID.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] b6 b7C

[redacted]

KH [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

168

29B-WF-171994

Sec Sec

1325015-000-7115

SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

REBUTEL DATED JULY 26, 1991.

ON AUGUST 1, 1991, LEGAT BRUSSELS WAS QUERIED CONCERNING THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) BY THE UNITED STATES DEPARTMENT OF JUSTICE' (DOJ'S) OFFICE OF INTERNATIONAL AFFAIRS (OIA).

DOJ OIA REQUESTED LEGAT QUERY LUXEMBOURG AUTHORITIES CONCERNING ARTICLES OF INCORPORATION IN LUXEMBOURG, BCCI'S CURRENT STATUS IN LUXEMBOURG, THE NATURE OF ITS ACTIVITIES PRIOR TO THE CLOSING OF ITS LONDON BRANCH, AND THE IDENTITY OF UNITED STATES ACCOUNT HOLDERS.

ALTHOUGH RESPONSES WILL UNDOUBTEDLY REQUIRE LETTERS ROGATORY, LEGAT HAS, NEVERTHELESS, SUBMITTED INQUIRIES TO LUXEMBOURG POLICE CONTACTS.

LEGAT NOTES THAT FOIMS INDICATES TWO NEW YORK MAIN CASES: NAMELY 196-1162 - OPENED IN JUNE 1980, AND 29A-15544 - OPENED IN APRIL, 1985.

FBIHQ AND/OR NEW YORK, PLEASE ADVISE OF ANY FBI INTEREST IN

THIS MATTER.

BT

#0004

NNNN

C.5

/READ 889/214
0000 MRI 00889

PP RUCNFB FBINY FBIWMFO LON

DE PAR #0006 2141535

ZNY EEEEE

P 021300Z AUG 91

FM LEGAT PARIS (BRUSSELS) (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI NEW YORK/PRIORITY/

FBI WMFO/PRIORITY/

LEGAT LONDON/PRIORITY/

BT

UNCLAS E F T O

CITE: //5250:PAR151.214 2 AUGUST 1991//

PASS: OLIA; WHITE COLLAR CRIME SECTION, CID.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V., NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]

29B-WF-171994-169

SW SW

[redacted] 1991

1325015-000-7118

PAGE TWO DE PAR 0006 UNCLAS E F T O

SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE BRUSSELS TELETYPE DATED 8/2/91.

REFERENCED BRUSSELS TELETYPE SET FORTH REQUEST RECEIVED DIRECTLY BY THE DEPARTMENT OF JUSTICE (DOJ) OFFICE OF INTERNATIONAL AFFAIRS (OIA) CONCERNING THIS MATTER.

THE PARTICULARS OF THIS REQUEST WERE SUBMITTED TO THE UNITED STATES EMBASSY IN LUXEMBOURG FOR COORDINATION, AND THE CABLE LEGAT SUBMITTED TO THAT EFFECT PROMPTED THE UNITED STATES AMBASSADOR TO LUXEMBOURG TO CONTACT LEGAT ON AUGUST 2, 1991, AND TO ADVISE THAT HE HAD HAD A DISCUSSION ON JULY 29, 1991, WITH THE LUXEMBOURG MONETARY INSTITUTE (LMI) WHICH IS THE STRUCTURE IN LUXEMBOURG WHICH LICENSES BANKS.

THE AMBASSADOR ADVISED THAT THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) IS PRESENTLY SHUT DOWN IN LUXEMBOURG. HE ALSO STATED THAT BCCI LUXEMBOURG WAS, IN FACT, TWO ENTITIES, ONE A HOLDING COMPANY AND THE SECOND A FUNCTIONING BANK.

THE HOLDING COMPANY WAS PRESUMABLY THE ENTITY WHICH HELD THE CHARTER FOR THE BRANCHES IN OTHER COUNTRIES. IT AND THE BCCI

BRANCH IN LUXEMBOURG EMPLOYED AROUND EIGHTY (80) PEOPLE COMPARED TO THE "SEVERAL THOUSAND" EMPLOYED IN BCCI LONDON.

FOR ADDITIONAL INFORMATION, THE LMI ADVISED THE AMBASSADOR THAT IT WOULD COOPERATE FULLY WITH APPROPRIATE UNITED STATES INVESTIGATIVE AUTHORITIES THROUGH WASHINGTON. THE LMI MADE THE ABOVE STATEMENT TO NEW YORK DISTRICT ATTORNEY MORGANTHAU WHO CONTACTED THE LMI DIRECTLY. WHEN MORGANTHAU WAS TOLD TO GO THROUGH WASHINGTON, HE BECAME QUITE UPSET, ACCORDING TO THE AMBASSADOR. b6 b7C

THE ABOVE INFORMATION SHOULD BE PASSED TO MR. [redacted] AT DOJ OIA AS PER REFERENCED BRUSSELS TELETYPE.

LEGAT WILL ENDEAVOR TO ANSWER MR. [redacted] OTHER QUESTIONS IN THIS MATTER SHORTLY. b6 b7C

BT

#0006

NNNN

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 7/23/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 7/19/91, the writer contacted Mrs. [redacted] at her residence in Bronxville, New York. telephone [redacted] The writer identified himself and the purpose for the call. Specifically, the writer advised that he was attempting to contact Mrs. [redacted] husband. The writer explained that captioned investigation was separate and distinct from that of the Manhattan District Attorney. Mrs. [redacted] stated that her husband was leaving Pakistan on that same date. She was not sure where he was travelling to but she expected to be contacted by him on this date. She agreed to give him the writer's name and telephone number. b6 b7C

On the above date, the writer attempted to contact [redacted] at his place of employment, Meridien International Bank, Limited, 126 East 56th St., New York, New York 10022, telephone (212)980-9110. The writer was informed that [redacted] was no longer employed by the above bank and no additional information would be given. b6 b7C

On 7/22/91, the writer discussed this matter with AUSA [redacted], District of Columbia. AUSA [redacted] advised that he would like to travel to New York between 7/31/91 and 8/2/91 with DOJ [redacted] SA [redacted] and the writer to continue the interview process in New York. b6 b7C

On 7/22/91, the writer was contacted by [redacted] advised that he was in Paris, France and would return to New York on 7/30/91. Arrangements were made to interview him on 8/1/91 and 8/2/91. Specific contents of the conversation with [redacted] were set forth on an appropriate FD-302. b6 b7C

INDEF

On 7/22/91, the writer contacted the office of Attorney [redacted] in Florida, at telephone [redacted] The purpose of the contact was to contact [redacted] b6 b7C

[redacted]

29B-WF-171994-170

SEARCHED SERIALIZED INDEXED FILED b6 b7C

1325015-000-7121

On that same date, the writer was contacted by [redacted] b6 b7C advised that he was no longer employed at Meridien Bank. He gave the writer a home telephone number of (213)622-4045. [redacted] agreed to be interviewed on 7/31/91, at the NYO.

On that same date, the writer confirmed the above interviews with AUSA [redacted] and DOJ [redacted] b6 b7C

1325015-000-7122

C-5

/READ/MRI 1637/210
0000 MRI 01697

PP RUCNFB FBIWMFO

DE FBICI #0018 2110315

ZNR UUUUU

P 292215Z JUL 91

FM FBI CINCINNATI (29B-WF-~~A~~-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //3160//

PASS: ATTENTION FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION.

SSUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; FIF; FAG.

OO:WMFO.

RE BUREAU TELETYPE TO ALL OFFICES, JULY 26, 1991.

CINCINNATI DIVISION OFFICE INDICES, BOTH AUTOMATED AND MANUAL, NEGATIVE REGARDING SUBJECTS AND COMPANIES IDENTIFIED IN TITLE OF REFERENCED BUREAU TELETYPE, AS WELL AS INDIVIDUALS ADDITIONALLY SET OUT IN BODY OF REFERENCED TELETYPE.

[redacted]

b6
b7C

29B-WF-171994-1911
Su Su

1325015-000-7123

CINCINNATI HAS NO KNOWLEDGE OF ANY INVESTIGATIONS BEING CONDUCTED BY FEDERAL, STATE OR LOCAL LAW ENFORCEMENT AGENCIES REGARDING THE ABOVE INDIVIDUALS OR COMPANIES.

BT

#0018

NNNN

/READ 2389/214
0000 MRI 02389

PP RUCNFB FBIWMFO

DE FBIBS #0013 2151504

ZNR UUUUU

P 022359Z AUG 91

FM FBI BOSTON (RUC)

TO DIRECTOR FBI (29B-WF-171994/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3090//

PASS: ATTN: SSA [redacted], FINANCIAL INSTITUTION FRAUD UNIT, b6 b7C

WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITHPHARON, AKA DR. GHAITHPHARON; FIF; FAG; OO: WMFO.

REFERENCE TEL CALL ON 8/2/91 FROM BOSTON SA [redacted] b6 b7C

TO SSA [redacted], FBIHQ.

ON 8/2/91, [redacted] FINANCIAL CRIMES UNIT, b6 b7C

U.S. ATTORNEY'S OFFICE, BOSTON, MASSACHUSETTS PROVIDED THE

[redacted]

29B WF-171994-172

See See

AUG 08

b6 b7C

FOLLOWING INFORMATION.

ON 8/1/91 U.S. SENATOR JOHN F. KERRY TELEPHONICALLY CONTACTED U.S. ATTORNEY WAYNE BUDD BOSTON, MASSACHUSETTS. KERRY SAID THAT HE HAD INFORMATION FROM SOURCES AND INFORMANTS TO THE EFFECT THAT COOLIDGE BANK AND TRUST COMPANY, 75 ARLINGTON STREET, BOSTON, MASSACHUSETTS 02116 WAS A "CLIENT BANK" OF BCCI. ACCORDING TO KERRY, THE BANK WAS PURCHASED BY A FOREIGN NATIONAL AS A STRAW IN A MANNER SIMILAR TO OTHER ACQUISITIONS OF BCCI.

KERRY ALSO SAID THAT [redacted] HAD RECENTLY TRANSFERRED MONEY TO THE PRIVATE BANKING FIRM OF BROWN BROTHERS HARRIMAN AND COMPANY, 40 WASHINGTON STREET, BOSTON, MASSACHUSETTS. b6 b7C

KERRY TOLD BUDD THAT HE MADE THE SAME TELEPHONE CALL TO [redacted] OF THE FEDERAL DEPOSIT INSURANCE CORPORATION. b6 b7C

U.S. ATTORNEY BUDD IS A PERSONAL FRIEND OF [redacted] AND HAS RECUSED HIMSELF FROM ANY FURTHER ROLE IN THIS MATTER. b6 b7C

ON 8/2/91, AUSA [redacted] SAID THAT HE HAD BEEN IN CONTACT WITH THE LOCAL GENERAL COUNSEL OF FDIC WHO HAD DISPATCHED EXAMINERS TO COOLIDGE BANK AND TRUST. ACCORDING TO [redacted] BANK OFFICIALS DISALLOW ANY RELATIONSHIP WITH BCCI. FDIC EXAMINER HAVE OFFERED TO DEBRIEF USAO BOSTON AND FBI ON 8/5/91 ABOUT 10:00 A.M. b6 b7C

ACCORDING TO PUBLIC RECORDS COOLIDGE BANK AND TRUST COMPANY, ABA ROUTING NUMBER 53-356, HAS TOTAL ASSETS OF APPROXIMATELY FOUR HUNDRED AND ONE MILLION DOLLARS. IT HAS TEN BRANCHES IN THE METROPOLITAN BOSTON AREA.

RMV RECORDS REFLECT THAT [redacted] DOB [redacted] RESIDES AT [redacted] [redacted] STREET, UNIT [redacted] BOSTON, MASSACHUSETTS FROM RMV RECORDS, IT APPEARS THAT HIS WIFE'S NAME IS [redacted] DATE OF BIRTH [redacted] AND THAT HE HAS THREE CHILDREN, [redacted] DATE OF BIRTH [redacted] [redacted] DOB [redacted] DATE OF BIRTH [redacted]

b6
b7C

BOSTON INDICES REFLECT ONE REFERENCE TO FILE [redacted] FILE IS CURRENTLY ON "SEARCH" IN BOSTON. CASE AGENT FOR THAT MATTER, SA [redacted] RECALLS THAT THE MATTER CENTERED AROUND A REQUEST FROM [redacted] TO DETERMINE WHO [redacted] WAS AS HE HAD PLACED A DEPOSIT FOR A HOTEL ROOM FOR A LAVISH WEDDING FOR HER CHILD.

b3
b6
b7C
b7D
b7E

SA [redacted] RECALLS THAT [redacted] WAS COOPERATIVE AND FORTHCOMING.

b6
b7C

AUSA [redacted] ADVISED THAT HE COULD THINK OF NO LOGICAL INVESTIGATION TO BE CONDUCTED IN THE ABSENCE OF MORE DETAILED

b6
b7C

SPECIFIC INFORMATION. BOSTON CONCURS WITH THAT ASSESSMENT AND WILL MAINTAIN THIS FILE IN AN RUC STATUS.

BT

#0013

NNNN

C-5

/READ 1596/216

No 1596/216
/READ 1596/217
0006 MRI 01596

OO P12 FBIWMFO

DE FBIBS #0008 2181340

ZNR UUUUU

O 052123Z AUG 91

FM FBI BOSTON

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //3090//

PASS: ATTN: SSA DENNIS WEAVER FIFU, WCC SECTION.

1, 2

SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITH PHARON AKA DR. GHAITH PHARDON.

RE BOSTON TT 8/2/91.

RE TEL CALL 8/5/91 SSA [redacted] FBIHQ TO SSA [redacted] [redacted] BOSTON. b6 b7C

ON 8/2/91 [redacted] FEDERAL RESERVE BANK OF BOSTON WAS INTERVIEWED AND ADVISED THAT ON THAT DATE HE HAS REVIEWED THE FINANCIAL CONDITION OF THE COOLIDGE BANK b6 b7C

main
-193
29B-WF-171994

INDEXED

AUG 06 1991

[redacted] b6 b7C

1325015-000-7129

AND TRUST COMPANY BOSTON (CBTC).

[redacted] CONCLUDED THAT THERE WAS NO EVIDENCE TO SUPPORT THE ALLEGATIONS THAT [redacted] FOR BCCI. b6 b7C

IT IS NOTED THAT [redacted] IS SEEKING OPEN BANK ASSISTANCE AND IS TO SUBMIT A PROPOSAL 8/5/91 WHEREBY HE WOULD INJECT $15 MILLION OF NEW CAPITAL INTO THE BANK. b6 b7C

RESULTS OF INTERVIEW WILL BE FURNISHED TO WMFO.

BT

#0008

NNNN

C-5

/READ 953/218
0006 MRI 00953

OO P12 FBIWMFO BON LON

DE PAR #0006 2181508

ZNY EEEEE

O 061417Z AUG 91

FM LEGAT PARIS (BRUSSELS) (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

LEGAT BONN/IMMEDIATE/

LEGAT LONDON/IMMEDIATE/

BT

UNCLAS E F T O

CITE: //5250:PAR163.218 6 AUGUST 1991//

PASS: HQ FOR OLIA; WHITE COLLAR CRIME SECTION, CID.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO: WMFO.

RE BRUSSELS TELETYPE DATED AUGUST 2, 1991.

REQUEST OF THE BUREAU:

FBIHQ IS REQUESTED TO ADVISE REGARDING THE DIRECTION OF THIS CASE NOTING THAT THE FOLLOWING INFORMATION IS THE SECOND DIRECT DEPARTMENT OF JUSTICE (DOJ) INQUIRY IN THIS MATTER WHICH HAS COME

-174
main
15-05-171994

[redacted]

AUG 06 1991

b6
b7C

[redacted]

1325015-000-7131

TO LEGAT BRUSSEL'S ATTENTION, THE FIRST BEING DIRECTED TO LEGAT FROM THE OFFICE OF INTERNATIONAL AFFAIRS (OIA) DOJ.

ON AUGUST 6, 1991, LEGAT BRUSSELS WAS AGAIN CONTACTED BY THE U.S. EMBASSY LUXEMBOURG IN INSTANT MATTER.

U.S. EMBASSY LUXEMBOURG STATED IT HAD BEEN CONTACTED BY THE DOJ'S OFFICE LOCATED AT THE U.S. CONSULATE, MUNICH, GERMANY, WHICH WAS REQUESTING ASSISTANCE IN CAPTIONED CASE.

SPECIFICALLY, THE DOJ OFFICE WISHED A LIST OF ATTORNEYS IT COULD USE IN LUXEMBOURG TO "SUE" THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) IN LUXEMBOURG.

LEGAT BRUSSELS THEREUPON CONTACTED THE DOJ OFFICE IN MUNICH AND SPOKE WITH DOJ EMPLOYEE MS. [redacted] DOJ OFFICE [redacted] WHO WAS ABSENT. b6 b7C

MS. [redacted] ADVISED SHE HAD BEEN ASKED TO CONTACT THE U.S. EMBASSY LUXEMBOURG BY HER BOSS IN WASHINGTON, FIRST NAME UNKNOWN (FNU) [redacted] OFFICE OF FOREIGN LITIGATION, CIVIL DIVISION, DOJ. b6 b7C

THE U.S. EMBASSY IN LUXEMBOURG IS CONSEQUENTLY CONFUSED. THEY ARE NOW FIELDING REQUESTS FROM TWO SEPARATE DOJ ENTITIES ON THE SAME CASE.

BT

#0006

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0006 MRI [illegible]

00 P12 FBIMM FBIWMFO

DE LON #0031 2181917

ZNR UUUUU

O 061837Z AUG 91

FM LEGAT LONDON [redacted] (P)

b3
b7E

TO DIRECTOR FBI/IMMEDIATE/

FBI MIAMI (29D-MM-49881)/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //5200:LON196.218 6 AUG 1991//

PASS: HQ FOR WCCS - FIFU, ATTN [redacted] OLIA ATTN [redacted]

b6
b7C

[redacted]

SUBJECT: BANK OF CREDIT & COMMERCE INTERNATIONAL (BCCI); FPC - GCM; OO: FBIHQ.

RE DEPUTY LEGAL ATTACHE (DLAT) [redacted] TELCALL TO [redacted] WHITE COLLAR CRIME SECTION (WCCS), AND TELECALL OF [redacted] WCCS, TO [redacted] AUGUST 4, 1991; NUMEROUS TELCALLS OF LONDON AND [redacted] AUGUST

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b7C

Main

29B-WF-171994 - 175

AUG 06 1991

[redacted]

b6
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1325015-000-7134

 b3 b7E

5 AND 6, 1991.

ON AUGUST 5, 1991, [redacted] MET WITH [redacted] b6 b7C

[redacted], FRAUD SECTION, CRIMINAL DIVISION, U.S. DEPARTMENT OF JUSTICE (DOJ), IN LONDON, ENGLAND. [redacted] ADVISED THAT HE WAS SENT TO LONDON BY ROBERT S. MUELLER, ASSISTANT ATTORNEY GENERAL (AAG), CRIMINAL DIVISION, DOJ, FOR THREE SPECIFIC PURPOSES, ALL RELATED TO THE CLOSURE OF BCCI.

(1) TO COORDINATE AND ATTEND ALL MEETINGS IN THE UNITED KINGDOM WITH REGARD TO U.S. PROSECUTIVE INTERESTS IN THE FAILURE OF BCCI. [redacted] WAS SPECIFICALLY INTENT UPON COORDINATING CONTACT AND LIAISON WITH [redacted] [redacted] SAID THAT AAG MUELLER INSISTED UPON PROSECUTOR-TO-PROSECUTOR CONTACT OF ALL CRIMINAL BCCI ISSUES AFFECTING THE UNITED STATES. b6 b7C b7D

(2) TO ESTABLISH THE LEGAT OFFICE AS [redacted] OWN POINT-OF-CONTACT FOR BCCI/UK RELATED ISSUES. WITH THIS IN MIND, [redacted] PROVIDED BACKGROUND MATERIALS PERTAINING TO THE CLOSURE OF BCCI, INCLUDING RECENT REPORTS PREPARED BY PRICE WATERHOUSE, ACCOUNTANTS TO THE BANK OF ENGLAND WHICH HAD BEEN TURNED OVER TO THE FEDERAL RESERVE BY THE BANK OF ENGLAND. b6 b7C

(3) [redacted] SAID THAT AAG MUELLER WAS DRAFTING A PERSONAL b6 b7C

b3
b7E

PAGE THREE LON [redacted] UNCLAS

LETTER TO [redacted] LONDON, ENGLAND, b6 b7C b7D

INDICATING THE DOJ RESOLVE AND PLAN OF ACTION FOR HANDLING U.S. BCCI RELATED CRIMINAL INVESTIGATION IN THE U.K. [redacted] CONTACT AND MEETINGS WITH [redacted] WERE TO SIGNAL AND ADVANCE THE SPIRIT OF AAG MUELLER'S LETTER. (IT IS NOTED THAT [redacted] IS OUT OF THE COUNTRY UNTIL AUGUST 14, 1991.)

[redacted] SAID THERE ARE CURRENTLY FOUR CRIMINAL CASES INVOLVING BCCI AT THE UNITED STATES ATTORNEY'S OFFICES IN TAMPA, FLORIDA; WASHINGTON, D.C.; MIAMI, FLORIDA; AND ATLANTA, GEORGIA. THE DOJ WILL COORDINATE THESE INVESTIGATIONS. THIS COORDINATION WILL AVOID DUPLICATING DOJ REQUESTS TO BRITISH AUTHORITIES AND ENSURE THE LOGICAL COLLECTION AND FLOW OF INFORMATION GAINED THROUGH UK INTERVIEWS AND DOCUMENTS. IN THIS REGARD, DOJ IS PREPARED TO SHARE A SUBSTANTIAL COLLECTION OF INFORMATION ALREADY OBTAINED IN THE COURSE OF U.S. BCCI INVESTIGATIONS WHICH SHOULD SIGNIFICANTLY ASSIST THE U.K. PROSECUTION EFFORT. b6 b7C

ON AUGUST 5, 1991, [redacted] MET WITH ASSISTANT UNITED STATES ATTORNEY (AUSA) [redacted] SOUTHERN DISTRICT OF FLORIDA, AND SPECIAL AGENT (SA) [redacted] MIAMI DIVISION,

TO DISCUSS THE BCCI IMPACT UPON THE MIAMI INVESTIGATION

PAGE FOUR LON [redacted] UNCLAS

CAPTIONED, [redacted]

CENTRUST SAVINGS AND LOAN; OO: MIAMI; 29D-MM-49881." THE PURPOSE OF THIS MEETING WAS TO INSTRUCT AUSA [redacted] IN THE NEW PARAMETERS WHICH DOJ DESIGNATED FOR THE CONDUCT OF ALL INVESTIGATIONS WITH BCCI INVOLVEMENT. AUSA [redacted] AND SA [redacted] SCHEDULE WAS AMENDED TO FIRST MEET AT [redacted] ON AUGUST 6, 1991, BEFORE CONDUCTING ANY INTERVIEWS.

ON AUGUST 5, 1991, [redacted] AND ASSISTANT LEGAL ATTACHE (ALAT) [redacted] MET WITH ASSISTANT [redacted] AND [redacted], AS IT WAS UNDERSTOOD THAT [redacted] WOULD BE UNAVAILABLE TO MEET ON AUGUST 6. AFTER A BRIEF MEETING IN WHICH [redacted] ADVISED [redacted] OF THE PURPOSE OF HIS TRAVEL, [redacted] ADJUSTED HIS SCHEDULE TO ATTEND AN EARLIER-SCHEDULED MEETING ON AUGUST 6.

ON AUGUST 6, 1991, [redacted] AUSA [redacted] SA [redacted], AND [redacted] MET WITH [redacted] AND [redacted] (DS) [redacted], CONCERNING THE ONGOING BCCI INVESTIGATIONS IN THE

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U.S. AND THE UK.

PAGE FIVE LON [redacted] UNCLAS b3 b7E

SPECIFIC ATTENTION WAS DEVOTED TO BRIEFING [redacted] PERSONNEL b7D
THE NATURE OF THE MIAMI INVESTIGATION AND THE BCCI ASPECTS OF
MIAMI'S CASE. [redacted] PERSONNEL CONDUCTED A QUICK COMPUTER
REVIEW OF THE DOCUMENTATION THEY HAVE COLLECTED TO DATE THROUGH
SEARCH WARRANTS AND LOCATED DOCUMENTS THAT RELATE DIRECTLY TO
MIAMI'S CASE. b6 b7C b7D

IT WAS DECIDED THAT MIAMI, THROUGH THE DOJ, WOULD PREPARE A
LETTER FOR [redacted] FOR THE MATERIALS
NECESSARY FOR MIAMI'S CASE.

[redacted] GAVE AN OVERALL DESCRIPTION OF THE U.S. CASES, AND THE b6 b7C
DESIRE TO COORDINATE ALL U.S. ATTORNEY'S OFFICE'S REQUESTS
THROUGH THE DOJ TO THE LEGAL ATTACHE'S OFFICE, LONDON.

MEETINGS REQUESTED BY MIAMI WITH [redacted] THE b6 b7C b7D
PROVISIONAL LIQUIDATOR, AND PRICE WATERHOUSE, WERE CANCELLED ON
THE ADVICE OF [redacted] [redacted] ADVISED THAT SUCH MEETINGS WOULD
BE UNPRODUCTIVE AT THIS TIME DUE TO THE VICE CHANCELLOR'S COURT
DECISION TO PLACE BCCI IN PROVISIONAL RATHER THAN FULL
LIQUIDATION ON JULY 29, 1991. THE NEXT COURT DATE SCHEDULED FOR

DECEMBER 2, 1991.

SEVERAL LEGAL AND PROSECUTORIAL ISSUES WERE DISCUSSED WITH

THE POSITIONS OF U.S. AND U.K. AUTHORITIES ON THE NATURE OF THE BCCI INVESTIGATIONS IN THEIR RESPECTIVE JURISDICTIONS PRESENTED.

A MEETING IS CURRENTLY SCHEDULED FOR 11:00 A.M., THURSDAY, AUGUST 15, AT THE [redacted], AT WHICH TIME [redacted] AND A REPRESENTATIVE OF THE LEGAL ATTACHE'S OFFICE, LONDON, WILL ATTEND. IT IS REQUESTED THAT AN FBIHQ REPRESENTATIVE COORDINATING THE FBI INVESTIGATION INVOLVING BCCI ATTEND.

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/READ 1832/218
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RR RUCNFB FBIWMFO

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ZNR UUUUU

R 062107Z AUG 91

FM FBI BALTIMORE (29B-WF-171994) (RUC)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //3050:SQ 6//

SUBJECT: CLARK MCADAMS CLIFFORD, AKA ET AL; FIF; FAG; OO:
WMFO.

RE TELCALL BETWEEN SA [redacted] BA, & SA [redacted] WMFO, ON AUGUST 5 & 6, 1991.

FOR INFORMATION OF FBIHQ, SA [redacted] HAS HAD PREVIOUS INVESTIGATIVE CONTACT WITH AN ASSOCIATE OF [redacted] A SUBJECT IN THE CAPTIONED CASE. [redacted] ASSOCIATE HAS PROVIDE INFORMATION TO THE FBI ON A CONFIDENTIAL BASIS IN THE PAST & HAS PERIODICALLY CONTACTED SA [redacted] BY TELEPHONE. [redacted]

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1325018-000-7140

ASSOCIATE HAS INSISTED THAT HIS COOPERATION REMAIN CONFIDENTIAL & HE IS NOT WILLING TO TESTIFY IN AN LEGAL PROCEEDING.

BALTIMORE DIVISION HAS ACCORDINGLY TREATED THIS INDIVIDUAL AS A CONFIDENTIAL SOURCE OF INFORMATION BUT HAS NOT OPENED UP ANY INFORMANT FILE TO DATE.

CONFIDENTIAL SOURCE ADVISED CLARK CLIFFORD & HIS [redacted] b6 b7C b7D

CONFIDENTIAL SOURCE SAID [redacted] b6 b7C b7D

THE CONFIDENTIAL SOURCE BELIEVES [redacted] b6 b7C b7D

THE SOURCE CLAIMED [redacted] IS [redacted]

[redacted] b6 b7C b7D

SOURCE DID DESCRIBE GHAITH PHARAON AS A CON MAN & THIEF. SOURCE SAID [redacted] HAS BEEN AN ADVISOR TO THE LAST THREE SAUDI ARABIAN KINGS. b7D

THE CONFIDENTIAL SOURCE SAID NEWSPAPER REPORTS HE HAS READ IN LONDON KEEP REFERRING TO A MYSTERIOUS [redacted] [redacted] APPARENTLY RECEIVED A $150 MILLION LOAN FROM BCCI & THE EUROPEAN PRESS DOES NOT SEEM TO KNOW WHO HE IS. SOURCE ADVISED THIS IS CONSIDERED A HUMOROUS ITEM AMONG MIDDLE EASTERN PERSONS BECAUSE [redacted] IS THE CURRENT [redacted] SAUDI ARABIAN INTELLIGENCE. CONFIDENTIAL SOURCE ADVISED THE $150 MILLION LOAN MADE TO [redacted] b6 b7C b7D

THE CONFIDENTIAL SOURCE DISCUSSED ANOTHER INDIVIDUAL BY

THE NAME OF [redacted] WHO IS ONE OF THE NOMINEE SHAREHOLDERS b6 b7C

FOR FIRST AMERICAN BANK. SOURCE ADVISED [redacted] WORKS FOR [redacted]

[redacted] IN EFFECT, ACTS AS A [redacted] ACCORDING

TO THE CONFIDENTIAL SOURCE.

BALTIMORE DIVISION BELIEVES THE CONFIDENTIAL SOURCE HAS

OVERLOOKED POSSIBLE CRIMINAL VIOLATIONS BY [redacted] IN HIS b6 b7C b7D

DEALINGS WITH THE U.S. FEDERAL RESERVE. THE CONFIDENTIAL

SOURCE OBVIOUSLY CONSIDERS [redacted] A FRIEND & BALTIMORE DIVISION

BELIEVES THE SOURCE COULD [redacted]

[redacted] IF WMFO & FBIHQ BELIEVED IT COULD BE A PRODUCTIVE

INTERVIEW.

BALTIMORE DIVISION WILL AWAIT DIRECTION FROM WMFO

CONCERNING ANY FURTHER CONTACTS WITH THE CONFIDENTIAL SOURCE.

ADMINISTRATIVE: THE CONFIDENTIAL SOURCE REFERRED TO

ABOVE IS [redacted] b6 b7C b7D

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OO P12 FBIWMFO

DE ROM #0001 2191225

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O 071022Z AUG 91

FM LEGAT ROME (29-O)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

ET

UNCLAS

CITE: //5350:ROM727.218 06 AUG 1991//

PASS: HQ - CID, WHITE COLLAR CRIMES SECTION, FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI: [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN

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29B-WF-171994

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1325015-000-7144

AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON. FIF; FAG; OO: WMFO.

RE FBIHQ TEL DATED 7/26/91 TO ALL FIELD OFFICES AND LEGATS, CAPTIONED A#0001

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ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-11-2018 BY [redacted]

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/READ 95/219
0000 MRI 00095

PP RUCNFB FBIWMFO

DE FBISU #0005 2191222

ZNR UUUUU

P 070118Z AUG 91

FM FBI SALT LAKE CITY (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3750//

PASS: FBIHQ, FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; ET AL; FIF; FAG; OO:WMFO.

SALT LAKE CITY INDICES NEGATIVE REGARDING CAPTIONED SUBJECTS, AS WELL AS [redacted]

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[redacted]

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29B-WF-171994

AUG 07 1991

[redacted]

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/READ 1873/219
0000 MRI 01873

RR RUCNFB FBIWMFO PAR

DE FBINY #0052 2201327

ZNR UUUUU

R 072129Z AUG 91

FM FBI NEW YORK (29B-WF-171944) (P)

TO DIRECTOR FBI (29B-WF-171944)/ROUTINE/

FBI WMFO (29B-WF-171944)/ROUTINE/

LEGAT PARIS (29B-WF-171944)/ROUTINE/

BT

UNCLAS

CITE: //3540//

PASS: HQ FOR FINANCIAL INSTITUTION FRAUD, WHITE COLLAR CRIMES UNIT.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M CLIFORD, CLARK;

CLIFFORD; [redacted]

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, NV NETHERLANDS, ANTILLES;

AGHA HASSAN ABEDI; [redacted]; SHAYKH ZAYID BIN SULTAN;

AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED;

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Main
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29B-WF-171944

AUG 08 1991

1325015-000-7147

DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; CHAITH PHARAON, AKA; DR GHAITH PHARAON: FIF, FAG; OO:WMFO.

RE LEGAT PARIS (BRUSSELS) TEL TO DIRECTOR DATED AUGUST 2, 1991.

FOR INFORMATION OF LEGAT BRUSSELS, NY DIVISION HAS REVIEWED 29A-15544. THE FOREGOING FILE IS A CONTROL FILE CONTAINING CRIMINAL REFERRAL FORMS FROM VARIOUS FINANCIAL INSTITUTIONS. SPECIFICALLY, BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) IS MENTIONED IN 29A-15544. SERIAL 898, WHICH IS A COMPLAINT FROM [redacted] b6 b7C BCCI, PARK AVENUE, NY, NY REGARDING THE CASHING OF TWO COUNTERFEIT CHECKS AT BCCI. LOSS SUSTAINED BY BCCI TOTALED $1,040.00.

NY FILE 196-1162 COULD NOT BE LOCATED AT THE PRESENT TIME. FILE HAS BEEN PLACED ON SPECIAL SEARCH AND NY WILL SUTEL RESULTS.

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/READ/MRI 1890/220
0000 MRI 01890

PP RUCNFB FBIWMFO

DE FBIMP #0004 2210355

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P 082011Z AUG 91

FM FBI MINNEAPOLIS (29B-WF-171994) (RUC)

TO DIRECTOR FBI (29B-WF-171994)/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //3480//

PASS: BUREAU: FINANCIAL INSTITUTION FRAUD UNIT, WCC SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; ET AL; FIF; FAG; OO: WMFO.

RE BUREAU TELETYPE TO ALL FBI FIELD OFFICES DATED JULY 26, 1991.

MINNEAPOLIS MANUAL AND COMPUTERIZED FOIMS INDICES WERE CHECKED FOR THE FOLLOWING INDIVIDUALS AND COMPANIES WITH NEGATIVE RESULTS:

CLARK MCADAMS CLIFFORD

29B-WF-171994 — 180

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1325015-000-7149

CLARK M. CLIFFORD

CLARK CLIFFORD

[redacted] b6 b7C

[redacted]

CREDIT AND COMMERCE AMERICAN HOLDING, N.V.,

NETHERLANDS, ANTILLES

AGHA HASAN ABEDI

[redacted] b6 b7C

SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN

SHEIK ZAYED BIN SULTAN AL-NAHAYAN

SHEIK ZAYED

BANK OF CREDIT AND COMMERCE, INTERNATIONAL

GHAITH PHARAON

DR. GHAITH PHARAON

FIRST AMERICAN BANKSHARES, WDC

NATIONAL BANK OF GEORGIA, ATLANTA, GEORGIA

FIRST AMERICAN BANK OF GEORGIA, ATLANTA, GEORGIA

INDEPENDENCE BANK, ENCINO, CALIFORNIA

[redacted] b6 b7C

THE FOLLOWING STATE/LOCAL LAW ENFORCEMENT AGENCIES WERE CONTACTED WITH NEGATIVE RESULTS FOR ANY CRIMINAL HISTORY, WANTS AND WARRANT INFORMATION REGARDING THE ONLY FOUR INDIVIDUALS LISTED IN REFERENCED TELETYPE WITH A DATE OF BIRTH, [redacted] (DOB - [redacted] b6 b7C

(DOB [redacted] AS[redacted] (DOB [redacted]

AND [redacted] (DOB [redacted]. ADDITIONAL CRIMINAL CHECKS COULD NOT BE CONDUCTED WITHOUT A DATE OF BIRTH.

MINNEAPOLIS POLICE DEPARTMENT

ST. PAUL POLICE DEPARTMENT

RAMSEY COUNTY SHERIFF'S OFFICE

HENNEPIN COUNTY SHERIFF'S OFFICE

NATIONAL CRIME INFORMATION CENTER (NCIC)

MINNESOTA BUREAU OF CRIMINAL APPREHENSION

NORTH DAKOTA BUREAU OF CRIMINAL INVESTIGATION

SOUTH DAKOTA DIVISION OF CRIMINAL INVESTIGATION

MINNEAPOLIS IS PLACING THIS MATTER IN RUC STATUS.

BT

#0004

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/READ/MRI 2299/220
0000 MRI 02299

RR RUCNFB FBIAT FBIMM FBINY FBIWMFO

DE FBICO #0005 2210C58

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R 082216Z AUG 91

FM FBI COLUMBIA (29B/WF-171994-3) (P)

TO DIRECTOR FBI/ROUTINE/

FBI ATLANTA/ROUTINE/

FBI MIAMI/POUTINE/

FBI NEW YORK/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //3180//

PASS: FIF UNIT, WCC SECTION.

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Sub Sug 3

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO:

WMFO.

REFERENCE DIRECTOR TELETYPE TO ALL FIELD OFFICES ON

7/27/91.

ON 8/7/91, [redacted] (PROTECT), [redacted] ROAD,

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29B-WF-171994 — 181

Sec Sec

[redacted]

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1325015-000-7153

[redacted] HILTON HEAD ISLAND, SOUTH CAROLINA (SC), TELEPHONE NUMBER [redacted] DOB [redacted] SSAN [redacted], FURNISHED THE FOLLOWING INFORMATION CONCERNING HIS RELATIONSHIP WITH GAITH PHARAON AND BCCI: b6 b7C b7D

[redacted] ADVISED HE WAS THE [redacted] COMPANY DURING THE PERIOD 1981-1988. THIS COMPANY, BASED IN [redacted] ADVISED IN THE [redacted] GAITH PHARAON BY [redacted]. HE DESCRIBED [redacted] WITH CITICORP, WHO WAS AT ONE TIME [redacted] GAITH PHARAON'S [redacted] IS DESCRIBED AS A FORMER GOVERNOR OF THE STATE OF SOUTH CAROLINA AND THE FORMER U.S. AMBASSADOR TO SAUDI ARABIA IN THE CARTER ADMINISTRATION. b6 b7C b7D

[redacted] FIRST MET PHARAON [redacted] WHERE HE WAS [redacted] THROUGH THIS INTRODUCTION PHARAON [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted]GAITH PHARAON WAS

[redacted]PHARAON AND

[redacted]PHARAON AT PHARAON'S

[redacted] b6 b7C b7D

[redacted]PHARAON IS ON A

[redacted]PHARAON THE

[redacted] b6 b7C b7D

BOARD.

[redacted] HAD NO INFORMATION THAT [redacted] b6 b7C b7D
[redacted] PHARAON BUT HAS BEEN TOLD [redacted] PHARAON
[redacted] FORMER PRESIDENT JIMMY CARTER. [redacted] WHO IS AN ATTORNEY.
HAS TOLD [redacted] PHARAON AND [redacted]
[redacted]

[redacted] ADVISED APPROXIMATELY TWO AND A HALF YEARS AGO HE b6 b7C b7D
WAS INTERVIEWED BY SA'S [redacted] AND
[redacted]. OF THE MIAMI DIVISION, ASSIGNED TO THE
FEDERAL STRIKE FORCE INVESTIGATING CENTRUS BANK. [redacted] HAS
ALSO MET WITH [redacted] LEAD ASSISTANT DISTRICT ATTORNEY
(ADA) FOR DISTRICT ATTORNEY HENRY MORGANTHAU, NEW YORK, NEW
YORK. [redacted] HAS ALWAYS PROVIDED INFORMATION TO THE ABOVE
INDIVIDUALS ON A CONFIDENTIAL BASIS AND HAS NEVER BEEN BEFORE
A GRAND JURY.

[redacted] IS AGREEABLE TO BE FURTHER INTERVIEWED CONCERNING b6 b7C b7D
BCCI, GAITH PHARAON, ETC. HE NOTED HE DID ATTEND [redacted]
[redacted] WASHINGTON, D.C., HOSTED BY [redacted]
[redacted]

ADMINISTRATIVE: [redacted] INTERVIEW WAS PRECIPITATED BY b6 b7C b7D
INFORMATION FURNISHED BY [redacted] (PROTECT), FORMER

[redacted] WHO CONTACTEI THE BEAUFORT RA AND RELATED THAT [redacted] HAD AT ONE TIME BEEN CONNECTED TO GAITH PHARAON.

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#0005

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FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: 5:40
Sender's Initials: [illegible]
Number of Pages: 5

To: USAO, Washington, D.C. (Name of Office) Date: 8/5/91

Facsimile number: (202) 514-8783

Attn: AUSA [redacted] (Name) b6 b7C

From: FBI, Washington Field (Name of Office)

Subject: CLARK CLIFFORD; et al

[redacted] ctions: Please handcarry to AUSA b6 b7C

Originator's Name: SA [redacted] Telephone: 324-6448

Originator's Facsimile Number: 324-6426

Approved: [signature]

288-WF-171994 -182

SEARCHED [illegible] INDEXED [illegible]
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FBI - WASH. METRO FIELD OFFICE

FBI/DOJ

1325015-000-7158

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PP RUCNFB FBIWMFO

DE FBIBS #0013 2151504

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P 022359Z AUG 91

FM FBI BOSTON (RUC)

TO DIRECTOR FBI (29B-WF-171994)/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3090//

PASS: ATTN: SSA [redacted] FINANCIAL INSTITUTION FRAUD UNIT, b6 b7C

WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITHPHARON, AKA DR. GHAITHPHARON; FIF; FAG; OO: WMFO.

REFERENCE TEL CALL ON 8/2/91 FROM BOSTON SA [redacted] b6 b7C

TO SSA [redacted] FBIHQ.

ON 8/2/91, [redacted] OF FINANCIAL CRIMES UNIT, b6 b7C

U.S. ATTORNEY'S OFFICE, BOSTON, MASSACHUSETTS PROVIDED THE

[redacted] b6 b7C

29B-WF-171994

AUG 03 1991

1325015-000-7159

FOLLOWING INFORMATION.

ON 8/1/91 U.S. SENATOR JOHN F. KERRY TELEPHONICALLY CONTACTED U.S. ATTORNEY WAYNE BUDD BOSTON, MASSACHUSETTS. KERRY SAID THAT HE HAD INFORMATION FROM SOURCES AND INFORMANTS TO THE EFFECT THAT COOLIDGE BANK AND TRUST COMPANY, 75 ARLINGTON STREET, BOSTON, MASSACHUSETTS 02116 WAS A "CLIENT BANK" OF BCCI. ACCORDING TO KERRY, THE BANK WAS PURCHASED BY A FOREIGN NATIONAL AS A STRAW IN A MANNER SIMILAR TO OTHER ACQUISITIONS OF BCCI.

KERRY ALSO SAID THAT [redacted] HAD RECENTLY TRANSFERRED MONEY TO THE PRIVATE BANKING FIRM OF BROWN BROTHERS HARRIMAN AND COMPANY, 40 WASHINGTON STREET, BOSTON, MASSACHUSETTS. b6 b7C

KERRY TOLD BUDD THAT HE MADE THE SAME TELEPHONE CALL TO [redacted] OF THE FEDERAL DEPOSIT INSURANCE CORPORATION.

U.S. ATTORNEY BUDD IS A PERSONAL FRIEND OF [redacted] AND HAS RECUSED HIMSELF FROM ANY FURTHER ROLE IN THIS MATTER. b6 b7C

ON 8/2/91, AUSA [redacted] SAID THAT HE HAD BEEN IN CONTACT WITH THE LOCAL GENERAL COUNSEL OF FDIC WHO HAD DISPATCHED EXAMINERS TO COOLIDGE BANK AND TRUST. ACCORDING TO WELCH, BANK OFFICIALS DISALLOW ANY RELATIONSHIP WITH BCCI. FDIC EXAMINER HAVE OFFERED TO DEBRIEF USAO BOSTON AND FBI ON 8/5/91 ABOUT 10:00 A.M. b6 b7C

ACCORDING TO PUBLIC RECORDS COOLIDGE BANK AND TRUST COMPANY, ABA ROUTING NUMBER 53-356, HAS TOTAL ASSETS OF APPROXIMATELY FOUR HUNDRED AND ONE MILLION DOLLARS. IT HAS TEN BRANCHES IN THE METROPOLITAN BOSTON AREA.

RMV RECORDS REFLECT THAT [redacted] DOB [redacted] RESIDES AT [redacted] [redacted] STREET, UNIT [redacted] BOSTON, MASSACHUSETTS FROM RMV RECORDS, IT APPEARS THAT HIS WIFE'S NAME IS [redacted] DATE OF BIRTH [redacted] AND THAT HE HAS THREE CHILDREN, [redacted] DATE OF BIRTH [redacted] DOB [redacted] AND [redacted] DATE OF BIRTH [redacted]. b6 b7C

BOSTON INDICES REFLECT ONE REFERENCE TO FILE [redacted] FILE IS CURRENTLY ON "SEARCH" IN BOSTON. CASE AGENT FOR THAT MATTER, SA [redacted] RECALLS THAT THE MATTER CENTERED AROUND A REQUEST FROM [redacted] TO DETERMINE WHO [redacted] WAS AS HE HAD PLACED A DEPOSIT FOR A HOTEL ROOM FOR A LAVISH WEDDING FOR HER CHILD. b3 b6 b7C b7D b7E

SA [redacted] RECALLS THAT [redacted] WAS COOPERATIVE AND FORTHCOMING. b6 b7C

AUSA [redacted] ADVISED THAT HE COULD THINK OF NO LOGICAL INVESTIGATION TO BE CONDUCTED IN THE ABSENCE OF MORE DETAILED b6 b7C

SPECIFIC INFORMATION. BOSTON CONCURS WITH THAT ASSESSMENT AND WILL MAINTAIN THIS FILE IN AN RUC STATUS.

BT

#0013

NNNN

1325015-000-7162

FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: 5:20
Sender's Initials: 4
Number of Pages: 5

To: Dept. Of Justice. Date: 8/5/91
(Name of Office)

Facsimile number: (202) 514-6118

Attn: [redacted] 514-0640
(Name) (Room) (Telephone No.)

b6
b7C

From: FBI, Washington Field
(Name of Office)

Subject: BCCI

Special [redacted]: Please handcarry to Mr. Urgenson

or [redacted]

b6
b7C

Originator's Name: [redacted] C-5 Telephone: 324-6418

Originator's Facsimile Number: 324-6426

Approved: [signature]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 06 1991
FBI - WASH. METRO FIELD OFFICE
FBI/DOJ

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FM FBI BOSTON (RUC)

TO DIRECTOR FBI (29B-WF-171994)/PRIORITY/

FBI WMFO/PRIORITY/

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UNCLAS

CITE: //3090//

PASS: ATTN: SSA [redacted] FINANCIAL INSTITUTION FRAUD UNIT, b6 b7C

WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL; GHAITHPHARON, AKA DR. GHAITHPHARON; FIF; FAG; OO: WMFO.

REFERENCE TEL CALL ON 8/2/91 FROM BOSTON SA [redacted] b6 b7C

TO SSA [redacted], FBIHQ.

ON 8/2/91, [redacted] OF FINANCIAL CRIMES UNIT, b6 b7C

U.S. ATTORNEY'S OFFICE, BOSTON, MASSACHUSETTS PROVIDED THE

[redacted] b6 b7C

29B-WF-171994

AUG 03 1991

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FOLLOWING INFORMATION.

ON 8/1/91 U.S. SENATOR JOHN F. KERRY TELEPHONICALLY CONTACTED U.S. ATTORNEY WAYNE BUDD BOSTON, MASSACHUSETTS. KERRY SAID THAT HE HAD INFORMATION FROM SOURCES AND INFORMANTS TO THE EFFECT THAT COOLIDGE BANK AND TRUST COMPANY, 75 ARLINGTON STREET, BOSTON, MASSACHUSETTS 02116 WAS A "CLIENT BANK" OF BCCI. ACCORDING TO KERRY, THE BANK WAS PURCHASED BY A FOREIGN NATIONAL AS A STRAW IN A MANNER SIMILAR TO OTHER ACQUISITIONS OF BCCI.

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SA [redacted] RECALLS THAT DUDHIA WAS COOPERATIVE AND FORTHCOMING. b6 b7C

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SPECIFIC INFORMATION. BOSTON CONCURS WITH THAT ASSESSMENT AND WILL MAINTAIN THIS FILE IN AN RUC STATUS.

BT

#0013

NNNN

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535

August 7, 1991

CLARK MCADAMS CLIFFORD, aka
Clark M. Clifford, Clark Clifford;
[redacted], aka
[redacted]
[redacted], aka
[redacted] aka
[redacted] aka
[redacted], aka
[redacted]
CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V.,
Netherlands, Antilles;
AGHA HASAN ABEDI;
[redacted]
SHEIK ZAYED BIN SULTAN AL-NAHAYAN, aka
Sheik Zayed;
[redacted]
BANK OF CREDIT AND COMMERCE, INTERNATIONAL;
GHAITH PHARAON, aka
Dr. Ghaith Pharaon;
FINANCIAL INSTITUTION FRAUD;
FRAUD AGAINST THE GOVERNMENT

This comm also filed in:
Fug 1
Fug 2
Fug 3

b6
b7C

Predication

The captioned investigation was begun by the Federal Bureau of Investigation (FBI) on February 7, 1991, predicated on information received from the Board of Governors of the Federal Reserve System (BGFRS) in a written, criminal referral, dated January 22, 1991, alleging that false and fraudulent statements were made by the captioned subjects to the BGFRS with regard to the true ownership and control--by the BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A. (BCCI)--of the subject entity CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. (BCCI), Netherlands, Antilles. CCAH is a bank-holding company which owns FIRST AMERICAN BANKSHARES (FABS), Washington, D.C.(WDC), which, itself, owns FIRST AMERICAN BANKs (FABs) in WDC and five states,

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Main
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Serialized Su
Indexed
Filed Su

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-7168

CLARK MCADAMS CLIFFORD

Three subsequent BGFRS referrals, each dated May 7, 1991, cited similar false statements, in addition to violations of the Bank Holding Company Act of 1956, by GHAITH PHARAON and BCCI with regard to PHARAON's being a nominee in BCCI's acquisition and control of the NATIONAL BANK OF GEORGIA (NBG) from 1978 to 1987, and of the INDEPENDENCE BANK Encino, California, beginning in 1984.

The central allegations in the aforementioned BGFRS referrals were: (1) that the captioned subjects [redacted] and GHAITH R. PHARAON were merely nominees for BCCI when they acquired interests in CCAH or, in PHARAON's case, NBG and INDEPENDENCE BANK, using funds which came directly from BCCI and which BCCI carried on its books as loans, collateralized by shares in the acquired entities; (2) that the subjects falsely told the BGFRS that BCCI had, and would have, no part in the acquiring and subsequent control of the various entities; and (3) that BCCI's actual ownership and control of the entities violated the Bank Holding Company Act of 1956, as amended.

b6
b7C

Investigation to date has included: contacts with various investigatory and regulatory entities, and with a confidential source; collection and review of documents; and identification and interviews of potential witnesses.

New York County District Attorney's Office

The initial contacts in this investigation were with the New York County District Attorney's Office (NYCDAO), New York, New York, and the BGFRS, WDC. In the former, representatives of the NYCDAO met with representatives of the U.S. Department of Justice (DOJ) at the U.S. Attorney's Office (USAO), WDC, on 2/7/91. The NYCDAO representatives told how their office had been investigating BCCI under the state's "enterprise corruption" statute for several years, and had received, from attorneys representing the "77.4% owners of BCCI," a favorable response to a plea offer, suggesting, inter alia, "a global settlement" of all the pending matters against BCCI, both state and federal. The NYCDAO representatives said that, due to grand jury secrecy requirements, they could not disclose the existence or nature of any evidence acquired during their investigation, unless the DOJ became a party to that New York County grand jury in a joint effort with the NYCDAO, or received leave of the New York courts, as had the BGFRS, they said. The DOJ representatives elected not to join in the NYCDAO's grand jury or "global settlement."

1325015-000-7169

CLARK MCADAMS CLIFFORD

BGFRS

The initial contact with the BGFRS was with its Division of Banking Supervision and Regulation. In that meeting, the allegations contained in the January 22, 1991 criminal referral were further explained. Specifically, it was reported that BCCI had recently disclosed it had originally acquired ownership of FABS through a series of non-performing, non-recourse "loans" to the "investors" who bought FABS' predecessor, FINANCIAL GENERAL BANKSHARES (FGB), then traded their shares of FGB for shares of CCAH. Captioned subjects CLARK MCADAMS CLIFFORD and [redacted] also became minor shareholders through similar, non-recourse "loans" in what appeared to the BGFRS to have been an insider stock deal, through which CLIFFORD and [redacted] realized profits of about $6 million and $3 million, respectively. b6 b7C

The BGFRS disclosed that, in response to its civil subpoena, it had received all CCAH documents supposedly in the U.S., and that, although all BCCI loan documents had been taken to Abu Dhabi, the BGFRS was negotiating with BCCI for their return. BCCI also was reported to be on the verge of agreeing to cease and desist from doing business in the U.S., and to put together a divestiture plan.

Between 4/24/91 and 5/6/91, pursuant to [redacted] grand jury subpoenas, the BGFRS relinquished custody of [redacted] FBI and the USAO, WDC, for copying and return. b3

[redacted] b3 b6 b7C

On 3/8/91, in a meeting of DOJ officials, an AUSA from the Southern District of Florida (SDF) reported having been contacted by [redacted] (Black/Male, Date of Birth [DOB] [redacted], Social Security Account Number [SSAN] [redacted], described only as [redacted] for CLARK CLIFFORD, who claimed to be [redacted] b3 b6 b7C

On 3/15/91, in Miami, Florida, [redacted] was interviewed and served with a [redacted] Grand Jury subpoena by the FBI (see FD-302). Essentially, [redacted] b3 b6 b7C

[redacted]

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[redacted] b3 b6 b7C

On 3/19/91, [redacted] was interviewed again by the FBI, [redacted] b3 b6 b7C

On [redacted] testified before the [redacted] grand jury, confirming that [redacted] b3

An investigation of the [redacted] account at PSB was begun (see FD-302s on [redacted] b3 b6 b7C

[redacted], but remains inconclusive at this date. Copies of the check and related documents were acquired; the teller, [redacted], who accepted the deposit, but who was fired the next day for supposedly unrelated reasons, was identified, located and interviewed; a videotape from the PSB security camera was collected and sent to the FBI Laboratory with a request for the production of enhanced, still photographs of persons approaching [redacted] teller station at or about the appropriate time [redacted] did not appear). Also, teller [redacted] own bank records at PSB were subpoenaed (FD-302, 7/3/91).

On 5/7/91 (see FD-302) [redacted] was located and interviewed by the FBI, Miami, for details of the [redacted], and for the purpose of securing a photograph of him to aid in the investigation of the allegedly-stolen check. During this interview, [redacted] reiterated his statement about the [redacted] On 5/16/91, however, [redacted] contacted the FBI, WDC (see FD-302), and said that he had lied to the FBI and the grand jury about [redacted] Although he was told he could appear before the grand jury to correct his earlier testimony, and he agreed to do so, [redacted] has not been heard from since. b3 b6 b7C

[redacted] b6 b7C

CLARK MCADAMS CLIFFORD

On 4/18/91, the existence of [redacted] (Pakistani national; date of birth [redacted] in Bhopal, India) as a potential witness, came to the attention of the USAO, WDC, through the USCS, Tampa, and USAO, Tampa. Essentially, it was predicted that [redacted] would be able to furnish information about the purchase of FGB by BCCI; how the financing was structured to allow BCCI a presence in the U.S.; discussions between ABEDI, [redacted] and CLARK CLIFFORD. b6 b7C

Between 4/18/91 and 7/10/91, efforts were made by the FBI, the USAO, and the U.S. Marshal's Service (USMS), to arrange an interview of [redacted]. Primarily, these efforts were made through contacts with [redacted] representative, [redacted] (W/M; dob [redacted]; U.S. citizen), who was interviewed at the USAO, WDC on 6/27/91 (see FD-302). Finally, it was arranged that, on 7/10/91, [redacted] would meet with FBI and DOJ representatives in London, England. b6 b7C

In the 7/10-11/91 interview (see FD-302) [redacted] furnished information about: his service as the [redacted] SHEIK ZAYED's Department of Private Affairs (DPA) along with [redacted] the relationship between SHEIK ZAYED and BCCI; the use of [redacted] of SHEIK ZAYED [redacted] as the nominee for BCCI's purchases of FGB shares; how CLIFFORD and [redacted] Office of Management and Budget during the CARTER administration, and [redacted] National Bank of Georgia [NBG]) came to Abu Dhabi in 1978 to begin preparing [redacted] to give false testimony in a civil proceeding in U.S. District Court, WDC, regarding the efforts of FGB's owners to block the takeover; how [redacted] after another session of rehearsals in WDC by [redacted], perjured himself in the WDC deposition. b6 b7C

Attempts continue to get [redacted] to come to the U.S. to testify. b6 b7C

[redacted] b6 b7C

ON 5/9/91, [redacted], a former BCCI official convicted in the Middle District of Florida in 1990 of [redacted] was interviewed at the Hernando County (Florida) Jail by agents of the FBI, U.S. Customs Service (USCS) and the [redacted], accompanied by representatives of the USAO and DOJ, WDC. (By prior agreement with the USCS, with whom [redacted] had been cooperating, the reporting of this interview was to be done by the USCS as part its overall reporting of its ongoing interview of [redacted]. At this date, the USCS has not completed its report. An outline [q.v.] of the FBI agents' recollections of [redacted] information has been b6 b7C b7E

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provided.)

[redacted] furnished information about: BCCI "conferences", otherwise known as "jamborees"; the placement of BCCI employees in FAB and NBG, particularly [redacted] and [redacted], and salary augmentations provided for them by BCCI; observations of CLIFFORD and [redacted] with AGHA HASAN ABEDI and [redacted]; gifts ABEDI bestowed; BCCI's involvement with FAB in joint-marketing ventures; [redacted] $50 million "loan" to CCAH; the [redacted] family's ties to BCCI; payoffs in Ecuador and Peru. b6 b7C

USCS/[redacted] INQUIRIES b7E

While in Tampa, Florida on 5/8-9/91, contact was established with investigators from both the USCS and the [redacted] regarding evidence gathered in their joint inquiry known as [redacted]: the money-laundering case in which BCCI was prosecuted in the Middle District of Florida. Documents and other evidence collected during that investigation were made available for review, and copies of some documents were made. Disclosed was the existence of tape recorded interviews of former BCCI officials [redacted] formerly an investigator for a U.S. Senate subcommittee. It was agreed that custody of the tapes and draft transcripts would be relinquished to the FBI. This transfer of custody was accomplished on 6/21/91. b6 b7C b6 b7C b7E

[redacted]

On 5/8/91, the USCS/[redacted] contact disclosed the existence of a possible witness, [redacted] (W/M; dob [redacted] in Lebanon; naturalized U.S. citizen), and provided a copy of a "Memorandum of Interview," dated 4/14/89, done following their interview of him. b6 b7C b7E

On 6/3/91, after several attempts, the FBI was able to contact [redacted]. After adopting the contents of the USCS/[redacted] memorandum, he provided some additional information (see FD-302). In summary, the information provided by [redacted] was: that he worked as the [redacted] at BCCI/NY from 4/86-10/86, and left when he realized BCCI was involved in laundering money; that from discussions in the office, from references by ABEDI and others to FAB, NBG and Independence Bank as "our" banks, and from observing BCCI employees being sent to First American and Independence banks as senior officers, he deemed it "general knowledge" that BCCI owned FAB, NBG and Independence Bank; that he was interviewed for his BCCI job by ABEDI and [redacted]-who later became [redacted] Independence Bank; that, in 4/86 or 5/86, he attended a 2-day conference in Miami on ways to enlarge BCCI's deposit base, chaired by [redacted] where [redacted] and b6 b7C b7E

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[redacted] were also in attendance and where the deposits BCCI was seeking were termed "black market money."

[redacted]

On 5/10/91 (see FD-302), [redacted] (W/M; dob [redacted] at Marion, Illinois; SSAN [redacted] was interviewed. [redacted] a certified public accountant, formerly was the [redacted] Board of Directors of BancOhio, prior to 4/14/82, when he officially became [redacted] FGB.

Information furnished by [redacted] during his interview included: how he was interviewed for the FGB position by CLIFFORD, [redacted] (in CLIFFORD's office); how he was not consulted on the hiring of BCCI employees for FABS subsidiaries; his recollections of attending one of BCCI's annual conferences; how his efforts to establish a strong, in-house audit staff were stymied by CLIFFORD's and [redacted] refusal to back up the auditor in disputes with subsidiary banks; how he believed BCCI had found a way--through nominees--to "park" FABS until such time as BCCI could openly own it.

CONFIDENTIAL SOURCE

Beginning on 5/10/91, a still-ongoig series of contacts was begun with a Confidential Source (CS-1) of the FBI. To date, CS-1 has provided information and a number of documents (copies provided to USAO, WDC) relating to [redacted] The information was: that [redacted]

[redacted]

On 5/29/91 and 5/31/91, [redacted] (Indian male; dob [redacted] in Simla, India; U.S. citizen) was interviewed in the office and presence of his attorney, and under the conditions set forth in an immunity agreement between [redacted] and

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the USAO, WDC. As a BCCI officer before he was transferred to FAB/NY in 7/83, as [redacted] b6
BCCI's [redacted] New York, beginning in or about b7C
1/80. In summary (see FD-302), the information [redacted] provided was: that one of his role at BCCI/NY was look at expansion possibilities for BCCI in Canada and Latin America; that [redacted] involved with the business affairs of GHAITH PHARAON, worked in but was not part of BCCI/NY; that [redacted], like [redacted], worked from BCCI's NY office, traveling frequently to Latin America;

That [redacted] first met CLIFFORD and [redacted] when they and b6
a couple other attorneys from the U.S. were meeting with ABEDI b7C
and [redacted] at a hotel in London, and the topic was legal issues involved in the FGB takeover; that [redacted] assisted, as [redacted]" in the search for office space for the new FAB/NY; that he believed the relationship between BCCI and FAB existed "at the top," i.e., between CLIFFORD, [redacted] and ABEDI, and "in the future," due to the existence of common shareholders; that he heard rumors in BCCI that the shareholders of both BCCI and FAB were nominees;

That [redacted] BCCI's behalf to purchase some b6
branches of Bankers Trust, and continued to do so on FAB/NY's b7C
behalf, while still a BCCI employee; that [redacted] offered him the position at FAB/NY, and that ABEDI, [redacted] had not ordered, nor had they encouraged him to take it; that leaving BCCI for FAB/NY was not "going out of the family";

That joint-marketing efforts between FAB/NY and BCCI were discussed at "coordinating committee" meetings; that he received certain financial benefits from BCCI during his tenure at FAB/NY, e.g., two payments of $20,000 each, and two paid trips to Pakistan for himself and his family; that ABEDI's interviews of and comments about prospective FAB/NY management employees could be construed as giving approval; that although ABEDI and [redacted] were monitoring progress at FAB/NY, [redacted] did not have the impression they were giving directions, but did have the impression CLIFFORD (e.g.) was not adverse to their suggestions; that it was rare that BCCI employees left BCCI to work for unrelated entities; that the coordinating committee, established by BCCI, had as a goal to take advantage of FAB as a resource in the U.S.; that the committee did discuss some joint-marketing efforts, but [redacted] denied going with BCCI employees on such quests.

On 8/1/91, [redacted] was again interviewed (see FD-302), b6
based on new background information relating to what he had said b7C
during the earlier sessions. On this occasion, he said: that he had attended a late-1985 meeting in Miami, Florida, where ABEDI, [redacted], CLIFFORD and [redacted] were present, but denied any recollection of ABEDI ordering the purchase of NBG by FABS, and that [redacted] was to go to NBG; that he was told in London in 1985

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by ABEDI and [redacted] that he was to go to NBG to replace [redacted] who was returning to BCCI;

That after becoming an FAB/NY employee in 1983, he made 4 or 5 trips to BCCI/London during a six-month period, when [redacted] would call him to a meeting; that he went on these trips because he thought it was both all right and required; that about 40% of his trips to BCCI while employed by FAB/NY were paid for by BCCI; that his transfer to FAB/NY had been announced to him by [redacted] in a "1-minute conversation," in which [redacted] told him, "It has been decided you are going to (FAB/NY); [redacted] will be calling you"; that he was not given a choice in whether to go to FAB/NY or, later, to NBG;

That during the previous interview, his lack of recollection about the foregoing was due to "mental blocks";

That [redacted] were getting financial reports (not from [redacted] on FAB/NY's performance, and were monitoring such things as how the acquisition of the Bankers Trust branches was going and who was going to be included in the management teams; that, regarding the payments and other benefits he received from BCCI after going to FAB/NY, [redacted] said "They (BCCI) wanted me to be comfortable with their involvement."

[redacted]

On 5/29/91, [redacted] (W/M; dob [redacted] in Germany; naturalized U.S. citizen), formerly [redacted] FAB/NY, was interviewed in New York. In summary, he said: that before joining BCCI in 1983, he was aware of a "general consensus" among many bankers that BCCI was growing "too fast," signaling a "lack of controllability"; that he was recruited by [redacted]; that in 4/83 or 5/83, he was among 6 or 8 people who met with ABEDI in New York to exchange ideas about banking in America, and was invited by ABEDI to "stop in" to see him in London; that in 6/83, he met with ABEDI, [redacted] and 4 or 5 others at BCCI/London, and was told, "We want you to join us," i.e., be a BCCI employee; that on a subsequent visit, [redacted] was told his job would be [redacted] FAB/NY;

That at FAB/NY, according to what ABEDI told him, [redacted] mandate was "to build us a big bank," and that capital was "no object"; that the possibility of BCCI control over FAB/NY "never entered (his) mind," but when he later told an associate of his intent to go to FAB/NY, the associate said, "Oh, so you're joining Mr. ABEDI"; that when he agreed to join FAB/NY, ABEDI sent him to CLIFFORD and [redacted]; that his impression was that CLIFFORD and [redacted] for the holding company of which [redacted]--had been "briefed" in London about his prospective employment;

That the lease for FAB/NY was negotiated by [redacted] and [redacted] that directions regarding operations of FAB/NY came mostly through [redacted] that he viewed [redacted] as incompetent,

1325015-000-7176

but when he complained about that, CLIFFORD said, "We have the utmost confidence in them"; that [redacted] seemed to be [redacted], and the opinions they expressed to [redacted] seemed to be those of superiors, not subordinates; that [redacted] viewed the relationship of BCCI to FAB as "family". b6 b7C

[redacted] b6 b7C

On 6/18/91, the FBI was notified by the USAO, WDC, of the existence of a possible witness, [redacted] (dob [redacted] U.K. citizen), one of the [redacted] of BCCI and, until mid-1990, its [redacted] The initial contact with [redacted] was by telephone on 6/19/91, at which time he told the FBI: that he had been deposed by the BGFRS (resulting in a 250-page deposition), had testified in the New York grand jury, and had been interviewed by the Bank of England (BOE) and Time magazine; that "BCCI" had successfully sought a "high court" injunction against him, effectively constraining him from talking to anyone other than the foregoing, and threatening him with a "massive" claim for damages.

On 7/12/91, after coordination between the USAO, WDC and [redacted] U.K. counsel, the FBI interviewed [redacted] (see FD-302) in London in conjunction with representatives of the U.K.'s [redacted] which was interviewing [redacted] as part of its own BCCI investigation. The interview was tape recorded by the [redacted] as is the [redacted] normal practice, and the FBI was given copies of the resultant cassettes (an official transcription from the [redacted] is forthcoming). b6 b7C b7D

In summary, [redacted] said: that he is licensed both as a chartered accountant and as a cost and management accountant in the U.K.; that he first worked for ABEDI in 1966 at United Bank in Pakistan, as [redacted] that after UB was nationalized, ABEDI decided to start a new bank to be 70% capitalized by SHEIK ZAYED, and 30% by the Bank of America (BOA); that 4 BOA [redacted] BCCI; that BOA insisted on such things as procedural manuals, good senior people, a "top-name" auditor (Ernst & Winney was hired at over $4 million/year), and an internal audit staff comprised of senior people from both BOA and BCCI, who even looked at such things as the lifestyles of management employees; b6 b7C

That, prior to 1989, there were some audit reports showing fraudulent activity by some managers, e.g., conducting foreign exchange transactions "off the books," and showing concentration of risk and loan balances that were too high with regard to commercial loans to shareholders;

That, in 11/89, the audit report from BCCI (Overseas), Grand Cayman, showed (a) $850 million in loans to CCAH

shareholders, who also were BCCI shareholders, and whose collateral (the CCAH shares) was deemed unlikely to cover the loss if the loans were defaulted, (b) that International Credit and Investment Company (ICIC), which had been formed as a holding company for the founders' shares of BCCI, had "started its own, little bank," designated ICIC (Overseas), supposedly catering to the need for "total secrecy" of investors and investment advice, but which (e.g.) was buying $300 million worth of shares of BCCI through nominees, had $100 million in loans outstanding to BCCI shareholders, and had hundreds of millions of dollars "loaned" in varying amounts to a large number of shell companies associated with the GOKAL Brothers shipping concerns;

That on 3/9/90, at the request of external auditor, Price Waterhouse (PW), a BCCI "investigatory committee" was set up to examine the problems the audit had disclosed; the committee, [redacted] was [redacted] that [redacted] whom [redacted] assigned to examine the CCAH problem, wrote a "mild" report and then vanished, while [redacted] returned to Abu Dhabi, [redacted] resigned, and [redacted] BCCI's [redacted] for Europe. b6 b7C

[redacted] provided a copy of the second affidavit he filed in his defense against the suit brought against him by BCCI, and copies of his own memoranda. b6 b7C

[redacted]

On 8/1/91, [redacted] (Pakistani male; dob [redacted] in Lahore, Pakistan; naturalized U.S. citizen) was interviewed in New York, NY (see FD-302), under the terms of a letter of immunity to him from the USAO, WDC. b6 b7C

In summary, [redacted] said: that he holds a [redacted], and an [redacted] WDC; that in or about 1979, while employed handling Eurodollar transactions for the law firm of White & Case, [redacted] first dealt with BCCI on a $3 million-to-$4 million loan to [redacted] to buy a second hand airplane; b6 b7C

That in the fall, 1982, after being recruited and hired by BCCI, [redacted] was sent by [redacted] to the BCCI/NY representative office, along with [redacted], to work on acquisitions of banks in Central and South America; that he met [redacted] within a week of coming to NY; that [redacted] was a frequent visitor to [redacted], who ran the office; that [redacted] primarily would discuss the takeover of Financial General Bankshares (FGB) and expansion, thereafter, into NY; b6 b7C

That for the first couple of years, [redacted] did not think b6 b7C

1325015-000-7178

BCCI owned FABS, but when even BCCI's drivers began talking about FABS as "our bank," he changed his mind; that [redacted] saw as indicators of ownership and control of BCCI over FABS: ABEDI's references in conferences to FABS and NBG as part of BCCI's "family group,"-[redacted] understood the word "family" to be used in the Eastern sense of "people in or under my hand"; [redacted] and [redacted] of BCCI finding and arranging the lease for th- space FAB/NY subsequently occupied, after ABEDI approved of it during a tour which included CLIFFORD and [redacted] seeing it for the first time; BCCI employees [redacted] being "sent" to FAB/NY, while [redacted] who had been on BCCI's board in Abu Dhabi, was sent to NBG; [redacted] and [redacted] being hired for their positions only after meeting with [redacted] and ABEDI, because it was BCCI that was approving their employment--"This BCCI womb is where the power is," [redacted] said; the existence of a "First American monitoring unit" in BCCI/London, comprised of ABEDI's and [redacted] whom [redacted] observed almost constantly conferring on communications and financial information regarding FABS, and frequently meeting with [redacted] considered to be [redacted] and friend; often seeing then-FAB/NY employees [redacted] and occasionally, [redacted] in BCCI/London deferentially conferring with SHOAIB; observing [redacted] while in NY, spending part of his days at BCCI/NY and part at FAB/NY, and constantly receiving calls from the other office; the inclusion of [redacted] names in a BCCI directory among those of the top 20 or 30 BCCI officers, even though they were employed by FAB/NY; and seeing [redacted] trips to BCCI/London become more frequent after the "Tampa problem" (the money laundering allegations) arose;

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b7C

That [redacted] both told [redacted] that BCCI always wanted control in any situation where it owned all or part of an entity; that [redacted] sent [redacted] a set of model documents to be used in nominee transactions;

b6
b7C

That in nominee situations, BCCI always sought out someone of the stature of a CLARK CLIFFORD to act as a shareholder, and paid a consulting fee to that person; that from observations of and discussions with [redacted] in BCCI/Miami, [redacted] knew it was [redacted] who [redacted] on direction from ABEDI;

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b7C

That beginning in or about 1984, [redacted] was directed by ABEDI to [redacted] GHAITH PHARAON's "global debts," which amounted to about $340 million; that his observations of the way PHARAON acted indifferently toward his supposed assets NBG, Independence Bank and CenTrust S&L, [redacted] believed PHARAON didn't really own them--a belief which was later corroborated by documents showing that the money for the purchases of those entities came from BCCI and that the stock PHARAON supposedly owned in them was pledged to BCCI; that PHARAON's attorney,

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b7C

1325015-000-7179

[redacted] claimed to have helped BCCI get the law in Georgia changed to allow foreign ownership of a Georgia bank; that BCCI's [redacted] that PHARAON's only explanation for wanting to buy Independence Bank in the midst of his financial problems was that ABEDI probably was "on to another winner like NBG," for which PHARAON claimed to be receiving offers of "two-times book"; that [redacted] warned both PHARAON and [redacted] of the likelihood of the "Tampa problem" leading to a full investigation of BCCI, which would "taint" both of them; that [redacted]--when [redacted] told PHARAON that [redacted] was a "bloody liar" in telling PHARAON there would be no investigation of BCCI--claimed to have called friends [redacted] and others, who told him there would be no investigation of BCCI. b6 b7C b6 b7C

[redacted]

On 7/31/91, under the terms of a letter of immunity to him from the USAO, WDC, [redacted] (Indian/male; dob [redacted] Canadian citizen; U.S. resident alien [redacted] SSAN [redacted] was interviewed in New York. b6 b7C

In summary, [redacted] said: that he holds an [redacted] and had taken 2 years of [redacted] training in the U.K.; b6 b7C

That he joined BCCI in 1976, which he equated with joining a "family"; that [redacted] known as Bureau de Change--a foreign currency exchange; that in 1979, he was sent to be the [redacted] BCCI representative office in Canada; that BCCI/Canada, supposedly a 50-50 partnership between BCCI and the GOKAL brothers--whom he never met--was licensed in Canada as a "100% subsidiary" of BCCI; b6 b7C

That he was assigned to head BCCI/Caribbean in Miami in 1982; that he was concerned with potential problems he saw in BCCI/Latin America's solicitation and acceptance of deposits from people and entities about whom they knew nothing;

That in early-1984, ABEDI asked [redacted] to contact and meet with U.S. Senator PAULA HAWKINS about her comments to Pakistan's President ZIA about a Pakistani bank in the Cayman Islands involved in money laundering; that the meeting with Sen. HAWKINS, in her office, was attended by 12-15 other people, including representatives of the DEA, State Department, DOJ and the senator's office; that [redacted] pledged BCCI's cooperation in rooting out whomever among BCCI's 11,000 employees was involved in money laundering; that Sen. HAWKINS and the others assured [redacted] that BCCI was not a target and that what they had said to President ZIA would not be given to the media;

That [redacted] knowledge of the takeover of FGB by BCCI was the same as everyone else's--everyone knew BCCI was buying FGB; b6 b7C

1325015-000-7180

CLARK MCADAMS CLIFFORD

That in or about 11/85, BCCI decided to buy a bank in Miami and, thereby, declare Florida to be its home state; that at about the same time, however, due to a change in accounting procedures, BCCI "discovered" a $365 million loss in its treasury, which made its balance sheet look bad and would preclude its acceptance by the BGFRS or FDIC; that in early-1986, [redacted] and others attended more than 3 meetings in Miami where the use of a nominee to purchase either Eagle Bank (EB) or Miami National Bank (MNB) was discussed; that [redacted] later overheard [redacted] side of a telephone call from [redacted] in which [redacted] was told [redacted] in the EB or MNB purchase would either be [redacted] that [redacted] recalled exchanging and discussing with [redacted] a file--which came to one or the other of them from [redacted]--on PHARAON's nominee purchase of Independence Bank, to be used as a model in the anticipated Miami acquisition; b6 b7C

That, on the topic of indications that BCCI owned and controlled FABS, [redacted] recalled the push to assist FABS in marketing and being told by the late AKHTAR ANIS, "We want to get business for (FAB) because, after all, they are our bank, too"; that even ABEDI and [redacted] made similar statements on "dozens" of occasions; that in a meeting at Vizcaya in Miami in 1984, where ABEDI, [redacted] were present, [redacted] complained that BCCI/Miami was neglecting marketing for FABs, to which [redacted] countered that FABs were "a bunch of nincompoops; they can't handle what we send them now"; that [redacted] attended a 1985 meeting in WDC, with [redacted] and [redacted] in which the discussion was about how BCCI and FABs could do business together, e.g., BCCI initiating mortgages in Florida and selling them to FABs, in return for FABs' international business referrals; that [redacted] accompanied FAB employee [redacted] to the Embassy of Brazil to jointly market BCCI and FABs as a "banking network"; b6 b7C

That CLARK CLIFFORD and [redacted] were appointed to their posts at FABS without having met the shareholders; b6 b7C

That [redacted] FABS [redacted] NBG was made by ABEDI, who announced it in a meeting in a glass-enclosed conference room in BCCI/Miami, in early-11/1985, attended by CLIFFORD, [redacted], and observed by [redacted] and others; that immediately after the session, CLIFFORD and [redacted] departed, but [redacted] met with [redacted] and the others to tell them about his decision on the time and price for the purchase NBG, and that he wanted [redacted] to go to NGB; that [redacted] protested the proposed move, saying he was happy in NY, and would just be returning to FAB anyway; that in a later conversation, [redacted] complained to [redacted] about being "pushed to buy a lemon; a can of worms" in NBG; that BCCI employee [redacted] was sent to NBG, only to return to BCCI in 1987; b6 b7C

That, during the time in 1988 when BCCI was trying to decide whether to openly go into California, [redacted] and b6 b7C

1325015-000-7181

CLARK MCADAMS CLIFFORD

[redacted] met with [redacted] in WDC, and [redacted], who had been in BCCI/Hong Kong for a long period of time, asked if he could say hello to CLIFFORD, whom he said he hadn't seen since the FGB takeover; that, on seeing [redacted] CLIFFORD said, [redacted] it's good to have you back. Now, we can start telling lies again"; b6 b7C

That, with regard to evidence that [redacted] made decisions for FABS, [redacted] knew [redacted] for FAB/NY; that at one point, [redacted] was kidding [redacted] saying, "If you can't make (FAB/NY) profitable with $80 million in capital, give it to me and I'll do it," to which [redacted] replied, "Well, thanks to [redacted] I have to pay $10 million a year rent"; b6 b7C

That, at BCCI/London, there were two empty desks in the second-floor executive area, jokingly understood--by [redacted] and [redacted] (who coined the phrase "Rent-a-Face" or [redacted] to apply to the well-known personages ABEDI recruited as nominees)--to be saved for CLIFFORD and [redacted] that, with regard to the U.S. Congress' attempts to subpoena [redacted] was told by [redacted] that [redacted] told him [redacted] said [redacted] should not come to the U.S. until the subpoena was quashed; that after the "Tampa problem" arose, [redacted] advised [redacted] to "get rid of the case before the regulators really look at BCCI and find we have no internal control system." b6 b7C

1325015-000-7182

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 8/7/91

TO : DIRECTOR, FBI
Attn: CID, WCCS, FIFU

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5 NVMRA)

SUBJECT : CLARK MCADAMS CLIFFORD, aka;
Et al;
FIF; FAG
(OO: WMFO)

Re WF fax to FBIHQ, 8/7/91.

Enclosed are five copies of an LHM, dated 8/7/91, concerning the captioned matter.

Investigation continuing.

3-FBIHQ (Enc. 5)
1-WMFO

JNR:jnr
(4)

main
29B-WF-171994--185

Searched
Serialized 5u
Indexed
Filed 5u

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-7183

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 04-11-2018 BY [redacted]

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/READ/MRI 1177/221
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DE RUCNFB #0065 2220318

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FM DIRECTOR FBI

TO FBI DALLAS/IMMEDIATE/

FBI NEW ORLEANS/IMMEDIATE/

FBI SAN FRANCISCO/IMMEDIATE/

FBI SAN ANTONIO/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //0624//

PASS: SSA [redacted] DALLAS; SSA [redacted] NEW ORLEANS; SSA [redacted] SAN ANTONIO; SSA [redacted] SAN FRANCISCO.

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SUBJECT: CLARK MCADAMS CLIFFORD, ET AL; FIF: FAG; OO: WMFO.

REBUTELCALLS TO DALLAS, SAN ANTONIO, SAN FRANCISCO, AND WMFO ON 8/8/91; BUTELCALL TO NEW ORLEANS 8/9/91; AND DIRECTOR TELETYPE TO ALL FBI FIELD OFFICES DATED 7/26/91.

29B-WF-171994 -186

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 10 1991
FBI - WASH. METRO FIELD OFFICE

ON 2/7/91, WMFO INITIATED A FINANCIAL INSTITUTION FRAUD (FIF) INVESTIGATION BASED ON A CRIMINAL REFERRAL FROM THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (BGFRS) ALLEGING THAT FALSE AND FRAUDULENT STATEMENTS HAD BEEN MADE CONCERNING THE BANK OF CREDIT AND COMMERCE INTERNATIONAL'S (BCCI) OWNERSHIP AND CONTROL OF CREDIT AND COMMERCE AMERICAN HOLDINGS (CCAH), THE PARENT-HOLDING COMPANY OF FIRST AMERICAN BANK SHARES (FABS) WHICH OWNS FIRST AMERICAN BANK, WASHINGTON, D.C.

ON 5/21/91, WMFO RECEIVED THREE ADDITIONAL CRIMINAL REFERRALS FROM THE BGFRS CONCERNING BCCI'S USE OF A NOMINEE IN THE PURCHASE OF TWO BANKS IN GEORGIA AND CALIFORNIA IN 1978 AND 1986 (THE NATIONAL BANK OF GEORGIA, NOW THE FIRST AMERICAN BANK OF GEORGIA, ATLANTA, GEORGIA, AND THE INDEPENDENCE BANK, ENCINO, CALIFORNIA), AND THAT FALSE STATEMENTS WERE MADE TO THE BGFRS CONCERNING THE OWNERSHIP AND CONTROL OF THESE TWO BANKS.

THE BCCI MATTER IS A TRANSACTIONS INTENSIVE CASE. WMFO ALREADY HAS OBTAINED OVER 60,000 DOCUMENTS RELATING TO THE TRANSFER OF MONEY BOTH WITHIN THE UNITED STATES AND OFFSHORE, BETWEEN BCCI AND CCAH, AND OTHER ENTITIES. WMFO ANTICIPATES OBTAINING ADDITIONAL DOCUMENTS THAT WILL BE REVIEWED AND ANALYZED IN THIS INVESTIGATION. FOUR SPECIAL AGENTS (SAS) ARE

PRESENTLY WORKING THIS INVESTIGATION IN CONJUNCTION WITH THE DEPARTMENT OF JUSTICE (DOJ) FRAUD SECTION AND THE U.S. ATTORNEY'S OFFICE (USAO), WASHINGTON, D.C. FOUR ADDITIONAL AGENTS ARE PRESENTLY NEEDED TO INVESTIGATE THIS MATTER. THE BCCI MATTER HAS RECENTLY RECEIVED EXTENSIVE MEDIA COVERAGE ALLEGING BCCI'S CONNECTION WITH TERRORISTS, MONEY-LAUNDERING, POLITICAL CORRUPTION, AND VARIOUS OTHER INTERNATIONAL ILLEGAL ACTIVITIES. THE BCCI IS PRESENTLY THE SUBJECT OF HEARINGS BY VARIOUS CONGRESSIONAL COMMITTEES.

WMFO IS ESTABLISHING A SPECIAL SQUAD TO CONDUCT THE INVESTIGATION OF THE BCCI MATTER. DUE TO THE MAGNITUDE OF THIS INVESTIGATION, FOUR SAS WILL BE ASSIGNED TO ASSIST WMFO ON A TEMPORARY DUTY (TDY) BASIS FOR A PERIOD OF 90 DAYS, SUBJECT AT THAT TIME TO REEVALUATION AND EXTENSION FOR AN ADDITIONAL 90 DAYS. THESE AGENTS SHOULD HAVE EITHER A FRAUD, PUBLIC CORRUPTION, OR ACCOUNTING BACKGROUND AND SHOULD BE AVAILABLE FOR IMMEDIATE ASSIGNMENT.

FBI DALLAS, NEW ORLEANS, SAN FRANCISCO, AND SAN ANTONIO WILL EACH PROVIDE ONE SA FOR THIS TDY ASSIGNMENT.

ON 8/5/91, [redacted] OF THE CRIMINAL DIVISION, b6 b7C

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PAGE FOUR DE RUCNFB 0065 UNCLAS

USAO, DISTRICT OF COLUMBIA, WASHINGTON, D.C., EXTENDED AN INVITATION TO THE FBI AND THE DOJ TO HAVE AGENTS AND ATTORNEYS WORKING THE BCCI MATTER ATTEND A MEETING AT THE USAO. 30TH [redacted] AND SAC, WMFO HAVE SPECIFICALLY REQUESTED THAT THE FOUR AGENTS CHOSEN FOR THE TDY ASSIGNMENT ATTEND THIS BRIEFING. b6 b7C

ATTORNEYS FROM THE USAO, DISTRICT OF COLUMBIA, WASHINGTON, D.C., WILL PRESENT A BRIEFING ON CAPTIONED MATTER FOR AGENTS AND ATTORNEYS ON 8/12/91, AT 10:00 A.M. AT THE USAO, 555 4TH STREET, N.W., WASHINGTON, D.C., TELEPHONE NUMBER (202) 514-6531.

THOSE AGENTS SELECTED FOR THIS TDY ASSIGNMENT WILL ATTEND THE BRIEFING ON 8/12/91, AT THE USAO AND SUBSEQUENTLY, WILL ATTEND A MEETING WITH THE WHITE-COLLAR CRIMES SECTION, CRIMINAL INVESTIGATIVE DIVISION, TO BE HELD IN FBIHQ CONFERENCE ROOM 5641 ON 8/13/91, FROM 9:00 A.M. THROUGH 12:00 NOON. LODGING AND TRANSPORTATION REQUIREMENTS SHOULD BE HANDLED THROUGH WMFO RELIEF SUPERVISOR [redacted] SQUAD C-5. b6 b7C

BT

#0065

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C-5

/READ 125/221
0000 MRI 00125

RR RUCNFB FBIMM FBIWMFO

DE FBIDL #0003 2211303

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R 090155Z AUG 91

FM FBI DALLAS (29D-7417 SUB F63L) (P)

TO DIRECTOR FBI/ROUTINE/

FBI MIAMI/ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

BT

UNCLAS

SECTION ONE OF TWO SECTIONS

CITE: //3190:SQUAD 9 //

PASS: FBIHQ: SSA [redacted] FINANCIAL INSTITUTION FRAUD UNIT, RM 3841.

1-6

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SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; FIF; FAG; OO: WMFO; THRIFTCON; MAJOR CASE 98; FIF(D); OO: DALLAS.

IN CONNECTION WITH THE INVESTIGATION OF CAPROCK SAVINGS AND LOAN ASSOCIATION (CAPROCK), LUBBOCK, TEXAS WITH OFFICES IN DALLAS, THE NAME OF BANK OF CREDIT AND COMMERCE INTERNATIONAL

29BW171994 - 187

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 09 1991
FBI WMFO METRO FIELD OFFICE

[redacted]

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1325015-000-7188

(BCCI) SURFACED. THE INVESTIGATION OF INSIDER ABUSE AT CAPROCK, IS BEING HANDLED UNDER THRIFTCON, MAJOR CASE 98. AN INVESTIGATION OF WIDESPREAD INSIDER CONSPIRATORIAL ABUSE CONTRIBUTING TO THE FAILURE OF NUMEROUS SAVINGS AND LOANS IN THE DALLAS DIVISION.

FOR BACKGROUND INFORMATION, CAPROCK, WHOSE ACCOUNTS WERE INSURED BY FSLIC, WAS CLOSED BY BANK EXAMINERS ON 8/1/89. CAPROCK WAS OWNED BY A HOLDING COMPANY KNOWN AS GREAT WEST BANC SHARES, INC. FOUR FORMER OFFICERS AT CAPROCK WERE INDICTED BY A FEDERAL GRAND JURY, NORTHERN DISTRICT OF TEXAS, ON 4/17/91 AND THREE OF THE OFFICERS AND TWO ASSOCIATES ARE SCHEDULED TO GO TO TRIAL IN USDC, DALLAS, ON 9/9/91.

CAPROCK S&L

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WERE CHARGED IN A 30 COUNT INDICTMENT WITH VIOLATIONS OF ALSO CHARGED IN TTHE INDICTMENT WERE AND WORKED FOR THE LAW FIRM OF HOOVER AND EGGLESTON, P.C., WHICH WAS THE FIRM REPRESENTING

CAPROCK. AS OF THIS DATE, [redacted] HAS PLED GUILTY TO ONE COUNT OF [redacted] AND ONE COUNT OF [redacted] OF THE CAPROCK INSIDERS, HAS PLED GUILTY TO ONE COUNT OF [redacted] THE LAUNDERING OF CAPROCK FUNDS PERTAINING TO THE APRIL 1991 INDICTMENT OF THE CAPROCK OFFICERS. ADDITIONALLY, [redacted] AT CAPROCK, HAS ALSO PLED GUILTY TO [redacted] IN CONNECTION WITH A CAPROCK LOAN THAT WAS USED TO BOOST THE CAPITAL POSITION OF CAPROCK. b6 b7C

THE INVESTIGATION SURROUNDING BCCI'S INVOLVEMENT WITH CAPROCK WAS PREDICATED UPON REVIEW OF TRANSACTIONS BETWEEN CAPROCK AND F. S. INVESTMENT COMPANY, A COMPANY BELIEVED TO BE [redacted] IR. [redacted] THE TRANSACTIONS ORIGINATED FROM AN EFFORT BY INSIDERS TO SOLVE A CAPITAL PROBLEM THAT CAPROCK WAS EXPERIENCING WITH ONE OF ITS SUBSIDIARIES, TITLE USA INSURANCE CORPORATION (TUSAIC). IN LATE 1987, STATE INSURANCE REGULATORS ADVISED THE OFFICERS AND DIRECTORS OF TUSAIC, WHICH WERE LARGELY THE SAME OFFICERS/DIRECTORS AT CAPROCK, THAT TUSAIC WAS SEVERAL MILLION DOLLARS SHORT OF THE b6 b7C

STATUTORY CLAIMS RESERVE, AND THUS BADLY NEEDED A CAPITAL INFUSION TO REMEDY THE DEFICIENCY. BY MID-1988, THE CAPROCK OFFICERS/DIRECTORS WERE ADVISED BY FEDERAL HOME LOAN BANK BOARD EXAMINERS THAT THE TUSAIC RESERVE SHORTFALL AND OVERALL CAPITAL STATUS OF BOTH ENTITIES HAD PLACED THE FUTURE OF CAPROCK IN JEOPARDY.

AS A RESULT, IN JUNE 1988 A MECHANISM WAS DEVISED UTILIZING THE SWAP OF STOCK BETWEEN GREAT WEST BANC SHARES, INC. AND TWO OTHER COMPANIES [redacted] DR. [redacted] THE NET RESULT WAS A SOLUTION TO THE CAPITAL SHORTFALL PROBLEMS AT CAPROCK THEREBY RELIEVING REGULATORY PRESSURE, BUT ULTIMATELY COSTING THE INSTITUTION SEVERAL MILLION DOLLARS.

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THE TWO TRANSACTIONS WERE SEPARATE BUT WERE USED FOR THE SAME PURPOSE. CAPROCK HOSPITALITY, FORMERLY KNOWN AS PARIBASS COMPANY, INC., AND CAPROCK PROPERTIES CORPORATION WERE THE TWO COMPANIES WHOSE STOCKS WERE UTILIZED. THE MAIN ASSETS OF EACH OF THESE COMPANIES WERE HOWARD JOHNSON MOTELS IN RALEIGH, NORTH CAROLINA, AND DUMFHRIES, VIRGINIA. INDICATIONS ARE THAT EACH OF THE MOTELS WERE GREATLY OVERVALUED. BCCI'S INVOLVEMENT COMES IN THE FORM OF LOANS THAT WERE OUTSTANDING TO BOTH CAPROCK HOSPITALITY AND CAPROCK PROPERTIES. IN ONE

INSTANCE, CAPROCK ISSUED A $3.5 MILLION IRREVOCABLE LETTER OF CREDIT TO BCCI IN ORDER TO REMOVE BCCI AS THE FIRST LIENHOLDER ON THE MOTEL PROPERTY IN RALEIGH, NORTH CAROLINA. OTHER ACTIVITIES UTILIZING CAPROCK FUNDS TO SATISFY BCCI INSTRUMENTS OCCURRED; HOWEVER, THE FULL EXTENT OF ANY CAPROCK-BCCI CONNECTION IS NOT FULLY UNDERSTOOD AT THIS TIME.

IT SHOULD BE NOTED THAT NUMEROUS OTHER COMPANIES AND INDIVIDUALS ARE INVOLVED IN THE CAPROCK INVESTIGATION WHICH MAY TIE IN WITH SEPARATE INVESTIGATIONS ONGOING IN WMFO AND OTHER FIELD OFFICES. SOME OF THESE INCLUDE:

1. MCDOWELL ENTERPRISES, INC. - A COMPANY WHOSE [redacted] DR. [redacted]

2. DR. [redacted] CAPROCK PROPERTIES;

3. BANK OF BARODA - AN INDIAN BANK WITH TIES TO [redacted] P.S. INVESTMENT COMPANY; AND

4. [redacted] - EVENTUAL [redacted] CAPROCK HOSPITALITY FROM THE TUSAIC PARENT, TITLE USA CORPORATION.

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ANOTHER ITEM OF INTEREST CONCERNS THE PAYMENT OF FUNDS TO CAPROCK [redacted] DRAWN ON THE ACCOUNT OF BANK OF

CREDIT AND COMMERCE INTERNATIONAL, S.A., A NEW YORK AGENCY, 320 PARK AVENUE, NEW YORK, NEW YORK, 10022. THE PAYMENTS ARE IN THE FORM OF THREE CONSECUTIVELY NUMBERED BCCI CHECKS TOTALING $95,500 AND ARE ALL DATED 11/16/88. THESE CHECKS, IN THE AMOUNTS OF $25,000, $32,500, AND $38,000, ARE MADE PAYABLE TO DILLMAN ASSOCIATES AND [redacted] THE DALLAS DIVISION IS UNCERTAIN AS TO THE PURPOSE OF THESE CHECKS; HOWEVER, THEY ARE HIGHLY SUSPECT. b6 b7C

IN A TELCALL BETWEEN DALLAS SA [redacted] AND WMFO SA [redacted], SA [redacted] INDICATED THAT FROM REVIEW OF BCCI RECORDS IN NEW YORK AND CONTACT WITH FORMER BCCI EMPLOYEES, IT WAS DETERMINED THAT [redacted] AN INDIVIDUAL PREVIOUSLY UNKNOWN TO THE DALLAS DIVISION, WAS A CLOSE ASSOCIATE OF CAPROCK [redacted] IS BELIEVED TO BE AFFILIATED WITH BCCI AND IS WELL KNOWN TO WMFO AND THE MIAMI DIVISION. SA [redacted] ALSO RECALLED HEARING ABOUT THE TWO HOWARD JOHNSON MOTELS IN VIRGINIA AND NORTH CAROLINA AS WELL AS THE CAPROCK HOSPITALITY AND CAPROCK PROPERTIES COMPANIES. [redacted] IS b3 b6 b7C

BT

#0003

NNNN

/READ 130/221
0000 MRI 00130

RR RUCNFB FBIMM FBIWMFO

DE FBIDL #0004 2211310

ZNR UUUUU

R 090157Z AUG 91

FM FBI DALLAS (29D-7417 SUB F63L) (P)

TO DIRECTOR FBI/ROUTINE/

FBI MIAMI/ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

BT

UNCLAS

SECTION TWO OF TWO SECTIONS

CITE: //3190:SQUAD 9 //

PASS: FBIHQ: SSA [redacted] FINANCIAL INSTITUTION FRAUD b6 b7C

UNIT, RM 3841.

SUBJECT: CLARK MCADAMS CLIFFORD; ET AL; FIF; FAG; OO: WMFO;

THRIFTCON; MAJOR CASE 98; FIF(D): OO: DALLAS.

TEXT CONTINUES:

SCHEDULED TO TESTIFY AT A FEDERAL GRAND JURY IN [redacted] IN

THE NEAR FUTURE. IF [redacted] COOPERATES, DALLAS WOULD DESIRE AN b3 b6 b7C

SEARCHED _____ INDEXED _____
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AUG 0 9 1991
FBI - WASH. METRO FIELD OFFICE

INTERVIEW OF [redacted] COUPLED WITH A GRAND JURY APPEARANCE. b3 b6 b7C

THE DALLAS DIVISION IS UNAWARE OF ANY OTHER BCCI FUNDS COMING TO [redacted] OR ANY OTHER CAPROCK OFFICERS. THE QUESTION OF ANY POTENTIAL BCCI OWNERSHIP OF CAPROCK IS UNRESOLVED AT THIS TIME; HOWEVER, CERTAIN LEGAL ISSUES CONCERNING THE TIMING AND VALUE OF THE CAPROCK HOSPITALITY AND CAPROCK PROPERTIES TRANSACTIONS MAY ADDRESS THESE OWNERSHIP QUESTIONS. b6 b7C

INVESTIGATION IS CONTINUING IN DALLAS AND THIS INFORMATION IS PROVIDED FOR WHATEVER ACTION DEEMED APPROPRIATE.

BT

#0004

NNNN

WMFO FAX TN# 202-324-6426 Recd 8/12/91 KLH 2:30

TRANSMIT ATTACHED BY FACSIMILE - UNCLASSIFIED

WHITE-COLLAR CRIMES SECTION
CRIMINAL INVESTIGATIVE DIVISION
FEDERAL BUREAU OF INVESTIGATION

Date: 8/12/91 Precedence: Routine

To: SAC, WMFO Time Transmitted:

Attn: [redacted] (Squad C-5) b6 b7C

Fm: Director, FBI

Subject: CLARK MCADAMS CLIFFORD; ET AL; FIF; FAG; OO: WMFO

Special handling instructions: Please hand carry to SSA [redacted] b6 b7C

Squad C-5

Approved: WMB/ar

29B-WF-171994 - 188

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AUG 12 1991

FBI - WASH. FIELD OFFICE

ORIGINAL

1325015-000-7196

RECEIVED
TELETYPE
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FEDERAL BUREAU
OF INVESTIGATION

0048 MRI 01619

OO P12 FBIHQ FBISA

DE MEX #0003 2192006

ZNR UUUUU

O 0720052 AUG 91

FM LEGAT MEXICO CITY [redacted] b3 b7E

TO DIRECTOR FBI/IMMEDIATE/

FBI HOUSTON/IMMEDIATE/

FBI SAN ANTONIO (INFO)/IMMEDIATE/ b3 b6 b7C b7E

BT

UNCLAS

CITE: //5450//

PASS: ATTN: FBIHQ/OLIA.

6 BCCI connection

SUBJECT: [redacted] -MEXICO BANK FRAUD; OO: b6 b7C
MEXICO.

ON 8/9/91, THE OFFICE OF THE ATTORNEY GENERAL (PGR) REPUBLIC OF MEXICO REQUESTED FBI ASSISTANCE IN CONJUNCTION WITH FRAUD ACTIVITIES BY CAPTIONED SUBJECT AND THE BCCI BANK IN MEXICO. AS RELATED BY SPECIAL PROSECUTOR AND INTERPOL [redacted] b6 b7C

[redacted] IS A MEXICAN BUSINESSMAN WHO WAS

ICC-OLA

NOTE BCCI connection

PAGE TWO DE MEX 0003 UNCLAS

BCCI'S [redacted] MEXICO. [redacted] IS CURRENTLY UNDER b6 b7C
INVESTIGATION FOR A 30 MILLION DOLLAR FRAUD ALONG WITH GAITH
PHARAON, A SAUDI BUSINESSMAN. [redacted] IS CURRENTLY BELIEVED TO BE
IN HOUSTON, TEXAS AND MEXICO WILL ATTEMPT TO EXTRADITE [redacted] IN
THE NEXT 60 DAYS UPON COMPLETION OF THEIR INVESTIGATION.
SPOKESPERSONS FOR THE PGR ARE DENYING THIS TO THE MEXICAN PRESS
BECAUSE THE PGR BELIEVES [redacted] WILL FLEE THE UNITED STATES.

THE PGR LEARNED ON 8/8/91, THAT A HOUSTON PRIVATE DETECTIVE
[redacted] STREET, HOUSTON, TEXAS, b6 b7C
TELEPHONE NUMBER [redacted] FAX [redacted] HAS RECENTLY IN MEXICO
CONTACTING GOVERNMENT OFFICIALS OFFERING INFORMATION ABOUT [redacted]
IT IS POSSIBLE THAT [redacted] WILL MEET WITH PERSONS ON 8/10/91
KNOWLEDGABLE ABOUT [redacted] ACTIVITIES. THE PGR HAS REQUESTED
THAT THE FBI CONTACT [redacted] WHO WILL BE COOPERATIVE, TO
DETERMINE HIS INTEREST IN THE [redacted] BCCI MATTER. THE PGR IS
ALSO INTERESTED IN LOCATING [redacted] AND MAINTAINING SOME PERIODIC
SPOT CHECKS OF [redacted] IN ANTICIPATION OF A FORMAL EXTRADITION
REQUEST BEING MADE BY MEXICO.

HOUSTON AT HOUSTON, TEXAS. CONTACT [redacted] b6 b7C
[redacted] STREET, TELEPHONE NUMBER [redacted],
REGARDING [redacted] KNOWLEDGE OF THE [redacted] AFFAIR.

PAGE THREE DE MEX 0003 UNCLAS

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#0003

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1325015-000-7199

rec'd 8/12/91 KLH 2:30

WMFO FAX TO # 329-6426

TRANSMIT ATTACHED BY FACSIMILE - UNCLASSIFIED

WHITE-COLLAR CRIMES SECTION
CRIMINAL INVESTIGATIVE DIVISION
FEDERAL BUREAU OF INVESTIGATION

Date: 8/12/91 Precedence: Routine

Time Transmitted:

To: SAC, WMFO b6 b7C
Attn: [redacted] (Squad C-5)

Fm: Director, FBI

Subject: CLARK MCADAMS CLIFFORD; ET AL; FIF; FAG; OO: WMFO

Special handling instructions: Please hand carry to SSA [redacted] b6 b7C
Squad C-5

Approved: WMB/ar

29B-WF-171994-188

SEARCHED SERIALIZED INDEXED FILED
AUG 12 1991
FBI - WASH. D.C.

[redacted] b6 b7C

1325015-000-7200

C-5

/READ 1434/225
0000 MRI 01434

OO P12 FBIWMFO

DE FBIMO #0003 2261259

ZNR UUUUU

O 122012Z AUG 91

FM FBI MOBILE (29B-WF-171994)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3490//

PASS: FINANCIAL INSTITUTION FRAUD UNIT. WHITE COLLAR CRIME SECTION.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO WMFO.

REBUTEL TO ALL OFFICES, JULY 26, 1991.

MOBILE DIVISION INDICES NEGATIVE REGARDING ALL COMPANIES AND INDIVIDUALS IDENTIFIED IN RETEL. NO KNOWN INVESTIGATIONS ARE IN PROGRESS WITHIN THE MOBILE DIVISION.

ADMINISTRATIVE:

29B-WF-171994-189

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
AUG 14 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-7201

PAGE TWO DE FBIMO 0003 UNCLAS

MOBILE INADVERTENTLY FAILED TO RESPOND TO RETEL BY BUDED INASMUCH AS NO RESPONSE WAS BELIEVED NECESSARY UNLESS POSITIVE RESULTS WERE OBTAINED.

BT

#0003

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C-5

** WMFO

DE RUCNFB #0172 2271241

ZNR UUUUU

P 142122Z AUG 91

FM DIRECTOR FBI

TO FBI PHILADELPHIA/PRIORITY/

FBI WMFO (293-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //0624//

PASS: SSRA [redacted] NEWTOWN SQUARE RA; SSA [redacted] C-5.

b6
b7C

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; ET AL; FIF; FAG; OO:
WMFO.

RE DIRECTOR AIRTEL TO ALL FBI FIELD OFFICES 7/26/91;
REBUTELCALLS WITH NEWTOWN SQUARE RA AND WMFO ON 8/14/91.

ON 8/13/91, DEPARTMENT OF JUSTICE (DOJ) [redacted]

b6
b7C

[redacted] FRAUD SECTION, WASHINGTON, D.C., ADVISED THAT DOJ HAD
BEEN CONTACTED ON 8/13/91 BY [redacted]
WESTCHESTER, PENNSYLVANIA, TELEPHONE NUMBER [redacted]

Main
29B-WF-171994 - 191

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 15 1991
FBI - WASH. METRO FIELD OFFICE
62

1325015-000-7205

[redacted] WAS THE [redacted] OF SPACE ENGINEERING, INC., 1800 CHESTNUT STREET, PHILADELPHIA, PENNSYLVANIA. b6 b7C

[redacted] HAD TOLD DOJ THAT HE CAN PROVIDE DOCUMENTS AND EVIDENCE THAT [redacted] A LEBANESE CITIZEN AND [redacted] SPACE ENGINEERING INC., WAS INVOLVED IN MONEY LAUNDERING THROUGH THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). DOJ [redacted] REQUESTED THAT [redacted] BE INTERVIEWED BY THE FBI TO OBTAIN DOCUMENTS AND EVIDENCE CONCERNING MONEY LAUNDERING ACTIVITIES OF BCCI. b6 b7C

PHILADELPHIA AT WESTCHESTER, PENNSYLVANIA CONTACT [redacted] WESTCHESTER, PENNSYLVANIA, TELEPHONE NUMBER [redacted] TO OBTAIN DOCUMENTS, EVIDENCE, AND DETAILS CONCERNING THE INVOLVEMENT OF [redacted] IN MONEY LAUNDERING ACTIVITIES THROUGH BCCI. SUTEL RESULTS TO WMFO (29B-WF-171994) AND TO SSA [redacted] FINANCIAL INSTITUTIONS FRAUD UNIT, WHITE-COLLAR CRIMES SECTION, FBIHQ ROOM 3839. b6 b7C

BT

#0172

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READ/ 14/228

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/READ 14/228
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RR RUCNFB FBIWMFO

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R 160014Z AUG 91

FM FBI SAN DIEGO (29B-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

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UNCLAS

CITE: //3780//

PASS: HQ FOR FIFU/WCCS.

SUBJECT: CLARK MC ADAMS CLIFFORD, AKA ET AL; FIF; OO: WMFO.

RE BUREAU TELETYPE TO ALL OFFICES, JULY 26, 1991 AND SAN DIEGO TELETYPE TO THE BUREAU, AUGUST 6, 1991.

SAN DIEGO HAS BEEN UNABLE TO LOCATE FILE SD 196-254 WHICH CONTAINS A REFERENCE TO BCCI. IT IS NOTED THAT THIS IS A DEAD FILE VOLUME AND IF LOCATED THE INFORMATION WILL BE FORWARDED TO THE BUREAU AND WMFO.

BT

#0003

29B-WF-171994 - 192

SEARCHED ___ INDEXED ___
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FBI - WASH. METRO FIELD OFFICE
162

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FD-36 (Rev. 8-29-83)

FBI

TRANSMIT VIA:
☒ Teletype
☐ Facsimile
☐ AIRTEL

PRECEDENCE:
☒ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

Date 8/16/91

FM FBI SAN ANTONIO (29B-WF-171994) (SQUAD #3) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3770//

PASS: OFFICE OF INSPECTIONS, INSPECTION DIVISION, [redacted] b6 b7C

[redacted] AND WHITE COLLAR CRIME SECTION, CRIMINAL INVESTIGATIVE DIVISION, FROM CHIEF WILLIAM J. ESPOSITO.

SUBJECT: BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).

RE TELETYPE FROM FBIHQ TO ALL FIELD OFFICES DATED AUGUST 15, 1991.

GENERAL INDICES, FOIMS AND INTELLIGENCE AND INFORMATION SYSTEMS (IIS) WERE CHECKED ON NAMES AND COMPANIES LISTED IN ABOVE-REFERENCED TELETYPE WITH NEGATIVE RESULTS. 193

29B-WF-171994 Main

SEARCHED ____ INDEXED ____
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AUG 16 1991
FBI WASH. METRO FIELD OFFICE

[redacted] b6 b7C

San Antonio
ANCHRG
(1)

Approved: [redacted] Original filename: IWC0150.228

Time Received: ____ Telprep filename: IWC0150.228

MRI/JULIAN DATE: 228 / 228 ISN: 228 004

FOX DATE & TIME OF ACCEPTANCE: 9

1325015-000-7208

^PAGE 2 SA (298-WF-171994) UNCLAS

CONTROL FILES AND SUB FILES RELATING TO BUREAU AIRTEL TO ALL SACS DATED AUGUST 28, 1987 WERE REVIEWED WITH NEGATIVE RESULTS.

SAN ANTONIO CONSIDERS THIS MATTER RUC.

BT

0000 MRI 01792

OO P12 FBIWMFO

DE FBICV #0020 2291106

ZNR UUUUU

O 162048Z AUG 91

FM FBI CLEVELAND (29B-WF-171994) (RUC) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3170//

PASS: ATTN: [redacted] OFFICE OF b6 b7C

INSPECTIONS, INSPECTION DIVISION; AND SECTION CHIEF WILLIAM J. ESPOSITO, WHITE-COLLAR CRIME SECTION, CRIMINAL INVESTIGATIVE DIVISION.

SUBJECT: BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).

REFERENCE BUREAU TELETYPE TO ALL FIELD OFFICES, DATED 8/15/91.

SEARCHES OF CLEVELAND GENERAL INDICES (MANUAL AND AUTOMATED) FOR THE NAMES OF INDIVIDUALS AND BUSINESSES LISTED

-194

29B-WF-171994 Miami

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FBI - MIAMI METRO FIELD OFFICE

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IN REFERENCED TELETYPE MET WITH NEGATIVE RESULTS.

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0-9 (Rev. 8-16-79)

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TRANSMIT VIA: AIRTEL

CLASSIFICATION: _____ **DATE:** 8/2/91

FROM: Director, FBI

TO: SAC, WMFO (29B-WF-171994) (P) (C-5)

CLARK M. CLIFFORD
ET AL;
BF&E; FAG;
CONSPIRACY
OO: WMFO

Re WMFO airtel to the Bureau, dated 5/15/91, and airtel from the Director, dated 7/9/91.

WMFO has requested Visual Investigative Analysis (VIA) assistance on this matter, however, personnel limitations have precluded the timely assignment of an analyst from the VIA staff at FBIHQ. For the information of WMFO, Ms. [redacted] currently assigned to the Computer Room at WMFO, has received VIA training and addressed WMFO VIA applications to the [redacted] investigation as well as to VIPERS case (the investigation of [redacted] prior to being named DISCOVIP).

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b7C

WMFO may wish to consider the possibility of Ms. [redacted] being assigned TDY to this VIA application. Should Ms. [redacted] be assigned the VIA application, she would have access to the CAVIA system at HQ and her work would be monitored by the VIA Unit at FBIHQ to ensure its integrity.

b6
b7C

UCSN

29B-WF-171994-195

1325015-000-7212

Memorandum

To : SAC, WMFO (29A-WF-171994) (P) Date 8/13/91

From : SA [redacted] b6 b7C

Subject: "HIDDEN INTEREST"
MAJOR CASE 38
OO:WMFO

On 8/13/91, SA [redacted] contacted [redacted], Office of the General Counsel, [redacted] The purpose of the call was to advise the [redacted] of captioned case and establish a point of contact for obtaining any pertinent information in the possession of the [redacted] as well as to inquire as to the necessity for further security clearances for investigating agents. b6 b7C b7E

[redacted] advised that he has already been contacted by DOJ in this regard and has turned over certain materials to certain DOJ representatives, namely LARRY URGENSON, [redacted] agreed that it would be most efficient to have one DOJ entity designated to receive such materials from the [redacted] SA [redacted] advised he would research the matter and recontact [redacted] in the near future. b6 b7C b7E

b6
b7C

MTU:mtu

29B-WF-171994-196

1325015-000-7213

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF;
FAG;
(OO: WMFO)

On 8/1/91, the writer was contacted by FBIHQ SSA [redacted] b6 b7C
[redacted]. SSA [redacted] advised that he was contacted by the U.S. State Department. Information was provided that [redacted] planned to travel to Pakistan in the next few days. The writer contacted logical airline contacts and determined that an individual using the name [redacted] was scheduled to leave JFK International Airport via TWA on 8/2/91 enroute to Pakistan.

On that same date, the writer placed a pretext telephone call to [redacted] at his place of employment, First American Bank/New York. [redacted] was in his office. b6 b7C

On that same date, the writer assisted AUSA [redacted] b6 b7C prepare a material witness arrest warrant for [redacted]. An interview was scheduled for later that same date. In the event [redacted] did not show up the arrest warrant would be pursued.

[redacted] was interviewed on that date. He admitted that he b3 b6 b7C planned to travel to Pakistan. [redacted] was scheduled to depart on 8/5/91 and to return to New York on 8/22/91. Following the interview, [redacted] was served with a FGJ subpoena. Said subpoena commanded that [redacted] appear before the FGJ on [redacted]

In view of the fact that [redacted] showed up for his b3 b6 b7C interview, stated that his trip to Pakistan was only for a few weeks and since he was served with a FGJ subpoena, the arrest warrant was not pursued.

29B-WF-171994 Main
Su Su - 198

1325015-000-7220

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

On 8/2/91, while in the former office of BCCI located at New York, New York, which was taken over by the New York State Banking Department, the writer had an informal discussion with [redacted] advised that he was one of fourteen former BCCI employees held over by the New York State Banking Department to wrap up BCCI matters. [redacted] has been employed by BCCI since 1986. [redacted] provided background information. He also advised that [redacted] was involved in a fraudulent transaction with a Dallas bank called Caprock. The deal involved two hotels owned by Caprock. They were a Howard Johnson's located in Dumphries, Va. and one located in North Carolina. The properties were over valuated to reflect a more liquid position on Caprock's books. [redacted] was a close friend of Caprock's President, [redacted] b6 b7C

On 8/5/91, the writer spoke with SA [redacted] Dallas Division. SA [redacted] stated that Caprock was being investigated as part of Thriftcon. SA [redacted] confirmed the real estate transactions. He was unaware of [redacted]. SA [redacted] advised that [redacted] received checks from BCCI. SA [redacted] could not explain why the checks were paid to [redacted] nor was he aware of the amounts involved. SA [redacted] stated that he would check on this matter and provide the writer with pertinent facts. b6 b7C

29B WF 171994 main
-199
Su Su Su

1325015-000-7221

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/19/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(00: WMFO)

On 7/31/91, the writer coordinated the moving of 40 boxes of records from the law firm Cleary Gottlieb to the New York State Banking Department. Both were located at 530 Fifth Ave., New York, New York. The records were from the BCCI Washington Representative Office. Since they were subpoenaed by numerous agencies, it has been mutually agreed that the New York State Banking Department would maintain control of same. It should be noted that the site where the records are being stored was the office of BCCI which was taken over by the New York State Banking Department on 7/5/91.

On the above date, AUSA [redacted] was kept apprised of the movement of the above records. The copying of same will be coordinated with SSA [redacted] NYO. b6 b7C

On 8/2/91, the aforementioned records were reviewed by AUSA [redacted] SA [redacted] the writer and NYO SA [redacted] Two boxes marked "privileged documents" were reviewed by AUSA [redacted] following discussions he had with Attorneys for the New York State Banking Department. Those documents deemed pertinent were marked for copying. b6 b7C

On the above date and on 8/5/91, SA [redacted] copied the aforesaid documents. The documents were subsequently furnished to the writer. b6 b7C

29B-WF171994 Main - 200

Su Su

1325015-000-7222

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 8/20/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS
MC #38
(OO: WMFO)

The purpose of this memorandum is to request authorization for SA [redacted] and me to travel, on a date yet to be determined, to Tampa Division to interview [redacted] b6 b7C

On 8/15/91, I called SA [redacted], US Customs Service (USCS), Tampa, FL, FTS [redacted], to inquire about the status of the writing of a report on the 5/9/91 joint USCS-FBI interview of [redacted] (in which it was agreed that USCS would prepare the report to avoid creating possibly-conflicting statements). SA [redacted] said former-USCS, now-DEA-SA-in-training [redacted] is still to write the report. (I subsequently notified AUSA [redacted] of what SA [redacted] had said, and was requested by AUSA [redacted] to proceed with an FD-302 on the [redacted] interview.) b6 b7C

SA [redacted] also informed me that, during the week of 8/26-30/91, he and USCS SA [redacted] are to begin the interviewing of former-BCCI official [redacted], currently being held pending trial (to begin in September, 1991) in the Middle District of Florida (MDF). [redacted] who was BCCI's regional manager for most of Europe and Africa, was indicted and extradited in the [redacted] case. b6 b7C b7E

On 8/20/91, I contacted USCS SA [redacted] to learn about the plans to interview [redacted] and was told that, about two weeks ago, pursuant to a "direct immunity" letter, preliminary "Rule 11-format" interviews of [redacted] were conducted by [redacted] MDF AUSAs and two Miami FBI SAs, [redacted] and another whose name [redacted] could not recall, but who were investigating the "CenTrust" matter. The purposes for the interviews were to evaluate [redacted] potential as a witness and candidacy for a plea offer. It was determined that [redacted] was amenable to pleading to the indictment in return for consideration of his cooperation at time of b6 b7C

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[redacted]

Main
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b6 b7C

1325015-000-7223

sentencing, and that he has valuable information to provide.

Currently, SA [redacted] is awaiting approval from the DOJ Office of Enforcement Operations authorizing USCS to apply for a writ to take [redacted] on a daily basis, out of the holding facility to a place for the interviews. He anticipates that approval momentarily, but also, that it will take another week before the writ can be acquired. b6 b7C

[redacted] (dpob [redacted], Bombay, India) joined BCCI in or about 1980, leaving Bank of America to open a new BCCI branch in Karachi, Pakistan. Ultimately, [redacted] rose to become [redacted] eastern Europe and northern Africa, and a member of BCCI's "central committee," composed of 5 people from BCCI/London and 8 regional managers. According to SA [redacted] with regard to the captioned matter, [redacted] can provide information about: b6 b7C

--discussions in and decisions by the "central committee";

--non-performing loans "rubber-stamped" by BCCI's "credit committee" and booked in BCCI branches under his control;

--violations of currency laws by BCCI in various countries (which may not be applicable to this case);

--the flow of funds through ICIC; the existence of the so-called "black network," which dates to the opening of the Karachi branch of BCCI;

--weekly, Saturday-morning meetings between AGHA HASAN ABEDI, [redacted] and GHAITH R. PHARAON; b6 b7C

--meeting [redacted] and CLIFFORD in Vienna, Austria, at a BCCI conference in 1984 or 1985;

--hearing [redacted] referred to as "BCCI's leader in the Americas";

--BCCI's in-house magazine, [redacted] in or about 1984 [redacted], containing articles relating to plans to expand BCCI in the U.S. through subsidiaries such as First American Bank (FAB); b6 b7C

--the process of purchasing the National Bank of Georgia;

--1986-87 meetings in London between CLIFFORD, [redacted] and ABEDI; b6 b7C

--the transfers of many high-ranking BCCI employees to FAB and back, because FAB was owned by BCCI.

SA [redacted] agreed to notify me when [redacted] is available for interview, i.e., after the plea agreement is signed and the DOJ OEO approval has been received. Given the apparent value of [redacted] information, I request approval for SA [redacted] and me to travel to Tampa, FL, to interview [redacted] when notified by the USCS. b6 b7C

1325015-000-7224

Memorandum

To : SAC, WMFO (29B-WF-171994) (SQUAD C-5) (RUC) 8/28/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTEREST;
FIF;FAG
OO:WMFO

For the information of the file, it has been brought to the attention of the above writer that WMFO, Tyson's Corner, would be able to access the public records of the Federal Election Commission. This information at the Federal Election Commission is kept in a database which would be accessible through a modem and public telephone lines. This information which would be accessible at the FBI offices would expedite investigative matters if able to obtain for the above captioned case.

It is requested that WMFO, Tyson's Corner, attempt to obtain database information from the Federal Election Commission.

2 - WMFO
AJC/ajc
(2)

[redacted] — 202 b6 b7C

29B-WF-171994 Main

5u 5u

[redacted] b6 b7C

1325015-000-7225

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
August 28, 1991

[redacted] b6 b7C

Assistant Staff Director for Disclosure
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463

Dear Mr. [redacted] b6 b7C

It would be greatly appreciated if the Federal Bureau of Investigation, Tysons Corner Resident Agency, would be able to have no cost access to the Federal Election Commission's public information.

The information which is contained in these public records is maintained on a computer database in your office which would be accessible by the FBI by the use of a modem and telephone line.

The FBI access to your database would be minimal and sporadic. This information would be used in the furtherance of an official investigation and would not be released to anyone outside the Department of Justice.

If the FBI, Tysons Corner, is able to obtain this information by the use of the telephone lines, it would save days of research at your facility on E Street, Washington, D.C.

If you have any further questions please contact Special Agent [redacted] at (202) 324-6361. b6 b7C

Your cooperation is appreciated.

Sincerely yours,

Robert M. Bryant
Special Agent in Charge

By: [redacted] b6 b7C
Supervisory Special Agent

1-WMFO(29B-WF-171994)
AJC:ajc

29B-WF-171994-203
Searched
Serialized Su
Indexed
Filed Su 1325015-000-7226

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 8/30/91

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38
FIF; FAG
(OO: WMFO)

On this date, AUSA [redacted] notified me that, b3 b6 b7C
at 10:00 a.m., 9/6/91, SCADDEN ARPS, the law firm representing CLIFFORD & WARNKE, will present another [redacted] to the grand jury in further response to the subpoena. AUSA [redacted] requested that agents be present to transport [redacted] to the scanning facility at the USAO.

AUSA [redacted] also informed me that SCADDEN ARPS has b6 b7C
an additional 50-60 boxes of "litigation documents," e.g., filings, motions, etc., which, by agreement, are not being brought to the grand jury. However, part of the agreement is that a review of those documents will occur. In furtherance of that review, AUSA [redacted] asked that the TDY personnel and I meet with him at his office at 9:30a.m. on 9/3/91, so that he can brief us on the parameters of the review. The actual review will subsequently take place at SCADDEN ARPS' offices, 15th St. and NY Ave, NW, WDC. The contact person at SCADDEN ARPS is [redacted] (ph.).

AUSA [redacted] anticipates that [redacted], the b6 b7C
[redacted] First American Bankshares, is about to waive attorney/client privilege on behalf of FAB.

2-WMFO (1-29B-WF-171994)
(1-TDY Personnel)

JNR:jnr
(2)

12-paragraphs
BCCI/First American Litigation Files
29B-WF-171994
204

AUG 30 1991
FBI - WASH. METRO FIELD OFFICE

1325015-000-7227

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 8/13/91

From : SA [redacted]

b6
b7C

Subject: HIDDEN INTEREST
MC #38
(OO: WMFO)

Attached are copies of the 7/29/91 indictment and the press release in the New York district attorney's case.

1-WMFO (Att. 2)

JNR:jnr
(1)

29B-WF-171994-205

1325015-000-7228

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK: CRIMINAL TERM

THE PEOPLE OF THE STATE OF NEW YORK :

-against- :

BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; :
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; :
BCCI HOLDINGS (LUXEMBOURG) S.A.; :
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED; :
INTERNATIONAL CREDIT AND INVESTMENT COMPANY HOLDINGS; :
AGHA HASAN ABEDI; and :
SWALEH NAQVI. :

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuse defendants Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A. [These defendants along with other related entities described below are hereinafter included in the appellation "BCC Group."], defendants International Credit and Investment Company (Overseas) Limited and International Credit and Investment Company Holdings [These defendants along with other related entities described below are hereinafter included in the appellation "ICIC Group."], and defendants Agha Hasan Abedi and Swaleh Naqvi of the crime of SCHEME TO DEFRAUD IN THE FIRST DEGREE, in violation of Penal Law Section 190.65 (1)(a), committed as follows:

The defendants, in the County of New York and elsewhere, during the period from November 1, 1972 through July 5, 1991, with intent to defraud ten and more persons and to obtain property from ten and more persons by false and fraudulent pretenses,

representations, and promises, engaged in a scheme constituting a systematic ongoing course of conduct and so obtained property from one and more such persons, as follows:

The defendants, in the County of New York and elsewhere, made false and fraudulent pretenses, representations and promises as to (1) the identity of the owners of the BCC Group, and the degree of their financial involvement in the BCC Group, (2) the amount of shareholder capital at risk in the BCC Group, (3) the financial condition, net worth, and capital of the member entities of BCC Group, and (4) the ability of the BCC Group to repay creditors, including but not limited to depositors and banking institutions.

By means of the scheme described herein the defendants obtained property, the value of which has exceeded $20,000,000,000.00 (twenty billion dollars), from diverse persons, including United States citizens and foreign citizens residing in New York County, banks based in New York County, central banks of other nations, and thousands of depositors throughout the world.

The scheme was premised on the fact that banks rely on credit. The essence of the scheme was to convince depositors and other banking and financial institutions, by means of false pretenses, representations, and promises that the BCC Group was a safe financial repository and institution for funds, and thereby defendants acted to persuade depositors and banking and other financial institutions to provide the BCC Group banks with deposits and credit.

1325015-000-7230

Foremost among the originators of the scheme was defendant Abedi, a Pakistani banker who had worked as chief executive of a number of Pakistani banks, until the nationalization of the banks in Pakistan in 1972. Abedi recruited co-schemers with the notion of establishing a third world bank which would be substantially owned by its employees and would be so structured that it could not be nationalized.

Defendants Abedi and Naqvi, acting with and assisted by others, established a series of banks and bank holding companies, as well as related corporate and investment entities, in more than seventy countries around the world. The leading bank, established first, was defendant Bank of Credit and Commerce International, S.A. [hereinafter BCCI, SA] established in 1972 in Luxembourg, Abu Dhabi, and England. Defendants Abedi and Naqvi, along with others, thereafter caused the incorporation and establishment of defendant Bank of Credit and Commerce International Holdings, S.A. [hereinafter BCCI Holdings] in Luxembourg in 1974, and defendant Bank of Credit and Commerce International (Overseas) Limited [hereinafter BCCI Overseas] in Grand Cayman in 1975. Those three entities, as well as the related corporate and investment entities established as subsidiaries to BCCI Holdings and as affiliates of defendants were collectively known as "the BCC Group."

As part of the scheme, defendant International Credit and Investment Company (Overseas) Limited [hereinafter ICIC Overseas] was established in Grand Cayman as a bank. ICIC Overseas was used to conceal BCC Group liabilities and to create false assets for the

1325015-000-7231

BCC Group. Defendant International Credit and Investment Company Holdings [hereinafter ICIC Holdings] was established and was used to conceal stolen monies. ICIC Overseas and ICIC Holdings, together with a series of related corporate and non-corporate entities were collectively known as the "ICIC Group."

Defendant Abedi was in charge of the BCC Group and the ICIC Group. Defendant Naqvi rose to become the second in command. In the late 1980s, after defendant Abedi became incapacitated, defendant Naqvi took charge of the scheme and of the BCC Group and ICIC Group. Defendants Abedi and Naqvi, acting with a small executive staff, created the false pretenses, representations and promises to advance the scheme to defraud.

In the course of the scheme and in furtherance thereof certain acts were committed. Among those are the following:

First, to create the false impression that the BCC Group was a repository and a financial institution with which depositors and other creditors could safely do business, the schemers employed the ruling families of a number of Middle Eastern states and other purportedly wealthy businessmen as nominal shareholders of the entities comprising the BCC Group, in particular, of BCCI Holdings. The schemers falsely pretended, represented, and promised that the nominees owned and financially would stand behind the BCC Group. However, by the terms of the secret contractual agreements the nominees were insulated from any economic loss suffered by the BCC Group.

1325015-000-7232

Among the nominees were Ghaith R. Pharaon, Sheik Kamal Adham, Sayed Jawhary, also known as El Sayed El Sayed El Gohari, and Faisal Saud al-Fulaij, all of whom assisted the defendants by knowingly permitting the BCC Group management to trade on their reputations for wealth by fraudulently using their names as shareholders in BCCI Holdings, and thus, as owners of the BCC Group. Defendants further advanced their scheme to defraud by causing documents to be filed with the Superintendent of Banks of New York State, in New York County, that gave false information concerning the identities of the true owners of the BCC Group, including BCCI Holdings.

In addition, Pharaon, Adham, Jawhary, and al-Fulaij permitted defendants Abedi and Naqvi, the BCC Group, including but not limited to defendants BCCI S.A., BCCI Overseas, and BCCI Holdings, and the ICIC Group, to create the false appearance that the BCC Group and the ICIC Group loaned them money. This resulted in the creation of false assets for the BCC Group in the form of loans receivable which were not genuine. The false and fraudulent impressions were further enhanced by false confirmations of indebtedness to the BCC Group which Pharaon, Adham, Jawhary, and al-Fulaij caused and permitted to be sent to auditors of the BCC Group.

The creation of false assets and the false assertions of ownership of the stock of defendant BCCI Holdings created the false and fraudulent impressions that Pharaon, Adham, Jawhary, and al-Fulaij were economically involved in defendant BCCI Holdings as

1325015-000-7233

shareholders, that their money was at risk in the bank, and that they would financially stand behind the BCC Group if necessary.

Second, defendants established separate subsidiaries of defendant BCCI Holdings in a number of countries, including Luxembourg and the Cayman Islands, which have strict laws against release of banking information. By so doing, defendants guaranteed that there would be no comprehensive regulation on a consolidated basis by any single regulator of the BCC Group. This permitted the inter-bank transfer of assets and liabilities to be conducted in a manner that could and did conceal the true economic position of the BCC Group.

Third, defendants authorized and caused to be authorized the payments of bribes and kickbacks to agents of other banking and financial institutions. By virtue of that practice, defendants attempted to avoid and did avoid scrutiny by other banking and financial institutions of the capital structure and financial viability of the BCC Group. In 1986 and 1987, to obtain deposits from and a banking relationship with the Central Reserve Bank of Peru, defendants Abedi and Naqvi authorized and directed employees of the BCC Group to open a bank account in a Swiss bank in Panama to transmit bribes and kickbacks in the amount of a percentage of the deposits maintained by The Central Reserve Bank of Peru to the two senior officers of that bank. The total of such payments was approximately $3,000,000.00.

Fourth, the defendants systematically engaged in a program known as the External Marketing Program in New York County during

1325015-000-7234

JUL 29 '91 12:24 FROM NY DISTRICT ATTORNEY

the period of from 1987 to 1990. Pursuant to that program defendants and agents of defendants actively solicited bank deposits from numerous persons in New York County and elsewhere for the BCC group. Accounts and deposits were solicited and obtained through false representations that the BCC Group was a safe and viable banking institution. As part of this program, the defendants and their agents also represented that said persons could open, at the agency of defendant BCCI S.A. located in New York County, banking accounts that would be booked at the overseas branches of the BCC Group, including but not limited to branches of defendant BCCI Overseas in Lahore, Pakistan and Dhaka, Bangladesh. By means of these solicitations and with the knowledge that the representations made concerning the financial condition and the capital and net worth of the banking institutions were materially false, defendants obtained property in the form of deposits at the BCCI SA agency in New York County on behalf of the BCC Group from American citizens and residents of New York County.

Fifth, the defendants systematically filed and caused to be filed with the Superintendent of Banks of the State of New York, in New York County, provided and represented as true to correspondent banks, and otherwise published financial statements which defendants knew to contain false and fraudulent representations materially overstating and falsifying the capital, net worth of the BCC Group, and, in particular, of defendants BCCI Holdings, BCCI S.A., and BCCI Overseas, as well as the ability of these institutions to repay their creditors.

1325015-000-7235

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of **GRAND LARCENY IN THE FIRST DEGREE**, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, on or about July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money, having an aggregate value of in excess of $1,000,000, to wit, greater than $12,900,000 in connection with foreign exchange trading between American Express Bank Ltd. and the BCC Group.

1325015-000-7236

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, on or about July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money, having an aggregate value of in excess of $1,000,000, to wit, $10,000,000 in connection with a non-collateralized placement by American Express Bank Ltd. with the BCC Group.

1325015-000-7237

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendants Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, and BCCI Holdings (Luxembourg) S.A., International Credit and Investment Company (Overseas) Limited, International Credit and Investment Company Holdings, Agha Hasan Abedi, and Swaleh Naqvi of the crime of GRAND LARCENY IN THE FIRST DEGREE, in violation of Penal Law Section 155.42, committed as follows:

Defendants, in the County of New York and elsewhere, during the period of from on or about January 1, 1983 to July 5, 1991, stole certain property from the American Express Bank Ltd., to wit, money having an aggregate value of in excess of $1,000,000, to wit, in excess of $6,900,000 in connection with letters of credit and acceptances between American Express Bank Ltd. and the BCC Group.

1325015-000-7238

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 24, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-7239

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 29, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-7240

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about August 30, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-7241

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of **FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE**, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 8, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

1325015-000-7242

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 13, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

FROM NY DISTRICT ATTORNEY 12:25 91 .62 JUL

1325015-000-7243

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about September 14, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 06001444 and omitted to make a record of said transactions as required by law.

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about October 12, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 01008270 and omitted to make a record of said transactions as required by law.

1325015-000-7245

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuse the defendant Bank of Credit and Commerce International S.A. of the crime of FALSIFYING BUSINESS RECORDS IN THE FIRST DEGREE, Penal Law Section 175.10, committed as follows:

Defendant Bank of Credit and Commerce International S.A., in the County of New York, on or about October 12, 1988, with intent to defraud and to commit another crime, to wit, a violation of 31 U.S.C. sections 5313 and 5322 and of 31 CFR sections 103.22 and 103.26 omitted to make a true entry in the business records of an enterprise, to wit, Bank of Credit and Commerce International S.A. in violation of a duty to do so which said defendant knew or should have known to be imposed upon said defendant by law and by the nature of said enterprise in that defendant, a financial institution, received currency deposits in New York County totalling more than $10,000 during that business day in single and multiple forms into account number 07004836 and omitted to make a record of said transactions as required by law.

ROBERT M. MORGENTHAU
District Attorney
New York County

1325015-000-7246

DISTRICT ATTORNEY - COUNTY OF NEW YORK

News Release

Contact: Gerald McKelvey

July 29, 1991

(212) 335-9400

A New York County grand jury has returned an indictment that charges that the Bank of Credit and Commerce International (BCCI), its related entities and two of its founders engaged in a multi-billion dollar scheme to defraud its depositors, falsified bank records to hide illegal money laundering, and committed larcenies totaling more than $30 million, District Attorney Robert M. Morgenthau announced today. The indictment stems from an ongoing investigation of BCCI that began in the spring of 1989.

Charged in the indictment are AGHA HASAN ABEDI, who founded the bank in 1972, and SWALEH NAQVI, who was the bank's chief operating officer until October of 1990. The corporate defendants are BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., the leading bank established by ABEDI in 1972, and four subsequently created entities, BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; BCCI HOLDINGS (LUXEMBOURG) S.A.; INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY HOLDINGS.

"This indictment spells out the largest bank fraud in world financial history," Mr. Morgenthau said. "BCCI was operated as a corrupt criminal organization throughout its entire 19 year history. It systematically falsified its records. It knowingly

1325015-000-7247

allowed itself to be used to launder the illegal income of drug sellers and other criminals. And it paid bribes and kickbacks to public officials."

All of the defendants are charged with the crime of Scheme to Defraud in the First Degree and three counts of Grand Larceny in the First Degree.

"By means of this scheme, the defendants obtained more than $20 billion from its depositors, including citizens and foreign nationals in New York City, banks headquartered in Manhattan, central banks of other nations, and thousands of depositors throughout the world," Mr. Morgenthau said. "The best estimates indicate at this time that upwards of $5 billion has been lost through this fraud."

The Scheme to Defraud count includes allegations that the defendants paid a bribe of $3 million to the two senior officers of the Central Reserve Bank of Peru, in exchange for receiving deposits from the bank.

The Grand Larceny counts relate to the loss of more than $30 million from the American Express Bank Limited on July 5, 1991, when the Bank of England and regulatory agencies in other nations, including the United States, ordered the closing of BCCI. Because BCCI obtained the deposits from American Express Bank through fraudulent means, by falsely representing BCCI's financial condition, the losses are thefts, Mr. Morgenthau said.

In addition, BCCI S.A. is charged with eight counts of Falsifying Business Records in the First Degree, relating to a

1325015-000-7248

series of instances on which the bank failed to file currency transaction reports on currency deposits of $10,000 or more in one of the bank's customer accounts, as is required by federal law.

"These transactions appear to be instances of money-laundering," Mr. Morgenthau said.

The top count in the indictment, Grand Larceny in the First Degree, exposes NAQVI and ABEDI to prison terms of up to 25 years on conviction. NAQVI, 57, is living in Abu Dhabi, one of the states in the United Arab Emirates, and ABEDI, 68, is living in Pakistan. The extradition of both men is being sought, Mr. Morgenthau said.

The corporate defendants are exposed to forfeiture actions and fines of millions of dollars on conviction of the charges.

"The corporate structure of BCCI was set up to evade international and national banking laws so that its corrupt practices would be unsupervised and remain undiscovered," Mr. Morgenthau said. "The defendants systematically falsified the capital structure of BCCI to make it appear as though it was a solvent, profitable bank secured by the backing of wealthy businessmen from the Middle East.

"In fact, much of the bank's capitalization and assets were fictitious and its backing illusory," the District Attorney continued. "The defendants created the appearance of respectability by persuading world leaders to appear with them

1325015-000-7249

and defrauded their thousands of depositors, both small and large, who relied on that appearance of respectability."

"This largest of Ponzi schemes is over," he said. "But we have much yet to discover about this bank, and much to do in reforming international banking practices. The key to the scheme was that BCCI was structured in such a way so that no single central bank was able to monitor its activities. No foreign bank should be permitted to operate in the United States unless it is supervised by a single, strong central bank and is not bound by bank secrecy laws of another jurisdiction. Without these reforms, the potential for massive worldwide bank fraud remains."

The investigation is continuing, Mr. Morgenthau said.

The District Attorney thanked the Federal Reserve Bank of New York and the Board of Governors of the Federal Reserve System, and the New York State Department of Banking, for their close cooperation from the earliest stages of the investigation. "Our combined efforts and resources have enabled us to understand one of the most complex and secretive criminal organizations that we have ever encountered," Mr. Morgenthau said. "Without the generous assistance and intricate knowledge of bank regulators, this investigation could not have been done."

He particularly thanked Federal Reserve Board Chairman Alan Greenspan, and William Taylor, Virgil Mattingly Jr. and Richard Small of the Federal Reserve System; and Gerald Corrigan, President of the Federal Reserve Bank of New York, and Ernest

Petrikas and Thomas C. Baxter Jr. of the Federal Reserve Bank of New York.

Mr. Morgenthau also thanked New York State Department of Banking Superintendent Derrick Cephas, Deputy Superintendent Vincent Conlon, former Superintendent Jill Considine, former counsel Barbara Barrantes, and Timothy Mahoney, Jerry Schwartz and Leon Ellen of the Department's Special Investigation Division.

The District Attorney also thanked the Bank of England for its invaluable assistance. "Under British law, the Bank could not assist us without some lawful basis to do so," Mr. Morgenthau said. "Since the time that stage was reached, however, we and the Bank have shared important information in a cooperative and helpful manner."

In the District Attorney's Office, the investigation was conducted under the supervision of Senior Investigator Andrew Finan, assisted by Investigators Mark Baldassare, Robert O'Donoghue and Fred Ghussin and Supervising Investigators Gerald McQueen, Mervin Woike and Thomas Jackson, under the supervision of Chief Investigator Andrew Rosenzweig.

The case was presented to the grand jury by Assistant District Attorney John W. Moscow, Deputy Chief of the Investigation Division, who, with Assistant District Attorneys Richard T. Preiss and Marc Frazier Scholl, is in charge of the prosecution. They were assisted by Investigation Division Chief Michael G. Cherkasky.

1325015-000-7251

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/14/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(00: WMFO)

For the information of recipients, captioned investigation centers on the hidden ownership/control of First American Bank (FAB) by the Bank of Credit and Commerce International (BCCI). The primary focus is on representations made to the Board of Governors of the Federal Reserve System (BGFRS), when the holding company which owns FAB purchased Financial General Bankshares (FGB) in 1980. Since the inception of this investigation widespread allegations of criminal activities involving BCCI have surfaced. Bank regulators in England, Luxembourg, the Cayman Islands and the United States have closed down and taken control of BCCI. This matter has received intense international media attention.

The writer has had numerous contacts with [redacted] b7D
The source, who has been known to the writer for in excess of 10 years, was [redacted] The source realized that [redacted]. The source has provided the writer with information germane to captioned investigation. In addition, the source has developed information that involves the [redacted] Said details are attached hereto on an FD-209 and insert.

It is requested that recipients review said attachments and respond to the writer as to the potential credibility of same. Handling/dissemination of this information is left to the discretion of recipients. It should be noted that the source has maintained a long standing relationship with the FBI and has provided reliable information during that time. The source has [redacted] b7D

1-SSA [redacted] C-1
1-SA [redacted]
1-SSA [redacted] C-6
1-SSA [redacted] C-13

Indexing done per insert placed in SUB A

29B WF 171994 -206

SU SU b6 b7C

1325015-000-7252

DML:dml

CLARK McADAMS CLIFFORD;
ET AL:
29B-WF-171994

On 7/26/91, [redacted] met with WMFO SA [redacted] in New York, New York. The source provided information [redacted] The source was requested to write an outline detailing the above information.

b6
b7C
b7D

On 8/6/91, the source provided the attached memorandum detailing the above information.

-TRAFIKRAPPORT- DATUM 06-AUG-1991 TID 15:06

b6
b7C

DATUM/TID = 06-AUG 15:02
KVITTONR = 07
KOMM. RESULTAT = OK
DUK = 05
FIL NR. =
TID = 00:04'21
INSTALL. = SAND
ADRESSAT =
TELEFONNUMMER = T 00912023245426
MOTTAGET ID = 202 324 6426
UPPLÖSNING = STANDARD

here is a copy of the confirmation on the first transmission

-TELEBUTIKEN FALKOPING -

-46 515 12102-

1325015-000-7254

ANT.SID 06

Memorandum

To : SAC, WMFO (29-WF-171994) Date 8/27/91

From : SSA [redacted] (TSS)

b6
b7C

Subject: CLARK MCADAMS CIFFORD
ET AL
FIF;FAG
OO:WMFO

On 8/20/91, writer, SSA [redacted] C-5, SA [redacted] b6
SA [redacted] C-14 and [redacted] C&P, did a b7C
telephone survey on the 6th floor space at Tyson's RA. It was decided that a 324 prefix would be provided for the 6th floor. The cable will be pulled from the FBI frame room located on the third floor. This cable will be a direct pull and will be encased in conduit. The conduit and cable will terminate in a locked closet in FBI space on the 6th floor. The old telephone lines will be removed from FBI space.

SSA [redacted] and SA [redacted] walked with Mr. [redacted] to b6
each of the [redacted] the 6th floor. SSA [redacted] and SA [redacted] b7C
advised Mr. [redacted] where each telephone block should be located and how many for each room. Mr. [redacted] marked each location on the floor plan provided by SSA [redacted]

Writer contacted Ms. [redacted] FBIHQ about the above b6
work. In addition to contacting Ms. [redacted] writer advised SA b7C
[redacted] about the locks and ET [redacted] about the alarms.

(5)-WMFO
(1-SSA [redacted] C-5)
(1-SSA [redacted] 4)
(2-SA [redacted])
(1-TSS)

C-5

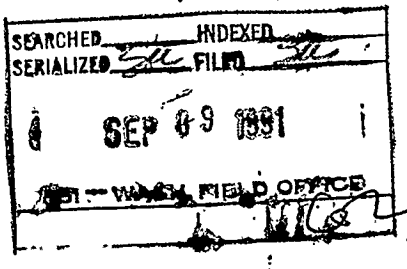
-208

29-WF-171994-MAN

JJS:lha
(5)

Rec'd 9/9/91

1*



1325015-000-7264

AO 110 (Rev. 10/82)

SUBPOENA TO TESTIFY BEFORE GRAND JURY

United States District Court

DISTRICT [redacted] b3 b6 b7C

SUBPOENA FOR #91-2

[redacted]

YOU ARE HEREBY COMMANDED to appear in the United States District Court at the location, date, and time specified below to testify before the Grand Jury in the above entitled case.

PLACE

United States Courthouse

[redacted] b3

COURTROOM

[redacted]

DATE AND TIME

[redacted]

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):(1)

[redacted] b3 b6 b7C

☐ *Please see additional information on reverse*

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK Esther D. Thomas

(BY) DEPUTY CLERK

DATE 07/18/91

This subpoena is issued on application of the United States of America by:
UNITED STATES ATTORNEY

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY

AUSA [redacted] b3 b6 b7C

1) If not applicable, enter "none."

1325015-000-7304

AO 110 (Rev. 10/82)

SUBPOENA TO TESTIFY BEFORE GRAND JURY

United States District Court

DISTRICT: [redacted] b3

TO: [redacted]

SUBPOENA FOR: #91-2

YOU ARE HEREBY COMMANDED to appear in the United States District Court at the location, date, and time specified below to testify before the Grand Jury in the above entitled case.

PLACE: [redacted]

COURTROOM: [redacted] b3

DATE AND TIME: [redacted]

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):(1)

[redacted] b3 b6 b7C

☒ *Please see additional information on reverse*

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK: Kathleen O. Thomas

DATE: 07/29/91

(BY) DEPUTY CLERK

This subpoena is issued on application of the United States of America by:

UNITED STATES ATTORNEY

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY

AUSA [redacted] b3 b6 b7C b7E

1) If not applicable, enter "none."

BCCI

1325015-000-7305

AO 110 (Rev. 10/82)

SUBPOENA TO TESTIFY BEFORE GRAND JURY

United States District Court

DISTRIC

SUBPOENA FOR

#91-2

YOU ARE HEREBY COMMANDED to appear in the United States District Court at the location, date, and time specified below to testify before the Grand Jury in the above entitled case.

PLACE

COURTROOM

DATE AND TIME

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):(1)

☐ *Please see additional information on reverse*

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

CLERK Kathleen O. Thomas

DATE 07/30/91

(BY) DEPUTY CLERK

This subpoena is issued on application of the United States of America by:
UNITED STATES ATTORNEY

NAME, ADDRE[illegible]F ASSISTANT U.S. ATTORNEY

AUSA

1) If not applicable, enter "none."

b3
b6
b7C
b7E

1325015-000-7306

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 47
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Page 32 ~ b5 - Per EOUSA; b6;
Page 33 ~ b5 - Per EOUSA; b6; b7C; b7D;
Page 34 ~ b5 - Per EOUSA; b6; b7C; b7D;
Page 36 ~ b5 - Per EOUSA; b6;
Page 37 ~ b5 - Per EOUSA; b6;
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UNITED STATES ATTORNEY
MIDDLE DISTRICT OF FLORIDA
500 ZACK STREET SUITE 400
TAMPA,FLORIDA 33602

DATE: 8/5/91

FROM [redacted] TO: [redacted] b6 Per EOUSA

TELEPHONE # [redacted] FAX # [redacted]

OF PAGES INCLUDING COVER: 9

SPECIAL INSTRUCTIONS: _____

MAIN PHONE # FTS [redacted] COMM:813- [redacted] b6 EOUSA

ADMIN/CIVIL FAX # FTS: [redacted] COMM: 813-

APPELLATE FAX # FTS: [redacted] COMM: 813-

CRIMINAL DIVISION FAX #'S

FRAUD/MAJOR CRIMES
FTS [redacted]
COMM:813 [redacted]

DTF/ASSET FOR. b6 per EOUSA
FTS: [redacted]
COMM:813- [redacted]

INDEPENDENCE BANK FINANCING

8/30/85

$8.5 million BCCI loan proceeds deposited to Pharaon account at BAII, Paris

PHARAON REPRESENTS TO CALIFORNIA BANKING DPT. $8.4 MILLION PERSONAL FUNDS, WITHOUT FINANCING

9/4/85

BAII confirms for California Banking Dpt. by telegram Pharaon with $8.5 million on deposit at BAII

NO DISCLOSURE: PROCEEDS FROM BCCI LOAN

10/1/85

Pharaon purchases Independence as BCCI nominee

9/30/85

$12.6 million loan obtained by Pharaon from First Nat'l Bank, Boston / secured by 100% Independence stock and $5 million Letter of Credit from BAII

$5 MILLION LETTER OF CREDIT GUARANTEED BY BCCI

July 1986

BCCI pays-off $12.6 million FNB Boston loan

1325015-000-7355

ATTACHMENT B

ATTACHMENT C

ATTACHMENT D

M E M O R A N D U M

TO: Wayne Williams

FROM: [redacted] b6 Per FBI b7C

DATE: August 6, 1991

RE: BCCI/Telex Response Analysis

Per our conversation of this morning, attached please find a brief analysis of the United States Attorney Offices' reponses to the Department's request for information concerning pending BCCI investigations. The only responses of any immediate particular interest are: b5 Per EOUSA b7C

[redacted]

Please note that no information was provided to me concerning the investigations in Louisiana. According to the information provided, there was an extensive discussion with Peter Clark concerning USAO-EDLA's investigation.

Please advise if there is anything further you need done in connection with this.

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 35
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AIRTEL

9/5/91

PERSONAL ATTENTION

Director, FBI

SACs, Atlanta
Detroit
Houston
Los Angeles
Miami
Tampa
WMFO
Legat, London

This comm also filed in:
Tag 1
" 2
" 3
" 4

HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

Re Director teletype to All FBI Field Offices and All Legats dated 8/28/91.

Enclosed for the information of each receiving office is one copy of the Department of Justice's (DOJ) Fraud Section memorandum dated 8/9/91.

On 2/7/91, WMFO initiated a financial institution fraud investigation based on a criminal referral from the Board of Governors of the Federal Reserve System (BGFRS) alleging that Clark M. Clifford and [redacted] had made false and fraudulent statements concerning the Bank of Credit and Commerce International's (BCCI) ownership and control of Credit and Commerce American Holdings (CCAH), the parent-holding company of First American Bank Shares (FABS). FABS is the largest bank-holding company in the Washington, D.C. area, with $11.5 billion in assets and controls banks in five other states. Clark Clifford served as Chairman of FABS and his [redacted] served [redacted] FABS from 1982 until they resigned these positions on 8/13/91.

b6 per FBI
b7C

On 5/21/91, WMFO received three additional criminal referrals from the BGFRS concerning BCCI's use of Ghaith Pharaon as a nominee in the purchase of two banks in Georgia and California (The National Bank of Georgia (now the First American Bank of Georgia, Atlanta, Georgia), and the Independence Bank, Encino, California), and that false statements were made to the BGFRS concerning the ownership and control of these two banks.

-209

29B-WF-171994-Main

Enclosure

[redacted]

b6 Per FBI
b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 1 [illegible]
FBI

[redacted]

1325015-000-7265

ATTACHMENT A

to be carried out by the Fraud Section, DOJ; and, (3) that the Fraud Section be the prosecutor on any new allegations involving BCCI.

The enclosed DOJ memorandum refers to "BCCI's American Banking Scheme" and receiving offices should review this memorandum to develop an understanding of the joint FBI/DOJ investigative - prosecutive strategy that will be pursued concerning that scheme.

WMFO has been designated as the office of origin in captioned matter to coordinate all aspects of this complex investigation. The Financial Institution Fraud Unit, White-Collar Crimes Section, Criminal Investigative Division, is working closely with DOJ Fraud Section and WMFO to insure that necessary resources are assigned as required to expedite this investigation.

1325015-000-7267

Airtel from Director, FBI to SACs, AT, DE, HO, LA, MM, TP, WMFO, and Legat, London
RE: Hidden Interests; Major Case 38; OO: WMFO

Investigation at WMFO has revealed that Pharaon had also purchased a bank in Detroit, Michigan, in 1975 and a bank in Houston, Texas, in 1977.

On 7/5/91, as a result of alleged fraudulent conduct by BCCI, bank regulators in Britain and six other countries closed down branches of BCCI within their respective jurisdictions. Information developed to date indicates that from at least 1977 through 1990, BCCI, its principals, and its affiliates, orchestrated a deliberate sustained criminal attempt to undermine the structure of American Banking and Securities laws by acquiring control of U.S. banks and thrifts without disclosing BCCI's controlling role, as required by state and Federal regulations. Preliminary investigation of BCCI's U.S. bank takeovers indicates a common scheme and practice involving numerous, repeated and consistent violation of Federal statutes including those which are predicate acts to a RICO violation under 18 U.S.C. 1962.

In recent weeks, actions by the Federal Reserve Board (FRB), by New York officials and charges in Senate hearings allege an extraordinary range of worldwide criminal violations by BCCI and its affiliates including: repeated unlawful acquisitions of U.S. banks and thrifts; public corruption and bribery in the U.S. and elsewhere; money laundering and financing other criminal activity; support for terrorist actions; and huge frauds and falsifications on the books and records of BCCI and its affiliates. Enclosed DOJ memorandum dated 8/9/91, from Laurence Urgenson, Chief, Fraud Section to Robert Mueller, Assistant Attorney General, Criminal Division, sets forth DOJ's recommended approach to investigating and prosecuting BCCI's alleged criminal activities in the United States. Based on a review of BCCI allegations made by the FRB, New York State authorities, and current outstanding investigations, DOJ opined (1) that BCCI had orchestrated a sustained, deliberate subversion of U.S. banking, security, and criminal laws commencing in 1977 for the purpose of secretly seizing control of U.S. banks and thrifts without making required disclosures and applications; and (2) that BCCI's American banking scheme had resulted in takeovers of the National Bank of Georgia; First American Bank, Washington, D.C.; Centrust, Miami, Florida; and Independence Bank, Encino, California. DOJ Fraud Section has recommended (1) that the current outstanding investigations be continued through the U.S. Attorney's Office (USAO), Washington, D.C.; (2) that the BCCI banking scheme be treated as a single case investigated and prosecuted as a consolidated Bank-RICO matter, with prosecution

1325015-000-7266

(1)

29B-WF-171994-MAIN-207

SU SU

1325015-000-7260

~~CONFIDENTIAL~~

NITED STATES, THE EMBASSY EXPLORE WITH UAE OFFICIALS THE POSSIBILITY OF PERMITTING FORMAL OR INFORMAL ACCESS BY US PROSECUTORS TO THE EVIDENCE LOCATED IN ABU DHABI. DOJ HAS ALSO ASKED THAT THE EMBASSY ASCERTAIN WHETHER UAE WILL ALLOW INTERVIEWS OF POTENTIAL WITNESSES IN ABU DHABI BY US OFFICIALS. DOJ IS PREPARED TO SEND A DELEGATION TO THE UAE AS EARLY AS THE BEGINNING OF NEXT WEEK TO REVIEW DOCUMENTS AND INTERVIEW WITNESSES IF THE UAE CONSENTS.

12. ACTION REQUESTED: WHEN DELIVERING DIPLOMATIC NOTE. EMBASSY IS REQUESTED TO ASK UAE FOR DOJ ACCESS TO EVIDENCE AND OPPORTUNITY TO INTERVIEW NON-UAE CITIZEN WITNESSES WHO HAVE BEEN DETAINED, STRESSING THE IMPORTANCE OF THESE FORMS OF ASSISTANCE TO AN EFFECTIVE INVESTIGATION.

13. PLEASE CAPTION REPLY FOR L/LEI AND NEA/ARP, AND POUCH A COPY OF THE NOTE AS DELIVERED TO L/LEI. - EAGLEBURGER

BT
#1185

NNNN

~~CONFIDENTIAL~~ STATE 301185/02

IN THE FIRST DEGREE, IN VIOLATION OF SECTION 155.42 OF THE NEW YORK STATE PENAL LAW.

7. THE NEW YORK STATE CHARGES STEM FROM SWALEH NAQVI'S PARTICIPATION IN A SCHEME TO DEFRAUD AND TO OBTAIN PROPERTY FROM TEN OR MORE PERSONS. THE FACTS UNDERLYING THE CHARGES CONTAINED IN THE NEW YORK INDICTMENT INDICATE THAT NAQVI, AS AN EXECUTIVE OFFICER IN THE BCCI BANKING GROUP, PERSONALLY USED HIS POSITION AND THE SERVICES OF LOWER LEVEL BANK OFFICERS TO MAKE FRAUDULENT REPRESENTATIVES AND PROMISES IN ORDER TO OBTAIN BANK DEPOSITS AND CREDIT FROM DEPOSITORS, BANKS, AND OTHER FINANCIAL INSTITUTIONS. THE STATE CHARGES ALSO FOCUS UPON THREE INSTANCES IN WHICH NAQVI, AS AN EXECUTIVE OFFICER IN THE BCCI BANKING GROUP, AND HIS BCCI-LINKED CODEFENDANTS STOLE MONEY FROM AMERICAN EXPRESS BANK, LTD., DURING THE COURSE OF FOREIGN EXCHANGE TRADING, NON-COLLATERALIZED PLACEMENT TRANSACTIONS, AND USE OF LETTERS OF CREDIT AND ACCEPTANCES.

8. ADDITIONAL CHARGES AGAINST SWALEH NAQVI MAY BE LODGED IN THESE AND OTHER US JURISDICTIONS AS A RESULT OF PENDING INVESTIGATIONS.

9. ACTION REQUESTED. EMBASSY ABU DHABI IS ASKED TO MAKE A FORMAL REQUEST VIA DIPLOMATIC NOTE DELIVERED AT AN APPROPRIATE LEVEL FOR THE TRANSFER OF NAQVI TO THE UNITED STATES FOR TRIAL BEGIN QUOTE BY ANY MEANS THAT ARE IN ACCORDANCE WITH UAE LAW. END QUOTE. POST SHOULD INCLUDE BACKGROUND INFORMATION (I.E., PARAS 3 THROUGH 8) IN

DIPLOMATIC NOTE TO ILLUSTRATE CASE FOR UAE FINDING NAQVI TO BE UNDESIRABLE ALIEN. POST SHOULD ALSO STATE IN NOTE THAT, IF UAE AGREES TO EXPEL/DEPORT NAQVI TO THE UNITED STATES, THE USG WILL BEAR THE COST OF HIS TRANSPORT AND IS PREPARED TO SEND US MARSHALS TO ESCORT HIM TO THE UNITED STATES.

10. COMMENT. OUR RECORDS INDICATE THAT THE UAE DOES NOT HAVE A DOMESTIC EXTRADITION LAW. AS WE HAVE NO EXTRADITION TREATY WITH THE UAE, IT APPEARS THAT THE MOST VIABLE OPTION IS UAE EXPULSION/DEPORTATION OF NAQVI AS AN UNDESIRABLE ALIEN. END COMMENT.

11. DOJ ALSO ADVISED THE DEPARTMENT THAT IT HAS LEARNED THAT ABU DHABI AUTHORITIES MAY HAVE SEIZED A SIGNIFICANT AMOUNT OF DOCUMENTARY AND OTHER EVIDENCE CONNECTED WITH BCCI AND NAQVI, AND THAT SUCH EVIDENCE IS OF GREAT INTEREST TO FEDERAL AND STATE PROSECUTORS. DOJ HAS ASKED THAT, IN ADDITION TO SEEKING NAQVI'S EXPULSION OR TRANSFER TO THE

BT
#1185

NNNN

1325015-000-7262

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 08-30-2018 BY: [redacted]

b6 (Per FBI)
b7C

6 ~~CONFIDENTIAL~~ STATE 301185/01

ACTION: ACS-2 INFO: CCA /3 LEGATT

VZCZCTP0885LA0138
OO RUFELD
DE RUEHC #1185/01 2550052 12-SEP-91 TOR: 00:53
ZNY CCCCC ZZH CHRG: STA
O 120048Z SEP 91 DIST: ACS
FM SECSTATE WASHDC
TO RUFHAD/AMEMBASSY ABU DHABI IMMEDIATE 9868
INFO RUEHIL/AMEMBASSY ISLAMABAD IMMEDIATE 5443
RUFHLD/AMEMBASSY LONDON IMMEDIATE 1243

~~CONFIDENTIAL~~ SECTION 01 OF 02 STATE 301185

E.O. 12356: DECL:OADR
TAGS: CJAN, EFIN, TC
SUBJECT: REQUEST FOR EXPULSION OF SUALEH NAQVI FROM THE UAE

1. THIS IS AN ACTION MESSAGE. SEE PARAS 9 AND 11 BELOW.

2. ON SEPTEMBER 10, DOJ REQUESTED THAT THE DEPARTMENT ASK THE EMBASSY TO APPROACH UAE AUTHORITIES FOR THE PURPOSE OF SEEKING SUALEH NAQVI'S EXPULSION OR OTHER LAWFUL TRANSFER TO THE UNITED STATES.

3. BACKGROUND (PARAS 3 THROUGH 8). SUALEH NAQVI HAS BEEN CHARGED BY INDICTMENT IN CASE NO. 91-239-CR-T-15(C), FILED IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA, TAMPA DIVISION, WITH PARTICIPATING IN MONEY LAUNDERING ACTIVITIES THROUGH THE USE OF THE BCCI BANKING GROUP.

4. SPECIFICALLY, HE IS CHARGED IN COUNT ONE OF THE INDICTMENT WITH CONSPIRACY TO PARTICIPATE IN THE CONDUCT OF A RACKETEERING ENTERPRISE (NAMELY, BCCI) THROUGH A PATTERN OF RACKETEERING ACTIVITY (MONEY LAUNDERING AND USING FACILITIES OF INTERSTATE AND FOREIGN COMMERCE), IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTIONS 1962(D), 1957, 1952 AND 2. HE IS CHARGED IN COUNT THREE WITH CONSPIRACY TO LAUNDER MONEY AND TO USE FACILITIES IN INTERSTATE AND FOREIGN COMMERCE TO PROMOTE UNLAWFUL ACTIVITY, IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTIONS 371, 1952, 1957 AND 2.

5. THE FACTS UNDERLYING THE INDICTMENT SHOW THAT BETWEEN 1985 AND 1989, NAQVI, AS AN EXECUTIVE OFFICER OF THE BCCI BANKING GROUP, PERSONALLY USED HIS POSITION AND THE SERVICES OF LOWER LEVEL BANK OFFICERS TO SEEK AND RECEIVE DEPOSITS AND MAKE TRANSFERS OF THE PROCEEDS OF DRUG TRAFFICKING AND OTHER ILLEGAL ACTIVITIES.

6. AN INDICTMENT HAS ALSO BEEN FILED AGAINST NAQVI IN THE SUPREME COURT OF THE STATE OF NEW YORK (NEW YORK COUNTY), CHARGING HIM WITH ONE COUNT OF SCHEMING TO DEFRAUD IN THE FIRST DEGREE, IN VIOLATION OF SECTION 190.65 (1)(A) OF THE NEW YORK STATE PENAL LAW, AND THREE COUNTS OF GRAND LARCENY

copy filed Suit File 2

SERIALIZED

1325015-000-7261

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 8/19/91

From : SA [redacted] (C-5) b6 Per FBI b7C

Subject: CLARK McADAMS CLIFFORD;
ET AL;
FIF; FAG;
(OO: WMFO)

b6 Per FBI b7C

On 7/25/91, the writer met with AUSA [redacted] District of Columbia. AUSA [redacted]

[redacted] b5 Per EOUSA b6 b7C

On that same date, the writer contacted NYO SSA [redacted] b6 Per FBI b7C [redacted] concerning the above mentioned records. Arrangements were made to have the records transported to the New York State Banking Department for custodial purposes.

On 7/26/91, prior to meeting with [redacted], the writer met with NYO SA [redacted] SA [redacted] and the writer discussed/prepared a request to [redacted]

IN b6 Per FBI b7C b7D b7E

On 7/29/91, the writer scheduled interviews with [redacted]. Said interviews were scheduled to take place at the NYO. In addition, the writer discussed the photocopying of the aforementioned BCCI records with SSA [redacted] b6 Per FBI b7C SSA [redacted] advised that this matter was being re-assigned to NYO Squad C-2. SSA [redacted] was the supervisor for C-2. This matter was subsequently discussed with SSA [redacted]

On 7/30/91, a meeting was held in the office of AUSA DAVID [redacted] District of Columbia. In addition to AUSA [redacted] present were [redacted] FBIHQ SSA [redacted] SA [redacted] and the writer. Discussed was the focus of the investigation. [redacted] b6 Per FBI b7C b5 Per EOUSA b6 b7C [redacted]

29B-WF-171994 -197
Su Su Su

1325015-000-7214

b6 Per FBI b7C [redacted]

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 5
Page 2 ~ b5 - Per EOUSA; b6; b7C;
Page 3 ~ b5 - Per EOUSA; b6; b7C;
Page 4 ~ b5 - Per EOUSA; b6; b7C;
Page 5 ~ b5 - Per EOUSA; b6; b7C;
Page 6 ~ b5 - Per EOUSA; b6; b7C;

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FD-448 (Rev. 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [X] Unclassified

Time Transmitted: 8:40
Sender's Initials: KTW
Number of Pages: 6

To: FBIHQ, CID, WCCS, FIFU (Name of Office) Date: 5/24/91

Facsimile number: 324-6492

Attn: SSA [redacted] (Name ... Telephone No.)

b6 Per FBI
b7C

From: SAC, WMFO (29B-WF-171994) (Name of Office)

Subject: CLARK M. CLIFFORD, aka; Et al

Special Handling Instructions: Hand carry to SSA [redacted]

b6 Per FBI
b7C

Originator's Name: SA [redacted] C-5 Telephone: 324-6418

b6 Per FBI
b7C

Originator's Facsimile Number: 324-6426

67

Approved: [redacted] 29B-WF-171994

b6 Per FBI
b7C

[redacted] [redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED FBI/DOJ FILED [redacted]
MAY 24 1991
FBI-WASH. METRO. FIELD OFFICE

1325015-000-4998

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 4
Page 2 ~ b3 - Per Fed. Res. Board;
Page 3 ~ b3 - Per Fed. Res. Board;
Page 4 ~ b3 - Per Fed. Res. Board;
Page 5 ~ b3 - Per Fed. Res. Board;

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[redacted] stated that per [redacted] planned to leak his information to NBC News. [redacted] did not have specific details as to the information [redacted] had pertaining to CLIFFORD and ALTMAN. b3 Per DIA b6

[redacted] advised that [redacted] was willing to cooperate with investigators. The classified documents were at the Cannon Office Building. They were in the possession of Security Officer [redacted] b3 Per DIA b6 b6 Per FBI b7C

Subsequently, on 4/29/91, the writer contacted [redacted] via secured telephone. [redacted] disclosed that the Defense Department documents that [redacted] had were from 1979 and dealt with the International Terrorism Compendium for the Middle East. The State Department documents related to Pakistan's Nuclear Capacity and other documents Dealing in Terrorism. b3 Per DIA b6 b6 Per FBI b7C

[redacted] stated that he would review his agency indices for the name [redacted] b3 Per DIA b6

On that same date, the Northern Virginia C & P Telephone Directory was checked. There were no listings under the name [redacted] b6 Per FBI b7C

1325015-000-4944

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 5/1/91

From : SA [redacted] (C-5) b6 b7C

Subject: CLARK CLIFFORD;
ET AL;
BF&E; FAG;
CONSPIRACY;
(OO: WMFO)

On 4/29/91, the writer was contacted by SSA [redacted] b6 b7C LIAISON UNIT, FBIHQ, extension 4635. SSA [redacted] advised that he was the FBI Liaison Agent with the Defense Department. SSA [redacted] was b3 Per DIA contacted by [redacted], Defense Intelligence Agency (DIA). [redacted] told [redacted] that an individual with the last name [redacted] claimed to have classified Defense Department and State Department documents. In addition, [redacted] had information concerning CLARK CLIFFORD and ROBERT ALTMAN. This information was supposedly known by a Congressional Staffer by the name [redacted] It was also believed that [redacted] was taking his information to NBC News. SSA [redacted] provided the writer with [redacted] telephone number, [redacted] b3 Per DIA

On that same date, the writer contacted [redacted] at b3 Per DIA DIA. [redacted] advised that he received a telephone call from b6 Treasury Agent [redacted] telephone number was (202)566-8534. [redacted] was assigned to Secretary BRADY'S detail. [redacted] told b6 Per FBI [redacted] that a call came into Secretary BRADY'S office from b7C [redacted] Committee Counsel, House Banking Committee, telephone (202)226-3241. Accordingly, [redacted] advised that he has had contact with a citizen who has information against CLARK CLIFFORD and ROBERT ALTMAN. The information was that CLIFFORD and ALTMAN were involved in a money laundering scheme.

The individual's name was First Name Unknown (FNU) [redacted] resided in Herndon, Virginia. To establish his bona fides [redacted] provided [redacted] with classified documents he had in his possession. The documents came from the State Department and the Defense Department. b6 b7C

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SW SW SW

132-015-000-4943

ZQB-WF-171994-33

(K)

Su Su

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 2 ~ b5; b6; b7C; b7D;
Page 3 ~ b5; b6; b7C; b7D;

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Embassy of the United States of America

Office of the Legal Attache
U. S. Department of Justice
Broad Street
Bridgetown, Barbados

19 January, 1995

Mr. Edric Potter
Commissioner
Royal Police Force of Antigua
St. John's, Antigua

ATTENTION: Supt. [redacted] b6 b7C

RE: Ghaith Rashad PHARAON
File 29B-WF-171994

Dear [redacted] b6 b7C

Per our telephone conversation today, I am forwarding to you descriptive data regarding Pharaon and his yacht. As I told you, Pharaon is wanted in the United States on Racketeering and Fraud charges related to the Federal Bureau of Investigation's case on the Bank of Credit and Commerce International (BCCI). He is allegedly enroute to Antigua on board his 165 foot yacht. The yacht is very easy to identify because of its size and the all white yacht's most distinguishing characteristic which is the likeness of the famous blue and gold death-mask of King Tutankhamen ("King Tut") on each side of the bridge.

The vessel left Las Palmas De Gran Canaria, Canary Islands at approximately midnight, January 18, 1995 and was allegedly enroute to Antigua. The vessel is said to be under the command of Captain [redacted] and manned by a crew of 13. The vessel is also alleged to have on board at least eight firearms. b6 b7C

The attached documents include a complete description of Pharaon and background information on the charges pending against him. Any assistance which you could provide in apprehending this badly wanted fugitive, would be greatly appreciated.

I look forward to seeing you again in the near future.

Sincerely,

[redacted] b6 b7C

Legal Attache

29B-WF-171994-14

1325015-000-4869

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 3
Page 2 ~ b7A - Per Interpol;
Page 3 ~ b7A - Per Interpol;
Page 4 ~ b7A - Per Interpol;

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X For this Page X
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Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 1/22/93

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG
(OO: WMFO)

In order to better administrate the captioned matter, the following subfiles have been opened:

Sub A.....Outgoing Teletypes/Facsimiles
Sub C.....1As
Sub D.....FD-302s and Inserts
Sub F.....Financial Matters
Sub G.....Atlanta (National Bank of Georgia/BCCI)
Sub H.....Bulky Exhibit Forms (FD-192)
Sub I.....Ghaith R. Pharaon - InterRedec, et al
Sub J.....Collection and Review of Records - BCCI
Sub L.....Los Angeles (Independence Bank - BCCI)
Sub M.....Miami (CenTrust/BCCI activity)
Sub N.....Results of Customs/[redacted]Joint, Money-laundering Investigation in Middle District of Florida b7E
Sub O.....Results of Investigation by Board of Governors of the Federal Reserve System
Sub P.....Press Coverage
Sub Q.....Subpoenas
Sub R.....Incoming Teletypes/Facsimiles
Sub S.....Airtels (In/Out)
Sub T.....All other banks (Main Bank/Houston; Bank of the Commonwealth/Detroit)
Sub U.....Dr. [redacted] et al b6
Sub V.....[redacted]; et al b7C
Sub W.....Clifford & [redacted]
Sub AA.....CAPCOM/TCI
Sub FS.....Forfeiture/Seizure
Sub TS.....Top Secret
Sub Fug 1.....Agha Hasan Abedi
Sub Fug 2.....[redacted]

SUB X — BRENT SKOWCROFT

30-WMFO
(1-29B-WF-171994)
(1-Each Subfile)

JNR:jnr
(30)

1325015-000-13084

29B-WF-171994

Sub Fug 3.....Ghaith R. Pharaon
Sub Fug 4....[redacted] b6 b7C
Sub BB.....Screening
Sub CC.....Kerry Committee Matters

The following, new subfile is being established:

Sub DD.....Lead Control

1325015-000-13085

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 12/22/92

From : SA [redacted] (BCCI) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

Reference Baltimore teletype dated 7/17/92 and telcal between SA [redacted] and SSA [redacted] PCU, FBIHQ on this date. b6 b7C

Referenced telcal was to discuss allegations against National Security Advisor BRENT SCOWCROFT contained in referenced teletype. These allegations were that SCOWCROFT, while a private businessman in Saudi Arabia, accepted commissions from the Saudi Arabian government. SSA [redacted] stated that this is not a violation of the Foreign Corrupt Pratices Act, therefore advising that WMFO should not conduct any investigation into these allegations. b6 b7C

8-3-93
Close #4
8/3/93

-2

29B-WF-171994 Sub X

SEARCHED SW INDEXED SW
SERIALIZED SW FILED SW
2 1992
FBI — WASH. FIELD OFFICE

1325015-000-13088

Proposed Investigation

Conduct interviews of [redacted] to determine the validity of the allegations. b6 b7C

Acquire [redacted] evidence, such as the taped conversation and documents. b6 b7C

Conduct full background investigation of BRENT SKOWCROFT.

It is requested that a Subfile of above captioned case be opened for this matter.

1325015-000-13087

Memorandum

SUBX

To : SAC, WMFO (29B-WF-171994) (P) Date 11/25/92

From : SA [redacted] (BCCI) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

Purpose:

A Baltimore Source has advised that [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

Additionally, BCCI subject [redacted]

[redacted]

At this time, [redacted]

[redacted] b6 b7C b7D

[redacted], New York Investigator advised that New York is attempting to have the U.S. State Department let [redacted] enter the U.S. and that he will be a key witness in their prosecution of BCCI nominees. b6 b7C b7D

2-WMFO

DBS:dml
(2)

O/A - 29B-WF-171994 - SubX 11-30-92

11/27/92

New Sub-file - SubX

" Brent Skowcroft "

-1

29B-WF-171994-SUBX

SEARCHED [redacted] INDEXED
SERIALIZED [redacted] FILED
NOV 27 1992
FBI — WASH. FIELD OFFICE
[redacted] b6 b7C

1325015-000-13086

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 12
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Page 4 ~ Duplicate;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 14 ~ Referral/Consult;
Page 15 ~ Duplicate;

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Memorandum

To : ADIC, WMFO (29B-WF-171994)(P)(C-5) Date 10/14/94

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Due to the fact that, for the reasons indicated, no investigation remains to be done, it is recommended that the following subfiles be administratively closed:

Sub U [redacted] ET AL): DOJ deferred to the District Attorney of New York (DANY) in the prosecution of this matter. b6 b7C

Sub V [redacted] ET AL): No evidence of a money laundering violation found.

Sub Fug 2 [redacted] Apprehended and prosecuted.

Sub Fug 4 [redacted] Prosecuted in the Middle District of Florida.

C4 10-18-94 SW

5-WMFO
1-29B-WF-171994 Main
1-29B-WF-171994-SUB V

29B-WF-171994- Sub V - 9

JNR:jnr
(5)

SW SW

1325015-000-10256

Memorandum

To : SAC, WMFO 29B-WF-171994 (P) Date 3/20/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF;FAG;
OO:WMFO

JPF

Attached is a copy of a memorandum received from AUSA [redacted] on 2/10/92, which requests action as deemed appropriate. b6 b7C

1 - 29B-WF-171994 - Sub V (Att. 1)
JPF:jpf
(1)

29B-WF-171994 - 4
Sub V

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
MAR 20 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-10244

On [redacted] SA [redacted] was contacted telephonically by [redacted] from [redacted] office at [redacted] b6 b7C b7D provided the following information:

DOB: [redacted]
POB:
SSAN:
CURRENT ADDRESS:

[redacted] advised that [redacted] b6 b7C b7D

[redacted] was unable to provide any further information at this time, but he stated that he would be willing to be contacted again.

(1) - 29B-WF-171994 - Sub-V

29B-WF-171994 Sub V

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 24 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-10245

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/19/92

On [redacted], SA [redacted] was contacted telephonically by [redacted] from [redacted] office at [redacted] Also present in the phone conversation was SA [redacted] United States Customs Service (USCS). [redacted] provided the following information: b6 b7C b7D

DOB: [redacted]
POB:
SSAN:
CURRENT ADDRESS: [redacted]

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] added that [redacted] b6 b7C b7D

[redacted] would not divulge [redacted] at this time.

[redacted] could provide no further information.

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED SU FILED SU
MAR 2 1992
FBI - WASH. METRO FIELD OFFICE
1 SU

Investigation on 3/19/92 at WASHINGTON, D.C. File # 29B-WF-171994 Sub-V

SA [redacted] — 6 b6 b7C

by [redacted] Date dictated 3/19/92

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/19/92

On [redacted] SA [redacted] was contacted telephonically by [redacted] from [redacted] office at [redacted] Also present in the phone conversation was SA [redacted] United States Customs Service (USCS). [redacted] provided the following information: b6 b7C b7D

DOB: [redacted]
POB: [redacted]
SSAN: [redacted]
CURRENT ADDRESS: [redacted]

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] added that [redacted] b6 b7C b7D

[redacted] would not divulge [redacted] at this time.

[redacted] could provide no further information.

Investigation on 3/19/92 at WASHINGTON, D.C. File # 29B-WF-171994 Sub-V

SA [redacted] JAF —6 b6 b7C

by _____ Date dictated 3/19/92

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

rec'd 3/20
KLH 1000

NORTH FLORIDA ENFORCEMENT AREA TRANSMITTAL COVERSHEET

C51789

DATE/TIME: 20 Mar 92 ~~18 Mar 92~~

TO: FBI [redacted] 324 6358

b6
b7C

FTS FAX#: 202 324 6426

FROM: US Customs [redacted]

PAGES SENT: 7
INCLUDING COVERSHEET

COMMENTS: arrest warrant on marks; helicopt on
aircraft marks

SPECIAL AGENT IN CHARGE
U.S. CUSTOMS SERVICE
2203 N. LOIS AVE., SUITE 600
TAMPA, FL. 33607

SAC FTS PHONE#----826-7638
SAC COMM PHONE#----813-225-7638
FTS FAX#----826-7099
GROUP PHONE NUMBERS
STRATEGIC----813-228-2171
CURRENCY----228-2014
FRAUD----225-7629
SEAPORT----228-2781
AIR SMUGGLING----228-2438
MARINE SMUGGLING----813-461-5391
MARINE SMUGGLING COMM FAX#----813-461-9366

ZAB-WF-171994 Serial 7

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
APR 7 1992
FBI - WASH. METRO FIELD OFFICE
JRF

AO 442 (Rev. 12/85) Warrant for Arrest

United States District Court

EASTERN DISTRICT OF MICHIGAN - Southern Division

UNITED STATES OF AMERICA
V.

SYED HASSAN AHMED,
JULIA MARKO.

WARRANT FOR ARREST

CASE NUMBER: 91-80367

To: The United States Marshal
and any Authorized United States Officer

LAWRENCE ZATKOFF

YOU ARE HEREBY COMMANDED to arrest JULIA MARKO
Name

and bring him or her forthwith to the nearest magistrate to answer a(n)

☒ Indictment ☐ Information ☐ Complaint ☐ Order of court ☐ Violation Notice ☐ Probation Violation Petition

charging him or her with (brief description of offense)

Conspiracy to launder monetary instruments

in violation of Title 18 United States Code, Section(s) 371

JOHN P. MAYER
Name of Issuing Officer

Clerk, United States District Court
Title of Issuing Officer

Signature of Issuing Officer

1/2/91 Detroit, Michigan 48226
Date and Location

I hereby certify that the foregoing is a true copy of the original on file in my office.
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
By Jeanette M. Curry 2/18/91
Deputy

Bail fixed at $ _____ by _____
Name of Judicial Officer

RETURN

This warrant was received and executed with the arrest of the above-named defendant at _____

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

1325015-000-10249

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYED HASSAN AHMED,
JULIA MARKO,

Defendants.
_____/

CRIMINAL ACTION NO. 91-80367

VIOLATIONS: 18 U.S.C. §§ 371, 1956(a)(3)

F I R S T
S U P E R C E D I N G I N D I C T M E N T

THE GRAND JURY CHARGES:

COUNT ONE
(18 U.S.C. § 371 - Conspiracy)

That beginning at least as early as December 8, 1990, and continuing thereafter until on or about April 29, 1991, the exact dates being unknown to the grand jury, within the Eastern District of Michigan and elsewhere, SYED HASSAN AHMED and JULIA MARKO, Defendants herein, did unlawfully, willfully and knowingly combine, conspire, confederate, and agree together and with other persons both known and unknown to the grand jury, to commit an offense against the United States, that is, to conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, which financial transaction involved property represented by a law enforcement officer to be the proceeds of a specified unlawful activity, namely, the distribution of a controlled substance in violation of Title 21, United States Code, Section

1325015-000-10250

- Laundering of Monetary Instruments)

That on or about April 29, 1991, within the Eastern District of Michigan, SYED HASSAN AHMED, Defendant herein, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit:

> the transfer of United States currency in the amount of approximately $1,000,000.00 from the State of Michigan to and through a place outside the United States;

which financial transaction involved property represented by a law enforcement officer to be the proceeds of a specified unlawful activity, to wit:

> the distribution of a controlled substance in violation of Title 21, United States Code, Section 841(a);

with the intent to do one or both of the following: (a) to promote the carrying on of said specified unlawful activity; (b) to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of said specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and 1956(a)(3)(B).

THIS IS A TRUE BILL

FOREPERSON OF THE GRAND JURY

1325015-000-10251

841(a), with the intent to do one or both of the following; (a) to promote the carrying on of said specified unlawful activity; (b) to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of said specified unlawful activity, all in violation of Title 18, United States Code, Sections 1956(a)(3)(A) and 1956(a)(3)(B).

OVERT ACTS

1. On December 10, 1990, SYED HASSAN AHMED and JULIA MARKO, Defendants herein, met with undercover, Drug Enforcement Administration Special Agent, Johnnie Granados, in Detroit, Michigan.

2. On January 7, 1991, SYED HASSAN AHMED and JULIA MARKO, Defendants herein, met with undercover, Drug Enforcement Administration Special Agent, Johnnie Granados, in Detroit, Michigan.

3. On January 8, 1991, SYED HASSAN AHMED and JULIA MARKO, Defendants herein, met with undercover, Drug Enforcement Administration Special Agent, Johnnie Granados, in Detroit, Michigan.

4. On April 29, 1991, SYED HASSAN AHMED, Defendant herein, met with undercover, Drug Enforcement Administration Special Agent, Johnnie Granados, in Detroit, Michigan.

All in violation of Title 18, United States Code, Section 371.

1325015-000-10252

** TOTAL PAGE.006

STEPHEN J. MAHAMAN
United States Attorney

KEITH E. CORBETT
Assistant U.S. Attorney

JAMES M. WOUCZYNA
Assistant U.S. Attorney

Dated: June 12 1991

1325015-000-10254

PAGE.006

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 1/15/93

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

Status Report - 12/30/92

Lead # 46 - [redacted] b6 b7C

[redacted] has been interviewed telephonically and advised writer [redacted] has not taken this advice [redacted] All information regarding [redacted] has been shared with appropriate authorities. Writer is in the process of gathering information regarding [redacted] and others through NEXES, FINCEN, etc. Upon receipt of that information a determination will be made as to any further investigation.

4 - WMFO (1 - 29B-WF-171994)
(1 - IIC [redacted]
(1 - SSA [redacted]
(1 - SA [redacted] b6 b7C

JPF
(4)

29B-WF-171994 Sub V-8

SEARCHED INDEXED
SERIALIZED FILED
JAN 21 1993
FBI — WASH. FIELD OFFICE

Memorandum

To : SAC, WMFO 29B-WF-171994 (P) Date 3/20/92

From : SA [redacted] (C-5) b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
OO:WMFO

RE memorandum from AUSA [redacted] to WMFO dated 2/10/92. b6 b7C

It is requested that an administrative subfile for the above captioned case be opened to handle matters related to the above referenced memorandum.

(D)

(1) - 29B-WF-171994 - Main
1 - 29B-WF-171994 - Sub V

b6 b7C

3-20-92

O+A Sub V
3/20/92

Sub V -1
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 20 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-10233

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 56
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Page 4 ~ Duplicate;
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Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
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Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 3/17/92

From : SA [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

PURPOSE

The purpose of this memo is to create a new sub-file (Sub-File U) for captioned case in order to maintain investigative results regarding [redacted] and his associates and various business affiliations. b6 b7C

JUSTIFICATION

[redacted] b6 b7C
the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI)-United States (New York) Division. Through his dealings with BCCI-NY, [redacted]
BCCI Officials. [redacted]
of [redacted]

In addition, officials from the U.S. SMALL BUSINESS ADMINISTRATION (SBA) have reported that [redacted] b6 b7C
[redacted] FALCON CAPITAL CORPORATION (FCC), [redacted]

2 - WMFO
(1 - 29B-WF-171994 -Main)
(1 - 29B-WF-171994 -Sub U)
CWS
(2)

[redacted] b6 b7C

1325015-000-12442

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1900 Half Street
Washington D. C. 20535
March 10, 1992

U.S. Small Business Administration
Office of Inspector General
Deputy Inspector General/Counsel
Mail Stop 4110
409 3rd Street S.W.
Washington, D.C. 20416

Re: Falcon Capital Corporation, Zurich Corporation,
P.S. Investment Company, [redacted] b6 b7C

Dear Sir/Madame:

Pursuant to an ongoing investigation, the Washington Metropolitan Field Office of the Federal Bureau of Investigation requests access to your agency's files regarding the above referenced entities/individual, as well as any known affiliated companies or individuals. Information obtained from your office will not be disseminated outside of the U.S. Department of Justice.

Sincerely,

Robert M. Bryant
Special Agent In Charge

By: [redacted] b6 b7C
Supervisory Special Agent

cc: [redacted] Trial Attorney b6 b7C
U.S. Small Business Administration

2 - Addressees
2 - 29B-WF-171994 (1 - 29B-WF-171994-Main)
(1) - 29B-WF-171994-Sub U)

CWS
(4)

29B-WF-171994 Sub-U -2

Searched ....
Serialized Su
Indexed ....
Filed Su

1825015-000-12444

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 3/17/92

From : SA [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

On 3/16/92, [redacted] b6 b7C U.S. SMALL BUSINESS ADMINISTRATION, OFFICE OF INSPECTOR GENERAL (SBA-OIG) Washington, D.C. (202/205-7400), telephonically advised that his office will refer their investigative interest in [redacted] FALCON CAPITAL CORPORATION (FALCON), to their Atlanta, Georgia Office, inasmuch as FALCON is located in North Carolina and falls within Atlanta's SBA-OIG territory.

(X)

29B-WF-171994 - 3

SUB U

2 - WMFO
(1 - 29B-WF-171994 -Main)
(1 - 29B-WF-171994 -Sub U)

CWS
(2)

1325015-000-12445

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/17/92

[redacted] Agent, U.S. SMALL BUSINESS ADMINISTRATION (SBA), was contacted at his place of employment located at 666 11th Street N.W., Washington, D.C. 20001, telephone number 202/272-3617. After being advised of the identity of the agent, [redacted] provided photocopies of the following documents: b6 b7C

1. Court Order dated December 17, 1991 signed by UNITED STATES DISTRICT JUDGE JAMES C. FOX, Eastern District of North Carolina, Cause Number 91-100-CIV-4-F, entitled UNITED STATES OF AMERICA, PLAINTIFF V. FALCON CAPITAL CORPORATION, DEFENDANT.

2. Judgement in a Civil Case Number 91-100-CIV-4-F by the UNITED STATES DISTRICT COURT for the Eastern District of North Carolina, dated December 18, 1991 against FALCON CAPITAL CORPORATION in the sum of $1,265,590.01.

3. Schedule entitled "FALCON CAPITAL CORPORATION, LICENSE NO. 04/04-0091, SCHEDULE OF PORTFOLIO COMPANIES. The schedule contains the names, addresses, loan type (Equity/Debt), loan date, loan amount and principal's name for credit extended by FALCON CREDIT CORPORATION. The schedule contains 31 accounts totaling $1,846,499.

Attached to and considered a part of this FD-302 are photocopies of the aforementioned documents.

-5

Investigation on 3/10/92 at Washington, D.C. File # 29B-WF-171994-Sub-D 29B-WF-171994-Sub-U

by SA [redacted] cws Date dictated 3/17/92

SEARCHED INDEXED SERIALIZED FILED MAR 17 1992 FBI - WASH. METRO FIELD OFFICE

b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-12463

FILED
DEC 18 '91
J. RICH ... CLERK
U.S. DISTRICT COURT
E. DIST. N.C.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
NEW BERN DIVISION
No. 91-100-CIV-4-F

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) O R D E R
FALCON CAPITAL CORPORATION,)
Defendant.)

Entry of default having been entered on November 25, 1991, and the United States' Motion for Appointment of the Small Business Administration as Receiver of Defendant being uncontested, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

1. Pursuant to the provisions of 15 U.S.C. § 687c, this court shall take exclusive jurisdiction of Falcon Capital Corporation (Falcon) and all or its assets, wherever located, and the Small Business Administration (SBA) hereby is appointed receiver of Falcon (Receiver) to serve without bond until further order of this court. The Receiver is appointed for the purpose of liquidating all of Falcon's assets and satisfying the claims of creditors therefrom in the order of priority as determined by this court.

2. The Receiver shall have all powers, authorities, rights and privileges heretofore possessed by the officers and directors of Falcon under applicable state and federal law and by the Charter, By-Laws and Articles of Incorporation of said corporation, in addition to all powers and authority conferred upon the Receiver by the provisions of 15 U.S.C. § 687c and 28 U.S.C. § 754. The

directors, officers, employees and agents of Falcon are hereby dismissed. Such persons shall have no authority with respect to Falcon's operations or assets, except as may hereafter be expressly granted by the Receiver. The Receiver shall assume and control the operation of Falcon and shall pursue and preserve all of its claims.

3. The past and/or present officers, directors, agents, and employees of Falcon as well as all those acting in their place, are hereby ordered and directed to turn over to the Receiver forthwith all books, records, documents, accounts and all other instruments and papers of said corporation and all other assets and property of the corporation, whether real or personal. Falcon shall furnish a written statement within five (5) days after the entry of this Order, listing the identity, location and estimated value of all assets of Falcon as well as the names, addresses and amounts of claims of all known creditors of Falcon. All persons having control, custody or possession of any assets or property of Falcon are hereby directed to turn such property over to the Receiver.

4. The Receiver shall promptly give notice of its appointment to all known officers, directors, agents, employees, shareholders, creditors, and debtors of Falcon. All persons and entities owing any obligations or debts to Falcon shall, until further ordered by this Court, pay all such obligations in accordance with the terms thereof to the Receiver and its receipt for such payments shall have the same force and effect as if Falcon

1325015-000-12465

had received such payments and receipt thereof.

5. The Receiver is hereby authorized to open such Receiver's bank accounts, at banking or other financial institutions, to extend credit on behalf of Falcon, to utilize SBA personnel, and to employ such other personnel as necessary to effectuate the operation of the receivership including, but not limited to, attorneys, and accountants, and is further authorized to expend receivership funds to compensate such personnel in such amounts and upon such terms as the Receiver shall deem reasonable in light of the usual fees and billing practices and procedures of such personnel. The Receiver is not required to obtain Court approval prior to the disbursement of receivership funds for payments to personnel employed by the Receiver or payments for expenses incidental to administration of the Receivership. In addition, the Receiver is authorized to reimburse the SBA for travel expenses incurred by SBA personnel in the establishment and administration of the receivership. The Receiver may, without further order of this Court, transfer, compromise, or otherwise dispose of any claim or asset, other than real estate, which would result in net proceeds to the Receiver not in excess of $5,000 per transaction.

6. Falcon's past and/or present officers, directors, agents, shareholders, employees, and other appropriate persons shall answer under oath to the Receiver all questions which it may put to them regarding the business of said corporation, or any other matter relevant to the operation or administration of the

1325015-000-12466

receivership or the collection of funds due to Falcon. In the event that the Receiver deems it necessary to require the appearance of the aforementioned persons, it shall direct notice for any such appearance by certified mail, and said persons shall appear and give answer to the receiver within (10) days of service of said notice at the time and place designated therein.

7. The parties to any and all civil legal proceedings wherever located, including, but not limited to arbitration proceedings, foreclosure actions or other default proceedings involving Falcon or any assets of Falcon, but excluding the instant proceeding, involving Falcon or its present or past officers or directors or the Receiver, sued for, or in connection with, any action taken by Falcon's officers or directors while acting in such capacity whether as plaintiff, defendant, third-party plaintiff, third-party defendant, or otherwise, or with respect to any assets of Falcon, are enjoined from taking any action, including discovery, commencing or continuing any legal proceeding of any nature in connection with any proceeding. All civil legal proceedings wherever located, including arbitration proceedings, but excluding the instant proceeding, involving Falcon or any of its assets or any action of any nature taken by Falcon's present or past officers or directors sued for, or in connection with, any action taken by them while acting in their official capacity whether as plaintiff, defendant, third-party plaintiff, third-party defendant, or otherwise, are stayed in their entirety, and all Courts having any jurisdiction thereof are enjoined from taking or

permitting any action until further Order of this Court. Notwithstanding the foregoing, the Receiver may bring suit on any causes of action which Falcon has against any parties liable to Falcon.

8. Falcon and its past and/or present directors, officers, agents, employees and other persons acting in concert or participation therewith be, and they hereby are, enjoined from either directly or indirectly taking any actions or causing any such action to be taken which would dissipate the assets and property of Falcon to the detriment of the Receiver appointed in this cause, including but not limited to destruction of corporate records, or which would violate the Small Business Investment Act of 1958, as amended, (the Act), 15 U.S.C. 661 et seq., or the regulations promulgated thereunder, (the Regulations), 13 C.F.R. § 107.1 et seq. (1990).

9. The Receiver is authorized to borrow on behalf of Falcon, from the SBA, up to $200,000 and is authorized to cause Falcon to issue Receiver's Certificates of Indebtedness in the principal amounts of the sums borrowed, which certificates will bear interest at or about 10 percent per annum and will have a maturity date no later than 18 months after the date of issue. Said Receiver's Certificates of Indebtedness shall have priority over all other debts and obligations of Falcon, excluding administrative expenses of the Receivership, whether presently existing or hereinafter incurred, including without limitation any claims of stockholders of Falcon.

1325015-000-12468

10. This court determines and adjudicates that Falcon has violated the Act and the Regulations, as alleged in the Complaint filed against Falcon in this action. After the foregoing activities are completed, the Receiver may submit a report to this court recommending that Falcon's license be revoked.

11. It appearing from the Complaint and affidavits and exhibits attached thereto that the SBA is further entitled to a judgment in the amount of $1,265,590.01, representing the principal balance and accrued interest as of November 1, 1991, on the debentures, plus interest accruing at a daily rate of $292.17, for each day subsequent to November 1, 1991, until date of entry of judgment. Therefore, the Clerk of Court is DIRECTED to enter judgment against Falcon in the sum on $1,265,590.01, plus any accrued interest on the debentures and accrued dividends on the preferred stock until the date of entry of judgment. It is further ORDERED that post-judgment interest shall accrue at the legal rate from the date of entry of judgment until the judgment is paid in full, pursuant to 28 U.S.C. § 1961.

SO ORDERED.

This 17th day of December, 1991.

JAMES C. FOX
United States District Judge

I certify the foregoing to be a true and correct copy of the original.
J. Rich Leonard, Clerk
United States District Court
Eastern District, North Carolina
By: Deputy Clerk

1325015-000-12469

AO 450 (Rev. 5/85) Judgment in a Civil Case

DEC 18 1991
J. RICH LEONARD, CLK
U.S. DISTRICT COURT
EAST. DIST. NO.

United States District Court

EASTERN DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA
Plaintiff

V.

FALCON CAPITAL CORPORATION,
Defendant

JUDGMENT IN A CIVIL CASE

CASE NUMBER: 91-100-CIV-4-F

☐ Jury Verdict. This action came before the Court for a trial by jury. The issues have been tried and the jury has rendered its verdict.

☒ Decision by Court. This action came to trial or hearing before the Court. The issues have been tried or heard and a decision has been rendered.

IT IS ORDERED AND ADJUDGED that judgment is entered against the defendant, Falcon Capital Corporation in the sum of $1,265,590.01, plus any accured interest on the debentures and accrued dividends on the preferred stock until the date of entry of judgment. Post-judgment interest shall accrue at the legal rate from the date of entry of judgment until the judgment is paid in full and this case is closed.

SO ORDERED - s/James C. Fox, United States District Judge.

THE ABOVE JUDGMENT WAS ENTERED TODAY, December 18, 1991, AND COPIES MAILED TO:

Mr. Rudy Renfer, Jr.
Assistant United States Attorney
310 New Bern Ave., Ste. 800
Raleigh, N.C. 27611 - 1461

Mr. Mark W. Vita
Office of General Counsel
409 3rd Street, S.W., 7th Floor
Washington, D.C. 20416

I certify the foregoing to be a true and correct copy of the original.
J. Rich Leonard, Clerk
United States District Court
Eastern District of North Carolina
By Delsia Heath
Deputy Clerk

December 18, 1991
Date

J. RICH LEONARD
Clerk

Delsia Heath
(By) Deputy Clerk

1325015-000-12470

FALCON CAPITAL CORPORATION
LICENSE NO. 04/04-0091
SCHEDULE OF PORTFOLIO COMPANIES

PORTFOLIO NAME	EQUITY DEBT	DATE	ORIGINAL AMOUNT	PRINCIPAL
1. Ace Trading Company 1 Seacoast Lane Sands Point, NY 11050	D	1/29/87	$100,000	V. Rao Veeramachaneni
2. Alligator Timber Co., Inc. P.O. Box 310 Manns Harbor, NC 27953	D	11/8/85	50,000	George C. Henderson
3. Americar Corporation 3318 Ridge Crest Court Raleigh, NC 27607	D	1/20/88	5,000	Haywood E. Whichard
4. ATIF Enterprises, Inc. 70-20 35th Avenue Jackson Heights, NY 11372	D	4/29/88	10,000	Babu Narsaiah
5. Cox Trailers, Inc. P.O. Box 388 Grifton, NC 28530	D	8/4/89	100,000	
6. Daftuar, Anil K. 105 Rosewood Court Hendersonville, TN 37075	D D	9/19/88 11/21/88	20,000 30,000	
7. Diamonds & Denims, Inc. 220 Norma Lane Evans, Georgia 30809	D	6/13/88	75,000	Girish K. Sharma
8. Energy Marketing Services (Pat & John A. White) 404 S. Harding St. Greenville, NC 27858	D	1/7/88	8,000	Pat White
9. Fizz, Inc. 110 E. 4th St. Greenville, NC 27834	D	10/26/87	10,000	Abdul H. Kamalpasha / Dr. Mohammad A. Ahad
10. Hallow Window & Door 3203 Memorial Drive Greenville, NC 27834	D D	2/8/88 6/7/88	50,000 50,000	Louis J. Hallow
11. Holtons Logging, Inc. Rt. 1. Box 123A Creswell, NC 27928	D D	11/30/89 1/29/88	25,000 35,000	Harold R. Holton
12. Majestic Inns 6598 Poplar Woods Memphis, TN 38138	D	7/13/87 (7/31/87)	100,000	P. Murali Krishna
13. Mason, Howard & Mary Rt.1 Box 5190 Beaufort, NC 28516	D D	4/28/89 6/1/89	48,500 19,999	Howard Mason

1325015-000-12471

3/10/92

FALCON CAPITAL CORPORATION
LICENSE NO. 04/04-0091
SCHEDULE OF PORTFOLIO COMPANIES

PORTFOLIO NAME	EQUITY DEBT	DATE	ORIGINAL AMOUNT	PRINCIPAL
14.Mayo, R. Guy Rt. 2 Box 7 Grimesland, NC 27837	D	5/4/87	100,000	R. Guy Mayo
15.Naz Fashions, Inc. 1225 Broadway New York, NY 10001	D	9/20/89	15,000	
16.Oza, Harish 107 N. Jefferson St. New Castle, PA 16101	D	10/17/88	45,000	
17.Patel, Kirit C. 3304 S. Memorial Dr. Greenville, NC 27834	D	5/16/88	15,000	
18.Rashdi, Shahaz & Yasim Qanruddin 2504 Vineyard Drive Durham, NC 27707	D	11/4/86	50,000	
19.Regal International, Inc. 256 North Belt East, St.252 Houston, TX 77060	D	11/3/89	80,000	Mahesh Shetty
20.RM&F, Inc. Highway 50 Topsail Beach, NC 28445	D	2/3/84	35,000	Robert C. Snyder
21.Bell Petroleum Services	D	5/90 ?	100,000	
22.Raheem, Shahbaz 34 Karen Way Summit, NJ 07901	D	1/25/88	75,000	
23.Raju Enterprises, Inc. 324 King George Rd. Greenville, NC 27834	D	10/15/85	100,000	Vegesena P. Raju
24.Desai, Vinod & Jayashree 2320 Capuane Rd. Lumberton, NC 28358	D	11/19/85	50,000	
25.Commander Electronics of USA, Inc. 115 Hampshire Dr. Plainboro, NJ 08536	D	2/10/86	100,000	Lalatendu Mohapatra

FALCON CAPITAL CORPORATION
LICENSE NO. 04/04-0091
SCHEDULE OF PORTFOLIO COMPANIES

PORTFOLIO NAME	EQUITY DEBT	DATE	ORIGINAL AMOUNT	PRINCIPAL
26. Lance, T. Bert P.O. Box 2228 Calhoun, Georgia 30701	D	9/15/86	75,000	
27. Owen, Charles 3932 Sandshell Dr. Fort Worth, Texas 76137	D	4/25/88	50,000	
28. Scandia International Trading Co. 60 E. 42nd Street New York, NY 11050	D	3/12/87	100,000	Chandra H. Ravel
29. Williams, Betty 160 Bermuda Court Ponta Verda, Florida 32082	D	10/29/87	20,000	
30. J & B Computers, Inc.	E	11/21/83	100,000	Jim Kelly
31. Reed, Cecil D. 2607 Argosy Court Fayetteville, NC 28304	D	8/2/88	100,000	
Kaminski lot				
TOTALS			$1,846,499	

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/19/92

[redacted], Attorney at Law with the firm CLEARY, GOTTLIEB, STEEN & HAMILTON (CGSH), was contacted at his place of employment located at One Liberty Plaza, New York, NY 1006, telephone number 212/225-2460. CGSH serves as outside counsel for the Superintendent of Banks for the State of New York (SBSNY). b6 b7C

After being advised of the identity of the agent, [redacted] furnished a photocopy of a civil lawsuit prepared and filed with the U.S. District Court for the Southern District of New York by CGSH on behalf of the SBSNY, entitled as follows: b6 b7C

DERRICK D. CEPHAS in his Capacity as The Superintendent of Banks of the State of New York in Possession of the Business and Property of the New York Agency of the Bank of Credit and Commerce International, S.A., Plaintiff,

- against -

ZURICH CORPORATION, P.S. INVESTMENT COMPANY, INC., PONNAPULA SANJEEVA PRASAD and INDRANI PRASAD, Defendants.

Attached to and considered a part of this FD-302 is a photocopy of the aforementioned lawsuit.

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Investigation on 3/12/92 at New York, NY File # 29B-WF-171994-Sub-D 29B-WF-171994-Sub-U

by SA [redacted] CWS Date dictated

SEARCHED INDEXED SERIALIZED FILED
MAR 19 1992
3/19/92
FBI WASH. METRO FIELD OFFICE

b6 b7C

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1325015-000-12474

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DERRICK D. CEPHAS in his Capacity as The Superintendent of Banks of the State of New York in Possession of the Business and Property of the New York Agency of the Bank of Credit and Commerce International, S.A.,	91 Civ. 7907 (JM)
Plaintiff,	COMPLAINT
-against-	JURY TRIAL DEMANDED
ZURICH CORPORATION, P.S. INVESTMENT COMPANY, INC., PONNAPULA SANJEEVA PRASAD and INDRANI PRASAD,	
Defendants.	

The Superintendent of Banks of the State of New York, by his undersigned attorneys Cleary, Gottlieb, Steen & Hamilton, as and for his Complaint against the defendants herein alleges as follows on knowledge as to himself and his acts and on information and belief as to all other matters except as indicated otherwise:

SUMMARY OF ACTION

1. This action arises out of a series of loans made by the New York Agency (the "Agency") of the Bank of Credit and Commerce International, S.A. ("BCCI, S.A.") to the defendants Zurich Corporation ("Zurich") and P.S. Investment Company, Inc. ("P.S. Investment"), both wholly-owned and controlled by defendants Ponnapula Sanjeeva Prasad ("P.S. Prasad") and his wife Indrani Prasad ("I. Prasad"), collectively the "Prasad Defendants." The Prasad Defendants devised and executed a scheme to fraudulently

3/14/92
1325015-000-12475

induce the lending of approximately $34 million to Zurich and P.S. Investment by the Agency, the largest single loan relationship maintained by the Agency, in many instances for purposes other than those stated in the loan application and have ciphoned off revenues generated by the properties purchased and refurbished with the proceeds of the Agency loans and have repaid none of the $34 million.

2. The fraudulent scheme was perpetuated by a variety of misrepresentations, concealments and other devices by the Prasad Defendants, including the use of grossly inflated and fraudulent appraisal reports, the making of other false statements in connection with the loan applications and the corruption of certain BCCI, S.A. and Agency employees. The Prasad Defendants co-opted these employees in order to obtain approval of the loans detailed herein pursuant to applications that were fraudulent on their face. To the extent certain Agency or BCCI, S.A. employees were aware of and participated in the fraud alleged herein, their knowledge as a matter of law cannot be imputed to the Agency.

3. As a result of this scheme, the Agency, and the Superintendent in the possession of its property, including the monies owned by the Prasad Defendants, have been defrauded of approximately $34 million. Defendants are liable for damages for their fraudulent misconduct.

4. Moreover, as part of a restructuring agreement entered into by and between the Agency and the Prasad Defendants, P.S. and I. Prasad each executed an unconditional guarantee of the

1325015-000-12476

Zurich and P.S. Investment loan obligations to the Agency. No payment has been made under the Guarantee by either P.S. or I. Prasad and by this action the Superintendent seeks payment under the Guarantee.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this action pursuant to 18 U.S.C. § 1965, in that this action asserts claims under 18 U.S.C. § 1961, et seq.; diversity jurisdiction exists pursuant to 28 U.S.C. § 1332(a)(1), in that the matter in controversy exceeds $50,000, exclusive of interest and costs, and the action is between citizens of different states; and principles of supplemental jurisdiction under 28 U.S.C. § 1367.

6. Venue is proper in this district pursuant to 28 U.S.C. § 1391 and 18 U.S.C. § 1965. The wrongful acts herein alleged occurred in substantial part within or emanated from this district, and defendants reside, are found, have agents, or transact their business in this district.

PARTIES

7. Plaintiff Derrick D. Cephas, the Superintendent of Banks of the State of New York (the "Superintendent"), has his offices at the New York State Banking Department, Two Rector Street, New York, New York. BCCI, S.A. is a bank chartered under the laws of Luxembourg, which, until July 5, 1991, had been doing business in the State of New York as an agency from its principal office at 530 Fifth Avenue, New York, New York, pursuant to Article V of the New York State Banking Law (the "NYBL"). On

1325015-000-12477

July 5, 1991, the Institut Monetaire Luxembourgeois took possession of BCCI, S.A. in Luxembourg. Following the seizure of the bank in Luxembourg, P. Vincent Conlon, Acting Superintendent, found BCCI, S.A. to be in an unsafe and unsound condition to transact its business and further found that BCCI, S.A. could not with safety and expediency continue doing business within the meaning of Section 606 of the New York State Banking Law ("NYBL"). On July 5, 1991, the Acting Superintendent, acting in accordance with and pursuant to the NYBL, took possession of the business and property of the Agency wherever located and the business and property of BCCI, S.A. in the State of New York. Pursuant to Section 618(1) of the NYBL, the Superintendent is required to collect debts due and owing to the Agency. The Superintendent has commenced this lawsuit in order to collect on a series of outstanding loan obligations as detailed herein, all of which were maintained on the books and records of the Agency as accounts receivable and are part of the property of the Agency to which the Superintendent is entitled.

8. P.S. Prasad is a United States citizen originally from India who on information and belief is a resident of North Carolina with a last known residence at 106 Countrywood Lane in Greenville, North Carolina.

9. I. Prasad is a United States citizen originally from India and the wife of P.S. Prasad. I. Prasad is, on information and belief, a resident of North Carolina with a last known residence at 106 Countrywood Lane in Greenville, North Carolina.

1325015-000-12478

10. Defendant Zurich is a corporation organized and existing under the laws of North Carolina. Zurich is engaged in the investment business and is headquartered in Greenville, North Carolina. Zurich is wholly-owned and controlled by P.S. and I. Prasad (collectively, the "Prasads").

11. P.S. Investment is a corporation organized and existing under the laws of North Carolina. P.S. Investment is engaged in the investment business and is headquartered in Greenville, North Carolina. P.S. Investment is wholly-owned and operated by the Prasads.

BACKGROUND

Structure of BCCI, S.A.

12. BCCI, S.A., a bank chartered under the laws of Luxembourg and technically headquartered in that country, maintained offices and agencies throughout the world.

13. For the period of time relevant to the instant complaint, BCCI, S.A. was for all intents and purposes headquartered in London, England or later on in Abu Dhabi, United Arab Emirates. Specifically, during most of the period of time relevant to the instant complaint, proposed loans and other economic transactions in an amount greater than $500,000 were required to be formally approved by the Central Credit Committee of the London office of BCCI, S.A. (the "Central Credit Committee").

14. BCCI, S.A. was operating in the United States in the form of agencies located in New York and various other locations,

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some of which were closed even prior to the events of July 5, 1991. The primary distinction between an agency and a branch is that an agency is not legally entitled to accept deposits from resident depositors, although it is entitled to accept such deposits from non-residents.

15. In addition, BCCI, S.A. maintained a regional office in New York, the function of which was to generally oversee the operations of the various agencies located in the United States. The United States Regional Office of BCCI, S.A. (the "Regional Office") was, along with the Agency, headquartered at 320 Park Avenue through early 1991 and then relocated to 530 Fifth Avenue in New York, New York.

16. Baji Palkhiwala ("Palkhiwala") assumed the position of regional general manager in February, 1988 and retained the position until in or about June, 1990 when he was replaced.

17. In or about 1987, Tariq Jamil, who had and may still have been a senior executive of the National Bank of Georgia and who subsequently became an officer of BCCI, S.A., introduced P.S. Prasad to employees of the Agency or Regional Office.

Summary of the Fraudulent Loan Transactions

18. Over a period extending from January, 1988 through approximately January, 1991, Zurich and P.S. Investment borrowed approximately $34 million from the Agency for the purchase and refurbishment of five hotels located in New York, North Carolina, Tennessee, Florida and Georgia. The loan transactions were marked by a pattern of fraudulent or grossly inflated appraisals

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and loan documentation, the diversion of the loaned funds from their intended purpose, as well as, with the exception of the last completed transaction, the lack of any legal representation of the Agency. With the exception of the North Carolina premises, which is in bankruptcy, each of the hotels is transacting business and, on information and belief, is producing significant operating income, none of which has been used to repay the debt owed by the defendants to the Agency, but instead has been and continues to be diverted by the defendants for their own purposes.

19. Moreover, during the same period of time, several loans, supported by fraudulent appraisals, were proposed to and some were approved by the Agency by allegedly non-Prasad-related entities. In reality, the loan applicants were related to the Prasads and that fact was at all times concealed from the Agency.

Caprock Savings and Loan Transaction

(a) **The Raleigh Loan Transaction**

20. In or about January 1988, P.S. Prasad contacted the Agency concerning a proposed loan from the Agency to finance the purchase of the Raleigh Inn ("Raleigh") in Raleigh, North Carolina (the "Raleigh Loan").

21. At the time of P.S. Prasad's initial inquiry concerning the Raleigh Loan, Raleigh had twice been in and out of bankruptcy proceedings. This fact must have been known to P.S. Prasad and yet at no time during the discussions between himself and the Agency concerning the proposed loan did he reveal the existence

of the prior bankruptcy proceedings. Indeed, at all times prior to the disbursement of the loan, P.S. Prasad fraudulently concealed this critical fact from the Agency.

22. In order to induce the Agency to make the loan, P.S. Prasad obtained a grossly inflated appraisal on Raleigh. That appraisal was prepared by Charles W. Smith ("Smith"). The appraisal failed to disclose or in any way reflect the prior bankruptcy filings by Raleigh and vastly overestimated the value of the property. In what became a pattern with the Prasad-related loan requests, no independent appraisal was conducted by the Agency and the loan to Zurich was made in significant part on the strength of and in reliance upon the appraisal provided by P.S. Prasad.

23. On or about January 26, 1988, the Agency made two loans to P.S. Investment, one in the amount of $3.5 million and the second in the amount of $2 million. Both loans were advanced to finance the purchase of Raleigh from Borg-Warner Financial Services ("Borg-Warner"). The $3.5 million loan was supported by a first mortgage on Raleigh, while the $2 million loan was supported by a third mortgage on Raleigh.

24. Also on or about January 26, 1988, Caprock Savings and Loan of Dallas, Texas ("Caprock S & L"), of which George Dillman ("Dillman") was the Chairman and William C. Hatfield ("Hatfield") was a director, lent $375,000 to P.S. Investment for the express purpose of bringing current the outstanding property taxes on Raleigh. This Caprock S & L loan was supported by a second

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mortgage on Raleigh. The credit proposal submitted to the Central Credit Committee for approval of the two Agency loans made no mention of this $375,000 loan by Caprock S & L.

25. On or about January 26, 1988, simultaneous with the two Agency loans and that by Caprock S & L, Caprock S & L issued a $3.5 million standby letter of credit in favor of the Agency on the condition that in the event of a drawdown on the letter of credit, Caprock S & L would be assigned the first mortgage interest on Raleigh obtained by the Agency in connection with its $3.5 million loan to P.S. Investment.

(b) **The Raleigh Purchase Transaction**

26. Prior to the Raleigh Loan, Caprock S & L had set up two special purpose subsidiaries, namely Caprock Hospitality and Caprock Properties, both under another Caprock S & L subsidiary: Title USA Insurance Corporation ("Title USA"). Caprock Hospitality was created for the purpose of holding Raleigh.

27. Raleigh was purchased by P.S. Investment from Borg-Warner with the proceeds of the Raleigh Loan.

28. On or about February 26, 1988, the Bank of Baroda made a loan in the amount of $3.3 million to P.S. Investment in connection with which the prior $2 million loan of the Agency to P.S. Investment was subordinated, relegating the Agency's then third mortgage interest on Raleigh to a fourth interest.

29. On or about May 24, 1988, P.S. Prasad was contacted by Dillman concerning a proposed agreement between Great West Bancshares, Inc. ("Great West"), the parent company of Caprock S

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& L by virtue of its ownership of 94% of the Caprock S & L stock, and P.S. Prasad or an entity controlled by him. The proposed agreement related to the transfer of Raleigh to Great West, or to a separate company whose equity was then owned by Great West or Caprock S & L, without any assumption of the debt associated with Raleigh by the transferee company and with the issuance to P.S. Prasad of certain stock in Great West.

30. On or about July 15, 1988, P.S. Prasad allegedly delivered preferred stock shares of Great West with a face amount of $3.8 million to his North Carolina attorney, Stephen F. Horne III ("Horne"), to be kept in Horne's custody for the benefit of the Agency, to which he had allegedly assigned the shares. On information and belief, these shares were at no point tendered to the Agency.

31. On information and belief, sometime during 1988, P.S. Investment sold Raleigh, subject to the Agency mortgage, to Caprock Hospitality.

32. On or about April 6, 1989, Hatfield as executive vice president of Caprock Hospitality and on Caprock Hospitality letterhead requested that the Agency extend a $3.5 million line of credit to Caprock Hospitality and release the $3.5 million standby letter of credit issued by Caprock S & L in favor of the Agency. In exchange, Caprock S & L was to provide or cause to be provided $1 million in deposits with the Agency and Caprock Hospitality was to obtain a $700,000 letter of credit in favor of the Agency to be presented for payment in the event of a default

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by Caprock Hospitality on its obligation to the Agency. The letter proposal further stated that the deposits and letter of credit would be provided within three weeks of the Agency's written acceptance of the proposal.

33. On information and belief, the letter proposal was never accepted by the Agency and the proposed transaction was never consummated.

34. On or about May 24, 1989, Caprock S & L extended the maturity date of the $3.5 million standby letter of credit issued in the Agency's favor on or about January 26, 1988 from May 30, 1989 to June 30, 1989.

35. On or about June 30, 1989 the Agency made a demand on the $3.5 standby letter of credit issued by Caprock S & L in connection with which the first mortgage interest held by the Agency on Raleigh was transferred to Caprock S & L.

36. By order of the Office of Thrift Supervision, Caprock S & L was placed into conservatorship and the Resolution Trust Corporation ("RTC") was appointed as its conservator on August 1, 1989. By operation of law, the RTC became the beneficial owner of the lien held by Caprock S & L on Raleigh.

37. In or about November, 1989 and in connection with the sale of Raleigh to Caprock Hospitality, P.S. Prasad approached the Agency concerning a loan to Zurich with respect to Raleigh, which at this point in time had been renamed and was doing business as a member of the Howard Johnson chain of hotels.

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Specifically, P.S. Prasad requested a line of credit in Zurich's favor in the amount of $11.5 million.

38. The alleged purpose of the $11.5 million line of credit was threefold: to repay the $2 million Raleigh Loan and to purchase the RTC and Bank of Baroda liens, both for less than their face value, which if accomplished would have given the Agency a first, rather than a third lien on Raleigh.

39. The $11.5 million line of credit was again approved in large part on the strength of a grossly inflated appraisal prepared by Smith, which again severely exaggerated the value of the property. On December 12, 1989, subsequent to the approval of the $11.5 million line of credit, but prior to its disbursement, Caprock Hospitality, the owner of Raleigh, filed for protection under Chapter 11 of the United States Bankruptcy Code. The bankruptcy filing by Caprock Hospitality was never reported to the Agency by P.S. Prasad or Zurich and was at no time reported to the Central Credit Committee, which had responsibility for evaluating and approving the proposed $11.5 million line of credit.

40. In or about March, 1990, and in connection with the $11.5 million line of credit, the deed of trust with respect to Raleigh was amended to reflect Zurich as the borrower in place of P.S. Investment.

41. Subsequent to the approval of the $11.5 million line of credit, Zurich drew down $2 million and used those funds to repay the Agency the outstanding debt on the Raleigh Loan. While a

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primary justification for the line of credit was to finance the purchase of the RTC lien on the property, it quickly became clear that the RTC did not and never had any intention of selling its lien to Zurich, despite P.S. Prasad's representations to the contrary at the time of his proposal to the Agency.

42. In or about May, 1990, Zurich obtained a $2.5 million disbursement on the line of credit, ostensibly for the purpose of purchasing the second lien on Raleigh that was held by the Bank of Baroda. In fact, however, Zurich fraudulently diverted the $2.5 million to purchase a second hotel, a Days Inn in Tarpon Springs, Florida ("Tarpon").

43. After the Agency discovered the fraud and demanded an explanation, P.S. Prasad asserted that he orchestrated the purchase of Tarpon in order to negotiate a lien swap with the Bank of Baroda of the Tarpon lien and the Bank of Baroda lien on Raleigh. P.S. Prasad then granted the Agency a mortgage interest in Tarpon. The Agency promptly took steps to record its mortgage. Almost immediately after the Agency recorded its mortgage interest in Tarpon, Harry McMullen ("McMullen") recorded a second mortgage on the property. At no time prior to its independent discovery of the McMullen mortgage interest, was the Agency made aware of the existence of any other persons or entities with a potential security interest in Tarpon.

44. Zurich continued to draw down on the $11.5 million line of credit for the purported purpose of refurbishing Raleigh.

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45. In or about May, 1990, P.S. Prasad requested a disbursement of $2 million on the $11.5 million line of credit, representing that he had negotiated a deal with the RTC for the purchase of its lien on Raleigh.

46. On or about May 4, 1990, P.S. Prasad mailed a letter to Raghu Bahadur, then an employee of the Agency, requesting that the $2 million be deposited into the trust account of his attorney in North Carolina where it would be held until the transaction with the RTC was consummated. The letter request was approved by Shahbaz Raheem ("Raheem"), the Senior Credit Officer at the Regional Office until in or about January, 1991, and the money was deposited into the account designated by P.S. Prasad as that of his attorney. Subsequent to the deposit, the Agency learned that the account into which the deposit was made was in fact the personal account of P.S. Prasad and further that no deal had ever been reached with the RTC concerning its lien on Raleigh.

47. Upon learning that the $2 million had been fraudulently diverted into P.S. Prasad's personal account, officials at the Agency demanded an explanation from P.S. Prasad. P.S. Prasad explained the diversion of funds by stating that he had used the $2 million to refurbish yet another property which had been purchased with financing from the Agency, the Quality Hotel at Laguardia Airport in New York City ("Laguardia"). The Agency immediately demanded evidence that the $2 million had in fact been used to refurbish Laguardia, in response to which P.S.

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Prasad produced a series of checks primarily made out to Right Connection Plumbing in the amount of $9,000, just below the legal reporting requirement of $10,000. Despite the Agency's demands, P.S. Prasad refused to provide complete copies of the checks, providing instead only xerox copies of the front of each check. P.S. Prasad thus deliberately stonewalled the Agency's attempts to verify that the checks had in fact been endorsed and cashed by their alleged recipient.

48. With the exception of the original two loans, totalling $5.5 million, which were repaid by a drawdown on the $3.5 million letter of credit issued by Caprock S & L and with $2 million advanced on the $11.5 million line of credit, no portion of the loans made to Zurich in connection with Raleigh has ever been repaid.

Chattanooga Transaction

49. In or about May, 1989, P.S. Prasad approached the Agency concerning a loan to P.S. Investment, the second of the Prasads' wholly-owned and controlled investment vehicles, in order to finance the refurbishment of the Ramada Inn in Chattanooga, Tennessee (the "Ramada Inn"), a property owned by P.S. Investment. The amount of the proposed loan was $500,000, the maximum dollar amount that could be disbursed without first obtaining the approval of the Central Credit Committee.

50. The $500,000 loan was made to P.S. Investment secured by a second mortgage in the Ramada Inn, a valueless property.

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The first mortgage is and was at the time held by the Bank of India.

51. No portion of the $500,000 loan made to P.S. Investment in connection with the Ramada Inn has ever been repaid.

52. In or about May, 1989, representatives of the Federal Reserve Board, the United States government agency with primary responsibility for regulating the operations of BCCI, S.A. in the United States, examined the books and records of the Agency. Observing that Zurich was wholly-owned by the Prasads and that the disbursements were being used for the purchase of real estate in a declining market, the Federal Reserve Board cautioned against further loans to the Prasad Defendants. The Agency nonetheless continued to lend to the Prasads' investment vehicles.

Macon Hilton Transaction

53. In or about August, 1989, P.S. Prasad again approached the Agency concerning his plans to purchase a hotel, the Downtown Macon Hilton ("Macon") in Macon, Georgia. Zurich sought to borrow $7.5 million to purchase and refurbish Macon, which was then in danger of losing its franchise rights as a member of the Hilton chain of hotels on account of its failure to meet the minimum Hilton certification standards. With respect to Macon, P.S. Prasad again obtained and provided the Agency with an appraisal prepared by Smith on which the Agency relied heavily in approving P.S. Prasad's request on behalf of Zurich for a $7.5 million loan.

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54. The Agency disbursed the $7.5 million and Zurich purchased Macon.

55. No portion of the $7.5 million loan made to Zurich in connection with Macon has ever been repaid.

Management of the Prasad-Related Loans

56. In or about February, 1988, Palkhiwala assumed the position of Regional General Manager of the Regional Office.

57. In or about November, 1989, Raheem authored a memorandum, which he sent to Palkhiwala, suggesting that the Prasad-related loans, as well as a limited number of certain other large loans, should be handled only by Z. Chaudry, Raheem and Palkhiwala. Sometime after receiving the memorandum, Palkhiwala revised it to limit the management of the Prasad-related loans to Raheem and Palkhiwala.

Marketplace Georgia Transaction

58. In or about November, 1989, Dillman approached the Agency concerning a proposed $250,000 line of credit in order to refurbish Market Place Georgia, a company which Dillman fraudulently stated owned a shopping mall in Valdosta, Georgia. Dillman held himself out as the owner of Market Place Georgia along with Gerish (Gary) Sharma ("Sharma") and further stated that he was the president of Market Place Georgia. In fact, Dillman was neither the owner nor the president of Market Place Georgia. Dillman also represented that the proposed loan was unrelated to P.S. Prasad. In reality, Market Place Georgia was purchased by P.S. Prasad in 1984 and he subsequently conveyed a

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fifty percent ownership interest in the property to Dr. Vithal Kusuma. The property was then allegedly transferred to Dillman and then to Sharma, but neither transfer was ever formalized and thus never consummated.

59. The credit line was approved and the initial $100,000 was disbursed and was used to repay a loan from the Agency to Dillman that had been collateralized by a $100,000 cash deposit of P.S. Prasad which was released at the time of the repayment. Of the remaining $150,000, $123,000 was fraudulently diverted to an entity controlled by P.S. Prasad, and $27,000 was disbursed to pay fees incurred in the transaction and for payment to Dillman. In sum, while the proposed Market Place Georgia transaction was presented as one wholly unrelated to the Prasads, P.S. Prasad and a Prasad-controlled entity were in fact together the recipients of the total dollar amount of the Agency disbursement.

60. Dillman executed a personal guarantee of the Market Place Georgia loan subsequent to which he filed for relief under the United States Bankruptcy Code.

Laguardia Transaction

61. In or about January, 1990, P.S. Prasad approached the Agency concerning a loan to Zurich in the amount of $14.1 million, $10.1 million to finance the purchase of a then welfare hotel at Laguardia Airport and $4.0 million for its refurbishment.

62. Again an appraisal was presented by P.S. Prasad to the Agency in connection with the loan application. The appraisal

valued the Laguardia property at $19.2 million, however, that appraisal fraudulently included the value of the adjoining parking lot, which had previously been sold to P.S. Prasad's brother, Murali Krishnan Ponnapula ("Ponnapula"), with the proceeds of a $2.0 million loan from the Bank of India.

63. The Agency conditioned the approval of the Laguardia loan on the location of a bona fide purchaser for Macon. In order to circumvent this condition, P.S. Prasad manufactured two purchase offers for Macon, at least one of which was a fictitious $9 million offer made by Sharma.

64. In or about September, 1990, the Agency, then under new management, lent an additional $208,000 to Zurich in order to finance the completion of the renovations necessary before Laguardia could open for business.

65. At this point in time, the Agency had retained outside counsel to explore the complexities of the loan relationship between the Agency and the investment vehicles controlled by the Prasads. Prior to the final documentation of the Laguardia transaction, the Agency's outside counsel discovered that the adjoining parking lot was not available as security for the proposed loan. Counsel also discovered the diversion of funds from the Raleigh Loan, which P.S. Prasad alleged were used to refurbish Laguardia, and as a result increased the Agency's mortgage interest in Laguardia to $16,308,000.

66. No portion of the $14.1 million loan to Zurich in connection with Laguardia has ever been repaid.

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Cox Distribution Transaction

67. In or about May, 1990, Mahesh Shetty ("Shetty"), holding himself out as a representative of Cox Distribution ("Cox"), contacted the Agency, concerning a possible loan to Cox from the Agency. Shetty, the then financial director of Zurich and the Secretary of Cox, described Cox, a company headquartered in Greensboro, North Carolina, as in the business of distributing the trailer products of Cox Trailer, of which Shetty was the financial director, and deliberately misrepresented Cox as totally unrelated to Zurich or the Prasads. In fact, however, Cox Trailers, the company whose products Cox allegedly distributed, is a wholly-owned subsidiary of Zurich and the documents transmitted to the Agency by facsimile for the review of Palkhiwala and Raheem concerning the proposed loan bore the imprint of Zurich's facsimile machine.

68. The loan amount requested by Shetty was $500,000, again the maximum dollar amount that can be disbursed without first obtaining the approval of the Central Credit Committee.

69. In support of the $500,000 loan application, Shetty provided the Agency with an appraisal estimating the value of Cox's principle place of business at $1 million. Subsequent to the transaction, the Agency learned that the appraisal company and appraiser who allegedly provided the $1 million valuation did not exist and no appraisal had ever been conducted on the Cox business.

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70. The documents in connection with the Cox transaction were prepared by Horne, on behalf of Shetty and Cox. The real estate closing on the transaction was also overseen by Horne.

71. Raheem and Palkhiwala approved the $500,000 disbursement. Despite the representation by Shetty that Cox was unrelated to the Prasads, the loan was approved by Palkhiwala and Raheem pursuant to the memorandum of Palkhiwala concerning the restricted approval process required for loans to the Prasad-entities.

72. Shetty fraudulently represented that the $500,000 loan was to be secured by a first mortgage on a warehouse in North Carolina. In fact the Agency was granted a security interest in a defunct service station located directly across the street from the warehouse.

73. The service station on which the Agency was granted a $500,000 mortgage was purchased by Cox from Margaret Norville for $80,000 at or about the time of the loan disbursement by the Agency. Horne, the attorney on the Cox transaction, was, at the time of the purchase, the trustee of an estate that was owed $25,000 by Norville, which was deducted from the $80,000 purchase price of the service station.

74. No portion of the $500,000 loan made to Cox has ever been repaid.

Bell Petroleum Transaction

75. In or about May, 1990, Samuel A. Jasti ("Jasti"), P.S. Prasad's brother-in-law and the president of Bell, contacted the Agency concerning a proposed loan in the amount of $500,000 to Bell Petroleum ("Bell"), a company headquartered in Corsicana, Texas.

76. Again, Bell was fraudulently presented as an entity unrelated to the Prasads, but, as was the case with the Cox transaction, the documentation transmitted to the Agency in support of the loan request bore the facsimile imprint of Zurich. Contrary to Jasti's representations concerning the ownership of Bell, it is a wholly-owned subsidiary of Regal International, Inc. ("Regal"), a publicly held company engaged in the manufacture and sale of various expendable rubber products and headquartered in Englewood Cliffs, New Jersey, in which P.S. Prasad owned a majority interest. Vijay Dandapani ("Dandapani"), the then president of Zurich was also the president of Regal at the time of the proposed loan to Bell and Hatfield, the prior chief executive officer of Bell and director of Caprock S & L, was also a director. Shetty has been the president and chief executive officer of Regal since February 28, 1991.

77. Again, Jasti's loan request was supported by an appraisal and accounting statement. The appraisal, on the letterhead of an appraisal firm in Corsicana, Texas, estimated the value of the property owned by Bell at $2 million.

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78. Prior to the disbursement of the $500,000 loan, an employee of the Agency telephoned the auditing company in order to confirm the value of the property owned by Bell. After telephoning the auditing company, the Agency learned that Bell was not a client of the company, that the signator of the appraisal was not employed by the company and that the company had at no point in time performed an audit for Bell or of the property allegedly owned by Bell. Moreover, the appraisal company did not exist at all.

79. After learning of the fraudulent documentation, the Agency rejected the proposed $500,000 disbursement to Bell.

Change in Agency and Regional Office Management

80. In or about March and April, 1990, the Central Credit Committee demanded information from Palkhiwala and Raheem concerning the status of the Prasad-entities' loan relationship with the Agency. The Central Credit Committee expressed its concern that significant amounts of money were loaned to Zurich and P.S. Investment, primarily on the purported strength of the Prasads' own financial condition, and that no portion of the loans had ever been repaid. The Central Credit Committee requested updated information on the security valuations, the personal net worth of the Prasads and other information relevant to the ability and intention of Zurich and P.S. Investment to service their $34 million debt obligation. On information and belief, Palkhiwala and Raheem never provided the Central Credit Committee with the requested information.

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81. In or about June, 1990, Palkhiwala was replaced as the Regional General Manager, who, along with other Senior Officers hired at or about the same time by BCCI, S.A., staffed the loan recovery unit at the Agency, a then newly created unit whose purpose was to take steps to restructure and recover on deficient loan obligations owed to the Agency.

82. Despite the fact that Palkhiwala's replacement was hired and commenced work as the Regional General Manager in or about June, 1990, Palkhiwala refused to leave New York until he was threatened with termination by the BCCI, S.A. home office. Upon that threat, Palkhiwala was transferred to BCCI, S.A. in London in January, 1991. Raheem similarly left the employ of the Regional Office in January, 1991.

83. After the replacement of Palkhiwala and the installation of the loan recovery unit, loans to Prasad and Zurich came to a virtual standstill. In fact, subsequent to the change in management, only $258,000 in additional funds was disbursed. These final disbursements, one in the amount of $208,000 and the second in the amount of $50,000, were both advances to Zurich for the express purpose of completing the renovation of Laguardia, which at that point had not opened for business. These final disbursements were made in order to finance the remaining renovations and open the hotel for business, which the loan recovery unit determined was the most likely means of obtaining payment on the loan obligations.

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Attempts to Restructure the Loans

84. In the Fall of 1990, after the installation of the loan recovery unit, attempts were made by the Agency to restructure the loans to Zurich and P.S. Investment. The first attempt at restructuring ended in failure with the refusal of P.S. Prasad to execute the proposed restructuring agreement on account of its inconsistency with the "spirit" of his prior relationship with the Agency.

85. By January, 1991, the then central headquarters of BCCI, S.A. in Abu Dhabi agreed that a restructuring of the Prasad-related loans was appropriate.

86. By March, 1991, the Agency and the Prasads on behalf of their investment vehicles, Zurich and P.S. Investment, reached an agreement on a restructuring plan (the "Restructuring Agreement"). The Restructuring Agreement included the execution of a personal guarantee by both P.S. Prasad and I. Prasad of the Zurich and P.S. Investment loan obligations.

87. The Restructuring Agreement obligated the Prasad Defendants to allow independent auditors retained by the Agency to evaluate each of the hotel properties in order to determine the revenue stream generated by each of the properties.

88. After the execution of the Restructuring Agreement, the Agency dispensed its independent auditors to both Macon and Laguardia in order to assess the revenue stream of each property. Macon was being operated at the time by P.S. Prasad's brother, Parthasarath (Pasha) Sanjeeva Ponnapula, who refused the Agency's

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auditors access to the Macon property and its books and records, in direct violation of the terms of the Restructuring Agreement.

89. The Agency's independent auditors were similarly denied access to the books and records of Laguardia.

90. No payments were ever made to the Agency under the Restructuring Agreement, and no records or explanation as to the use or whereabouts of the substantial revenue generated by the properties discussed herein has ever been provided to the Agency or the Superintendent.

FIRST CLAIM
Under 18 U.S.C. § 1962(c)

91. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 90 inclusive, as if fully set forth herein.

92. At all relevant times, Laguardia, Tarpon, the Ramada Inn, Macon and Raleigh were enterprises engaged in, and the activities of which affected, interstate and foreign commerce within the meaning of 18 U.S.C. §§ 1961(4) and 1962(c).

93. At all relevant times, defendants P.S. Prasad, I. Prasad, Zurich and P.S. Investment were "persons" within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c) employed by or associated with Laguardia, Tarpon, the Ramada Inn and Macon in that (a) Zurich, the wholly-owned and operated investment vehicle of P.S. and I. Prasad, owns and operates Laguardia; (b) Zurich owns and operates Tarpon; (c) P.S. Investment, the second wholly-owned and operated investment vehicle of P.S. and I. Prasad, owns and operates the Ramada Inn; (d) Zurich owns and operates Macon;

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and (e) Zurich owned and operated Raleigh at all times prior to its bankruptcy filing.

94. Each of the defendants participated directly or indirectly in the conduct of the affairs of the enterprise through a pattern of racketeering activity in committing multiple acts of mail and wire fraud, in violation of 18 U.S.C. §§ 1341 and 1343, in furtherance of a systematic scheme to defraud the Agency in the making of the loans set forth herein, the fraudulent diversion of the proceeds of those loans for unintended purposes and the diversion of funds generated by the operation of the enterprise for unknown purposes, not the repayment of the approximately $34 million total principal amount of the Agency loans to Zurich and P.S. Investment.

95. In executing such scheme or attempting to do so, and in furtherance thereof, persons, including the defendants, acting on behalf of the defendants placed in authorized depositories for mail matter to be sent and delivered to the Agency by the Postal Service and placed on the wires correspondence necessary to the success of defendants' scheme, as described below. Each such transmittal constituted a separate violation of the mail or wire fraud statutes, 18 U.S.C. §§ 1341 and 1343 by each of the defendants. A sample of such mailings and wires is described below.

(a) a facsimile transmitted on May 27, 1988 from P.S. Prasad as President of P.S. Investment and on P.S. Investment letterhead to the then Regional Manager of BCCI,

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S.A. advising that the standby letter of credit in favor of Borg-Warner was being called and requesting that his account be debited accordingly.

(b) a facsimile transmitted on June 1, 1988 from P.S. Prasad to Raheem by a P.S. Investment facsimile cover sheet, enclosing a letter dated May 24, 1988 from Dillman as the chairman of the board of Caprock S & L to P.S. Prasad on the letterhead of Great West Bancshares ("Great West") detailing a proposed transaction involving the transfer of ownership of Raleigh to Great West or to a separate entity whose equity was owned by Caprock S & L, in exchange for the issuance of stock shares to P.S. Prasad.

(c) a facsimile transmitted on October 12, 1988 from P.S. Prasad on P.S. Investment letterhead to Raheem representing that P.S. Prasad had reached an agreement to purchase the Ramada Inn and requesting the immediate approval of a $200,000 overdraft so that he could meet the deposit requirement on the transaction.

(d) a facsimile transmitted on November 21, 1989 from P.S. Prasad on Zurich letterhead to Palkhiwala requesting a wire transfer in the amount of $500,000 to an account of Title USA at the Texan Commerce Bank in connection with the acquisition of Caprock Hospitality stock by Zurich and further requesting the wire transfer of $250,000 to a Zurich account maintained at Planters National Bank in Rocky Mount, North Carolina.

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(e) a facsimile transmitted on December 1, 1989 by P.S. Prasad to Amir Saleem at the Agency on the facsimile cover sheet of Zurich attaching a projected cash flow analysis for Laguardia for the years 1990, 1991 and 1992.

(f) a facsimile transmitted on February 1, 1990 from Shetty on Zurich letterhead to Raheem enclosing a proposal for the issuance by the Agency of a standby letter of credit in the amount of $11.5 million in favor of Zurich and/or P.S. Investment, which had been agreed to and accepted by Dandapani on behalf of both Zurich and P.S. Investment on January 26, 1990.

(g) a letter dated and mailed on or about March 20, 1990, by P.S. Prasad as Chairman of Zurich and on Zurich letterhead to Raheem requesting the consideration by the Agency of a proposed purchase by unnamed persons of both Macon and Laguardia for the purchase amount of $10 million, to be applied to the total outstanding loan obligation to Zurich of $21.5 million, with the assumption by the unnamed buyers of the remaining $11.5 million loan obligation and the payment of a $300,000 transaction fee to the Agency.

(h) a letter dated and mailed on or about March 22, 1990 by P.S. Prasad on Zurich letterhead to an unidentified employee of BCCI, S.A. requesting authorization of an $8 million drawdown on the $11.5 million line of credit for the following purposes: (i) repaying a $2.5 million overdraft of Zurich; (ii) repaying a $3 million overdraft of P.S.

1325015-000-12503

Investment; and (iii) the purchase of the Bank of Baroda mortgage on Raleigh for the sum of $2.5 million and the letter further requests the remittance of $3.5 million to the trust account of a law firm in Memphis, Tennessee to finance the purchase of the RTC lien on Raleigh.

(i) a facsimile transmitted on April 30, 1990 from Zurich to the Agency of an undated loan request to the Agency from Bell for a loan in the amount of $500,000, secured by the assignment of receivables estimated at a value of $800,000 and accompanied by a March 4, 1990 review of the accompanying financial statement of Bell performed by Anthony Simmons, Certified Public Accountant, and presented on the letterhead of Bailey Vaught Robertson & Co. of Dallas, Texas.

(j) a facsimile transmitted on May 4, 1990 from P.S. Prasad on Zurich letterhead to Palkhiwala requesting the immediate wire transfer of $2.3 million to a described trust account for the purpose of financing the purchase of the RTC lien on Raleigh and the letter further states that the second mortgage on Raleigh held by the Bank of Baroda was then in the process of being assigned to BCCI, S.A.

(k) a facsimile transmitted on June 5, 1990 on the facsimile cover sheet of Zurich to Ruben Ahmed of BCCI, S.A. from Pat White providing a list of trade references for Bell as per a facsimile request dated May 17, 1990.

1325015-000-12504

(l) a facsimile transmitted on June 21, 1990 signed by Ruben V. Aragon as Chairman of the Board of Bell and on the letterhead of Bell regarding a sixty-day extension in which to obtain a new appraisal on the Corsicana, Texas property, which was being pledged as collateral for a proposed $500,000 loan to Bell.

(m) a facsimile transmitted on July 6, 1990 from Zurich to the Agency of a letter offer dated July 5, 1990 for the purchase of Macon by Reis Partners, Inc. for the purchase price of $8.5 million.

(n) a letter dated July 6, 1990 from Dandapani on Zurich letterhead and sent by facsimile to Raheem on July 6, 1990 explaining that the $2 million advance on the $11.5 million line of credit, which had been disbursed for the purpose of financing the purchase of the RTC lien on Raleigh, was instead used for the payment of union contractors who had been performing work on Laguardia.

96. Further, each of the defendants participated directly or indirectly in the conduct of the affairs of the enterprise through a pattern of racketeering activity in committing multiple acts of bank fraud, in violation of 18 U.S.C. § 1344, in furtherance of a systematic scheme to defraud the Agency in the making of the loans set forth herein, the fraudulent diversion of the proceeds of those loans for unintended purposes and the diversion of funds generated by the operation of the enterprise for unknown purposes, not the repayment of the approximately $34

1325015-000-12505

million total principal amount of the Agency loans to Zurich and P.S. Investment. As set forth above, those acts included, but were not limited to the following:

(a) each of the acts of mail and wire fraud set forth above.

(b) P.S. Prasad provided the Agency with two copies of his consolidated personal financial statement, both purporting to report the status of his financial condition as of June 30, 1989 and the first setting forth the amount of cash on hand and in banks as $150,000, with the second setting forth the amount of such cash as $10,150,000 and further with the first statement valuing P.S. Prasad's real estate holdings as of June 30, 1989 at $20,000, with the second financial statement for the identical time period placing a value on the property holdings at $15,020,000.

97. Each of the aforesaid violations constitutes an instance of racketeering activity as defined in 18 U.S.C. § 1961(1).

98. The multiple acts of racketeering activity by the Prasad Defendants were neither isolated nor sporadic, but were interrelated, part of a common and continuous pattern of fraudulent schemes, and perpetrated for the same or similar purposes, thus constituting a pattern of racketeering activity as defined in 18 U.S.C. § 1961(5).

99. The Superintendent in possession of the business and property of BCCI, S.A. in the State of New York and the Agency

1325015-000-12506

has suffered financial loss as the proximate result of the participation of the defendants in the conduct of the affairs of the enterprise through a pattern of racketeering activity in violation of 18 U.S.C. § 1962(c), in that the assets of the Agency available for distribution to its creditors have been fraudulently diverted, both by the diversion of the funds loaned to Zurich and P.S. Investment and the ciphoning off and diversion for unknown purposes, not the repayment of the Prasad Defendants' loan obligations, of revenues generated by the defendants' operation of the enterprise. By reason of the foregoing, defendants are liable to the Superintendent for threefold the damages the Superintendent has sustained, and the cost of this suit, as well as a reasonable attorney's fee.

SECOND CLAIM
Under 18 U.S.C. § 1962(d)

100. Plaintiff repeats and realleges paragraphs 1 through 90 inclusive, as if fully set forth herein.

101. By reason of the circumstances and events set forth above, the defendants, along with others unknown, unlawfully, willfully and knowingly conspired to violate the provisions of 18 U.S.C. § 1962(c).

102. In furtherance of their conspiracy, and to effect its objectives, defendants each committed overt acts in the Southern District of New York, in that the defendants sent or had sent numerous communications to the Agency or Regional Office in New York, New York from in or about 1988 to in or about 1991, and met with officers and employees of the Agency and Regional Office at

1325015-000-12507

various times in 1991 concerning the negotiation and execution of the Restructuring Agreement.

103. As a proximate result of defendants' conspiracy, plaintiff suffered financial loss in the amount of at least $34 million and such other amounts as may be proven at trial. By reason of the foregoing, defendants are liable to the Superintendent for threefold the damages the Superintendent has sustained, and the cost of this suit, as well as a reasonable attorney's fee.

THIRD CLAIM
Common Law Fraud and Deceit

104. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 90 inclusive, as if set forth fully herein.

105. As set forth above, defendants conceived and implemented a fraudulent scheme to induce the Agency into lending approximately $34 million to the Prasad-owned and controlled investment vehicles and concealed such fraud through various devices and misrepresentations that perpetuated the fraud.

106. As set forth above, defendants accomplished this fraudulent scheme through various misrepresentations, omissions and other devices upon which the Agency reasonably relied to its detriment, and upon which the defendants intended the Agency to so rely, including a series of fraudulent and misleading appraisals and other loan documentation.

107. The Superintendent has been damaged by the defendants' fraudulent scheme by reason of their fraudulent inducement of the

1325015-000-12508

lending of such funds by the Agency and by concealment of that fraud through various devices and misrepresentations that perpetuated the fraud and by reason of the failure of the defendants to pay sums lawfully due under the initial loan agreements and Restructuring Agreement.

108. As a proximate result of the foregoing, the Superintendent has been damaged in an amount of at least $34 million and such other amounts as may be proven at trial, which amounts plaintiff is entitled to recover from said defendants jointly and severally.

FOURTH CLAIM
(Against Defendants P.S. Prasad and I. Prasad)

109. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 90 inclusive, as if fully set forth herein.

110. On March 14 1991, the Prasad Defendants entered into the Restructuring Agreement with the Agency relating to the following loans:

(a) the Macon Loan, made to Zurich on or around August 28, 1989, for the principal amount of $7,500,000;

(b) the Raleigh Loans, the first made to Zurich on or around November 8, 1989 for the principal amount of $11,500,000;

(c) the Chattanooga Loan, made to Zurich on or around May 18, 1989 for the principal amount of $500,000;

1325015-000-12509

(d) the Tarpon Springs Loan, made to P.S. Investment on or around April 5, 1990 for the principal amount of $3,100,000; and

(e) the Laguardia Loans, made to Zurich for the principal amount of $16,258,000.

111. The Restructuring Agreement provides, inter alia, for (i) the creation of a revolving credit facility in favor of Zurich and P.S. Investment in the amount of $250,000 (the "Credit Facility"), (ii) the extension of three term notes in favor of Zurich and P.S. Investment in the aggregate amount of $30,000,000 and (iii) the extension of a loan to the Prasads in the amount of $4,000,000.

112. Pursuant to the Restructuring Agreement the revolving credit facility is to bear interest at 1% over the prime rate of interest published in the Wall Street Journal and each of the three term notes as well as the $4,000,000 loan is to be repaid with interest at a rate of 8.33% per annum (the "Notes")

113. On or about March 14, 1991 and in connection with the Notes and Credit Facility, Zurich and P.S. Investment executed certain Security Agreements (the "Security Agreements").

114. Under the Security Agreements, Zurich and P.S. Investment granted the Agency a security interest in all of each company's right, title and interest in existing and future (i) contracts, (ii) accounts, contract rights and general intangibles, (iii) equipment, (iv) inventory, and (v) all proceeds and products arising out of or in connection with:

1325015-000-12510

Laguardia, Macon, Tarpon Springs, Chattanooga (on which the Agency possessed a second mortgage) and Raleigh.

115. The Security Agreements further provide that the obligations of Zurich and P.S. Investment shall become immediately due and payable upon certain events of default, including, inter alia, non-payment by the Prasad Defendants.

116. In connection with the Restructuring Agreement, P.S. Prasad and I. Prasad each executed an absolute and unconditional guarantee of the indebtedness of Zurich and P.S. Investment under the Restructuring Agreement. A true and complete copy of the guarantee of P.S. and I. Prasad is annexed as Exhibit A.

117. Both the Restructuring Agreement in Section 7.01(n) and the Guarantee contain specific waiver of notice provisions prior to collection upon the Guarantee.

118. To date, no payment has been made under the Restructuring Agreement by either Zurich or P.S. Investment, despite demands for payment by the Agency, constituting an event of default under the Security Agreements.

119. Further, no payments have been made by the Prasads under the Guarantee.

WHEREFORE, plaintiff the Superintendent of Banks of the State of New York in possession of the business and property of BCCI, S.A. in New York and the business and property of the New York Agency of BCCI, S.A., prays for a judgment in his favor as follows:

1325015-000-12511

(a) On the First Claim against the defendants for $34,000,000 in damages with accrued interest under the Loan and Restructuring Agreements, trebled pursuant to 18 U.S.C. § 1964(c), and attorneys fees;

(b) On the Second Claim against the defendants for $34,000,000 in damages with accrued interest under the Loan and Restructuring Agreements, trebled pursuant to 18 U.S.C. § 1964(c), and attorneys fees;

(c) On the Third Claim against the defendants jointly and severally, for damages in the amount of $34,000,000 with accrued interest under the Loan and Restructuring Agreements;

(d) On the Fourth Claim against the defendants P.S. Prasad and I. Prasad, pursuant to the Guarantee, for principal and interest due and owing by Zurich and P.S. Investment under the Restructuring Agreement; and

(e) Granting Plaintiff the Superintendent such other, further and different relief as to the Court may seem just and proper;

all together with the costs and disbursements of this action.

Dated: New York, New York
November 21, 1991

CLEARY, GOTTLIEB, STEEN & HAMILTON

By: Edwin B. Mishkin

Edwin B. Mishkin (EM 4218)
One Liberty Plaza
New York, New York 10006
(212) 225-2000

Attorneys for the Plaintiff, Derrick D. Cephas, the Superintendent of Banks of the State of New York

1325015-000-12513

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 3/20/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG;
(OO: WMFO)

LISTING OF DOCUMENTS MAINTAINED BY LAW FIRM

On 3/12/92, [redacted] Law Clerk with the firm **CLEARY, GOTTLIEB, STEEN & HAMILTON** (CGSH), One Liberty Plaza, New York, New York, telephone number 212/225-2774, provided one (1) computer diskette containing four (4) WordPerfect document files as follows: b6 b7C

File Name	Size	Date	Time
GENERAL.CMB	163,613	03-12-92	03:05p
SECURITY.IDX	5,504	03-06-92	12:22p
SEIZED.DOC	37,662	03-12-92	03:05p
[redacted]IDX	11,342	12-18-91	06:50p

b6 b7C

These files represent listings of key documents that have been inventoried by the firm (CGSH) pursuant to the pending lawsuit that was filed on behalf of their client against **ZURICH CORPORATION, P.S. INVESTMENT COMPANY, INC.,** [redacted] b6 b7C

On 3/15/92, the files were printed out for review by SA [redacted] The printouts are retained in the Sub-C Section of File. The listings are as follows: b6 b7C

1. GENERAL.CMB - General Correspondence listing (70 pages)
2. SEIZED.DOC - Documents Seized from the LaGuardia Hotel (21 pages)
3. SECURITY - (Asset) Security Documents (2 pages)
4. [redacted]IDX - Loan Recovery documents regarding CAPROCK PROPERTIES (5 Pages) b6 b7C

29K-WF-171994 - 7 Sub U

(3) - WMFO
~~(1 - 29B-WF-171994 - Sub C)~~
(1 - 29B-WF-171994 - Sub U)

CWS
(2)

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SERIALIZED Su FILED Su
MAR 20 1992
FBI - WASH. METRO FIELD OFFICE

1325015-000-12514

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/23/92

[redacted] Loan Recovery Specialist, NEW YORK STATE BANKING DEPARTMENT (NYSBD), 530 Fifth Avenue, 7th Floor, New York, NY 10036, telephone number 212/789-8625, telephonically contacted the FEDERAL BUREAU OF INVESTIGATION (FBI). After being advised of the identity of the agent, [redacted] furnished the following information: b6 b7C

[redacted] met with [redacted], NEW YORK DISTRICT ATTORNEY (NYDA), on March 23, 1992, regarding the NYDA's investigation of the QUALITY HOTEL AT LAGUARDIA AIRPORT, New York, New York and [redacted]. Pursuant to that meeting, [redacted] had reviewed some of his handwritten notes that he had taken during the time(s) he had met with [redacted] [redacted]'s notes reflected that there was a letter dated August 16, 1987, from [redacted] addressed to the BANK OF CREDIT AND COMMERCE S.A. (BCCI), advising that he was attempting to secure a $20 million loan in order to purchase a payroll services company. Pursuant to previous conversations with investigators, [redacted] believes that the company [redacted] was interested in acquiring was known as HAMILTON-TAFT. b6 b7C

[redacted] would be able to produce a copy of the letter if requested. b6 b7C

Investigation on 3/23/92 at Falls Church, VA File # 29B-WF-171994 Sub D

by SA [redacted] CWS Date dictated 3/23/92

29B-WF-171994 Sub D
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b6 b7C

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 3/27/92

[redacted] **Loan Recovery Specialist, NEW YORK STATE BANKING DEPARTMENT (NYSBD), 530 Fifth Avenue, 7th Floor, New York, NY 10036, telephone number 212/789-8625,** telephonically contacted the FEDERAL BUREAU OF INVESTIGATION (FBI). After being advised of the identity of the agent, [redacted] furnished the following information: b6 b7C

[redacted] has been in contact with officials from the **U.S. SMALL BUSINESS ADMINISTRATION (SBA)** pursuant to the joint interest between the two agencies regarding the affairs of [redacted], **FALCON FINANCIAL CORPORATION and ZURICH CORPORATION.** Through recent contacts with SBA officials, it appears that former [redacted] **BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.- New York Region (BCCI-NY),** may have a financial interest or ownership in the hotel previously owned by [redacted] in **Chattanooga, Tennessee.** The SBA has been advised by employees of the hotel that [redacted] is the owner/manager and has been for the past two (2) years. Apparently within hours of when [redacted] was transferred in to take over as [redacted] of BCCI-NY, [redacted] obtained a loan through BCCI-NY to refinance his personal residence. [redacted] advised that it appears [redacted] provided an inflated appraisal of the house. The loan at BCCI-NY was in the amount of $350,000. [redacted] had an outstanding mortgage at another financial institution for approximately $150,000, and therefore [redacted] received his alleged equity of $200,000 in cash from the loan proceeds. [redacted] believes that [redacted] may have used those funds to acquire his [redacted] s) financial interest in the hotel. b6 b7C

Regarding the pending RICO lawsuit filed by the NYSBD against [redacted] advised that it appears that the NYSBD will receive a default judgement inasmuch as [redacted] has not provided any defense against the allegations. b6 b7C

Based on his review of [redacted] transactions, it appears that loan proceeds were funnelled from **ZURICH CORPORATION** to **SCANDIA INTERNATIONAL** and **MC DOWELL ENTERPRISES, INC.** b6 b7C

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Investigation on 3/27/92 at Falls Church, Va File # 29B-WF-171994 Sub U

SEARCHED INDEXED SERIALIZED FILED

by SA [redacted] :CWS Date dictated 3/27/92 b6 b7C

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FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
X ☐ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 4/15/92

TO : **SAC, DALLAS** (29D-7417 SUB F63 L) (SQ. 9)

FROM : **SAC, WMFO** (29B-WF-171994) (P)

SUBJECT : **HIDDEN INTEREST;**
MAJOR CASE # 38;
FIF; FAG;
OO: WMFO

Re 4/15/92 telcal between **SA** [redacted] **(WMFO)** and **SA** [redacted] **(Dallas)**; and Dallas airtel to WMFO, dated 11/25/91. b6 b7C

Pursuant to references communications, enclosed are the following:

1. Two (2) copies of one (1) FD-302 regarding the interview of [redacted] which was conducted on 3/11/92 in New York. b6 b7C

2. One (1) 1-A Envelope containing photocopies of schedules (prepared by [redacted] summarizing various business affiliations and lending activities of [redacted] with the **BANK OF CREDIT AND COMMERCE, S.A. (BCCI).** b6 b7C

2 - Dallas
2 - WMFO (1 - 29B-WF-171992 Sub S)
(1 - 29B-WF-171992 Sub U)
Enclosures - 3
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29B-WF-171994 Sub-U
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Searched
Serialized SW
Indexed
Filed SW

Approved: _____ Transmitted _____ (Number) (Time) Per _____

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For information of Dallas, WMFO has initiated an investigation regarding [redacted] and his related entities obtaining loans from **BCCI** in excess of $34 million through false representations, inflated/bogus appraisals and diverting funds from the intended purposes of the loans. Possible federal violations regarding Conspiracy, Fraud by Wire, Interstate Transportation of Stolen Property, and Bank Fraud are apparent in Florida, Georgia, New York, North Carolina, Tennessee, Texas, and Virginia. **BCCI** records and documents are currently in the custody of a New York law firm that is representing the **NEW YORK STATE SUPERINTENDENT OF BANKING (NYSSB)** in a civil lawsuit filed against [redacted] etal. b6 b7C

On 4/14/92, [redacted] telephonically advised that the **NYSSB** recently received a default judgement of approximately $112 million. b6 b7C

Pursuant to referenced communications, WMFO will coordinate with Dallas in the matter of [redacted] **CAPROCK PROPERTY, CAPROCK HOSPITALITY,** and **MARKETPLACE GEORGIA)** and [redacted] **CAPROCK SAVINGS AND LOAN ASSOCIATION** and **TITLE U.S.A.)**. b6 b7C

Investigation continuing in Washington, D.C.

1325015-000-12534

SUPERINTENDENT OF BANKS NEW YORK STATE
IN POSSESSION OF BCCI, NEW YORK AGENCY
530 FIFTH AVENUE, 7TH FLOOR
NEW YORK, NY 10036

DERRICK D. CEPHAS
SUPERINTENDENT OF BANKS

FAX TRANSMISSION

DATE: 21 JUL 92

TO: [redacted] b6 b7C

FBI

Fax 202 324 9335

FROM: [redacted] b6 b7C

NY STATE Dept of BANKING / BCCI

NUMBER OF PAGES SENT 2 (INCLUDING THIS PAGE)

-13

MESSAGE: As requested.

[redacted] b6 b7C

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FBI — [redacted]

NOTE: IF MESSAGE IS NOT RECEIVED, COMPLETE OR LEGIBLE, PLEASE CONTACT 212 789 8625

SALVATORE MORABITO, SPECIAL DEPUTY SUPERINTENDENT (212) 789-8620
HARRY J. MORPURGO, PRINCIPAL BANK EXAMINER (212) 789-8661 FAX (212) 869-2313

1325015-000-12535

b6
b7C

aka [redacted]

BORN : [redacted]

CITIZENSHIP : U.S.

PASSPORT : [redacted] ISSUED [redacted]

S.S.N. : [redacted]

ADDRESS: PERMANENT

[redacted]

present

[redacted]

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[redacted]

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PAY TO THE ORDER OF [redacted] $ [redacted]

DOLLARS

CHEMICAL BANK
52 Broadway
New York, N.Y. 10004

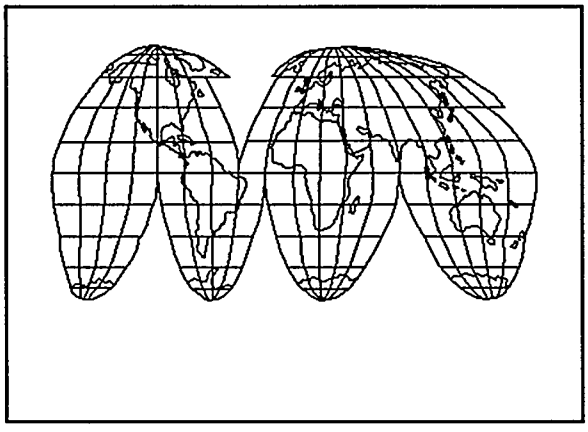
VOID VOID VOID

MEMO

⑆021000128⑆ [redacted] 0277

F.B.I.

Washington Metropolitan Field Office
Washington, D.C.



BCCI Squad

Fax : 202/324-9335
Voice: 202/324-9300

Date: 7/22/92 Page 1 of 2

To : [redacted] b7E

Attention : [redacted]

Fax Number: [redacted]

From: SA [redacted] Telephone Number: 202/324-9303 b6 b7C

Special Instructions: [redacted] -14

Approved: [redacted]

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JUL [redacted] 1992
FBI — [redacted]

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Dr. P.S. Prasad allegedly owes $34 million to BCCI — more than any other U.S. citizen. The bank's liquidator wants the money, but his lawyer says, "I don't think he'll be back here tomorrow."

YUNG SHENG TSAO

7/27/12 per e-mail

b6
b7C

1325015-000-12540

Memorandum

To : SAC, WMFO (29B-WF-171994)(P) Date 8/24/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO:WMFO

On 8/19/92, SSA [redacted] and SA [redacted] b6 b7C discussed the possibility of interviewing [redacted] during the trip to London on 8/31/92 to 9/4/92. Since the interview of [redacted] was not scheduled until 9/2-3/92, SAs [redacted] and [redacted] would have an open date to conduct a pertinent interview of [redacted] concerning a specific transaction of [redacted] and a general discussion about [redacted]. SSA [redacted] approved of the interview and recommended calling [redacted] to arrange the meeting.

On 8/20/92, SA [redacted] telephonically contacted [redacted] b6 b7C s attorney in the absence of [redacted] concerning an interview of [redacted] on 9/1/92. [redacted] was advised that the interview would be conducted by SAs [redacted] and [redacted] and the interview would concern [redacted] and [redacted] advised that Trial Attorney [redacted] had also contacted him to arrange an interview for himself and two attorneys from Florida concerning [redacted] and CenTrust Bank. [redacted] stated that he would contact [redacted] to discuss possible times for the interview, and he requested SA [redacted] to call him the next day around 11:30 AM, EST.

On 8/21/92, SA [redacted] spoke with [redacted] as scheduled. b6 b7C [redacted] advised that [redacted] had no concerns discussing the matters previously mentioned; however, he would like to conduct the interviews requested by [redacted] and SA [redacted] on the same day, preferably 9/2/92. SA [redacted] explained that 9/2 & 3/92 were not good days, as the SAs had prior engagements that could not be changed. [redacted] stated that [redacted] said the afternoon of 9/1/92

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could be used as a fall back date. [redacted] inquired as to where the meeting should take place, and SA [redacted] stated that they could meet at [redacted]s office, [redacted]'s office, the hotel, whatever was amenable to [redacted] then agreed that SA [redacted] should discuss the afternoon date of 9/1/92 with [redacted] and recontact [redacted] on 8/24/92. b6 b7C

Later on the same day, 8/21/92, SA [redacted] telephonically contacted Trial Attorney Matthews concerning the above discussions with [redacted] SA [redacted] explained that the SAs interview of [redacted] was not expected to take longer than 1 hour, which should leave enough time for the Florida AUSAs to speak with [redacted] asked if 9/4/92 was a possible date for the interview. SA [redacted] explained that 9/4/92 would not work for the SAs, as they were scheduled to return to the U.S. that morning; however, since the FBI had no request from the Florida AUSAs for the FBI to conduct an interview of [redacted], the attorneys could try to meet with [redacted] on 9/4/92. [redacted] agreed that the afternoon of 9/1/92 would be the best time to meet with [redacted] stated that he would contact [redacted] on 8/24/92 and advise him of the plans. b6 b7C

It should be noted that during the conversation with [redacted] on 8/21/92, that SA [redacted] advised him that should the AUSAs from Florida require an FBI interview of [redacted] they should contact the Miami FBI office, who would in turn, contact this field office. It was also stressed that planning for such an interview would need to take place. [redacted] stated that he had invited the AUSAs to Washington, D.C., for the joint [redacted] meeting to be held on 8/27/92. b6 b7C

1325015-000-12554

SUPERINTENDENT OF BANKS NEW YORK STATE
IN POSSESSION OF BCCI, NEW YORK AGENCY
530 FIFTH AVENUE, 7TH FLOOR
NEW YORK, NY 10036

DERRICK D. CEPHAS
SUPERINTENDENT OF BANKS

FAX MESSAGE

DATE: 22SEP92

TO: [redacted] b6 b7C

SPECIAL AGENT
FBI
SOUTH TOWER SUITE 200 C5
7799 LEESBURG PIKE
FALLS CHURCH VA 22043
FAX 202 324 9335

FROM: [redacted] b6 b7C

LOAN RECOVERY SPECIALIST
NEW YORK STATE BANKING DEPARTMENT/BCCI
FAX:(212) 869-2313

NUMBER OF PAGES SENT 2 (INCLUDING THIS PAGE)

MESSAGE:
AS REQUESTED. PLS NOTE THAT I HAVE NOT FOUND THE OLD LOAN POLICY RE: $500K LIMIT ON AUTONOMOUS LENDING APPROVAL AUTHORITY FOR US REGION. I SHOULD HAVE IT BY THE END OF THE WEEK.

NOTE: IF MESSAGE IS NOT RECEIVED, COMPLETE OR LEGIBLE, PLEASE CONTACT [redacted] 212 789 8625 b6 b7C

-20

29B-WF-171996 Sub U

SEARCHED Su INDEXED
SERIALIZED Su FILED Su

SEP 22 1992

FBI — WASH. FIELD OFFICE

SALVATORE MORABITO, SPECIAL DEPUTY SUPERINTENDENT (212) 789-8620
HARRY J. MORPURGO, PRINCIPAL BANK EXAMINER (212) 789-8661 FAX (212) 869-2313

1325015-000-12556

BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.

UNITED STATES REGIONAL OFFICE 320 PARK AVENUE NEW YORK NY 10022

Expense Voucher

Name (Print) [redacted] b6 b7C

In Town Expense [ ] Travel Expense [XX]

Period Covered From October To 89 --

Date Prepared NOV 1 '89

Date (Mo/Day)	Nature of Expense	Air Trans.	Taxi, Limo, Carefare	Lodging	Meals	Business Meals	Other (Provide Details)	Voucher Number	Total	Conversion Rate and US $ Total
10-3	N.Y. - Raleigh & N.Y.	476	47.00					1		523.00

CHECKED BY [illegible] DT 12/6

APPROVED BY [illegible] DT

BY USA DT

PAID ON 12/6/89

A/C NO 6155015

OC NO. 3V2689

Misc Expense

Total Expenses

Purpose of Trip/Approved By

To inspect Hotel & Plant of Client

CHARGE TO CLIENT [ ]

Name:

A/C No: N.A.

Amount:

Date:

Employee's Signature

Approver's Signature

B.C.C.

DEC - 6 1989

b6 b7C

GRAND TOTAL $	523.00
Less Total Advances	( )
Less Ticket Purchased Company	(476.00)
Balance Due (Employee)	47.00
FINAL TOTAL $	47.00

1325015-000-12557

CLEARY, GOTTLIEB, STEEN & HAMILTON

RUE DE LA LOI 23 - BTE 5
1040 BRUSSELS

56TH FLOOR, BANK OF CHINA TOWER
ONE GARDEN ROAD
HONG KONG

WINCHESTER HOUSE
77 LONDON WALL
LONDON EC2N 1DA

ONE LIBERTY PLAZA
NEW YORK, N.Y. 10006
(212) 225-2000
FACSIMILE
(212) 225-3999
TELEX
WUI 62985

41, AVENUE DE FRIEDLAND
75008 PARIS

SHIN KASUMIGASEKI BUILDING
3-2, KASUMIGASEKI 3-CHOME
CHIYODA-KU
TOKYO 100

1752 N STREET, N.W.
WASHINGTON, D.C. 20036

September 22, 1992

Writer's Direct Dial
(212) 225-3773

VIA FEDERAL EXPRESS

[redacted] b6 b7C

Federal Bureau of Investigation
7799 Leesburg Pike
Falls Church, VA 22043

Dear [redacted]

Attached please find additional documents that were not enclosed in the box of Zurich Corp. documents sent to you on September 9, 1992. I apologize for any inconvenience this oversight may have caused you. Please feel free to call me at the above number.

Very truly yours,

[redacted] b6 b7C

Legal Assistant

Rec'd 9/28/92

Enclosures

copies of Documents retained 1-B BY SS [redacted]

298-WF-171694 Sub U - 21 [redacted] b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 30 1992
FBI — WASH. FIELD OFFICE

1325815-000-12558

Memorandum

To : **SAC, WMFO** (29B-WF-171994) (P) Date 10/13/92

From : **SA** [redacted] b6 b7C

Subject: **HIDDEN INTERESTS;**
MC #38;
FIF; FAG
(OO: WMFO)

[redacted] **ETAL - New York Case** b6 b7C

On 10/13/92, [redacted] **New York Department of Banking**, New York, NY, was telephonically contacted regarding the status of the **New York District Attorney's (NYDA)** investigation of [redacted] etal. [redacted] advised that the NYDA will be empaneling a grand jury in November 1992 and will begin to present witnesses at that time. [redacted] does not anticipate an indictment regarding the case until early 1993. [redacted] believes that the NYDA is focusing its case on a time window from 11/89 through 6/90, which is the time that the majority of the loans at the **BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI)** were made. [redacted] believes that the New York case involves BCCI and 3 - 4 other New York area banks, and does not include any business transactions involving **CAPROCK SAVINGS & LOAN ASSOCIATION** or **FALCON CAPITAL CORPORATION.** [redacted] believes that the investigation will include [redacted] former credit officer at BCCI, but will not include [redacted] former head of the New York Regional Office of BCCI.

29B-WF-171994
Sub U-22

1 - WMFO (29B-WF-171994 - Sub U)
CWS
(1)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 13 1992
FBI — WASH. FIELD OFFICE

1326015-000-12559

SUPERINTENDENT OF BANKS NEW YORK STATE
IN POSSESSION OF BCCI, NEW YORK AGENCY
530 FIFTH AVENUE, 7TH FLOOR
NEW YORK, NY 10036

DERRICK D. CEPHAS
SUPERINTENDENT OF BANKS

FAX TRANSMISSION

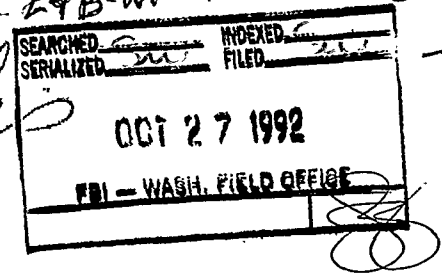
DATE: 10/27/92

TO: [redacted] b6 b7C

FROM: [redacted] b6 b7C
PRINCIPAL BANK EXAMINER
NEW YORK STATE BANKING DEPARTMENT
(212) 869-2313

NUMBER OF PAGES SENT 3 (INCLUDING THIS PAGE)

MESSAGE: These are from 29B-WF-171954-Sub 4. -23
address Books



b6 b7C

Notes re [redacted] re Congressmen names - lw

NOTE: IF MESSAGE IS NOT RECEIVED, COMPLETE OR LEGIBLE, PLEASE CONTACT MERCEDES PADRO (212) 789-8623

SALVATORE MORABITO SPECIAL DEPUTY SUPERINTENDENT (212) 789-8420
HARRY I. MORFOGEN PRINCIPAL BANK EXAMINER (212) 789-8461 FAX (212) 869-2313

[redacted] b6 b7C

Approved by

[redacted]

[redacted]

[redacted] office + home

b6
b7C

[redacted] Home office

[redacted]

Fax 212 . 46.5 . 1524
(Home)

[redacted]

[redacted]

I @ NY

President CARTER, ~~NUNN~~ ? NUNN [redacted]

b6
b7C

INTERNATIONAL

[redacted]

SEN NUNN
PRES. CARTER

Jessee (50) HELMS

Credit ALLIANCE 212 421 360
910 - 41 - 420 4M6

Private Foundations

Burgers CHAMBERS

[redacted] 50,000/—

b6
b7C

[redacted]

[redacted]

© WILSON JONES COMPANY U.S.A. "COLUMN WIDE" © (C) 1990 NY W07605 "PAYRING" BOUND

1325015-000-12561

Prepared By
Approved By

yellow ... memo

b6
b7C

[redacted]

Brown ... address

b6
b7C

[redacted]

© JONES COMPANY U.S.A. - "COLUMN WRITE" PATENTED WATER WRINKLE BOND

Doc

WMFO 29B-WF-171994
DOM

CENTRAL OFFICE, IMMIGRATION AND NATURALIZATION SERVICE
425 I Street Northwest
Washington, D.C.

On October 7, 1992, Investigative Assistant (IA) [redacted] caused a search to be made of the files of the of the above agency, for information pertaining to [redacted] born [redacted] at [redacted] was advised the following information on June 17, 1993:

b6
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[redacted]

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-24
29B-WF-171994 Sub U

1325015-000-12563

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.)

Date:
Edition:

Title:

Character:
or
Classification:
Submitting Office:

Indexing:

The New York Times

DATE: 7-9-93
PAGE: D2

Indictment Says B.C.C.I. Was Bribe Victim

By RICHARD PÉREZ-PEÑA

By doling out bribes and claiming assets they did not have, two brothers illegally secured $28 million in loans from five banks, including B.C.C.I., prosecutors charged yesterday.

Robert M. Morgenthau, Manhattan District Attorney, said the case had come to light during his office's investigation into the Bank of Credit and Commerce International. He said the men had turned the tables on the outlaw bank, fraudulently obtaining $16.8 million in loans from B.C.C.I.

Ponnapula Sanjeeva Prasad and Murali Krishna Ponnapula were indicted on charges of grand larceny, a felony carrying a maximum penalty of 8⅓ to 25 years in prison, and several lesser counts.

Mr. Ponnapula, who lives in Memphis, pleaded not guilty yesterday in State Supreme Court in Manhattan and was released on a $25,000 bond. His brother, a psychiatrist whom Mr. Morgenthau described as the mastermind of the operation, is in India, where he lives.

"They both vigorously deny all of the allegations," said Frederick P. Hafetz, the lawyer for both men. "Dr. Prasad plans to return to the United States to fight the charges."

A third man, Nasim A. Syed of Ronkonkoma, L.I., a former official of the Bank of Oman Ltd., was charged with accepting a $53,000 bribe from Dr. Prasad and Mr. Ponnapula to help get a loan. He pleaded not guilty and was released on a $50,000 bond. His lawyer, Michael F. Bachner, said the payment to Mr. Syed had been for "legitimate purposes outside the bank."

A fourth man, Shahbaz A. Raheem, formerly B.C.C.I.'s chief credit officer in America, has pleaded guilty to receiving bribes of $100,000 in cash and part ownership of a hotel in Tennessee, and is awaiting sentencing.

Prosecutors learned of the improper dealing, Mr. Morgenthau said, when another former B.C.C.I. official, Baji A. Palkhiwala, told a grand jury that he had taken bribes totaling $250,000 from the two brothers. Because he was testifying under immunity, Mr. Morgenthau said, Mr. Palkhiwala cannot be prosecuted for accepting the bribes.

The loans were made to several companies controlled by Dr. Prasad, which Mr. Morgenthau said were little more than factories for bogus loan documents. "Their only business was monkey business," he said.

29B-WF-171994 Sub U-25

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SERIALIZED [illegible] FILED [illegible]

JUL 15 1993

FBI — WASH. FIELD OFFICE

FBI/DOJ

1325015-000-12565

sent 3:15
7/19/93

FBI
Washington Metropolitan Field Office
Washington, D.C.

BCCI Squad

Fax : ~~202/324-9335~~
Voice: ~~202/324-9300~~

Facsimile Cover Sheet

PRECEDENCE
___ Immediate
___ Priority
_X_ Routine

CLASSIFICATION
___ Top Secret
___ Secret
___ Confidential
___ Sensitive
_X_ Unclassified

Date: 7/19/93 Page 1 of 5

To : DIRECTOR, FBI (29B-WF-171994)

Attention : SSA [redacted] WCCS/FIF UNIT

Fax Number: 202/324-6492

From: SA [redacted] WMFO/C-2 Telephone Number: 202/324-6395

Special Instructins: HIDDEN INTERESTS; MAJOR CASE #38;

Received attached from [redacted] NYSBD, re: [redacted] ETAL;

Provided for your information.Same case as BCCI Squad determined.

-26

29B-WF-171994 Sub-U

Approved: RMB/lw

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 19 1993
FBI — WASH. FIELD OFFICE

1325015-000-12566

SUPERINTENDENT OF BANKS NEW YORK STATE
IN POSSESSION OF BCCI, NEW YORK AGENCY
530 FIFTH AVENUE, 7TH FLOOR
NEW YORK, NY 10036

DERRICK D. CEPHAS
SUPERINTENDENT OF BANKS

FAX MESSAGE

RUSH///RUSH///RUSH///RUSH///RUSH///RUSH///RUSH

DATE: 19JUL93

TO: [redacted] b6 b7C
FBI

FAX 202 324 6426

FROM: [redacted] b6 b7C
LOAN RECOVERY SPECIALIST
NEW YORK STATE BANKING DEPARTMENT/BCCI
FAX:(212) 869-2310

REF: PRASAD ORGANIZATION

NUMBER OF PAGES SENT 5 (INCLUDING THIS PAGE)

MESSAGE: AS DISCUSSED.

NOTE: IF MESSAGE IS NOT RECEIVED, COMPLETE OR LEGIBLE, PLEASE CONTACT [redacted] 212 789 8625 b6 b7C

RUSH///RUSH///RUSH///RUSH///RUSH///RUSH///RUSH///RUSH///RUSH

-27
29B-WF-179942 Sub U

SEARCHED Stu INDEXED Stu
SERIALIZED Stu FILED Stu
JUL 19 1993
FBI — WASH. FIELD OFFICE

SALVATORE MORABITO, SPECIAL DEPUTY SUPERINTENDENT (212) 789-8620
HARRY J. MORPURGO, PRINCIPAL BANK EXAMINER (212) 789-8661 FAX (212) 869-2313

No.

ADA DAVID STEINER
FRAUDS BUREAU
CALENDAR PART

The People of the State of New York

Counsel

-against-

Filed day of ,19

P.S. PRASAD a/k/a PONNAPULA' SANJEEVA PRASAD, MURALI KRISHNA PONNAPULA, NASIM A. SYED a/k/a NASIM AKHTAR,

Pleads

Defendants.

INDICTMENT

Bail

CONSPIRACY 4°, P.L. §105.10(1), (1 ct.)
SCHEME TO DEFRAUD 1°, P.L. §190.65(1)(b), (1 ct.)
ATTEMPTED GRAND LARCENY 2°, P.L. §110/155/40(1), (1 ct.)
GRAND LARCENY 1°, P.L. §155.42, (7 cts.)
GRAND LARCENY 2°, P.L. §155.40(1), (3 cts.)
FORGERY 2°, P.L. §170.10(1), (10 cts.)
FALSIFYING BUSINESS RECORDS 1°, P.L. §175.10, (45 cts.)
COMMERCIAL BRIBING 1°, P.L. §180.03, (3 cts.)
COMMERCIAL BRIBE RECEIVING 1°, P.L. §180.08, (1 ct.)

ROBERT M. MORGENTHAU
District Attorney
New York County

Foreperson

Robert M. Morgenthau

1325015-000-12572

DISTRICT ATTORNEY - COUNTY OF NEW YORK

News Release
July 8, 1993

Contact: Gerald McKelvey
(212) 335-9781

Manhattan District Attorney Robert M. Morgenthau announced this morning that two men have been arrested and a third is being sought on an indictment charging them with fraudulently obtaining more than $27 million in loans from five banks and bribing officials of two of the banks to facilitate some of the loans.

Mr. Morgenthau said that this investigation and indictment resulted from his office's continuing probe into the now-defunct Bank of Credit and Commerce International (BCCI); more than $16.8 million of the fraudulent loans were obtained from BCCI. This is the fourth set of indictments resulting from the BCCI investigation.

Specifically, today's indictment charges that defendant P.S. PRASAD, a/k/a PONNAPULA SANJEEVA PRASAD, masterminded the fraud through his control of a group of related companies (the "Prasad Group"). In addition, the indictment charges PRASAD's brother, MURALI KRISHNA PONNAPULA, with being a participant in the schemes. Also charged is NASIM A. SYED, a/k/a NASIM AKHTAR, a former high-ranking official of the New York office of the Bank of Oman, Ltd., for allegedly accepting bribes from the Prasad Group.

Mr. Morgenthau said that the investigation disclosed that in order to obtain the fraudulent loans, PRASAD and his accomplices bribed high-ranking officials at two of the five banks, made false representations and submitted phony loan documents to each of the banks. These fraudulent documents included loan applications containing false information about the borrowing entities, financial statements misstating the financial conditions of PRASAD himself, his accomplices and various companies that he controlled, appraisals overstating the value of properties offered as collateral, and environmental reports misrepresenting the condition of properties offered as collateral. According to Mr. Morgenthau, "Today's indictment charges that PRASAD's real business was operating a document factory which produced phony loan documents by the truck-full." PRASAD's organization operated in Greenville, North Carolina, from the beginning of the conspiracy in August of 1989, until 1990, when it moved to Queens, New York.

Mr. Morgenthau said that altogether, the indictment charges that loans were obtained fraudulently from the following institutions: BCCI, loans totaling $16.8 million; Bank of India, loans totaling $5.9 million; State Bank of India, one loan of $1.4 million; Bank of Oman Ltd., one loan of $1.5 million; and,

1325015-000-12573

Branch Banking and Trust Co. of Greenville, North Carolina, one loan of $2.5 million.

The indictment charges that PRASAD used loan proceeds for "the personal benefit of Girish K. Sharma, a PRASAD associate who was the brother of Satish K. Sharma, a high-ranking Indian politician and government official." Satish Sharma is currently the Minister of Petroleum in India.

PRASAD, is charged with seven counts of Grand Larceny in the First Degree, conspiracy and 63 related felonies in connection with the scheme. The top count, First Degree Grand Larceny, carries a prison sentence of up to 25 years.

PRASAD's brother, MURALI KRISHNA PONNAPULA, is charged with one count of Grand Larceny in the First Degree and Falsifying Business Records in the First Degree for assisting in fraudulently obtaining a $1.9 million loan from the Bank of India, which has an office in Manhattan.

The third man indicted, NASIM A. SYED, the former Bank of Oman, Ltd. official, is charged with Commercial Bribe Receiving in the First Degree, which carries a prison sentence of up to four years. SYED allegedly accepted bribes totaling $53,000 in exchange for, among other things, helping fraudulently to obtain the $1.5 million loan from the Bank of Oman, Ltd.

SYED and PONNAPULA will be arraigned later this morning in New York State Supreme Court. PRASAD returned to his native India before the fraud was uncovered; the District Attorney's Office is seeking his return to New York for prosecution.

Mr. Morgenthau said that in addition to bribing SYED, PRASAD also paid bribes to two BCCI officials to facilitate fraudulent loans from BCCI. Specifically, bribes totaling $250,000 were paid to Baji A. Palkhiwala, the former head of BCCI's regional office in the United States. In addition, bribes of $100,000 in cash, plus an ownership interest in a Tennessee hotel, were paid to Shahbaz A. Raheem, the former chief credit officer for BCCI in the United States. Raheem has already pleaded guilty to Commercial Bribe Receiving in the First Degree for his role in this scheme and is awaiting sentence, Mr. Morgenthau said. Palkhiwala, who was called to testify before the BCCI grand jury before this fraud was uncovered, received immunity by operation of New York law when he testified and cannot be prosecuted.

In addition to using loan proceeds to bribe bank officials, the investigation further disclosed that large portions of the stolen money were diverted for the personal benefit of PRASAD, PONNAPULA and other members of their family. Moreover, the loans were used to purchase controlling interests in two established corporations, Regal International, Inc., a Texas company that

manufactures oilfield and marine rubber products, and Pharmacontrol, Inc., a New Jersey pharmaceutical company.

Mr. Morgenthau said that one of the saddest episodes of this case involved a small company called Cox Trailers, Inc., located in Grifton, North Carolina, which manufactured boat trailers and had been in existence since 1903. In mid-1989, PRASAD purchased control of the company from the Cox family. Shortly thereafter, in 1990, he obtained fraudulent loans totalling $4 million in the name of the company, ostensibly to inject much-needed capital into the business. However, rather than using the loans to reinvigorate Cox Trailers, as promised, PRASAD diverted the money for other purposes. Mr. Morgenthau said that, in large part as a result of this diversion, the company collapsed and the week before Christmas 1990, Prasad ordered that its remaining employees be fired. "Those who have difficulty perceiving the harm that PRASAD and his accomplices caused need only examine the story of Cox Trailers and its hard-working employees," Mr. Morgenthau said.

Mr. Morgenthau commended Senior Investigator Terence V. Hayes for his work on the investigation, under the supervision of Andrew Rosenzweig, Chief of the Investigations Bureau. The case was presented to the grand jury and will be prosecuted by Assistant District Attorney David Steiner, Senior Investigative Counsel in the Frauds Bureau, under the supervision of Frauds Bureau Chief Roslynn Mauskopf and Investigation Division Chief Daniel J. Castleman.

Defendant information:

b6
b7C

#

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 29
Page 42 ~ Duplicate;
Page 43 ~ Duplicate;
Page 44 ~ Duplicate;
Page 45 ~ Duplicate;
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Page 47 ~ Duplicate;
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(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/06/1999

To: Washington Field

From: Washington Field
Squad C-1
Contact: SSA [redacted] Ext. 2295

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. v. BCCI Holdings

Synopsis: CLOSING COMMUNICATION

Details: The purpose of this communication is to summarize recent events surrounding the 63 seizure files associated with the BCCI investigation. On 2/1/99, several members of DOJ, USMS, and FBI met to determine how to close out the BCCI seizures entered in the CATS database as the Sixth and Final Order of Forfeiture had been entered into as of 12/22/98. A summary of this meeting is attached as reference. In brief, it was decided that the 63 BCCI individual seizures entered into CATS would be deleted in exchange for 6 seizures entered into CATS corresponding to each of the six orders of forfeiture. The following CATS ID numbers and corresponding seizure numbers were utilized for the respective orders of forfeiture.

92-FBI-000460 (3920-92-F-0115; 1st Order - 1/24/92 & 1/31/92)
92-FBI-000461 (3920-92-F-0116; 2nd Order - 7/29/92)
92-FBI-000462 (3920-92-F-0117; 3rd Order - 8/19/93)
95-FBI-003535 (3920-95-F-0097; 4th Order - 12/21/94)
96-FBI-003688 (3920-96-F-0097; 5th Order - 9/20/96)
99-FBI-000970 (3920-99-F-0092; 6th Order - 12/22/98)

The USMS has taken the responsibility for associating each of the 63 individual seizures with the 6 seizures for each order of forfeiture. Attached for reference is a spreadsheet which correlates each of the 63 seizures with the appropriate order of forfeiture. The USMS will make entries to the itemized list in CATS which will detail the total amount received for each

LT99b97lcc

29B-WF-171994 FF-1

Seizure Form

Asset ID: <A> | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
393-0	WF			96-0097	N

(7) Case Number:	(8) Case Name:
295-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	SA

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
2/12/96	Criminal Order	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
SA	202-324-9073

(17) Seized From: DCCT HOLDINGS

(18) Place/Address Where Seized: | (19) City: | (20) State:

(21) Seizure: Judicial District OC	(22) Processing: DC	(23) Forfeiture Statute: 18 USC 982	(24) Violation Statute: 18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($): 2.2 million	(26) Above Minimum Threshold Value? YES	(27) Appraisal Date:	(28) Asset Type: CURRENCY	(29) Asset Sub-Type: BANK ACCT	(30) Forfeiture Type: JUDICIAL

(31) Asset Description: D.C.C.T ASSETS TOTALLING 2.2 MILLION DOLLARS

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
NO	NO	NO	NO
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
NO	NO	NO	NO
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
NO	NO	NO	YES

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:
ROBB EVANS, TRUSTEE	#149-240-134

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

1325015-000-10258

Seizure Form

Asset ID: <A> | Date: <B>

Asset Description: <C>

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI HOLDINGS		Owner	
(95) Address:		Lienholder	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Seized From	X
(100) Contact Name (if business):	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): N / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated?	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
		Owner	
(95) Address:		Lienholder	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Seized From	
(100) Contact Name (if business):	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated?	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

Seizure Form

Asset ID: <A> | Date: <B> | Page 3

Asset Description: <C>

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI HOLDINGS		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: DEPT OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign): FEDERAL		
(137) Address: 1400 N.Y. AVE., N.W.		(138) City: WASHINGTON		
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:	(143) Sharing Possible? NO
(144) Contact Name: [redacted] TRIAL ATTORNEY			(145) Contact Phone Number:	
(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	
(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

b6
b7C

Seizure Form

Asset ID: <A>	Date: <B>	Page 4
Asset Description: <C>		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
USMS	-U.S. MARSHALS SERVICE	2/13/96

(149) Storage Facility Address:
ONE ST. ANDREWS PLAZA

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: Per:
NY	NY	10007	$

PREPARED BY

(154) Signature:	(155) Date:
	3/7/96
(156) Prepared By:	(157) Title:
	SA, FBI

APPROVED BY

(158) Signature:	(159) Date:
	3/14/96
(160) Approved By: A/SSA	(161) Title:

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Probable Cause

<D> "SEE ATTACHED"

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. Robb Evans, trustee has been appointed to oversee the complex assets listed in the four criminal BCCI forfeiture orders. On 02/12/96, Evans completed a $2,200,000.00 (two million) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture.

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] BCCI), and Capcom Financial Services, LTD. with conspiracy (18 U.S.C. Section 371), money laundering (18 U.S.C. Sections 1956 (a) (1) & (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

This indictment resulted from [redacted] b7E

On Jan 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Three additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted] Trial Attorney, Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court. [redacted] anticipates a fifth order of forfeiture will be forthcoming in the Spring of 1996

b6
b7C

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305
Facsimile
(213) 955-9344
Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: [redacted] **DATE:** Mar. 4, 1996

FIRM: Federal Bureau of Investigations **FAX NO.:** 202-324-6426

FROM: [redacted] **NO. OF PAGES:** three (3)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear [redacted]

Please call me at (213) 955-8305 if you need more information, otherwise I will talk to you at the next dividend remittance.

Best regards,

[redacted]

[redacted]

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ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of February 12, 1996

Forfeiture Order Date	19-Aug-93	21-Dec-94	21-Dec-94	03-Nov-95	
State	California	California	New York	New York	Total
Forfeiture Orders					
Cash	34,379,642	3,647,571	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,650	0	25,817,380	2,035,184	41,747,214
Miscellaneous Property	31,445	0	0	0	31,445
Other	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	74,519,724	164,149,037	310,867,141
Net Remittance To The US Marshal					
Sources of Funds					
Asset Conversions:					
Cash	34,379,642	3,647,571	20,000,000	1,000,000	59,027,213
Loans	22,895,404	0	443,424	570,601	23,909,428
Real Property	21,043,370	0	1,960,096	0	23,003,466
Miscellaneous Property	49,094	0	0	0	49,094
Other	124,228	0	22,845	157,090	304,163
Total Asset Conversions	78,491,739	3,647,571	22,426,365	1,727,691	106,293,365
Total Revenue Collection (1)	5,239,298	0	505,494	747,208	6,492,000
Total Sources of Funds	83,731,037	3,647,571	22,931,859	2,474,899	112,785,365
Uses of Funds					
Seller Financing and Cash Disbursements	(10,635,737)	0	(5,476,091)	(1,474,899)	(18,586,727)
Operating Account Balance	(748,638)	0	(750,000)	0	(1,498,638)
Special Reserve Account (2)	(500,000)	0	(1,000,000)	(1,000,000)	(2,500,000)
Surplus Balance as of 2/12/96	0	0	0	0	0
Total Uses of Funds	(11,884,375)	0	(8,226,091)	(2,474,899)	(22,585,365)
Net Remittances	71,846,662	3,647,571	14,705,768	(0)	90,200,000
Present Book Value Per Budget					
Cash	1,248,638	0	1,750,000	49,000,000	51,998,638
Loans	3,715,014	0	11,644,442	3,491,553	18,851,009
Real Property	3,232,254	0	12,930,640	1,170,000	17,332,894
Miscellaneous Property	0	0	0	0	0
Other Assets	5,668	0	56,058	2,731,522	2,793,248
Total Liabilities	(206,655)	0	(2,229,387)	(1,000,000)	(3,436,042)
Total PBV Per Budget	7,994,918	0	24,151,753	55,393,075	87,539,747

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $8,095,187.50.*
(2) Special Reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and necessary capital improvements, and for New York claims.

ROBB EVANS, TRUSTEE
SCHEDULE OF DISTRIBUTION TO US MARSHAL
From: May 5, 1993 to February 12, 1996

From Account	Date Sent	Payment Sent	Comments
First Interstate Bank: 149-2-40134	26-Aug-93	35,964,405.69	By Order of August 19, 1993
First Interstate Bank: 149-2-40134	22-Oct-93	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	17-Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	16-Aug-94	8,850,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Oct-94	200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Dec-94	3,035,594.31	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Feb-94	17,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Dec-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Feb-96	2,200,000.00	60 Day Remittance
Total		90,200,000.00	

KPMG LA 25FL R.A.P. ; 3- 4-96 ;10:15AM ; PEAT MARWICK LLP ;# 3/ 3

```
 03/20/96                PROPERTY FORFEITURE APPLICATION              PFAPGM01
 15:01:40                General Information - Screen 1          3920-96-F-0097
-------------------------------------------------------------------------------
FD-635 Date    : 031496  Entered 03/20/96  HQ Rec'd ------  Field Specialist SCF
File Number    : Class 029 B / WF -  0171994 Sub ---------- UCFN Y    Squad C1--
OO File Number: --- -  -------  OO --                      HQ Specialist ---
Primary Viol   : 18 USC 982--    Secondary: ------------    Sharing Requests 0
Case Captioned: HIDDEN INTERESTS; MAJOR CASE #38-----------------
                ------------------------------------------------
Assoc Action   : C               Admin/Judicial J          Property Type C
Joint Agency   : DEPARTMENT OF JUSTICE-----------------------------
Appraised Val $ 2200000.00-----                            Program 05
Case Agent     : [redacted]-----          Co-Agent -------------------- b6
Seized/Adopted: 021296                                                 b7C
Place Seized   : BCCI HOLDINGS-----------------
        City   : WASHINGTON----------  State DC  Zip 00000  Jud District DC--
Quick Released: N                      Expenses Reimbursed $ 0.00-----
Recipient Title ----- First Name -------------------- Last --------------------
        Street: ----------------------------
        City   : --------------------  State --  Zip -----
Field Work Outstanding -               Justification For Delayed Submission -
-------------------------------------------------------------------------------
 Screen To Query: --          F9= MODIFY          F10= EXIT          F12= CANCEL
4BÜ               Aa             B0--W9515402   R 5  C 18        16:16  3/20/96
```

```
 03/20/96                PROPERTY FORFEITURE APPLICATION                PFAPGM02
 15:02:12                Property - Screen 2 CASH                   3920-96-F-0097
-------------------------------------------------------------------------------
CONVEYANCE -          VIN/Serial Registration Number: --------------------
  Yr: --  Make: ---------------  Model: ---------------  Style: ---------------
  Color: ------------    Condition Code: -    Mileage: ------     Cylinders: --
  License Number: --------     License State: --     License Year: --
NONCONVEYANCE Description: $2,200,000.00 U.S. CURRENCY----------------------
                           ------------------------------------------------
                           ------------------------------------------------
                           ------------------------------------------------
-------------------------------------------------------------------------------
Equipment/Accessories ...: ------------------------------------------------
Repairs Required ........: ------------------------------------------------
Suitable for Official Use: N
Processing Agency .......: FBI  USMS Notified: ------  Cash Deposited: ------
Assets Compromised by USA: N    Total Value: 0.00-----------
              Disposition: ------------------------------------------------
              Description: ------------------------------------------------
Prosecution Deferred ....: -
              Agency ....: ------------------------------------------------
-------------------------------------------------------------------------------
 Screen To Query: --    F2= DESCRIPTION    F9= MODIFY   F10= EXIT   F12= CANCEL
4BÜ              Aa              B0--W9515402   R 5  C 57        16:16  3/20/96
```

```
 03/20/96                PROPERTY FORFEITURE APPLICATION                PFAPGM03
 15:02:20          Storage & Adoption Information - Screen 3     3920-96-F-0097
-------------------------------------------------------------------------------
 Storage Facility .............: FEDERAL RESERVE BANK--------------------
                         Street: ------------------------------
                         City  : NEW YORK------------ State: NY  Zip: 00000
 Date Stored ..................: 021396   Release Date: ------
 Storage Cost Per Day .........: 0.00---
 Seizing Agent (1).............: [redacted]------   Squad: C1--          b6
               (2).............: ------------------   Squad: ----          b7C
 Seizure Method ...............: 5
 Undercover Operations Used ...: N
 Subject in Custody ...........: N   Date: ------
 Turned Over to USMS ..........: N   Date: ------
 Date Seized/Adopted ..........: 02/12/96
 Date Seized by Referring Agency: ------
 Adopted From -          Name  : --------------------  --------------------
                         Street: ------------------------------
                         City  : --------------------  State: --  Zip: -----
 Location PD Seized -    Street: ------------------------------
                         City  : --------------------  State: --  Zip: -----
-------------------------------------------------------------------------------
  Screen To Query: --        F9= MODIFY          F10= EXIT          F12= CANCEL
4BÜ                Aa            B0--W9515402   R 5  C 35        16:16  3/20/96
```

03/20/96 PROPERTY FORFEITURE APPLICATION PFAPGM04
15:02:31 Probable Cause Synopsis - Screen 4 3920-96-F-0097
Page 1

Legal Review: [redacted] -- Date Approved: 031496 b6 b7C

THE WASHINGTON METROPOLITAN FIELD OFFICE (WMFO) HAS----
BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR--------
MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM FOUR----
CRIMINAL ORDERS OF FORFEITURE IN U.S. V HIDDEN INTERESTS;---
MAJOR CASE NUMBER 38. ROBB EVANS, TRUSTEE HAS BEEN---------
APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE FOUR C
RIMINAL BCCI FORFEITURE ORDERS. ON 02/12/96, EVANS---------
COMPLETED A $2,200,000.00 (TWO MILLION) WIRE TRANSFER TO THE
UNITED STATES MARSHALS SERVICE IN NEW YORK REPRESENTING THE-
LIQUIDATION OF CASH ASSETS FROM THE FOURTH ORDER OF---------
FORFEITURE.----------
ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS-----
RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF--

Screen To Query: --

F2= ADDITIONAL LEGAL REVIEW F3= COPY F9= MODIFY F10= EXIT F12= CANCEL
4BÜ Aa B0--W9515402 R 6 C 16 16:16 3/20/96

CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND-- COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY,---- "BCCI"), [redacted] b6 b7C
[redacted] BCCI),---
AND CAPCOM FINANCIAL SERVICES, LTD. WITH CONSPIRACY (18 USC- SECTION 371), MONEY LAUNDERING (18 USC 956 (A)(1)&(2)), AND- DRUG CONSPIRACY-(21 USC 846). THE FIRST SUPERSEDING-------- INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO- ADDITIONAL BCCI [redacted] AND TWO NARCO-TRAFFICKERS, [redacted] WERE INDICTED ON MAY 4, 1989.----------
THIS INDICTMENT RESULTED FROM [redacted] b7E

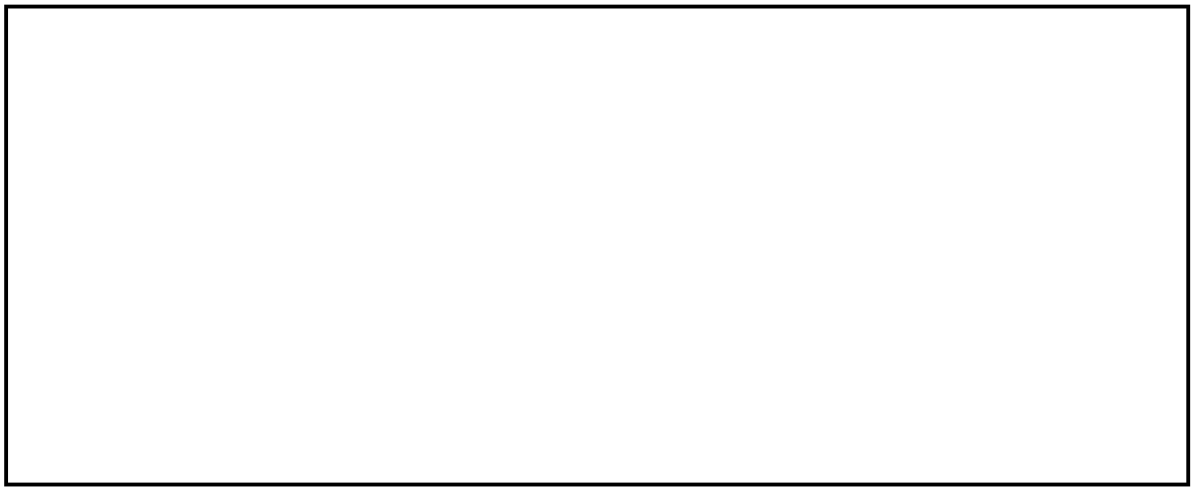
Screen To Query: --

F2= ADDITIONAL LEGAL REVIEW F3= PAGE 1 F9= MODIFY F10= EXIT F12= CANCL
4BÜ Aa B0--W9515402 R 7 C 11 16:16 3/20/96

03/20/96 PROPERTY FORFEITURE APPLICATION PFAPGM17
15:02:47 Probable Cause Synopsis -Screen 4 3920-96-F-0097
Page 3

---

b7E



Screen To Query: --

F2= ADDITIONAL LEGAL REVIEW F3= PAGE 1 F9= MODIFY F10= EXIT F12= CANCL
4BÜ Aa B0--W9515402 R 7 C 11 16:16 3/20/96

03/20/96 PROPERTY FORFEITURE APPLICATION PFAPGM18
15:02:54 Probable Cause Synopsis -Screen 4 3920-96-F-0097
Page 4

---

b7E

[redacted]----------

ON JAN. 24, 1992, THE UNITED STATES DISTRICT COURT FOR-
THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF----
THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI") AND THE
PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA
. AN ORDER OF FORFEITURE WAS ENTERED AS PART OFTHE PLEA----
AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS-
NAMED SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS
IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING-----
WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND------
INTANGIBLE PERSONAL PROPERTY.----------
THREE ADDITIONAL SUPPLEMENTAL ORDERS OF FORFEITURE HAVE
BEEN ISSUED BY JUDGE JOYCE GREEN, UNITED STATES DISTRICT----
COURT, DISTRICT OF COLUMBIA CONCERNING BCCI. [redacted]--

b6
b7C

Screen To Query: --

F2= ADDITIONAL LEGAL REVIEW F3= PAGE 1 F9= MODIFY F10= EXIT F12= CANCL
4BÜ Aa B0--W9515402 R 7 C 11 16:16 3/20/96

03/20/96 PROPERTY FORFEITURE APPLICATION PFAPGM19
15:02:57 Probable Cause Synopsis -Screen 4 3920-96-F-0097
Page 5

[redacted] TRIAL ATTORNEY, CRIMINAL DIVISION HAS ADVISED----- b6
UNTILL ALL POTENTIALLY FORFEITABLE ASSETS HAVE BEEN--------- b7C
IDENTIFIED THAT NO FINAL ORDERS OF FORFEITURE WILL BE ISSUED
BY THE COURT. [redacted] ANTICIPATES A FIFTH ORDER OF--------
FORFEITURE WILL BE FORTHCOMING IN THE SPRING OF 1996.--------

Screen To Query: -- F3= PAGE 1 F9= MODIFY F10= EXIT F12= CANCL
4BÜ Aa B0--W9515402 R 7 C 11 16:16 3/20/96

```
 03/20/96                PROPERTY FORFEITURE APPLICATION                PFAPGM05
 15:03:08                    Seized From - Screen 5                  3920-96-F-0097
--------------------------------------------------------------------------------
PROPERTY SEIZED FROM:
     Title .....: -----
     First Name : HOLDINGS------------   Last Name : BCCI----------------
     Street ....: ------------------------------
     City ......: WASHINGTON----------   State: DC   Zip: -----
     Run Letter : -
PROPERTY REGISTERED TO:
     Title .....: -----
     First Name : --------------------   Last Name : ----------,-----------
     Street ....: ------------------------------
     City ......: --------------------   State: --   Zip: -----
     Run Letter : -

     Title .....: -----
     First Name : --------------------   Last Name : --------------------
     Street ....: ------------------------------
     City ......: --------------------   State: --   Zip: -----
     Run Letter : -
--------------------------------------------------------------------------------
  Screen To Query: --    F2= NOTICES    F9= MODIFY    F10= EXIT    F12= CANCEL
4BÜ              Aa              B0--W9515402   R 6  C 20        16:17  3/20/96
```

29B-WF-171994-FF-1 -2

SEARCHED Kat INDEXED Kat
SERIALIZED Kat FILED Kat
MAR 0 1 1996
FBI — WASH. METRO FIELD OFFICE

b6
b7C

Seizure Form

Asset [redacted]96-FBI-000829 | Date: 03/[redacted]6 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960097	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
02/12/96	Other	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
	202-324-9073

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized:	(19) City:	(20) State:
Not Available	Not Available	DC

(21) Seizure: Judicial District	(22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1957

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
2200000.00	Y		Financial Instrument	13	Criminal

(31) Asset Description: B.C.C.I. Holdings Bank Account Totaling 2.2 Million Dollars

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	
(36) Expenses Incurred?	**(37) Forfeiture-Dependent Award?**	**(38) Quick Release Performed?**	**(39) Intra-Agency Assistance?**
N	N	N	N
(40) Suitable for Official Use?	**(41) OCDETF Case?**	**(42) Sharing Anticipated?**	**(43) Additional Agencies?**
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	**(65) Four Wheel Drive?**	**(66) Salvage Certificate?**

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:
Robb Evans	149-240-134

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:

Seizure Form

Asset ID: [redacted]FBI-000829 | Date: 03/0[redacted]

Asset Description: B.C.C.I. Holdings Bank Account Totaling 2.2 Million Dollars

(92) Name: BCCI Holdings			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address: Not Available				Owner	
(96) City: Not Available	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	Lienholder	
(100) Contact Name (if business): Not Available			(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated? N		(107) Prisoner ID:		Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:		(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel? N	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

(92) Name:			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:				Owner	
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	Lienholder	
(100) Contact Name (if business):			(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated?		(107) Prisoner ID:		Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:		(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel?	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

Seizure Form

Asset ID: [redacted]FBI-000829 | Date: 03/0[redacted]

Asset Description: B.C.C.I. Holdings Bank Account Totaling 2.2 Million Dollars

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	U.S. v. BCCI HOLDINGS		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: Not Available
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name:			(134) Agency Case ID:	
DEPT OF JUSTICE				
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
N		Federal		
(137) Address:			(138) City:	
1400 N.Y. Ave., N.W.			Washington	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
DC	20005	USA	DCDOJ0000	N
(144) Contact Name:			(145) Contact Phone Number:	
			Not Available	

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(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: [redacted]FBI-000829	Date: 03/0[redacted]
Asset Description: B.C.C.I. Holdings Bank Account Totaling 2.2 Million Dollars	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	FBI	02/12/96

(149) Storage Facility Address:

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date:
	02/12/96
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date:
	03/07/96
(164) Prepared By:	(165) Title:
	SA (FBI)

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APPROVED BY

(166) Signature:	(167) Date:
	03/14/96
(168) Approved By:	(169) Title:
	A/SSA

Asset ID: 96-FBI-000829
Asset Description: B.C.C.I. Holdings Bank Account Totaling 2.2 Million Dollars

Probable Cause

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. Robb Evans, trustee has been appointed to oversee the complex assets listed in the four criminal BCCI forfeiture orders. On 02/12/96, Evans completed a $2,200,000.00 (two million) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture.

See File For Complete Facts and Circumstance.

Asset ID: 96-FBI-000829
Asset Description: B.C.C.I. Holdings Bank Account Totaling 2.2 Million Dollars

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	03/28/96
Headquarters Receipt Date:	03/26/96	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960097
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Temporary Restraining Order Date:		**Expiration Date:**	

Dept. NF-171494-FBI-3
3920-96-0097

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1325015-000-10282

Seizure Form

A[redacted]D: 96-FBI-000790 | Date: [redacted]7/96 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960097	N

(7) Case Number: 29B-WF-171994

(8) Case Name: Hidden Interests; Major Case #38

(9) Operation Name:

(10) Case Agent: SA [redacted] b6 b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
02/12/96	Other	12/21/94	

(15) Seizing Agent: SA [redacted]

(16) Phone Number: (202)324-9073

(17) Seized From: B.C.C.I. Holdings

(18) Place/Address Where Seized: Not Available

(19) City: Not Available

(20) State: DC

(21) Judicial Seizure:	(22) District Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 981

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
2200000.00	Y		Financial Instrument	04	Civil/Judicial

(31) Asset Description: B.C.C.I. Assets Totalling 2.2 Million Dollars

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:
Robb Evans, Trustee	149-240-134

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:
		1325015-000-10283

Seizure Form

Asset [redacted] 96-FBI-000790 | Date: [redacted]7/96

Asset Description: B.C.C.I. Assets Totalling 2.2 Million Dollars

(92) Name: B.C.C.I. Holdings			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address: Not Avaiable				Owner	
(96) City: Not Available	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	Lienholder	
(100) Contact Name (if business): Not Available			(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	X
(106) Incarcerated? N		(107) Prisoner ID:		Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:		(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel? N	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:		(120) State:	(121) Zip Code:	(122) Country:	

(92) Name:			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:				Owner	
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	Lienholder	
(100) Contact Name (if business):			(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated?		(107) Prisoner ID:		Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:		(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel?	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:		(120) State:	(121) Zip Code:	(122) Country:	

Seizure Form

Asset [redacted]96-FBI-000790 | Date: 0[redacted]/96

Asset Description: B.C.C.I. Assets Totalling 2.2 Million Dollars

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	U.S. v BCCI Holdings		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: Not Available
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name: DEPT OF JUSTICE			(134) Agency Case ID:	
(135) Adopted From? N			(136) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(137) Address: Not Available,			(138) City: Washington	
(139) State: DC	(140) Zip Code: 00000	(141) Country: USA	(142) NCIC Code: DCDOJ0000	(143) Sharing Possible? N
(144) Contact Name: [redacted] Trial Attorney			(145) Contact Phone Number:	

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(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset [redacted] 96-FBI-000790	Date: [redacted]/96
Asset Description: B.C.C.I. Assets Totalling 2.2 Million Dollars	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	Federal Reserve Bank, N.Y.	02/12/96

(149) Storage Facility Address:
Not Available

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: Per:
New York	NY	00000	

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date: 02/12/96
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date: 03/07/96
(164) Prepared By:	(165) Title: SA, FBI

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APPROVED BY

(166) Signature:	(167) Date: 03/14/96
(168) Approved By:	(169) Title: A/SSA

Asset ID: 96-FBI-000790
Asset Description: B.C.C.I. Assets Totalling 2.2 Million Dollars

Probable Cause

29B-WF-171994

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. ROBB EVANS, Trustee has been appointed to oversee the complex assets listed in the four criminal BCCI forfeiture orders. On 02/12/96, EVANS completed a $2,200,000.00 (two million) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture.

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] b6 b7C

BCCI), and Capcom Financial Services, LTD. with conspiracy (18 U.S.C. Section 371), money laundering (18 U.S.C. Sections 1956 (a) (1) (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989.

This indictment resulted from [redacted] b7E

On January 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. An order of forfeiture was entered as art of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interested in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Three additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted] Trial Attorney, Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court. [redacted] anticipated a fifth order of forfeiture will be forthcoming in the Spring of 1996.

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Seizure Form

Asset ID: 96-FBI-000790

Asset Description: B.C.C.I. Assets Totalling 2.2 Million Dollars

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	03/19/96
Headquarters Receipt Date:	03/15/96	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960097
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	C-Civil/Judicial	**Date Changed:**	
Prior Forfeiture Types:			
Temporary Restraining Order Date:		**Expiration Date:**	

3920-96-F-00974

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____

APR 12 1996

FBI — WASH. METRO FIELD OFFICE

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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/11/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: ASSA [redacted]

Drafted By: [redacted]:AC

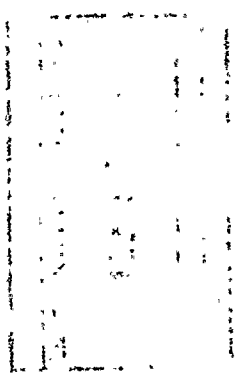
File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Details: On 4/10/96, [redacted] Trial Attorney, Asset Forfeiture/Money Laundering Section, Department of Justice furnished the following information: The fifth order of forfeiture in the above captioned investigation has been delayed. No specific date has been scheduled but [redacted] anticipates within the next four to six weeks the court will issue the fifth order of forfeiture. The reason for the delay is to ensure DOJ has an opportunity to identify all potential assets subject to forfeiture. b6 b7C

[redacted] concluded the conversation by stating the BCCI investigation is "getting toward the end." She does not believe additional orders of forfeiture are "imminent." However, it may take Robb Evans, the court appointed trustee a significant length of time to liquidate assets (i.e real estate). Then [redacted] promised to contact SA [redacted] when the fifth order of forfeiture becomes available. b6 b7C

1 - 29B-WF-171994 (FS)
1 - FSPU [redacted] b6 b7C
1 - 3920-95-F-0058
1 - 3920-95-F-0059
1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-95-F-0024
1 - 3920-96-F-0097
1 - SA [redacted]



1325015-000-10291

SENDER:

- Complete items 1 and/or 2 for additional services.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery.

Consult postmaster for fee.

3. Article Addressed to: [redacted]-96-F-0097

[redacted]

4a. Article Number

P 961 351 609

4b. Service Type ☒ CERTIFIED

7. Date of Delivery

11-8-96

5. Received By: *(Print Name)*

8. Addressee's Address *(Only if requested and fee is paid)*

6. Signature: *(Addressee or Agent)*

X [redacted]

PS Form **3811,** January 1996 DM: 11/04/96 / 01 / FSPO Domestic Return Receipt

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[redacted]

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SEARCHED
INDEXED
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FBI - WASH METRO FIELD OFFICE
NOV 22 1996

288-WF-[redacted]-95

1325015-000-10292

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1/FAST, NVMRA
Contact: SA [redacted] x9072

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Trial Attorney, Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

♦♦ [redacted] b6 b7C

1- 29B-WF-171994
1- All seizure files

Closed 12/20/96 1 12/23/96

sir by 29B-WF-171994 FF-2 6

SEARCHED INDEXED
SERIALIZED FILED
DEC 19 1996
FBI-WASH. METRO FIELD OFFICE

[redacted]

1325015-000-10293

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 1/7/1997

To: DIRECTOR, FBI **Attn:** FINANCE DIVISION
FE [redacted] b6 b7C

From: WFO ADIC

Approved By: [redacted]

Drafted By: [redacted] scf

File Number(s): 66-6019 (Pending)

Title: JUDICIAL FORFEITURE MATTERS STATUS UPDATE

Details: Per a communication dated January 3, 1997, from Forfeiture Examiner (FE) [redacted] of the Forfeiture and Seized Property Unit (FSPU), the following status update is provided relative judicial forfeiture actions undertaken in regard to WFO seizures, that are assigned to Paralegal Specialist (PS) [redacted] b6 b7C

It is noted that several of the cases attributed to PS [redacted] are actually assigned to other individuals on WFO/FAST. In regard to those seizures which were accidentally attributed to PS [redacted] the individuals currently responsible for these cases have been advised of the FSPU request to provide a judicial forfeiture status update, and will forward appropriate information regarding these seizures. b6 b7C

SEIZURE#	STATUS	COMMENTS
3920-96-F-0082	PENDING	CASE ASSIGNED TO SA [redacted]
3920-96-F-0097	N/A	CASE ASSIGNED TO SA [redacted]
3920-96-F-0103	FORFEITED	REFERENCED PROPERTY WAS FORFEITED ON 11/21/96. APPROPRIATE DOCUMENTATION WAS FORWARDED TO FSPU IN NOVEMBER OF 1996 (RE-SUBMITTED 1/7/96, PER REQUEST OF FE [redacted]
3920-96-F-0180	PENDING	FINAL ORDER HAS BEEN ADVERTISED. IT IS ANTICIPATED THAT THE FORFEITURE WILL BE FINALIZED BY FEBRUARY 15, 1997.

b6 b7C

1-BUREAU
1-(FSPU ATTN: FE [redacted] b6 b7C
1-WFO
1-(EACH SEIZURE FILE)
(5)

29B-WF-171994 FA1-7

SEARCHED INDEXED
SERIALIZED FILED
FBI - WASH. METRO FIELD OFFICE

1325015-000-10294

SFC07[illegible].FC

[redacted] SCF

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)
[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log ____
Foims (PFA) ____
CATS ____

CC: 9-BUREAU, ATTN: [redacted] b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994 -112

LT990425.ec

[redacted] -8
29B-WF-171994(FF-1)

/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/14/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: SSA [redacted] b6 b7C

Drafted By: SA [redacted] :ac

File Number(s): 29B-WF-171994 (Pending)
3920-96-F-0097

Title: U.S. v HIDDEN INTERESTS

Entry (Check One): [X] New Case [ ] Change or Add

[X] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[ ] Order of Forfeiture	[ ] Police Reports

FOIMS [redacted] b6 b7C

[X] Other Subsequent Materials
Fax from Robb Evans, Trustee dated 3/3/96

1 [redacted] (FSPU)
1- WMFO (29B-WF-171994)
1- SA [redacted]
ATTACHMENTS

4/4/96

4/3/96

29B-WF-171994 Sub FF-1

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
MAR 03 1996
FBI — WASH. METRO FIELD OFFICE

1325015-000-10257

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 7 ~ Duplicate;
Page 10 ~ Duplicate;

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X For this Page X
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29B-WF-171994-1

Searched
Serialized
Indexed
Filed

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
20-92-F-0239	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/WMFO	$20,241,169.59	

16. Forfeiture Deferred ☐ Yes ☒ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SA [redacted] BCCI	5.	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
7-29-92	Mabon Securities			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
abon Securities				

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

FBI/DOJ

1325015-000-10431

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted]:set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases)Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-239)

29B-WF-171994BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 13 1997
FBI - WASH. METRO OFFICE

[redacted]

1325015-000-10436

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231 U.S. VS BCCI
0232 HIDDEN INTERESTS;
0233 MAJOR CASE 38;
0234 FIF; FAG;
0235 OO: WMFO
0236
0237
0238
0239
0240
0241
0242
0243

Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted], and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today. b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73.

DOJ/TA [redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ, b6 b7C

1-FBIHQ/FSPU, Attn: [redacted]
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

29B-WF-171994-Q
3920-92-F-0239-

EPG:epg
(15)

SEP 24 1992

[redacted] b6 b7C

1825015-000-10433

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
(1-3920-92-F-0120)
(1-3920-92-F-0121)
(1-3920-92-F-0122)
(1-3920-92-F-0123)
(1-3920-92-F-0124)
(1-3920-92-F-0125)
(1-3920-92-F-0126)
(1-3920-92-F-0127)
(1-3920-92-F-0128)
(1-3920-92-F-0129)
(1-3920-92-F-0130)
(1-3920-92-F-0131)

(1-3920-92-F-231)
(1-3920-92-F-232)
(1-3920-92-F-233)
(1-3920-92-F-234)
(1-3920-92-F-235)
(1-3920-92-F-236)
(1-3920-92-F-237)
(1-3920-92-F-238)
(1-3920-92-F-239)
(1-3920-92-F-240)
(1-3920-92-F-241)
(1-3920-92-F-242)
(1-3920-92-F-243)

(1-29B-WF-171994 SUB FS)

EPG:epg
(30)

7/21/93
29B-WF-171994 -3
3920-92-F 0239

7/21/93
WDC

SERIALIZED JUL 21 1993 FILED
FBI FIELD OFFICE

1325015-000-10435

b6
b7C

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
USMS		Washington	DC		

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

(* SEE 14 ABOVE)

ICIC INVESTMENTS LTD. 20,240,717.09 ICIC INVESTMENTS LTD. 0.00

ICIC INVESTMENTS LTD. 452.50

ICIC INVESTMENTS LTD. 0.00

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	9/8/92	118. Award Recommended

b6
b7C

1325015-000-10432

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
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Page 10 ~ Duplicate;

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29B-WF-171994-1

Searched
Serialized
Indexed
Filed

1325015-000-13211

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
29-92-F-023?8	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/WMFO	360,602.60	

16. Forfeiture Deferred ☐ Yes ☒ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SSA [redacted] BCCI	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07=29-92	Goldman , Sachs & Co.			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
Goldman, Sachs & Co.				

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-13212

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted] set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file (3920-92-F-238))

29B-WF-171994/BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 1 3 1997
FBI - WASHINGTON METROPOLITAN FIELD OFFICE b6 b7C

[redacted]

25015-000-13217

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231 U.S. VS BCCI
0232 HIDDEN INTERESTS;
0233 MAJOR CASE 38;
0234 FIF; FAG;
0235 OO: WMFO
0236
0237
0238
0239
0240
0241
0242
0243

Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted] and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today. b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73. b6 b7C

DOJ [redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ,

1-FBIHQ/FSPU, Attn: [redacted] b6 b7C
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

EPG:epg
(15)

29B-WF-171994-2
3920-92-F-0238-

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 24 1992 b6 b7C
[redacted]

1325015-000-13214

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
(1-3920-92-F-0120)
(1-3920-92-F-0121)
(1-3920-92-F-0122)
(1-3920-92-F-0123)
(1-3920-92-F-0124)
(1-3920-92-F-0125)
(1-3920-92-F-0126)
(1-3920-92-F-0127)
(1-3920-92-F-0128)
(1-3920-92-F-0129)
(1-3920-92-F-0130)
(1-3920-92-F-0131)

(1-3920-92-F-231)
(1-3920-92-F-232)
(1-3920-92-F-233)
(1-3920-92-F-234)
(1-3920-92-F-235)
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(1-3920-92-F-240)
(1-3920-92-F-241)
(1-3920-92-F-242)
(1-3920-92-F-243)

(1-29B-WF-171994 SUB FS)

EPG:epg
(30)

7/21/93

CH 7/21/93 WDC

3920-92-F-0230-
29B-WF-171994 - 3

RECEIVED SERIALIZED FILED
JUL 21 1993
FBI - WMFO

b6 b7C

1325015-000-13216

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
USMS		Washington	DC		

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

(See * 14)

CIC Investments Ltd. 00.00

CIC Investments Ltd. 360,602.60

116. PLA Sig

9/8/92

117. Sharing ☐ Yes ☐ No

b6
b7C

118. Award Recommended

1325015-000-13213

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 7 ~ Duplicate;
Page 10 ~ Duplicate;

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X No Duplication Fee X
X For this Page X
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29B-WF-171994 -1

Searched
Serialized JAB
Indexed
Filed JAB

1325015-000-13203

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
20-92-F-0237	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/ WMFO	140,478.46	

16. Forfeiture Deferred ☐ Yes ☒ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SSA [redacted] BCCI	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07-29-92	First American Title Inc.			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP
irst American Title Ins. Co			

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-237)

29B-171994 BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 13 1997
FBI - WASH. METRO FIELD OFFICE

b6 b7C

[redacted]

1325015-000-13209

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231 through 0243
U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted] and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today. b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73. b6 b7C

DOJ/TA [redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ,

1-FBIHQ/FSPU, Attn: [redacted] b6 b7C
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

29B-WF-171994-2
3920-92-F-0231-

EPG:epg
(15)

SEARCHED INDEXED
SERIALIZED FILED
SEP 24 1992
FBI/DOJ

b6 b7C

[redacted]

62-1325015-000-13206

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

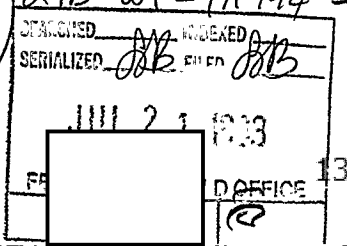
(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/21/93

C4
7/21/93
WDC

3920-92-F-0231-
29B-WF-171994 -3



b6 b7C

1325015-000-13208

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
USMS/DOJ		Washington	DC		

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

See 14)

(Proceeds of Sale of Condo) 140,478.46 b6 b7C

	116. PLA Signatur	117. Sharing ☐ Yes ☐ No
		1325015-000-13205
		118. Award Recommended

b6 b7C

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 1
Page 10 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
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29B-WF-171994 -1

Searched
Serialized JJB
Indexed
Filed JJB

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
20-92-F-0236	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/WMFO	$68,919.87 see below	

16. Forfeiture Deferred ☐ Yes ☒ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SSA [redacted] BCCI	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07/29/92	First American Bank, N,A			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
irst American Bank,NA.				

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-10423

FBI/DOJ

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted]:set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-236)

29B-WF-171994 BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 13 1997
FBI - WASH. METRO FIELD OFFICE

[redacted]

25015-000-10428

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231 U.S. VS BCCI
0232 HIDDEN INTERESTS;
0233 MAJOR CASE 38;
0234 FIF; FAG;
0235 OO: WMFO
0236
0237
0238
0239
0240
0241
0242
0243

Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted], and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today. b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73.

DOJ/TA [redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ, b6 b7C

1-FBIHQ/FSPU, Attn: [redacted]
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

EPG:epg
(15)

3920-92-F-0236-
29B-WF-171994-2

SEARCHED INDEXED
SERIALIZED FILED
SEP 24 1992
FBI

1925015-000-10425 b6 b7C

telephone (202) 514-1263, advised WMFO 9/3/92 that the United States Marshals Service in New York, Attn: USM [redacted] telephone (212) 791-1350, is handling all seizures that have occurred in BCCI to date including those listed in the attached Notice of Forfeiture, with the exception of two seizures by USMS in WDC (Capital Bank - located in Miami, FL, but WDC local counsel Williams & Connolly accepted service of seizure order by WDC USMS; and, First American Bank of DC), and USMS in EDVA (Alexandria, VA.)(First American Title Co. in Fairfax, VA.). b6 b7C

Seizure Dates: WMFO/FAST listed 7/29/92 (the date of Judge Green's Order) as the date of seizure in each of the attached FD-635s. This may or may not correspond with actual seizure dates. Also, WMFO/FAST does not have addresses for the entities from which the accounts were seized. This information can be obtained from USM [redacted] or DOJ TA [redacted] if needed. b6 b7C

Questions concerning the above can be directed to TA [redacted] 514-1263, or WMFO FAST SA [redacted] ext. 7118/7223. b6 b7C

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted], A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
(1-3920-92-F-0120)
(1-3920-92-F-0121)
(1-3920-92-F-0122)
(1-3920-92-F-0123)
(1-3920-92-F-0124)
(1-3920-92-F-0125)
(1-3920-92-F-0126)
(1-3920-92-F-0127)
(1-3920-92-F-0128)
(1-3920-92-F-0129)
(1-3920-92-F-0130)
(1-3920-92-F-0131)
(1-3920-92-F-231)
(1-3920-92-F-232)
(1-3920-92-F-233)
(1-3920-92-F-234)
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(1-3920-92-F-242)
(1-3920-92-F-243)

(1-29B-WF-171994 SUB FS)

EPG:epg
(30)

7/21/93

CY
7/21/93
WDC

3920-92-F-0231-
29B-WF-171994 -3

SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI [redacted] OFFICE

b6
b7C

1325015-000-10427

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
USMS/DOJ		Washington	DC		

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

(see *14 above)

CI Legal Fund 68,919.87

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 9/8/92	118. Award Recommended

b6
b7C

1325015-000-10424

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 7 ~ Duplicate;
Page 10 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
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29B- WF- 171994 -1

Searched
Serialized BB
Indexed
Filed BB

1325015-000-13195

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
20-92-F-0235	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	29 (BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/WMFO	$4,925,000.00 see below	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SA [redacted] BCCI	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07-29-92	Esanu Katsky Korins & Siger			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
Esanu Katsky Korins Siger				

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

FBI/DOJ

1325015-000-13196

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-235)

29B-WF-171994, BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 13 1997
FBI - W... OFFICE b6 b7C

[redacted]

015-000-13201

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231
0232
0233
0234
0235
0236
0237
0238
0239
0240
0241
0242
0243

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted] and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today. b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73. b6 b7C

DOJ [redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ,

1-FBIHQ/FSPU, Attn: [redacted] b6 b7C
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

3920-92-F-0235-
29B-WF-171994 - 2

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 24 1992

[redacted] b6 b7C

EPG:epg
(15)

15-000-13198

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(3)

7/21/93
7/21/93
WDC

3920-92-F-0235
29B-WF-171994-3

SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI/DOJ OFFICE

b6
b7C

1325015-000-13200

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
SMS/DOJ		Washington	DC		

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

(*SEE ABOVE) 14)

eneral Coffer Corp Claim in Bankruptcy 4,925,000.00

115. FA Signature

116. PLA Signat

9/8/92

117. Sharing ☐ Yes ☐ No

118. Award Recommended

b6
b7C

1325015-000-13197

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 7 ~ Duplicate;
Page 10 ~ Duplicate;

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X For this Page X
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29B-WF-171994-1

Searched
Serialized
Indexed
Filed

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-92-F-0234	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/WMFO	$ 991,174.19	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SSA [redacted] BCCI	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07=29-92	Capital Bank			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
Capital Bank				

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

FBI/DOJ

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file)(3920-92-F-234)

29B-WF-171994BCCI

SEARCHED INDEXED
SERIALIZED FILED
MAR 1 3 1997
FBI - WASHINGTON FIELD OFFICE

b6 b7C

[redacted]

1325013-000-13193

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231 U.S. VS BCCI
0232 HIDDEN INTERESTS;
0233 MAJOR CASE 38;
0234 FIF; FAG;
0235 OO: WMFO
0236
0237
0238
0239
0240
0241
0242
0243

Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted], and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today.

b6
b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73.

b6
b7C

DOJ/[redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ,

1-FBIHQ/FSPU, Attn: [redacted]
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

b6
b7C

EPG:epg
(15)

3920-92-F-0234
29B-WF-171994-2

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 24 1992

b6
b7C

[redacted]

015-000-13190

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

C 4
7/21/93
WDC

7/21/93
3920-92-F-0234
29B-WF-171994-3

SERIALIZED FILED
JUL 21 1993

[redacted] b6 b7C

325015-000-13192

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
USMS/DOJ		Washington	DC		

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

(SEE 14 ABOVE)

CI (Overseas) Jamaica 351,769.41

CI S.A. PARAGUAY 639,404.78

115. FA Signature

116. PLA Signature

9/8/92

117. Sharing ☐ Yes ☐ No

118. Award Recommended

b6
b7C

1325015-000-13189

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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Page 10 ~ Duplicate;

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29B-WF-171994 -1

Searched
Serialized DJB
Indexed
Filed DJB

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0233	29B-WF-171994	Wmfo		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/WMFO	$ 34,891,523.00	

16. Forfeiture Deferred ☐ Yes ☒ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SSA [redacted], BCCI	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07-29-92	Bear Stearns & Co., Inc.			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
Bear Stearns & Co.,				

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

FBI/DOJ

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-233)

29B-WF-171994BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 13 1997 b6
FBI - WASH. METRO FIELD OFFICE b7C

[redacted]

015-000-13185

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231
0232
0233
0234
0235
0236
0237
0238
0239
0240
0241
0242
0243

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

[redacted] Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted] and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today. b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73. b6 b7C

DOJ/[redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ,

1-FBIHQ/FSPU, Attn: [redacted] b6 b7C
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

EPG: epg
(15)

3920-92-F-0233-2
29B-WF-171994

SEARCHED [redacted] b6
SERIALIZED [redacted] b7C
SEP 24 1992
[redacted]

5015-000-13182

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted], A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/21/93
C4
7/21/93
WDC

3920-92-F-0233-
29B-WF-171994-3

SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI

b6 b7C

15-000-13184

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
USMS		Washington	DC		
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

(* SEE

(* SEE 14 ABOVE)

ICIC Investments Ltd. 34,376,678.00

ICIC Investments Ltd. 514,845.00

115. FA Signature

116. PLA Signat

9/8/12

117. Sharing ☐ Yes ☐ No

118. Award Recommended

b6
b7C

1325015-000-13181

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

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29B-WF-171994 - 1

Searched
Serialized SAB
Indexed
Filed SAB

1325015-000-13171

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0232	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI/WMFO	$15,220,667.63 SEE BELOW	

16. Forfeiture Deferred ☐ Yes ☒ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. *Description of Other Property*

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☒ No
SSA [redacted] BCCI	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07-29-92	Bank of New York			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP
Bank of New York			

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

FBI/DOJ

1325015-000-13172

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases)Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0232)

29B-WF-171994/BCCI

SEARCHED INDEXED
SERIALIZED FILED
MAR 13 1997
FBI - WASH. METRO FIELD OFF b6 b7C

[redacted]

015-000-13177

AIRTEL

Date 09/03/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-WF-171994)

Entry (Check One)
[x] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0231 U.S. VS BCCI
0232 HIDDEN INTERESTS;
0233 MAJOR CASE 38;
0234 FIF; FAG;
0235 OO: WMFO
0236
0237
0238
0239
0240
0241
0243
0243

Re 9/2/92 telcon between WMFO SA [redacted] and FSPU [redacted] and 9/2/92 facsimile of 8/21/92 Notice of Forfeiture in USA Today. b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635s for each of the above captioned seizure numbers (13 total). Each FD-635 represents one or more seizures from the same financial institution.

WMFO FAST was advised 9/2/92 that the Honorable JOYCE HENS GREEN, United States District Judge, WDC, entered an Order condemning and forfeiting properties of the Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment company (Investments), on 7/29/92. The total value of the Order was $104,488,322.73. b6 b7C

DOJ [redacted] (DOJ ASSET FORFEITURE OFFICE LIASON WITH FBI/LFU), the BCCI seizure/forfeiture contact at DOJ, b6 b7C

1-FBIHQ/FSPU, Attn: [redacted]
14-WMFO
(1-29B-WF-171994 SUB FS)
(13-1 each to 3920-92-F-0231 through 0243)

3920-92-F-0232-2

EPG:epg
(15)

SEP 24 1992 b6 b7C

[redacted]

1325015-000-13174

29B-WF-171994

telephone (202) 514-1263, advised WMFO 9/3/92 that the United States Marshals Service in New York, Attn: USM BOB JOHNSON, telephone (212) 791-1350, is handling all seizures that have occurred in BCCI to date including those listed in the attached Notice of Forfeiture, with the exception of two seizures by USMS in WDC (Capital Bank - located in Miami, FL, but WDC local counsel Williams & Connolly accepted service of seizure order by WDC USMS; and, First American Bank of DC), and USMS in EDVA (Alexandria, VA.)(First American Title Co. in Fairfax, VA.).

Seizure Dates: WMFO/FAST listed 7/29/92 (the date of Judge Green's Order) as the date of seizure in each of the attached FD-635s. This may or may not correspond with actual seizure dates. Also, WMFO/FAST does not have addresses for the entities from which the accounts were seized. This information can be obtained from USM BOB JOHNSON, or DOJ [redacted] if needed.

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Questions concerning the above can be directed to [redacted] or WMFO FAST SA [redacted] ext. 7118/7223.

b6
b7C

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted], A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
(1-3920-92-F-0120)
(1-3920-92-F-0121)
(1-3920-92-F-0122)
(1-3920-92-F-0123)
(1-3920-92-F-0124)
(1-3920-92-F-0125)
(1-3920-92-F-0126)
(1-3920-92-F-0127)
(1-3920-92-F-0128)
(1-3920-92-F-0129)
(1-3920-92-F-0130)
(1-3920-92-F-0131)
(1-3920-92-F-231)
(1-3920-92-F-232)
(1-3920-92-F-233)
(1-3920-92-F-234)
(1-3920-92-F-235)
(1-3920-92-F-236)
(1-3920-92-F-237)
(1-3920-92-F-238)
(1-3920-92-F-239)
(1-3920-92-F-240)
(1-3920-92-F-241)
(1-3920-92-F-242)
(1-3920-92-F-243)

(1-29B-WF-171994 SUB FS)

EPC:epg
(30)

7/21/93
WDC

7/21/93

3920-92-F-0232 -
29B-WF-171994 - 3

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 21 1993
FBI [redacted] ICE

b6
b7C

1325015-000-13176

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility USMS/DOJ	76. Street Address	77. City Washington	78. State DC	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

* See 14 Above

BCCI (Overseas) Kenya 30,238.40 ICIC (Overseas) Ginny Mae Book Entry

118.708.66

ICIC (Overseas) Ginnie Mae Interest Distributions 9,489.40

ICIC (Overseas) 527,592.32

ICIC Investments Itd. 14,534,639.63

b6
b7C

116. PLA Signature/Date

9/8/92

117. Sharing ☐ Yes ☐ No

1325015-000-13173

118. Award Recommended

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 4
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Page 10 ~ Duplicate;

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29B-WF-171994 - 1

Searched
Serialized
Indexed
Filed

1325015-000-12432

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO
(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
(1-3920-92-F-0120)
(1-3920-92-F-0121)
(1-3920-92-F-0122)
(1-3920-92-F-0123)
(1-3920-92-F-0124)
(1-3920-92-F-0125)
(1-3920-92-F-0126)
(1-3920-92-F-0127)
(1-3920-92-F-0128)
(1-3920-92-F-0129)
(1-3920-92-F-0130)
(1-3920-92-F-0131)
(1-3920-92-F-231)
(1-3920-92-F-232)
(1-3920-92-F-233)
(1-3920-92-F-234)
(1-3920-92-F-235)
(1-3920-92-F-236)
(1-3920-92-F-237)
(1-3920-92-F-238)
(1-3920-92-F-239)
(1-3920-92-F-240)
(1-3920-92-F-241)
(1-3920-92-F-242)
(1-3920-92-F-243)
(1-29B-WF-171994 SUB FS)

EPG:epg
(30)

7/21/93
CY
7/21/93
WDC

29B-WF-171994 -3
SEARCHED 230-92-F-0131
SERIALIZED FILED
JUL 21 1993
[redacted]
115-000-1 b6 b7C

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
USMS/DOJ		Washington	DC		
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

*14 above

BCCI (Overseas) Chittigong 398,724.15

BCCI (Overseas) Dhaka 3,155,691.38

BCCI (Overseas) Sri Lanka 84,930.45

BCCI (Overseas) Sri Lanka 420,947.93

115. FA Signature

116. PLA Signature/Dat

PLA

9/8/92

117. Sharing ☐ Yes ☐ No

b6
b7C

118. Award Recommended

1325015-000-12434

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0231	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
09-04-92	(BCCI) Hidden Interests; Major Case 38

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	C

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI/WMFO	4,060,293.91 SEE BELOW	☐ Yes ☐ No

16. Forfeiture Deferred	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified
☐ Yes ☒ No		

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property

33. Case A	34. Seizure Method	35. Subject in Custody/Date
SSA [redacted] BCCI	5	☐ Yes ☒ No

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
07/29/92	Bank of California Corp			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
Bank of California				

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

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Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0131	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$73,000.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Paine Webber Account #DN-R5056-01

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	S	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12673

FBI/DOJ

SEIZURE NUMBER: 3920-Q-F-0131
PROPERTY: Bank Acct # 73,000
FBI CASE NUMBER: BA WF-171994
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/93 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/21/93
29B-WF-171994-2
3920-92-F-0131-

SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI

C4
7/21/93
WDC

b6
b7C

1325015-000-12675

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115	116. PLA Signature/Da FLA 5/31/92	117. Sharing ☐ Yes ☐ No 118. Award Recommended

b6
b7C

1325015-000-12674

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 7
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0125	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$25,363,313.42	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed

32. Description of Other Property

Security Pacific Internat'l Bank Accts - 05007001, 07012001, 04020101, 04020023, 04011002, 05011001, 04012039, 04020030, 0500801, 03005016, 04018017, 04031016, 05009001, 04027001,05012001

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12662

FBI/DOJ

SEIZURE NUMBER: 3920-92-F-0125
PROPERTY: Bank Acct $25,363,313.42
FBI CASE NUMBER: 29A-WF-171944
CASE AGENT/SQUAD: [redacted] b6 b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/12/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

DB 7/21/93
CH 7/21/93 WDC

29B-WF-171994-2
3920-92-F-0125

SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI

b6 b7C

1325015-000-12664

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature

116. PLA Signature/Date

PLA 5/31/92

117. Sharing ☐ Yes ☐ No

b6
b7C

118. Award Recommended

1325015-000-12663

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 8 ~ Duplicate;
Page 13 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS' OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

b6
b7C

EPG:epg
(20)

29B-WF-171994-1
3920-92F-0124-

3 1 1992

[redacted]

b6
b7C

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-12966

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0124	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI	$150,111,348.92	☐ Yes ☒ No

16. Forfeiture Deferred	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified
☐ Yes ☐ No		

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed

32. *Description of Other Property*

American Express Bank LTD Accts #1509800, ~~1605800, 703876, 353066, 353165, 353173, 698316,~~ 3705517, 714758, 352977, 53116, 3711036

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date
	5	☐ Yes ☐ No

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12967

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 3/31/82	118. Award Recommended

b6
b7C

1325015-000-12968

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(6)

3920-92-F-0124
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 27 1997
FBI - WASH. METRO FIELD OFFICE
[redacted] b6 b7C

CC: 1-BUREAU, FSPU (ATTN: [redacted])
17-WFO (1-EACH SEIZURE FILE)

LH-973024.EC

1325015-000-12975

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases)Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0124)

29B-171994BCCI
SERIALIZED INDEXED
FILED
MAR 13 1997 b6 b7C
FBI - WASH. METRO FIELD OFFICE

[redacted]

015-000-12970

SEIZURE NUMBER: 3920-92-F-0124
PROPERTY: Bank Accts # 150.111,348.92
FBI CASE NUMBER: 29A-WF-171994
CASE AGENT/SQUAD: [redacted] b6 b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/3/92 #DAYS AFTER SEIZURE __
DATE FORFEITED _____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057 b6 b7C

Thank you.

[redacted]

(4)

3920-92-F-0124
29B-WF-177994 BCCI

SEARCHED INDEXED
SERIALIZED FILED
JUL 0 1997
FBI-WASH METRO FIELD OFFICE
1325015-000-12973

b6 b7C [redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

-5

3920-92-F-0124

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

29B-WF-171994

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
24-WFO (1 EACH SEIZURE FILE)

SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997 b6 b7C
FBI - WASHINGTON FIELD

[redacted]

1325015-000-12974

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)
(1-3920-92-F-0116)
(1-3920-92-F-0117)
(1-3920-92-F-0118)
(1-3920-92-F-0119)
(1-3920-92-F-0120)
(1-3920-92-F-0121)
(1-3920-92-F-0122)
(1-3920-92-F-0123)
(1-3920-92-F-0124)
(1-3920-92-F-0125)
(1-3920-92-F-0126)
(1-3920-92-F-0127)
(1-3920-92-F-0128)
(1-3920-92-F-0129)
(1-3920-92-F-0130)
(1-3920-92-F-0131)
(1-3920-92-F-231)
(1-3920-92-F-232)
(1-3920-92-F-233)
(1-3920-92-F-234)
(1-3920-92-F-235)
(1-3920-92-F-236)
(1-3920-92-F-237)
(1-3920-92-F-238)
(1-3920-92-F-239)
(1-3920-92-F-240)
(1-3920-92-F-241)
(1-3920-92-F-242)
(1-3920-92-F-243)
(1-29B-WF-171994 SUB FS)

EPG:epg
(30)

7/21/93
WDC

29B-WF-171994-2
3920-92-F-124

SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI

b6
b7C

1325015-000-12969

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 8 ~ Duplicate;
Page 13 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
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FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17
19-WMFO
(1-BCCI Squad, Attn: SA [redacted], NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

EPG:epg
(20)

b6
b7C

3920-92F-0128
29B-WF-171994

[redacted]

b6
b7C

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-12955

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0123	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$40,240.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Manufacturers Hanover Trust Company

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12956

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	3/31/92	118. Award Recommended

b6
b7C

1325015-000-12957

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted], Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(6)

3920-92-F-0123.
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 2 / 19[illegible]
FBI - WASH. METRO FIELD OFFICE

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
(17) WFO (1-EACH SEIZURE FILE)

b6 b7C

[redacted]

LA 97 3024. EC

1325015-000-12964

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: WPS [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-123)

29B-17194BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 13 1997
FBI - WASH. METRO FIELD OFFICE

b6 b7C [redacted]

25015-000-12959

SEIZURE NUMBER: 3920-92-F 0123
PROPERTY: Bank Cert $40,240
FBI CASE NUMBER: 29A WF 171994
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED _____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted]

b6
b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97.

b6
b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

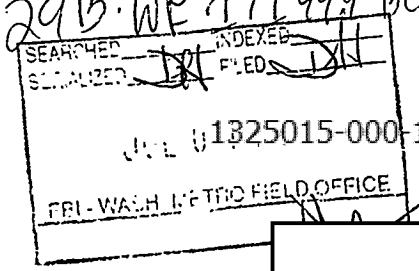
Thank you

b6
b7C

[redacted]

(4)

3920-92-F-0123
29B-WF-177994 BCCT



b6
b7C

[redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

(5)

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

3920-92-F-0123
29B-WF-171994
SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
FBI - WASHINGTON FIELD b6 b7C

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
24-WFO (1 EACH SEIZURE FILE)

[redacted]

325015-000-12963

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/21/93
WDC

7/21/93

29B-WF-171994-2
3920-92-F-123

SEARCHED INDEXED
SERIALIZED FILED
JUL 21 1993
FBI

b6
b7C

1325015-000-12958

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 8 ~ Duplicate;
Page 13 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17 b6 b7C
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

EPG:epg
(20)

3920-92F-0122
29B-WF-171994-1

[redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12944

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0122	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$65,093,027.79	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Court Registry Investment System Accounts - 86078, 86047, 86052, 86041

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12945

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date PLA 3/31/92	117. Sharing ☐ Yes ☐ No 118. Award Recommended 1325015-000-12946

b6
b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(16)

3920-92-F-0122
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 2 / 19[redacted]
FBI - WASH. METRO FIELD OFFICE b6 b7C

CC: 1-BUREAU, FSPU (ATTN [redacted] b6 b7C
(17) WFO (1-EACH SEIZURE FILE)

LH 973024. EC

[redacted]

1325015-000-12953

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted]:set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases)Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-122)

29B-171994BCCI
SEARCHED INDEXED
SERIALIZED FILED
MAR 1 3 1997
FBI - WASH. METRO FIELD OFFICE b6 b7C
[redacted]

15-000-12948

SEIZURE NUMBER: 3920-92-F-0122
PROPERTY: Bank Acct # 65,093,027,8479
FBI CASE NUMBER: 29A-WF-174994
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED _____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITTION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

Thank you.

b6
b7C [redacted]

(4)

3920-92-F-0122
29B-WF-177994 BCCI

SEARCHED INDEXED
SERIALIZED FILED

JUL 1325015-000-12951

FBI - WASHINGTON FIELD OFFICE

b6
b7C [redacted]

[redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

5

Questions concerning the above may be directed to PS [redacted] t 278-2310. b6 b7C

3920-92-F-0122
29B-WF-171994

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
24-WFO (1-EACH SEIZURE FILE)

SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
FBI - WASHINGTON FIELD

[redacted] b6 b7C

1325NTS-000-12952

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/21/93
WDC

29B-WF-171994-2
3920-92-F-0122

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 21 1993
FBI [redacted] OFFICE

b6
b7C

1325015-000-12947

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 10 ~ Duplicate;
Page 15 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17 b6 b7C
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

EPG:epg
(20)

29B-WF-171994 - 1
3920-92-F-0131

[redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12931

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0121	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$2,992,107.70	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Oppenheimer & Company Inc. Account - 05391184

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

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36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12932

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 3/31/92	118. Award Recommended

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1325015-000-12933

29B-WF-171994 -2

SEARCHED INDEXED
SERIALIZED FILED
MAR 30 1993
FBI — WASH. FIELD OFFICE

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b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(17)
3920-92-F-0121
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 2 / 19[redacted]
FBI - WASH. METRO FIELD OFFICE
[redacted] b6 b7C

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
(17)-WFO (1-EACH SEIZURE FILE)

[redacted] b6 b7C

LH 973024. EC

325015-000-12942

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/23/93
29B-WF-171994-3
3920-92-F-0121-
C4
7/23/93
WDC

SCANNED SERIALIZED FILED
JUL 23 1993
FBI [redacted] OFFICE

b6 b7C

1325015-000-12936

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases)Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0121)

29B-171994BCCI
SEARCHED
SERIALIZED
MAR 1 2 1997
FBI
[redacted] b6 b7C

325015-000-12937

SEIZURE NUMBER: 392D-92-F-0121
PROPERTY: Bank Acct $2992,107.70
FBI CASE NUMBER: 29B-GF-171994
CASE AGENT/SQUAD: [redacted] b6 b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted]

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Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97.

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3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

Thank you,

[redacted]

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3920-92-F-0121-
29B-WF 177994 BCCT

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

JUL 0 1 1325015-000-12940

FBI - WASH. METRO FIELD OFFICE

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[redacted]

[redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: **FORFEITURE MATTERS - STATUS UPDATE**

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135- Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007- On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008- Same as 3920-96-F-0007.

3920-97-F-0054- Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055- Same as 3920-97-F-0054.

3920-97-F-0056- Same as 3920-97-F-0054.

3920-97-F-0057- Same as 3920-97-F-0054.

(6)

3920-92 - F-0121
29B-WF - 171994

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

CC: 1-BUREAU, FSPU (ATTN: [redacted])
24-WFO (1-EACH SEIZURE FILE)

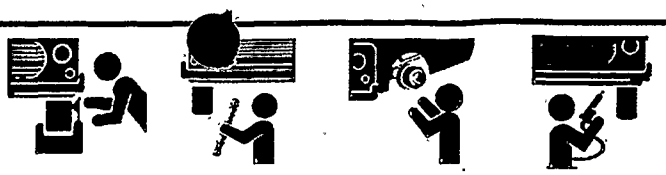
SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
FBI - WASHINGTON FIELD b6 b7C

b6 b7C

[redacted]

015-000-12941

Performance DISCOUNT TIRE



3/5/92

Store Location _____

ESTIMATE

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b7C

CUSTOMERS NAME Quality Auto ADDRESS _____

YEAR CAR _____ MAKE / MODEL OF CAR Acura ODOMETER _____

TAG # red. PHONE NUMBER- HOME _____ WORK _____

SERIAL # _____ SERVICE TECHNICIAN/STORE MGR. _____

CUSTOMER'S DESCRIPTION OF PROBLEM AND REQUEST FOR REPAIRS:

Est. Cost of Tire & Wheel Replacement

CUSTOMER SIGNATURE: _____ DATE: _____

PARTS (Manuf. & Part #)	New Used Rebuilt	COST		LABOR DESCRIPTION	EST.TIME	LABOR COST	
16 X 7 Epic 360-6708		325	33	x (4) 1301.32			
Chrome - PLATED							
Wheels							
225 50VR16 PIREN		161	90	x (4) 647.60			
VR RADIAL.							
Spin Balance		1000 x		4 4.00			
		SALES		TAX 87.70			
CORE CHARGE							
TOTAL PARTS				2076.62 TOTAL LABOR			

This company is not liable for breach of estimated completion date caused by: an act of God, strike, unexpected illness, or unexpected shortage of parts or labor.

All parts and labor are warranted for 90 days or 4,000 miles unless otherwise stated below:

Labor is charged by the flat rate manual at $_____ per hour.

Estimate charge is 7% of total estimate, $5.00 min., plus the cost of any mechanical work required for the estimate (If repairs are not made).

Please proceed with repairs, but call me before continuing if the price will exceed $ _____. X _____

Do you want replaced parts returned to you if they are not returnable under warranty? _____ Yes _____ No.

TOTAL PARTS		
TOTAL LABOR		
TAX		
TOTAL ESTIMATE		

Estimated Completion Date _____
(If blank, no estimate completion date can be given)
Estimate valid for 30 days
Estimate charge and other charges for release of car, if repairs are not made.
Estimate accepted and work authorized:
X _____
Customer's Signature

1325015-000-12935

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 8 ~ Duplicate;
Page 13 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted], enc-17 b6 b7C
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

EPG:epg
(20)

29B-WF-171994-1
3920-92F-0120

3 1 92

[redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12920

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0120	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG;

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$12,786,950.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Citibank, N.A. Accounts 36054705, 36060398, 089543

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

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b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12921

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

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b7C

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 3/31/92	118. Award Recommended

1325015-000-12922

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(-6)

3920-92-F-0120-
29B-WF-171994-

SEARCHED_____INDEXED_____
SERIALIZED_____FILED_____
OCT 2 / [illegible]
FBI - WASH. METRO FIELD OFFICE

CC: 1-BUREAU, FSPU (ATTN: [redacted] b6 b7C
17-WFO (1-EACH SEIZURE FILE)

HQ5015-000-12929

LH 973024. EC

[redacted] b6 b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: VP PS [redacted] set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0120)

29B-171994-BCCI 13
SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 13 1997
FBI - WASH. METRO FIELD OFFICE
[redacted] b6 b7C

[redacted]

325015-000-12924

SEIZURE NUMBER: 3920-92-F-0170
PROPERTY: Bank Accts # 12,786,950.
FBI CASE NUMBER: 29A-WF-171861
CASE AGENT/SQUAD: [redacted]

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b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/93 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

Thank you

[redacted] b6 b7C

(4)

3920-92-F-0120-
29B-WF-171994 BCCI

SEARCHED INDEXED
SERIALIZED FILED
JUL 1325015-000-12927
FBI - WASHINGTON FIELD OFFICE

[redacted] b6 b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

(5)

3920-92-F-0120-

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

29B-WF-171994-

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
24-WFO (1 EACH SEIZURE FILE)

SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
1325015-000-12928
FBI - WASHINGTON FIELD

[redacted] b6 b7C

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7B

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(10)

7/23/93
29B-WF-171994-2
3920-92-F-0120-
C-4
7/23/93
WDC

SEARCHED INDEXED
SERIALIZED FILED
JUL 23 1993
FBI [redacted]

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25015-000-12923

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 8 ~ Duplicate;
Page 13 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted], enc-17 b6 b7C
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

EPG:epg
(20)

3920-92F-0119 -
29B-WF-171994-1

[redacted] b6 b7C

Approved: _____ Transmitted _____ _____
(Number) (Time)

1325015-000-12909

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0119	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG;

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$583,305.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Kemper Security Account #1278-4388

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12910

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 3/3/92	118. Award Recommended

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b7C

1325015-000-12911

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

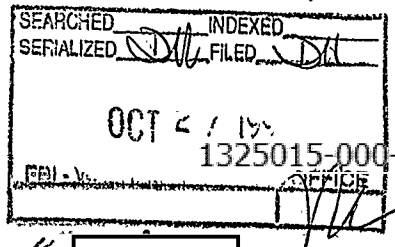
Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(-6)

3920-92-F-0119-
29B-WF-171994



1325015-000-12918

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
17 WFO (1-EACH SEIZURE FILE)

LH 973024 EC

[redacted] b6 b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted]

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

b6
b7C

Approved By: SSA [redacted]

Drafted By: [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted]
37-WFO (1-each file) (3920-92-F-0119)

b6
b7C

29B-171994BCCI - 3

SEARCHED INDEXED
SERIALIZED FILED
MAR 13 1997
FBI - WASH. METRO FIELD OFFICE

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[redacted]

15-000-12913

SEIZURE NUMBER: 3920-92-F-0119
PROPERTY: Bank Accts $ 582,305.02
FBI CASE NUMBER: 29A-WF-177994
CASE AGENT/SQUAD: [redacted] b6 b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED _____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

Thank you.

[redacted]

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(4)

3520-92-F-0119
29B-WF-177994 BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

1325015-000-12916

FBI - WASHINGTON FIELD OFFICE

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b7C

[redacted]

[redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

(5)

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

3920-92-F-0119
29B-WF-171994-

CC: 1-BUREAU, FSPU (ATTN: [redacted] b6 b7C
24-WFO (1-EACH SEIZURE FILE)

SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
FBI - WASHINGTON FIELD
1325015-000-12917

RMC [redacted] b6 b7C

[redacted]

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG: epg
(30)

7/23/93 29B-WF-171994-2
3920-92-F-0119-
SEARCHED INDEXED
SERIALIZED FILED
JUL 23 1993
FBI

C 4 7/23/93 WDC

b6 b7C

1325015-000-12912

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 7 ~ Duplicate;
Page 13 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

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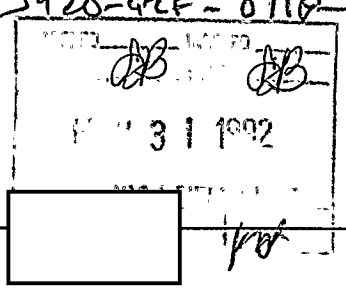
b7C

EPG:epg
(20)

29B-WF-171994-1
3920-92F-0110



[redacted]

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Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-12898

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0118	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interest; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$15,789,646.43	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed

32. Description of Other Property

Bank of New York Accounts - #018872-500, 8109803821, 019043-500, 8109803155, 8900054840, 018856-500, 810929283, 8900051531, 8900053658, 8900054301, 8900054328, 8900054794, 8900054921, 019089-500, 8109298752, 8900053399

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12899

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

b6
b7C

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	3/31/92	118. Award Recommended 1325015-000-12900

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted], Ext. 2310 b6 b7C

Approved By [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

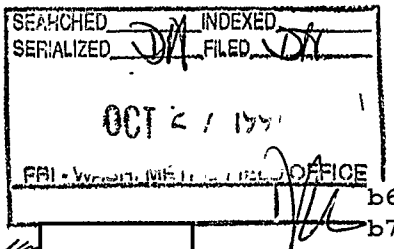
Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(5)

3920-92-F-0118-
29B-WF-171994



b6 b7C

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
17-WFO (1-EACH SEIZURE FILE)

L7+ 973024. EC

[redacted] 015-000-12907

SEIZURE NUMBER: 3220-92-F-0118
PROPERTY: Bank Accts & 15,789,646.43
FBI CASE NUMBER: 29A-WE-171994
CASE AGENT/SQUAD: [redacted] b6 b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/23/93
29B-WF-171994-2
3920-92-F-0118

SEARCHED INDEXED
SERIALIZED FILED
JUL 23 1993
FBI [redacted] OFFICE

b6
b7C

1325015-000-12904

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted], by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

Thank you,

[redacted] b6 b7C

(3)

3920-92-F-0118
29B-WF-177994 BCCT

SEARCHED INDEXED
SERIALIZED FILED
1325015-000-12905
JUL 0 1 ...
FBI-WASH. METRO FIELD OFFICE

b6 b7C

[redacted]

[redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

(4)

3920-92-F-0118-
29B-WF-171994-

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
FBI - WASHINGTON, D.C.

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
24-WFO (1-EACH SEIZURE FILE)

b6 b7C

[redacted]

25015-000-12906

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0118)

29B-171994BCCI

SEARCHED INDEXED
SERIALIZED FILED
MAR 13 1997
FBI - WASH. METRO FIELD OFFICE

[redacted] b6 b7C

015-000-12901

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 8 ~ Duplicate;
Page 13 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17 b6 b7C
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

EPG:epg
(20)

3920-92F-0112-1
29B-WF-171994-1
3 1 1992
[redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12878

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0117	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$500,308.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Doha Bank LTD account - #55804511

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

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36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12879

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor				
64. Street Address		65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed		70. Name/Title		
71. Street Address		72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner		87. Name of Institution			
88. Street Address		89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner		93. Name of Institution			
94. Street Address		95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner		99. Name of Institution			
100. Street Address		101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP	
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP	

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

b6
b7C

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 3/31/92	118. Award Recommended 1325015-000-12880

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310

Approved By: [redacted] b6 b7C

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(6)

3920-92-F-0117.
29B-WF-171994.

SEARCHED INDEXED
SERIALIZED FILED
OCT 2 / 199
FBI - W... OFFICE

CC: 1-BUREAU, FSPU (ATTN: [redacted] b6 b7C
17-WFO (1-EACH SEIZURE FILE)

LH973024.EC

[redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases)Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
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5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0117)

29B-WF-171994 BCCI

SEARCHED INDEXED
SERIALIZED FILED
MAR 13 1997
FBI - WASH. METR... OFFICE

[redacted] b6 b7C

1325015-000-12882

SEIZURE NUMBER: 3920-92-F-0117
PROPERTY: Bank Accts $ 500,308
FBI CASE NUMBER: 29A-WF-171994
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted], by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

b6 b7C

Thank you

[redacted]

3920-92-F-0117-4
29B-WF-177994 BCCT

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]

JUL 1325015-000-12885

FBI - WASHINGTON FIELD OFFICE

b6 b7C

[redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

(5)

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

3920-92-F-0117
298-WF-171994 -

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
24-WFO (1-EACH SEIZURE FILE)

SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
1325015-000-12886
FBI - WASHINGTON FIELD

RJR [redacted] b6 b7C

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/23/93
29B-WF-171994-2
3920-92-F-0117-

C4
7/23/93
WDC

SEARCHED INDEXED
SERIALIZED FILED
JUL 23 1993
FBI FIELD OFFICE

b6 b7C

325015-000-12881

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 8 ~ Duplicate;
Page 13 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: [redacted] enc-17
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

b6
b7C

EPG:epg
(20)

3920-92-F-0116-1
29B-WF-171994-1

[redacted]

b6
b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12867

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0116	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI	$1,283,092.84	☐ Yes ☒ No

16. Forfeiture Deferred	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified
☐ Yes ☐ No		

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Bank of California Corp Account - #91212381

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date
	5	☐ Yes ☐ No

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-12868

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 3/31/15	118. Award Recommended

b6
b7C

1325015-000-12869

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(6)

3920-92-F-0116
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 2 / 19[illegible]
FBI - WASH. METRO FIELD OFFICE

b6 b7C

CC: 1-BUREAU, FSPU (ATTN: [redacted]
17-WFO (1-EACH SEIZURE FILE)

b6 b7C

LH 973024. EC

1325015-000-12876

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0116)

29B-WF-171994 BCCI

SEARCHED INDEXED
SERIALIZED FILED
MAR 1 3 1997
FBI - WASH. METRO FIELD OFFICE

b6 b7C [redacted]

25015-000-12871

SEIZURE NUMBER: 3920-92-F-0116
PROPERTY: Bank Acct @ 1,283,092.84
FBI CASE NUMBER: 29A-WF-171994
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED ____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A_____

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

Thank you,

[redacted] b6 b7C

(4)

3920-92-F-0116-
29B-WF-177994 BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 0 1325015-000-12874
FBI-WASH FIELD OFFICE

b6 b7C [redacted]

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: **FORFEITURE MATTERS - STATUS UPDATE**

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA [redacted] b6 b7C

3920-95-F-0135- Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007- On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008- Same as 3920-96-F-0007.

3920-97-F-0054- Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055- Same as 3920-97-F-0054.

3920-97-F-0056- Same as 3920-97-F-0054.

3920-97-F-0057- Same as 3920-97-F-0054.

(5)

3920-92-F-0116

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

29B-WF-171994

CC: 1-BUREAU, FSPU (ATTN: [redacted] b6 b7C
24-WFO (1-EACH SEIZURE FILE)

SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1997
FBI - WASHINGTON, D.C. b6 b7C

[redacted] 1325015-000-12875

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/23/93
29B-WF-171994-2

C-4
7/23/93
WDC

SEARCHED INDEXED
SERIALIZED FILED
JUL 23 1993
FBI — WASH. FIELD OFFICE

1325015-000-12870

[redacted] b6 b7C

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 9
Page 4 ~ b6; b7C; b7D; b7E;
Page 5 ~ b6; b7C; b7D; b7E;
Page 6 ~ b6; b7C; b7D; b7E;
Page 7 ~ b7D; b7E;
Page 8 ~ b6; b7C; b7D; b7E;
Page 9 ~ b6; b7C; b7D; b7E;
Page 10 ~ b6; b7C; b7D; b7E;
Page 11 ~ b6; b7C; b7D; b7E;
Page 17 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
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- DEA
- File Clerk
- HRT
- N.A. Counselor
- Nurse
- Post Office
- Print Shop
- Receiving
- Supply Clerk
- Switchboard
- T&A Clerk
- Telephone Coord
- Word Processing

- See Me
- Call Me
- Please Handle
- For Info
- Voucher Unit, JEH

b6
b7C

Room # 3839, TL # 231

om

Here's that material we discussed. The telegram I referred to is an attachment to the first 209. Hope it helps.

FBI Academy
Quantico, Virginia

1325015-000-11812

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 3/31/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC#8;
FIF; FAG;
OO: WMFO

Re: WMFO A/T to FBIHQ dtd 2/12/92 concerning captioned matter.

ENCLOSED FOR THE BUREAU

FD-635s for seizures numbered 3920-92-F-0115 through and inclusive of 3920-92-F-0131.

WMFO FAST recently received from the US ATTYS OFFICE, WDC, a computer listing of property seized to date in this matter, commonly referred to as the BCCI investigation. UACB we will report property seized in this investigation as would be done in any criminal forfeiture matter.

1-FBIHQ, Attn: Paul King, enc-17
19-WMFO
(1-BCCI Squad, Attn: SA [redacted] NVMRA)
(1-FAST, 29B-WF-171994, SUB FS)
(17-1 to each seizure file: 3920-92F-0115 thru 0131)

b6
b7C

EPG:epg
(20)

29B-WF-171994-1
3920-92F-0115
3 1 1992

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-11821

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-92-F-0115	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
3/27/92	Hidden Interests; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$4,024,324.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	Capital Bank Accounts- #850053580, 902204122, 902205102, 902205110

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-11822

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	PLA 3/31/92	118. Award Recommended

b6
b7C

1325015-000-11823

Attn: [redacted] b6 b7C

C-1 Forfeiture

[redacted] b6 b7C

Please provide final orders of forfeiture, or other documentation showing property forfeited, for the following:

3920-92-F-115-131

Thank you.

[redacted] b6 b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted] b6 b7C

From: (PS) [redacted]
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] :set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-92-F-0115)

29B-WF-171994 BCCI

SEARCHED INDEXED
SERIALIZED FILED
MAR 13 1997
FBI - WASH. METRO FIELD OFFICE

[redacted]

25015-000-11825

SEIZURE NUMBER: 3920-92-F-0115
PROPERTY: Bank Acct $4,034,324.00
FBI CASE NUMBER: 29A-WF-171994
CASE AGENT/SQUAD: [redacted]

b6
b7C

1) RECORD OF SEIZED PROPERTY (FD-635) DEADLINE = 25 DAYS

DATE OF SEIZURE ____ DATE FD-635 SUBMITTED 3/31/92 #DAYS AFTER SEIZURE __
DATE FORFEITED _____ SERIAL# OF ORDER ___ #DAYS AFTER SEIZURE __

2) NOTICE OF EXPEDITED RELEASE

DATE WRITTEN NOTICE EXECUTED _____ EXPEDITED PETITION RECEIVED _____

DATE OF AUSA DECISION _____ #DAYS AFTER PETITION _____

SUBSTITUTE RES RECEIVED _____ AMOUNT _____

3) ADOPTIVE SEIZURES

DATE OF ADOPTION _____ DATE OF REJECTION LETTER N/A

4) PETITION FOR REMISSION OR MITIGATION DEADLINE = 45 DAYS

PETITIONER _____ DATE PETITION RECEIVED _____

DATE INVESTIGATION SUBMITTED TO FBIHQ (SERIAL #) _____

#DAYS AFTER RECEIVED _____ LFU DECISION (SERIAL #) _____

5) CLAIM & COST BOND DEADLINE = 30 DAYS TO AUSA

DATE RECEIVED ____ CLAIMANT _____ DATE TO AUSA __AUSA DENIAL TO PROCEED (SERIAL #) _____ DISPOSITION AND DATE _____

6) QUICK RELEASE

DATE OF DECISION _____ #DAYS AFTER SEIZURE _____ RELEASED TO _____

7) SHARING

DATE DAG-71 SUBMITTED (SERIAL#) _____ PD/AGENCY _____

8) OFFICIAL USE

OFFICIAL USE MEMO (SERIAL #) _____ AMU DECISION (SERIAL #) _____ SQUAD _____

9) UNITED STATES MARSHALL SERVICE

JUDICIAL DISTRICT _____ SUBSTITUTE CUSTODY ORDER (SERIAL#) _____

CASH/DATE RELEASED TO USMS (USMS 102 SERIAL#) _____

DATE PROPERTY NOT RETAINED FOR OFFICIAL USE RELEASED _____

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97.

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

b6 b7C

Thank you,

[redacted]

-4

3520-92-F-0115-
29B-WF-177994 BCCI

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 0 1 [illegible]
FBI - WASHINGTON FIELD OFFICE

b6 b7C

[redacted]

1525015-000-11828

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/19/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :lh

File Number(s): 29B-WF-171994;
166E-WF-186971
166E-WF-190896;
166E-WF-180680

Title: **FORFEITURE MATTERS - STATUS UPDATE**

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Awaiting Final Order.
* Please note: These seizures have been reassigned to SA Robert Roth.

3920-95-F-0135 - Civil forfeiture proceedings have been terminated. See Order of Dismissal and Certificate of Reasonable Cause dated 5/30/97, forwarded to FSPU by EC dated 8/5/97. WFO FAST has closed out this matter.

3920-96-F-0007 - On 8/15/97, the U.S. Attorney's Office advised that they are awaiting the entry of a default judgment in this matter.

3920-96-F-0008 - Same as 3920-96-F-0007.

3920-97-F-0054 - Property indicted December 1996. Indictment pending; subject is fugitive. Sharing requests pending.

3920-97-F-0055 - Same as 3920-97-F-0054.

3920-97-F-0056 - Same as 3920-97-F-0054.

3920-97-F-0057 - Same as 3920-97-F-0054.

Questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

5

3920-92-F-0115
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
AUG 19 1997
FBI - WASHINGTON FIELD

CC: 1-BUREAU, FSPU (ATTN: [redacted])
24-WFO (1 EACH SEIZURE FILE)

ROTH

1325015-000-11829

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/27/1997

To: Director, FBI **Attn:** Finance Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: PS [redacted] Ext. 2310 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 29B-WF-171994

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU facsimile dated 10/22/97 requesting status updates for the following seizures:

3920-92-F-0115 - 0131 - Referenced seizures are BCCI matters. WFO/FAST is awaiting Final Orders. WFO/FAST will forward Final Orders to FSPU upon receipt.

Any questions concerning the above may be directed to PS [redacted] at 278-2310. b6 b7C

(6)

3920-92-F-0115-
29B-WF-171994

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 2 1 1997
FBI - WASH. METRO FIELD OFFICE
[redacted] b6 b7C

CC: 1-BUREAU, FSPU (ATTN: [redacted]
(7) 1-WFO (1-EACH SEIZURE FILE)

LA 973024. EC

[redacted]

1325015-000-11830

Memorandum

To : SAC, WMFO Date 7/20/93

From : SA [redacted] A-6 (FAST) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

7/23/93
29B-WF-171994 -2
3920-92-F-0115

C4
7/23/93
WDC

SEARCHED INDEXED
SERIALIZED FILED
JUL 23 1993
FBI LA OFFICE

b6 b7C

1325015-000-11824

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 45
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 14 ~ Referral/Consult;
Page 15 ~ Referral/Consult;
Page 16 ~ Referral/Consult;
Page 19 ~ Duplicate;
Page 22 ~ Duplicate;
Page 27 ~ Referral/Consult;
Page 28 ~ Referral/Consult;
Page 29 ~ Referral/Consult;
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Page 48 ~ Duplicate;
Page 55 ~ Duplicate;
Page 58 ~ Duplicate;
Page 59 ~ Duplicate;
Page 60 ~ Duplicate;
Page 61 ~ Duplicate;
Page 62 ~ Duplicate;
Page 63 ~ Duplicate;
Page 68 ~ b7D;
Page 72 ~ Referral/Consult;
Page 73 ~ Referral/Consult;
Page 76 ~ Referral/Consult;
Page 77 ~ Referral/Consult;
Page 78 ~ Referral/Consult;
Page 79 ~ Referral/Consult;
Page 80 ~ Referral/Consult;
Page 81 ~ Referral/Consult;
Page 82 ~ Referral/Consult;
Page 83 ~ Referral/Consult;
Page 84 ~ Referral/Consult;
Page 85 ~ Referral/Consult;
Page 86 ~ Referral/Consult;

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29B-WF-1711994

SAC, CIRG has been briefed on the possible overseas travel to the island of Antigua and the need to use alias identification in furtherance of MAJOR CASE 38. SAC approval has been granted for use of alias identification, including alias passports. The SAC is aware of the security to be afforded the alias identification and the restrictions on the use of same.

[redacted]

b6
b7C

/RAN

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: PRIORITY **Date:** 09/12/1996

To: CID **Attn:** Financial Institution Fraud Unit; b7E

Miami **Attn:** SSA b6 b7C

From: London

Contact: Alat tel. 011 44 171 408 8078

Approved By:

Drafted By: jds

Case ID #: 29B-WF-171994-728 (Pending)

Title: BCCI; MAJOR CASE #38;
FINANCIAL INSTITUTION FRAUD; FRAUD AGAINST THE GOVERNMENT

Synopsis: b7D
the b6 b7C upcoming trial of

Details: Reference is made to the phone call from Alat b6 to SSA on 9/11/96. b7C

For the information of Miami, is b6 b7C scheduled to commence trial in a BCCI related matter DOB , is scheduled to give evidence in this trial. Recent attempts to contact at his last known address were unsuccessful. However, he has acknowledged correspondence from the court in the past and has agreed in the past to testify on behalf of the prosecution.

The last known address for was given as b6 b7C telephone number

29B-WF-171994-728

1325015-000-13514

To: CID From: London
Re: 29B-WF-171994, 09/12/1996

LEAD(s):

Set Lead 1:

MM

AT MIAMI, FLORIDA

Will attempt to make contact with [redacted] at [redacted], telephone number [redacted] to ascertain if he is at that premises and would be willing to provide testimony at the trial of above captioned subject. If the witness is not at the address, but can be contacted elsewhere, obtain the new contact telephone number and address [redacted] Inasmuch as trial starts on [redacted] it is requested that this matter be given priority handling.

b6
b7C
b7D

♦♦

1325015-000-13515

(06/01/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/04/1996

To: LEGAT LONDON **Attn:** ALAT [redacted] b6 b7C
CID **Attn:** FIF UNIT; IRS-1

From: MIAMI
WCC-1
Contact: SA [redacted] (305) 787-6217

Approved By: [redacted]

Drafted By: [redacted] JPK

Case ID #: 29B-WF-171994 (Pending)

Title: BCCI; MAJOR CASE #38;
FIF; FRAUD AGAINST THE GOVERNMENT

Synopsis: Lead to locate and make contact with [redacted] b6 b7C covered.

Reference: London EC to CID and Miami dated 9/12/96; Serial 728.

Details: On 9/12/96, SSA [redacted] (Miami), through SA [redacted] b6 b7C telephonically contacted ALAT [redacted] and advised [redacted] of a telephone number where [redacted] could be reached, as well as the message that [redacted] would attempt to telephonically contact [redacted] in London.

It is Miami's understanding that contact was made by [redacted] to [redacted] shortly thereafter. b6 b7C

After receiving the "hard copy" of the EC on 10/4/96, SA [redacted] telephonically contacted [redacted] in London to ensure [redacted] did in fact make contact with her. [redacted] informed SA [redacted] that [redacted] had done so. b6 b7C

Miami considers this lead to be covered.

♦♦

29B-WF-171994-729

1325015-000-13516

29B-WF-171994-729

STANLEY E. STEIN & ASSOCIATES CO., L. P.A.
Attorneys and Counselors at Law

75 Public Square, Suite 714
Cleveland, Ohio 44113-2078

Phone: (216) 621-2424
Fax: (216) 621-5633

Stanley E. Stein

Associates
Bradley D. Burland
Lisa P. Kirby

of Counsel:
Alvin Brouman
Henry P. Kosling
Mary Ann J. Kozik

Jeffrey H. Stein
(1951-1978)

Arthur R. Weinberg
(1916-1994)

December 13, 1996

FEDERAL BUREAU OF INVESTIGATION
935 Pennsylvania Avenue, NW
Washington D.C., 20535-0001
Attention: Forfeiture Dept.

3920-97-F-007, 8, 10
12, 14, 15, 16, 19-28, 41

RE: [redacted] b6 b7C

Dear Gentlemen:

Please be advised that this office represents the interests of [redacted] in his attempt to recover $115,000.00 borrowed, over time, by [redacted] A& M. Auto Sales. It is my understanding that the FBI has caused the forfeiture of a significant amount of A & M Auto Sales business assets as a result of an additional investigation done by your office. I am also to understand that [redacted] is involved in criminal prosecution as a result of that investigation. b6 b7C

[redacted] despite outside appearances is not a man of means. He works as a substitute teacher for various schools districts throughout the Cleveland area. His wages, (See Attached) provide him with relatively little income, as you can see. He lent [redacted] substantially all of his savings as an investment which, obviously, did not bear fruit. b6 b7C

While my client, up to the present, has been able to meet his financial obligations, largely due to the help of his wife's family, his financial situation has now become critical. While I understand that the FBI will not actively be involved in obtaining reimbursement to [redacted] perhaps your office might assist us as a creditor of [redacted] and A & M Auto Sales, if and when the forfeited vehicles are sold at auction. b6 b7C

Any assistance you may render to assist my client in recovery of his money will be greatly appreciated.

Please advise at your earliest convenience.

Sincerely yours,

[redacted] b6 b7C

BDB:hs

Ack by OGC letter dated 3/11/97

1325015-000-13526

[redacted] b6 b7C

00: WF
296-WF-171994

March 11, 1997

CERTIFIED RETURN RECEIPT

[redacted] b6 b7C

Stanley E. Stein & Associates Co., L.P.A.
75 Public Square, Suite 714
Cleveland, Ohio 44113-2078

RE: $60,000,000.00 IN U.S. CURRENCY
FBI SEIZURE NUMBER: 3920-97-F-0028

Dear [redacted] b6 b7C

The petition for remission or mitigation of forfeiture of the above-described property, filed by you on behalf of [redacted] dated December 13, 1996, has been received at this office. b6 b7C

A review of this matter indicates that the property is subject to criminal forfeiture. The administrative forfeiture action has ceased and the matter has been referred to the Criminal Division, Department of Justice, for judicial action. As a result, your petition has been forwarded to the Asset Forfeiture and Money Laundering Section, Criminal Division, Department of Justice for a determination and ruling. This office (Federal Bureau of Investigation) will not be ruling on your petition.

MAILED 81
P 168 273 632
MAR 12 1997
FBI

1 - WFO (29B-WF-171994)
Attention: Paralegal Specialist
1 - Acting LFU Unit Chief
1 - [redacted] b6 b7C
1 - [redacted]
1 - [redacted]
1 - LFU (Case File)
1 - LFU (Judicial File)

SJJ:CLL:caw (12) SEE NOTE PAGE 3

Dep. Dir.
Chief of Staff
Off. of Gen. Counsel
Asst. Dir.:
Crim. Inv.
CJIS
Finance
Info. Res.
Insp.
Lab.
National Sec.
Personnel
Training
Off. of EEOA
Off. of Public & Cong. Affs.
Director's Office

MAIL ROOM

[redacted] 757

1325015-000-13527

[redacted]

b6
b7C

NOTE:

Due to the fact that the property is subject to criminal forfeiture, the petition for the remission or mitigation of the forfeiture of the referenced property has been forwarded to the Criminal Division, Department of Justice, for a recommendation. A determination will be made by the Asset Forfeiture and Money Laundering Section.

[redacted] b6 b7C

00:WF 45411
29B-WF-171994

March 11, 1997

CERTIFIED RETURN RECEIPT

Gerald E. McDowell, Chief
Asset Forfeiture and Money Laundering Section
Attn: Nancy L. Rider, Deputy Chief
Criminal Division
Department of Justice
1400 New York Avenue, NW
Room 10100, BOND Building
Washington, D.C. 20005

RE: $60,000,000.00 IN U.S. CURRENCY
FBI SEIZURE NUMBER: 3920-97-F-0028

Dear Ms. Rider:

On December 13, 1996, a petition for remission or mitigation of the forfeiture of the above-described property was filed with the Federal Bureau of Investigation by [redacted] on behalf of [redacted] b6 b7C

A review of the captioned matter indicates that the property is subject to criminal forfeiture. The matter has been referred to the Criminal Division, Department of Justice, for judicial action. No administrative forfeiture of this property will occur.

Inasmuch as this matter will proceed as a judicial forfeiture, we are enclosing a copy of the original petition for you. We are terminating our administrative forfeiture of this property and will not be ruling on the petition.

Enclosure

ENCLOSURE

1 - WFO (29B-WF-171994) 458
Attention: Paralegal Specialist
1 - Acting LFU Unit Chief
1 - [redacted]
1 - [redacted]
1 - [redacted] b6 b7C
1 - LFU (Case File)
1 - LFU (Judicial File)

SJJ:CLL:caw (10)

caw

[redacted]

MAIL ROOM

MAILED 81
MAR 12 1997
FBI
P 163 273 034

Dep. Dir.
Chief of Staff
Off. of Gen. Counsel
Asst. Dir.:
Crim. Inv.
CJIS
Finance
Info. Res.
Insp.
Lab.
National Sec.
Personnel
Training
Off. of EEOA
Off. of Public Affs.
Director's Office

FBI/DOJ
1325015-000-13530

[redacted] b6 b7C

CO: WF
29B-WF-171994

March 11, 1996

CERTIFIED RETURN RECEIPT

[redacted] b6 b7C

Asset Forfeiture and Money Laundering Section
Criminal Division
Department of Justice
1400 New York Avenue, N.W.
Room 10100, BOND Building
Washington, D.C. 20005

RE: $60,000,000.00 IN U.S. CURRENCY
FBI SEIZURE NUMBER: 3920-97-F-0028

Dear [redacted] b6 b7C

On December 13, 1996, a petition for remission or mitigation of the forfeiture of the above-described property was filed with the Federal Bureau of Investigation by [redacted] on behalf of [redacted] b6 b7C

A review of the captioned matter indicates that the property is subject to criminal forfeiture. The matter has been referred to the Criminal Division, Department of Justice, for forfeiture. No administrative forfeiture of this property will occur.

Inasmuch as this matter will proceed as a judicial forfeiture, we are enclosing a copy of the original petition for you. A copy of the original petition is being sent to the Chief, Asset Forfeiture and Money Laundering Section, Criminal Division, U.S. Department of Justice. We are terminating our administrative forfeiture of this property and will not be ruling on the petition.

MAILED 81
P 168 273 033
MAR 12 1997
FBI

Enclosure

1 - WFO (29B-WF-171994)
Attention: Paralegal Specialist
1 - Acting LFU Unit Chief
1 - [redacted] b6 b7C
1 - [redacted]
1 - LFU (Case File)
1 - LFU (Judicial File)

SJJ:CLL:caw (10)

caw

Dep. Dir. ____
Chief of Staff ____
Off. of Gen. Counsel ____
Asst. Dir.: ____
Crim. Inv. ____
CJIS ____
Finance ____
Info. Res. ____
Insp. ____
Lab. ____
National Sec. ____
Personnel ____
Training ____
Off. of EEOA ____
Off. of Public & Cong. Affs. ____
Director's Office ____

MAIL ROOM

[redacted]

1325015-000-13532

[redacted]

b6
b7C

The Petitioner has been advised of the referral of the petition to your office by letter. A copy of that letter is enclosed. The Washington Field Division will submit to you a copy of a Petition Investigation Report concerning this matter.

Sincerely yours,

[redacted]

b6
b7C

Acting Unit Chief
Legal Forfeiture Unit
Office of the General Counsel

1325015-000-13533

Memorandum

To : Assistant Attorney General
Criminal Division

Date 4/19/95

From : Deputy Assistant Director
Criminal Investigative Division

Subject: EXTRATERRITORIAL USE OF CONFIDENTIAL INFORMANT (CI)

ACTION MEMORANDUM

I. EXECUTIVE SUMMARY OF REQUEST

1. Summary of Authorization Requested

Department of Justice (DOJ) authorization is requested to utilize a CI [redacted] b7E

2. Summary of Investigation

Pharaon is the subject of the Washington Metropolitan Field Office (WMFO) investigation entitled "Hidden Interests; Major Case 38." Pharaon is wanted to stand trial in the United States for federal wire fraud and racketeering offenses. He is one of the subjects of indictment number 91-655-7 (JHG), filed in the U.S. District Court for the District of Columbia, Washington, D.C., on November 15, 1991. A warrant for Pharaon's arrest was issued on the same date. The indictment was superseded on January 15, 1993 broadening the alleged conspiracy.

[redacted] b6 b7C

1 - [redacted]
1 -
1 -
1 -
1 -
1 -

Dep. Dir. ____
ADD Adm. ____
ADD Inv. ____
Asst. Dir.:
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Cong. Affs. Off. ____
Off. of EEO ____
Off. Liaison & Int. Affs. ____
Off. of Public Affs. ____
Telephone Rm. ____
Director's Sec'y ____

WAP:may (8)

SEE NOTE PAGE TEN

MAIL ROOM

1325015-000-13537

Assistant Attorney General

The charges against Pharaon relate to his participation in the illegal activities of various financial corporations which are collectively known as the Bank of Credit and Commerce International (BCCI). The offenses charged are felonies under United States law and are punishable by imprisonment of not more than 20 years, fines and/or court-ordered restitution. Pharaon has also been indicted in the Northern District of Georgia, the Southern District of Florida, and the State of New York. As a result, Pharaon is wanted on three federal warrants and one state warrant, all relating to fraud and racketeering.

The United States government has actively sought the apprehension of Pharaon since his indictment. DOJ has made provisional arrest requests to various countries throughout the world, including [redacted] and others. A request for arrest also has been made by the FBI through Interpol. b7D

Since November,1994, WMFO has been tracking Pharaon's Panamanian flag, luxury yacht ,"Le Pharaon," from Spain to where it is currently believed to be headed, Antigua, WI. The yacht was first in Antigua from January 26, 1995 until February 26, 1995 [redacted] source [redacted] The vessel returned to Antigua on or about April 8, 1995 after stops at various Caribbean islands but departed by April 9, 1995. Legat Bridgetown confirmed the marine vessel's presence in Barbados on April 10, 1995, however it apparently departed on April 12, 1995. It is believed the yacht may be returning to Antigua. It is currently unknown if Pharaon is, or will be, aboard the vessel. b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

1325015-000-13538

Assistant Attorney General

[redacted] b6 b7C b7D

The source has reported [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

On [redacted] the source learned [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

3. **LEGAL BASIS FOR AUTHORIZATION**

[redacted] b7E

Assistant Attorney General

[redacted] b7E

[redacted] b7E

[redacted] b7E

4. **Views of the Chief of Mission**

Janet W. Hyde, Ambassador, Bridgetown, Barbados, is aware [redacted] b7E and posed no objection.

5. **Undercover Review Committee**

Undercover review is not required.

6. **Involvement of the Prosecutor**

The Fraud Section, DOJ, attorneys responsible for the prosecution of this investigation are aware of this proposal for the use of the CI in this extraterritorial investigative activity and have requested that it be submitted for review and approval.

Assistant Attorney General

II. DESCRIPTION OF REQUEST

1. **Country Involved**

b7E

2. **Notification of Host Country Authorities**

b7D
b7E

3. **Description of Investigative Activity**

b7E

b6
b7C
b7D

Assistant Attorney General

[redacted] b6 b7C b7D

4. **Involvement of Other Agencies**

This operation will be coordinated with the U. S. Coast Guard.

5. **Sensitive Circumstances Requiring Authorization**

[redacted] b7D b7E

[redacted] b7E

[redacted] b7E

1325015-000-13542

Assistant Attorney General

III. FBI HEADQUARTERS FINDINGS

In accordance with the Attorney General Extraterritorial Guidelines, the following findings are made:

(1) The operation of this CI is reasonably necessary to detect, investigate, prosecute, or prevent criminal conduct in violation of the laws of the United States.

[redacted] b7E

[redacted] b6 b7C b7D

[redacted] b7E

(4) The proposed use of the CI in this extraterritorial investigative activity has been discussed with representatives of DOJ, including [redacted] Chief, Fraud Section, and representatives of the Office of International Affairs; as well as representatives of the Department of State. DOJ will review the proposed operation of the CI, insofar as it relates to compliance with United States laws and litigation strategy. b6 b7C

(5) All reasonable measures have been taken to reduce the risks of physical and monetary harm arising out of this investigation.

1325015-000-13543

Assistant Attorney General

(6) The CI understands that in the event he/she is arrested or detained as a result of activities undertaken either on behalf of or at the behest of the FBI, circumstances may be such that the FBI and the DOJ may be unable to provide any assistance in resolving the situation.

(7) The development and operation of the CI has, and will continue to be conducted in a manner consistent with all applicable FBI and Attorney General Guidelines.

(8) Consistent with the need to preserve the anonymity of the CI, the FBI has coordinated this extraterritorial law enforcement activity with the U.S. Embassy.

1325015-000-13544

Assistant Attorney General

IV. AUTHORIZATION REQUESTED

Based on the above information, the FBI requests authority to use this CI as an extraterritorial source pursuant to the authority conveyed in the Attorney General Guidelines on the Development of Operation of FBI Criminal Informants and Cooperative Witnesses in Extraterritorial Jurisdictions.

Approved: [redacted] Acting Associate Attorney Gen. 4/20/95 b6 b7C

Disapproved: _____

1325015-000-13545

Assistant Attorney General

NOTE: This proposal has been discussed by the Financial Crimes Section and WMFO with officials of the Fraud Section, DOJ, as well as with Office of International Affairs, and Department of State officials. The Fraud Section, DOJ, advised that this proposal will be reviewed and evaluated upon receipt of this request.

This request differs in form from routine requests to DOJ in matters related to FBI Extraterritorial Investigations and Extraterritorial Use of Confidential Informants, with respect to certain information that should be provided. Specifically, the request normally details, in Section I, Part 6, the views of the prosecutor, as required by guidelines. Additionally, the request normally furnishes findings, in Section III, Part 4, that, "The Presidentially appointed prosecutor (normally the United States Attorney), or his designee, has reviewed the proposed compliance with the United States laws and litigative strategy, and concurs with the proposed operation of the cooperative witness."

In view of the fact that the prosecution of this investigation is being handled directly by DOJ, Washington, D.C., the decision concerning the impact of this proposed Extraterritorial Use of Confidential Informant on the prosecution cannot be viewed separately from the overall global policy implications of the extraterritorial investigative activity. This aspect has resulted in a reluctance on the part of the Fraud Section, DOJ, officials to commit to a concurrence concerning the proposed use of the CI, or the extraterritorial operation, without higher level review and evaluation since a supportive position, albeit initial, might in the end be contrary to the final position. As a result, the Fraud Section, DOJ, declined to render an opinion concerning the impact of the extraterritorial use of the CI on the prosecution, pending receipt of this request for review and evaluation. It is anticipated that the issues concerning the extraterritorial use of the CI and the extraterritorial rendition will be fully addressed by DOJ, concurrently, upon receipt of the request(s) for authorization.

Finally, Section I, Part 4, of this request notes that [redacted] consultation with the Office of International Affairs, DOJ, to identify any special circumstances which may negatively impact the proposed scenario. This requirement is set forth as Bureau policy in the Director's memorandum to all SACs, dated 11/1/94, captioned "Luring Fugitives from Foreign Countries; Extraterritorial FBI Operations and Investigations; Policy and Guidelines." Consultation is intended to facilitate and support the law enforcement mission and provide guidance for the effective implementation of the proposed lure. b7E

APPROVED: Crim. Inv. 65/18 Info. Res. _____ Training _____
Crim. Jus. Info. Serv. _____ Inspection _____ Office of EEO Affairs _____
Director _____ Finance _____ Laboratory _____ National Sec. _____ Office of Public & Cong. Affairs _____
Deputy Director _____ Gen. Counsel _____ Personnel _____

10

1325015-000-13546

Memorandum

To : Assistant Attorney General
Criminal Division

Date 4/19/95

From : Deputy Assistant Director
Criminal Investigative Division

Subject: EXTRATERRITORIAL USE OF CONFIDENTIAL INFORMANT (CI)

ACTION MEMORANDUM

I. EXECUTIVE SUMMARY OF REQUEST

1. Summary of Authorization Requested

Department of Justice (DOJ) authorization is requested to utilize a CI [redacted] b7E

2. Summary of Investigation

Pharaon is the subject of the Washington Metropolitan Field Office (WMFO) investigation entitled "Hidden Interests; Major Case 38." Pharaon is wanted to stand trial in the United States for federal wire fraud and racketeering offenses. He is one of the subjects of indictment number 91-655-7 (JHG), filed in the U.S. District Court for the District of Columbia, Washington, D.C., on November 15, 1991. A warrant for Pharaon's arrest was issued on the same date. The indictment was superseded on January 15, 1993 broadening the alleged conspiracy.

1325015-000-13547

Memorandum

To : Assistant Attorney General
Criminal Division

Date 4/19/95

From : Deputy Assistant Director
Criminal Investigative Division

Subject: EXTRATERRITORIAL OPERATION AND CRIMINAL INVESTIGATION

ACTION MEMORANDUM

I. EXECUTIVE SUMMARY OF REQUEST

1. Summary of Authorization Requested

Department of Justice (DOJ) authorization is requested to implement an extraterritorial operation involving sensitive circumstances, as defined in the Attorney General Guidelines for Extraterritorial Operations and Criminal Investigations, [redacted]. b7E

[redacted]

2. Summary of Investigation

Pharaon is the subject of the Washington Metropolitan Field Office (WMFO) investigation entitled "Hidden Interests; Major Case 38." Pharaon is wanted to stand trial in the United States for federal wire fraud and racketeering offenses. He is one of the subjects of indictment number 91-655-7 (JHG), filed in the U.S. District Court for the District of Columbia, Washington, D.C., on November 15, 1991. A warrant for Pharaon's arrest was issued on the same date. The indictment was superseded on January 15, 1993 broadening the alleged conspiracy.

1 - [redacted] b6 b7C
1 -
1 -
1 -
1 -
1 -

Dep. Dir.
ADD Adm. 1
ADD Inv. 1
Asst. Dir.:
Adm. Servs. 1
Crim. Inv. 1
Ident.
Insp.
Intell.
Lab.
Legal Coun.
Rec. Mgmt.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Sec'y

WAP:may (8)

SEE NOTE PAGE EIGHT

MAIL ROOM

1325015-000-13556

Assistant Attorney General

The charges against Pharaon relate to his participation in the illegal activities of various financial corporations which are collectively known as the Bank of Credit and Commerce International (BCCI). The offenses charged are felonies under United States law and are punishable by imprisonment of not more than 20 years, fines and/or court-ordered restitution. Pharaon has also been indicted in the Northern District of Georgia, the Southern District of Florida, and the State of New York. As a result, Pharaon is wanted on three federal warrants and one state warrant, all relating to fraud and racketeering.

The United States government has actively sought the apprehension of Pharaon since his indictment. DOJ has made provisional arrest requests to various countries throughout the world, including [redacted] and others. A request for arrest also has been made by the FBI through Interpol. b7D

Since November,1994, WMFO has been tracking Pharaon's Panamanian flag, luxury yacht ,"Le Pharaon," from Spain to where it is currently believed to be headed, Antigua, WI. The yacht was first in Antigua from January 26, 1995 until February 26, 1995. [redacted] The vessel returned to Antigua on or about April 8, 1995 after stops at various Caribbean islands but departed by April 9, 1995. Legat Bridgetown confirmed the marine vessel's presence in Barbados on April 10, 1995, however it apparently departed on April 12, 1995. It is believed the yacht may be returning to Antigua. It is currently unknown if Pharaon is, or will be, aboard the vessel. b6 b7C

3. **LEGAL BASIS FOR AUTHORIZATION**

[redacted] b7E

[redacted] b7E

1325015-000-13557

Assistant Attorney General

[redacted] b7E

[redacted] b7E

4. **Views of the Chief of Mission**

Janet W. Hyde, Ambassador, Bridgetown, Barbados, is aware of [redacted] and poses no objection. b7E

5. **Undercover Review Committee**

Undercover review is not required.

6. **Involvement of the Prosecutor**

The Fraud Section, DOJ, attorneys responsible for the prosecution of this investigation are aware of this proposal for the extraterritorial operation and request that it be submitted for review and approval.

1325015-000-13558

Assistant Attorney General

II. DESCRIPTION OF REQUEST

1. **Country Involved**

[redacted] b7E

2. **Notification of Host Country Authorities** b7D b7E

[redacted]

3. **Description of Investigative Activity**

[redacted] b7E

[redacted] b7E

4. **Involvement of Other Agencies**

This operation will be coordinated with the United States Coast Guard.

1325015-000-13559

Assistant Attorney General

5. **Sensitive Circumstances Requiring Authorization**

The proposed operation involves [redacted] b7D b7E

[redacted] b7D b7E

[redacted] b7D b7E

1325015-000-13560

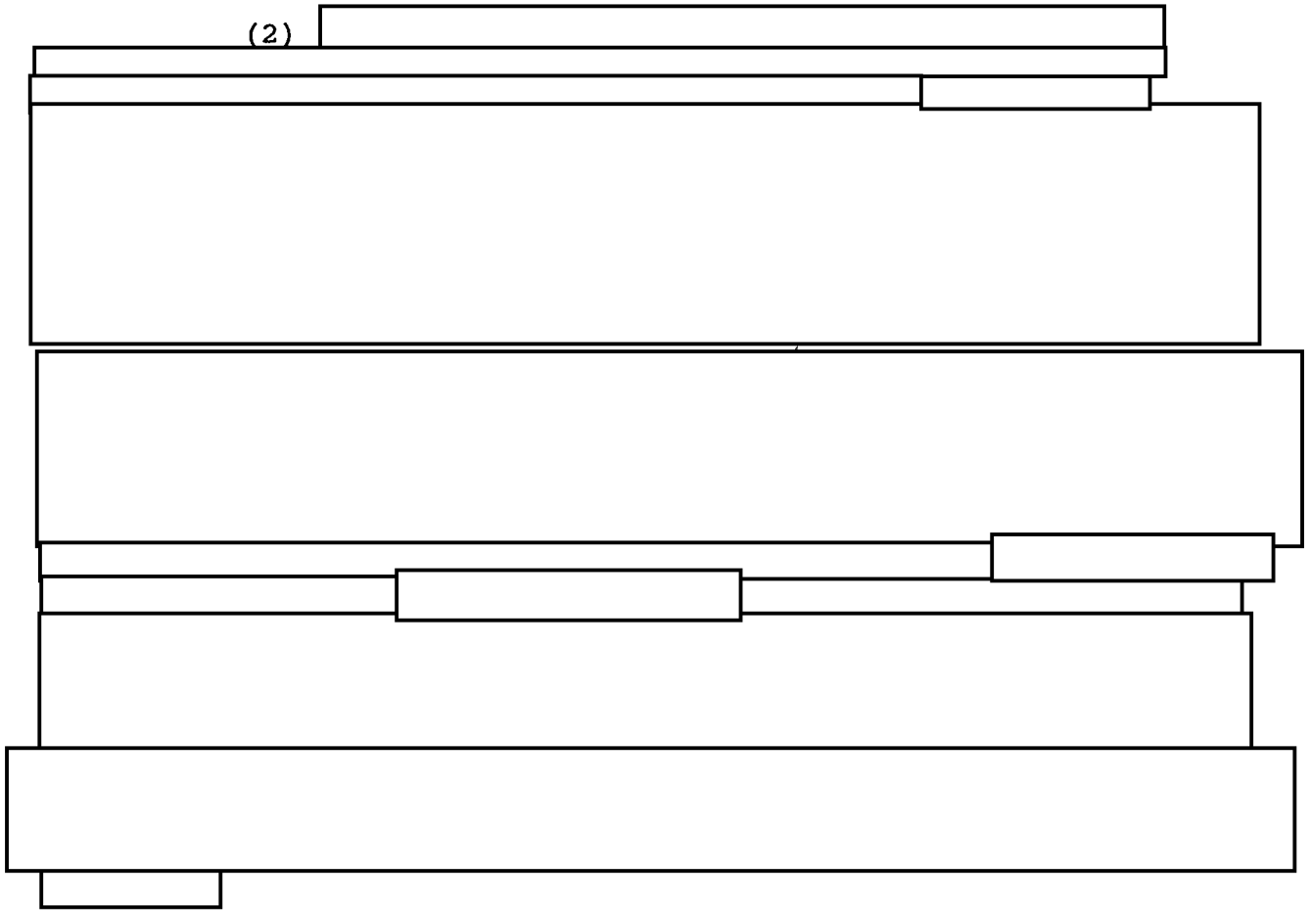
Assistant Attorney General

III. FBI HEADQUARTERS FINDINGS

In accordance with the Attorney General Extraterritorial Guidelines, the following findings are made:

(1) The proposed operation is reasonably necessary to detect, investigate, prosecute, or prevent criminal conduct in violation of the laws of the United States.

(2) [redacted] b7E



b6
b7C
b7D
b7E

b7E

(4) All reasonable measures have been taken to reduce risks of physical and financial harm arising out of the proposed operation.

(8) Consistent with the need to preserve the identity of informants and cooperating witnesses , the FBI has coordinated this extraterritorial law enforcement activity with the U.S. Embassy and the U.S. Coast Guard.

1325015-000-13561

Assistant Attorney General

NOTE: This proposal has been discussed by the Financial Crimes Section and WMFO with officials of the Fraud Section, DOJ, as well as with Office of International Affairs, and Department of State officials.

Fraud Section, DOJ, has requested that this request be submitted for review and evaluation so that it may be fully addressed concurrently with the request for authorization for Extraterritorial Use of Confidential Informant.

APPROVED:

Director	Crim. Inv.	Info. Res.	Training
Deputy Director	Crim. Jus. Info. Servs.	Inspection	Office of EEO Affairs
	Finance	Laboratory	Office of Public & Cong. Affairs
	Gen. Counsel	National Sec.	
		Personnel	

1325015-000-13563

Memorandum

To : Assistant Attorney General
Criminal Division

Date 4/19/95

From : Deputy Assistant Director
Criminal Investigative Division

Subject: EXTRATERRITORIAL OPERATION AND CRIMINAL INVESTIGATION

ACTION MEMORANDUM

I. EXECUTIVE SUMMARY OF REQUEST

1. Summary of Authorization Requested

Department of Justice (DOJ) authorization is requested to implement an extraterritorial operation involving sensitive circumstances, as defined in the Attorney General Guidelines for Extraterritorial Operations and Criminal Investigations. [redacted] b7E

2. Summary of Investigation

Pharaon is the subject of the Washington Metropolitan Field Office (WMFO) investigation entitled "Hidden Interests; Major Case 38." Pharaon is wanted to stand trial in the United States for federal wire fraud and racketeering offenses. He is one of the subjects of indictment number 91-655-7 (JHG), filed in the U.S. District Court for the District of Columbia, Washington, D.C., on November 15, 1991. A warrant for Pharaon's arrest was issued on the same date. The indictment was superseded on January 15, 1993 broadening the alleged conspiracy.

1325015-000-13564

U.S. Department of Justice **Notification of Foreign Travel**

DATE 4-21-95

TO

FROM [redacted] b6 b7C
DEPUTY ASSISTANT DIRECTOR

Traveler's Name and Title
(SEE ATTACHED LIST)

Date(s) of Travel
4/17/95- 5/1/95

Cities/Countries to be Visited
[redacted] b7E

Purpose TO PARTICIPATE IN DOJ APPROVED EXTRATERRITORIAL OPERATION INVOLVING EXTRATERRITORIAL ARREST OF BCCI FUGITIVE GHAITH PHARAON

Anticipated Contact with US and Foreign Officials

YES

State Department Post Services Requested

NO

PART B. RETURN TO DEPARTMENT OF JUSTICE

Date

TO: Director, Security Staff
Attn: Foreign Travel Unit
Room 6525, Main Building
Department of Justice
Washington, D.C. 20530

29B-WF-171994-836

_____ This office has no objection to this travel.

_____ Remarks:

Signature

Organization

pls file

29B-WF-171994

1325015-000-13571

TRAVELER'S NAME	TITLE
	SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT
	ASST. SPECIAL AGENT IN CHARGE
	SUPV. SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT
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	SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT
	SPECIAL AGENT

b6
b7C

Embassy of the United States of America
U.S. Department of Justice
Office of the Legal Attache
P.O. Box 302
Bridgetown, Barbados
Fax Number: (809) 437-7772
Voice Telephone: (809) 437-7770

D'encl p 1

Page 1 of 4 pages

To: **FBIHQ ATTN: SSA [redacted] Financial Crimes Unit** b6 b7C

Fax Number: **(202) 324-6492**

Voice: **(202) 324-5659**

From: [redacted]

Messa: **Please Hand Carry to SSA** [redacted]

faxed to CIRG 4/20/95

29B-WF-171994-839

29B-WF-171994

1325015-000-13573

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
[X] Teletype	[ ] Immediate	[ ] TOP SECRET
[ ] Facsimile	[X] Priority	[ ] SECRET
[ ] AIRTEL	[ ] Routine	[ ] CONFIDENTIAL
		[X] UNCLAS E F T O
		[ ] UNCLAS

Date 4/18/95

FM LEGAT BRIDGETOWN (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS E F T O

CITE: //5500:BRI126.109//

PASS: FBIHQ FOR SSA [redacted] FCU, RM 3849; WMFO FOR SA [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO: WMFO.

CAUTION: ARMED AND DANGEROUS.

FOR INFORMATION OF RECEIVING OFFICES, LEGAT BRIDGETOWN HAS JUST RECEIVED A FACSIMILE FROM [redacted] b7D

[redacted]

29B-WF-171994-44

SEARCHED
SERIALIZED
INDEXED
FILED

Approved: _____ Origi. file: BRT126W.109

Time Received: _____ Telprep filename: BRT126S.109

MRI/JULIAN DATE: _____ ISN: _____

FOX DATE & TIME OF ACCEPTANCE: _____

1325015-000-13574

^PAGE 3 BRI

** TX CONFIRMATION REPORT ** AS OF APR 20 '95 17:19 PAGE.01

FINANCIAL-CRIMES

	DATE	TIME	TO/FROM	MODE	MIN/SEC	PGS	STATUS
01	4/20	17:16	703 640 1294	G3--S	03'32	06	OK

1325015-000-13577

0-9 (Rev. 8-16-79)

TRANSMIT VIA: AIRTEL

CLASSIFICATION: UNCLAS **DATE:** 5/1/95

FROM: Director, FBI

TO: ADIC, WMFO (29B-WF-171994)
(Attention: SSA [redacted] Squad 5)

b6
b7C

HIDDEN INTERESTS
Major Case 38
FIF; FAG
OO: WMFO

Enclosed for WMFO is a letter dated 2/17/95, from James G. Meeker, Special Agent in Charge of Special Investigations, Department of Justice, Office of Inspector General (OIG), to the FBI with an attached OIG complaint form.

The referral concerns a complaintant's allegation of an unspecified conspiracy involving Santos Trafficante, BCCI, and black Washington, D.C. drug dealers.

This information is being furnished to WMFO for whatever action is deemed appropriate.

Enclosures (3)

1 - [redacted]
1 - [redacted]

b6
b7C

WAP:wap/dig (5)

29B-WF-171994-848

RECEIVED 18
MAY 03 1995
FBI

Dep. Dir. ____
ADD Adm. ____
ADD Inv. ____
Asst. Dir.: ____
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Rec. Mgmt. ____
Tech. Servs. ____
Training ____
Cong. Affs. Off. ____
Off. of EEO ____
Off. Liaison & Int. Affs. ____
Off. of Public Affs. ____
Telephone Rm. ____
Director's Sec'y ____

MAIL ROOM

APPROVED:

Director ____
Deputy Director ____
Crim. Inv. ____
Crim. Jus. Info. Servs. ____
Finance ____
Gen. Counsel ____
Info. Res. ____
Inspection ____
Laboratory ____
National Sec. ____
Personnel ____
Training ____
Office of EEO Affairs ____
Office of Public & Cong. Affairs ____

[redacted]
Rm 3965

b6
b7C

1325015-000-13578

U.S. Department of Justice

Federal Bureau of Investigation

Washington, D. C. 20535

May 2, 1995

Mr. James G. Meeker
Special Agent in Charge of
Special Investigations
Investigations Division
U.S. Department of Justice
Office of Inspector General
P.O. Box 27718
Washington, D.C. 20038-7718

Dear Mr. Meeker:

Your communication to the FBI dated February 17, 1995, was referred to me for reply.

I am forwarding copies of your communication with the attached referral, [redacted] concerning unknown person(s) to our Washington Metropolitan Field Office. If it should become necessary for the FBI to obtain additional information from you, you will be contacted by a representative of that office. b7E

Should you wish to provide any additional information which you believe may be of investigative interest to the FBI, please furnish the specific details directly to that office located at 1900 Half Street S.W., Washington, D.C. 20535.

Sincerely,

[redacted] b6 b7C
Chief, Financial Crimes Section
Criminal Investigative Division

[illegible]

1325015-000-13581

U.S. Department of Justice

Federal Bureau of Investigation

Washington, D. C. 20535

May 2, 1995

Mr. James G. Meeker
Special Agent in Charge of
Special Investigations
Investigations Division
U.S. Department of Justice
Office of Inspector General
P.O. Box 27718
Washington, D.C. 20038-7718

Dear Mr. Meeker: Hidden Interests

Your communication to the FBI dated February 17, 1995, was referred to me for reply.

I am forwarding copies of your communication with the attached referral, [redacted] concerning unknown person(s) to our Washington Metropolitan Field Office. If it should become necessary for the FBI to obtain additional information from you, you will be contacted by a representative of that office. b7E

Should you wish to provide any additional information which you believe may be of investigative interest to the FBI, please furnish the specific details directly to that office located at 1900 Half Street S.W., Washington, D.C. 20535.

29B-WF-171994-849

Sincerely,

[redacted] b6 b7C

Chief, Financial Crimes Section
Criminal Investigative Division

MAILED 18
MAY 0 3 1995
FBI

Dep. Dir. ____
ADD Adm. 1 -
ADD Inv. 1 -
Asst. Dir.:
Adm. Servs. 1 -
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Rec. Mgmt. ____
Tech. Servs. ____
Training ____
Cong. Affs. Off. ____
Off. of EEO ____
Off. Liaison & Int. Affs. ____
Off. of Public Affs. ____
Telephone Rm. ____
Director's Sec'y ____

[redacted] b6 b7C

NOTE: Correspondent furnished a referral from a complainant alleging [redacted] b7E

WAP/wap (5)

29B-WF-171994

APPROVED:

Director ____
Deputy Director ____
Crim. Inv. ____
Crim. Jus. Info. Servs. ____
Finance ____
Gen. Counsel ____
Info. Res. ____
Inspection ____
Laboratory ____
National Sec. ____
Personnel ____
Training ____
Office of EEO Affairs ____
Office of Public & Cong. Affairs ____

MAIL ROOM

1325015-000-13582

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 4/18/95

TO : DIRECTOR, FBI (29-0)
(ATTN: [redacted] USOU RM 3117) b6 b7C

FROM : SAC, CIRG (244-1 SUB A)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF;FAG;
O: WMFO

Re teletype from WMFO to the Director, FBI dated 3/30/95.

Per request of referenced communication, the Hostage Rescue Team (HRT) has developed a provisional operation/ arrest plan for captioned matter (29B-WF-1711994). As part of the plan, HRT operators will be required to operate in an undercover (UC) capacity [redacted] b7E

[redacted] b6 b7C

[redacted] b6 b7C

Rush as UC needed re; travel pop request;

2-BUREAU
2-CIRG
(1-244-1 SUB A)
(1-ASAC [redacted]) b6 b7C
JLE:jle
(4)

[redacted]

FBI-HRT 2 agents WEP/wsAP
HRT BIC 04 W 1325

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-13594

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 5
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Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;

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432

U.S. Department of Justice

Federal Bureau of Investigation

Washington, D. C. 20535

b6
b7C
b7E

January 23, 1995

GHAITH RACHAD PHARAON

The Washington Metro Field Office (WMFO) of the Federal Bureau of Investigation is seeking aid in locating captioned fugitive and his yacht, the marine vessel (M/V) "Le Pharaon." Pharaon reportedly uses his yacht as an office.

Pharaon is wanted to stand trial in the United States relative to his participation in the illegal activities of various financial corporations collectively known as the Bank of Credit and Commerce International (BCCI). In December 1991, BCCI, as a corporate entity, pleaded guilty in Washington, D.C., to racketeering, fraud, and conspiracy charges.

Pharaon is described as follows:

Name:	GHAITH RACHAD PHARAON
Aliases/Nicknames:	Dr. Ghaith Pharaon
Date of birth:	September 7, 1941
Place of birth:	Riyadh, Saudi Arabia
Documents:	Saudi Arabian Passport 100132/31
Languages:	Arabic, English, French, and some Greek

Pharaon is the subject of provisional arrest warrants lodged in several countries, and the U.S. fully intends to seek his extradition when he is apprehended. Pharaon is the subject of an Interpol "Red Notice," Number A355/8-1992. Pharaon should be considered "Armed and Dangerous" due to the discovery of numerous firearms aboard M/V "Le Pharaon," in September 1992, as reported by the police of the Port of Larnaca, Cyprus, when the yacht docked there for a short period of time.

1 - Mr. [redacted]
1 - Ms.
SKP skp (2)

b6
b7C

29B-WF-171994-808

29B-WF-171994 Sub FWG3

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Insp.
Intell.
Lab.
Legal Coun.
Rec. Mgnt.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Sec'y
MAIL ROOM

1325015-000-12894
FBI/DOJ

FD-36 (Rev. 11-17-88)

0/9

432

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 2/6/95

50209055

ORIGINAL
Copy 1 Spec. Detached

TO : DIRECTOR, FBI
Attn: Laboratory Division
Document Section, Language Services Unit

FROM ~~Acting ADIC, WMFO (29B-WF-171994 SUB J)~~

SUBJECT : HIDDEN INTERESTS;
rem MC #38;
vio 1 FIF; FAG;
OO: WMFO

Request of the Bureau: Translate (from French to English) the enclosed documents.

Enclosed is a memorandum from the American Embassy, Luxembourg, Luxembourg, to the U.S. Department of State, dated 1/11/95, and captioned, [redacted]

b3
b7E

WMFO believes that some of the enclosed documents are duplicates or at least repetitive. Only one each of such documents should be translated.

29B-WF-171994-820

[redacted] (20)

b6
b7C

2-FBIHQ (Enc. 1) ENCL
1-WMFO

JNR:jnr
(3)

INDEXED

29B-WF-171994

Translation to WMFO on 3/21/95

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

no ccs retained in Lang. Services Unit

1325015-000-12897

GHAITH RACHAD PHARAON

NOTE: The above information was requested by [redacted] relative to a meeting to be held on 1/23/95 at [redacted] with WMFO SSA [redacted] This information was extracted from a WMFO LHM dated 1/18/95, captioned as above. b6 b7C b7E

Also coordinated w/ SSA [redacted] WCC, x5594. b6 b7C

1325015-000-12896

GHAITH RACHAD PHARAON

As of July 25, 1994, the M/V "Le Pharaon" was registered in Panama (Registry #20681-93-A, Code #HP-7039). On January 15, 1995, "Le Pharaon" departed Gibraltar, bound for Las Plamas de Gran Canaria, Canary Islands, with possible additional destinations including Antigua, Bermuda, and Miami, Florida. On January 18, 1995, the yacht arrived at Las Plamas, and reportedly departed shortly thereafter for the Caribbean. The vessel reportedly has the following telephone numbers:

Cellular....[redacted].....658-2010 b6
Captain [redacted] (a U.S. citizen) [redacted] b7C
Puerto Rico.....809-385-4225
Virgin Islands.....809-771-1943

Atlantic Ocean
Tel.....874-144-1310
Tlx.....WUI 584-144-1310
ITT 804 RCA 802 GRPYX-144-1310
Fax.....874-144-1311

Any information developed concerning this matter should be directed to Supervisory Special Agent [redacted] or Special Agent [redacted], WMFO, telephone (202) 324-6408. b6 b7C

1325015-000-12895

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 16
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 19 ~ Referral/Consult;
Page 20 ~ Referral/Consult;
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Page 22 ~ Referral/Consult;
Page 23 ~ Referral/Consult;
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Page 27 ~ Referral/Consult;
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[redacted]

UNIT CHIEF, AUTOMOTIVE
MANAGEMENT UNIT

[redacted]

PROGRAM ANALYST
AUTOMOTIVE MANAGEMENT UNIT

b6
b7C

[redacted]

UNIT CHIEF, CONTRACT
REVIEW UNIT

[redacted]

SUPERVISORY SPECIAL AGENT
LEGAL ADVISOR, CONTRACT
REVIEW UNIT

REPORTEDLY NOW ON TRIAL IN ABU DHABI, AND STATEMENT(S) OF THE CHARGES AGAINST THEM. WHEN REQUESTED INFORMATION IS RECEIVED, HK WILL BE ADVISED. THE BEST AVAILABLE INFORMATION NOW AVAILABLE AT HMFO IS THAT ABU DHABI HAS BEEN HOLDING THE FOLLOWING PEOPLE:

1. AS "CHARGED DETAINEES":

[redacted] BCCI/CANADA; [redacted] BANQUE DE COMMERCE ET DE PLACEMENTS (BCP), SWITZERLAND; [redacted], BCCI BOARD OF DIRECTORS; [redacted], BCCI CREDIT COMMITTEE; [redacted] ASIA DIVISION.

b6
b7C

[redacted] BCCI [redacted] LONDON, [redacted] [redacted] (RGM), BCCI/CAYMAN ISLANDS; ON LIST OF [redacted] [redacted] SUPPORT CENTRE EXECUTIVES, UK R.G.M."; NOMINEE FOR BCCI [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS (CCAH)--OSTENSIBLY, THE PARENT OF FIRST AMERICAN BANK (FAB).

b6
b7C

[redacted], AKA [redacted] ON LIST OF "(CSO) [redacted]..."; [redacted], BCCI/NIGER; [redacted], BCCI/NIGERIA; SECRETARY, BCCI BOARD OF DIRECTORS; MEMBER BCCI INVESTMENT COMMITTEE.

b6
b7C

[redacted] ON LIST OF "(CSO) [redacted]."; [redacted]

b6
b7C

WORKED UNDER [redacted]; BECAME NUMBER [redacted] b6 b7C

BCCI'S INTERNATIONAL DIVISION.

[redacted]: ON LIST OF "(CSO) [redacted]..."; b6 b7C

BECAME [redacted] BCCI UNDER [redacted] AND [redacted]

BCCI/EMIRATES; [redacted] SHEIK ZAYED; [redacted]

[redacted] ROYAL FAMILY IN ABU DHABI.

[redacted] LISTED IN b6 b7C

BCCI "STAFF DIRECTORY" AS ASSOCIATED WITH "ICIC FOUNDATION";

FORMERLY, ICIC [redacted]; MEMBER OF ICIC'S CREDIT

COMMITTEE, AND OF BOARDS OF DIRECTORS OF ICIC HOLDINGS, AND

LINDEN INVESTMENTS (COMPANY OWNED BY REPORTEDLY-DECEASED BCCI

NOMINEE, MOHAMMED M. HAMMOUD); [redacted] BOARD OF ICIC

FOUNDATION, PRIMARILY STATIONED ON GRAND CAYMAN ISLAND.

[redacted], AKA [redacted]; PAKISTANI b6 b7C

MALE; DOB: [redacted] BCCI.

[redacted], AKA [redacted] MEMBER OF BOARDS OF b6 b7C

DIRECTORS OF BCCI/CAMEROON, BCCI/NIGER AND BCCI/NIGERIA;

APPEARS ON LIST OF "(CSO) DIVISIONAL HEADS..."

[redacted] AKA [redacted]; NO FURTHER b6 b7C

IDENTIFYING INFORMATION.

[redacted], AKA [redacted], BCCI/- b6 b7C
COLOMBIA; ON LIST OF "(CSO) [redacted]."; SUPPOSEDLY,
[redacted] BCCI, I.E., [redacted]
[redacted] SUPPOSEDLY, [redacted] BCCI IN ABU DHABI; b6 b7C
APPEARS ON LIST OF "(BCCI) [redacted]; AND
IDENTIFIED ON LIST OF PARTICIPANTS AT 5/12/89 "MANAGEMENT &
BUSINESS MEETING" IN LONDON AS ASSOCIATED WITH BCCI/EMIRATES.

2. AS "UNCHARGED DETAINEES":

[redacted], AKA [redacted]: BCCI b6 b7C
OFFICIAL, APPARENTLY IN HUMAN RESOURCES DEPARTMENT; REPORTEDLY
TOLD [redacted] THAT
PAYMENTS BY BCCI TO PERSONS AND COMPANIES, THROUGH ICIC AND IN
WHICH CAPCOM WAS INVOLVED, WERE PAYOFFS.

[redacted], AKA [redacted], REPORTEDLY AT ONE TIME b6 b7C
WAS [redacted] AND AT ANOTHER
TIME, [redacted] BCCI/BANGLADESH.

[redacted] AKA [redacted], REPORTEDLY b6 b7C
A [redacted]; BCCI [redacted] BCCI'S
ACQUISITION OF A BANK IN VENEZUELA.

[redacted], AKA [redacted] NO IDENTIFYING b6 b7C
INFORMATION.

[redacted], AKA [redacted] REPORTEDLY [redacted] b6 b7C

[redacted] BCCI(MISR), AKA BCCI/EGYPT; APPEARS ON

BCCI'S LIST OF [redacted]

[redacted] NO IDENTIFYING INFORMATION. b6 b7C

[redacted], AKA: [redacted]

ON LIST OF "(CSC) [redacted]

BCCI/EMIRATES; [redacted] BCCI'S INTERNAL AUDIT STAFF; ON BCCI'S b6 b7C

MIDDLE EAST MANAGEMENT COMMITTEE.

BT

#0044

NNNN

4-22 (12-3-92)

Federal Bureau of Investigation
Information Services Section

FR UTD _____, 19____

- ☐ Name Searching Unit, Newington Annex
- ☐ Special File Room, 5991
- ☐ Forward to File Review, 6912
- ☐ Attention _____
- ☐ Return to _____
  Supervisor, Room, Ext.

Scope of Search: (Check One)

- ☐ Automated Data Base - 5 & 20
- ☐ Automated Data Base - 5 & 30
- ☐ Unrestricted (ADB & Inactive Index)

Type of Search Requested:

- ☐ All Records (Security & Criminal)
- ☐ Security Search
- ☐ Criminal Search
- ☐ Main _____ Records Only

Special Instructions:

- ☐ Exact Name Only (On the Nose)
- ☐ Builup ☐ Variations
- ☐ Restricted to Locality of _____

Subject _____ b6 b7C
AKA(s) _____

Birthdate & Place _____
SSAN _____
Localities _____

R# _____ Date _____ Searcher Initials _____
Prod. _____

File Number	Serial	Ident	ADB	Inactive	Date of Ref M/Y
29B-WF-171994					
29-116176					
269-14-16					
29B-LA-126283-1					
245-2679-12					

1325015-000-12688

432

Memorandum

To : DIRECTOR, FBI Date 7/15/94

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference: WMFO tel dated 7/12/94.

Dissemination, as outlined below, was made on dates indicated.

_____ copy of referenced

___X___ Pertinent information from referenced teletype.

Name and Location	Date Furnished
	7/15/94

b7D

29B-WF-171994-732

29B-WF-171994

(1) - Bureau (OLIA)
2 - Hong Kong
(1-66-94)
JMdiP/krp
(3)
LEG-7

1325015-000-12691

432

28 JUL 94 12 46

FEDERAL BUREAU OF INVESTIGATION

0104 MRI 00765

PP RUCNFB FBIWMFO

DE BRU #0003 2091148

ZNR UUUUU

P 281147Z JUL 94

FM LEGAT BRUSSELS (298-WF-171994) (P*)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

ST

UNCLAS

CITE: //5220:BL201.209 28 JUL 94//

PASS: FBIHQ: LIAS, FLU 1 AND FIFU, FCS, CID, ATTN: SSA [redacted] b6 b7C

[redacted] WMFO: SA [redacted]

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; FAG; OO: WMFO.

REQUEST OF BUREAU: LIAS, FLU 1 REQUESTED TO ADVISE OFFICE OF INTERNATIONAL AFFAIRS (OIA), DOJ, OF INFORMATION CONTAINED HEREIN.

[redacted], WHO HAS b6 b7C b7D

HANDLED CAPTIONED MATTER SINCE ITS INCEPTION, ADVISED THAT HE

298-WF-171994-734

CC 3823

1325015-000-12692

[redacted] b6 b7C b7D

BRUSSELS INDICES NEGATIVE RE (FNU) [redacted] AND DUE TO b6 b7C

BRUSSELS LIMITED DIRECT INVOLVEMENT, BRUSSELS NOT IN POSITION TO COMMENT FURTHER.

AMFO AT WASHINGTON, D.C.: CONSIDER SUPPLEMENTARY L/R FOR PAPERS RE [redacted] b6 b7C

BT

#0003

NNNN

432
86

RECEIVED
TELETYPE UNIT
29 JUL 94 10 56
FEDERAL BUREAU
OF INVESTIGATION

0173 MRI 01168

PP RUCNFB FBIWMFO BER LDN

DE BON #0004 2101641

ZNY EEEEE

P 291638Z JUL 94

FM LEGAT BONN (298-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (C-5)/PRIORITY/

LEGAT BERN/PRIORITY/

LEGAT LONDON/PRIORITY/

BT

UNCLAS E F T O

CITE: //5300:BON596M.210//

PASS: LIAS, FLU I.

SUBJECT: O HIDDEN INTEREST; MC #38; FIF; FAG; OO: WMFO.

RE WMFO TELETYPE TO DIRECTOR 7/18/94.

IN REFERENCED TELETYPE OF 7/18/94 WMFO ADVISED AS FOLLOWS:

[redacted] (PAKISTANI MALE DOB [redacted]) AS ARRESTED AT [redacted] ON [redacted] WHILE IN TRANSIT TO THE U.S.

b6
b7C

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.
Adm. Serv.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Serv.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

29B-WF-171994-735

1325015-000-12694

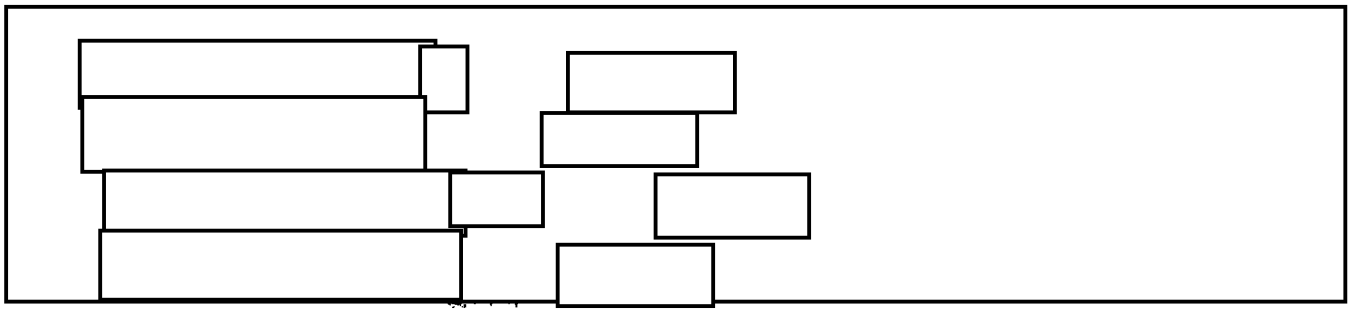
THE ARREST WAS APPARENTLY MADE ON A SWISS WARRANT CHARGING [redacted] WMFO HAD PLANNED TO INTERVIEW [redacted] IN CAPTIONED (BCCI) MATTER IN NEW YORK ON 7/19/94. b6 b7C

ON 7/29/94 ALAT [redacted] RECEIVED THE FOLLOWING INFORMATION FROM THE [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D



b6
b7C
b7D

IN REFERENCED TELETYPE OF 7/19/94, WMFO HAD REQUESTED BERN TO OBTAIN THE PARTICULARS REGARDING THE SWISS ARREST WARRANT FOR [redacted], LEGAT LONDON IS REQUESTED TO OBTAIN THE SAME INFORMATION REGARDING THE BRITISH WARRANT AND FORWARD SAME TO WMFO.

b6
b7C

AS THERE IS NO FURTHER INVESTIGATION AT BONN, THIS MATTER IS RUC.

BT

#0004

NNNN

432

Memorandum

To : DIRECTOR, FBI Date 7/29/94

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference: WMFO airtel (w/encl.) dated 7/12/94.

Dissemination, as outlined below, was made on dates indicated.

___X___ copy of referenced enclosure.

___X___ Pertinent information from referenced airtel.

Name and Location	Date Furnished
	7/29/94

b7D

29B-WF-171994-737

(1) - Bureau (OLIA)
2 - Hong Kong
(1-66-94)
JMdiP/krp
(3)
LEG-7

1325015-000-12697

4-22 (12-3-92)

Federal Bureau of Investigation
Information Services Section

FR UTD _____, 19____

- ☐ Name Searching Unit, Newington Annex
- ☐ Special File Room, 5991
- ☐ Forward to File Review, 6912
- ☐ Attention _____
- ☐ Return to _____
  Supervisor, Room, Ext.

Scope of Search: (Check One)

- ☐ Automated Data Base - 5 & 20
- ☐ Automated Data Base - 5 & 30
- ☐ Unrestricted (ADB & Inactive Index)

Type of Search Requested:

- ☐ All Records (Security & Criminal)
- ☐ Security Search
- ☐ Criminal Search
- ☐ Main _____ Records Only

Special Instructions:

- ☐ Exact Name Only (On the Nose)
- ☐ Buildup ☐ Variations
- ☐ Restricted to Locality of _____

b6
b7C

Subject _____
AKA(s) _____

Birthdate & Place _____
SSAN _____
Localities _____

R# _____ Date _____ Searcher Initials _____
Prod. _____

File Number	Serial	Ident	ADB	Inactive	Date of Ref M/Y
29BWF-171994	-1				

1325015-000-12698

Memorandum

RQ
3859

Exec AD Adm. ____
Exec AD Inv. ____
Exec AD LES ____
Asst Dir.:
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Off. Cong. & Public Affs. ____
Rec. Mgmt. ____
Tech. Servs. ____
Training ____
Off. Liaison & Int. Affs. ____
Telephone Rm. ____
Director's Sec'y ____

To [redacted]

From [redacted]

Date 8/18/92

Subject: OPERATION "HIDDEN INTERESTS"
UNAUTHORIZED COMMITMENTS
RENTAL OF VEHICLES
WASHINGTON METROPOLITAN FIELD OFFICE

PURPOSE: To recommend that a ratification be approved with respect to the unauthorized rental of vehicles in captioned investigation.

RECOMMENDATIONS: 1) That a ratification of unauthorized commitments with respect to vehicle rentals in the amount of $21,564.00 be approved for payment to Thrifty Car Rental and $14,580.00 be approved for payment to Action Auto Rental.

APPROVED: ____ Adm. Servs. ____ Crim. Inv. ____ Laboratory ____ Legal Coun. ____ Off. of Liaison & Int. Affs. ____
Director ____ Ident. ____ Tech. Servs. ____ Off. of Public Affs. ____
Dep. Dir. ____ Info. Mgmt. ____ Training ____
ADD-Adm. ____ Inspection ____ Cong. Affs. Off. ____
ADD-Inv. ____ Intell. ____ Off. of EEO ____

2) That a purchase order be issued on a compelling and urgent basis for the Bank of Credit and Commerce International (BCCI) Task Force to rent vehicles from 9/1/92 through 11/30/92 or when vehicles are obtained from the GSA rental vehicle schedule.

29B-WF-171994-780

APPROVED: ____ Adm. Servs. ____ Crim. Inv. ____ Laboratory ____ Legal Coun. ____ Off. of Liaison & Int. Affs. ____
Director ____ Ident. ____ Tech. Servs. ____ Off. of Public Affs. ____
Dep. Dir. ____ Info. Mgmt. ____ Training ____
ADD-Adm. ____ Inspection ____ Cong. Affs. Off. ____
ADD-Inv. ____ Intell. ____ Off. of EEO ____

1 - Mr. [redacted]
1 - Mr.
1 - Mr.
1 - Mr.
1 - Mr.
1 - Mrs
HRC:kly (7)

Hidden Interests file

b6
b7C

12/Ke

☆ U.S.G.P.O.: 1988-202-042/75505

1325015-000-12713

Memorandum from [redacted] to Mr. [redacted]

b6
b7C

RE: OPERATION "HIDDEN INTERESTS"
UNAUTHORIZED COMMITMENTS
RENTAL OF VEHICLES
WASHINGTON METROPOLITAN FIELD OFFICE

DETAILS: It has come to the attention of the Automotive Management Unit (AMU) that the Washington Metropolitan Field Office (WMFO) has rented vehicles in support of operation "HIDDEN INTERESTS" in excess of previously approved limits. The Criminal Investigative Division (CID) and SAC, WMFO have requested a ratification be approved. Ratification, if approved, would be done pursuant to Section 1.602-3 of the Federal Acquisition Regulation (FAR). Set forth below are pertinent background information facts and findings to support a ratification.

The BCCI Task Force is currently utilizing nine rental vehicles from Action Auto Rental until 8/31/92. This request for ratification will cover through time period 8/31/92. Based on an urgent and compelling need, it is requested a new purchase order be issued to cover rental vehicle for the months of September, October, and November, 1992, until vehicles are received off of the GSA mandatory rental car schedule. It is recognized that the months of October and November will be handled based on the availability of funds due to the new fiscal year funding.

1) Facts leading up to the obligation

By teletype dated 8/6/91, the WMFO advised the Financial Institution Fraud Unit (FIFU), White Collar Crimes Section (WCCS), CID, of the formation of a special squad consisting of one Supervisory Special Agent, eight Special Agents, two investigative assistants, two financial analysts, one secretary and one rotor clerk, to conduct the major investigation involving the BCCI. The case has been codenamed "Hidden Interests" and designated Major Case 38, and is being handled under WMFO case 29B-WF-171994. The case was initiated in February, 1991, when WMFO received a criminal referral from the Board of Governors of the Federal Reserve System alleging false and fraudulent statements had been made concerning BCCI ownership and control of the parent - holding company of First American Bank Shares. Bank regulators in Great Britain, Luxembourg, Switzerland, Spain, France and the Cayman Islands have closed BCCI branches in their respective jurisdictions and opened up criminal investigations. Additional referrals on criminal activities have been received regarding BCCI which has been closely coordinated with the Department of Justice. Extensive media coverage, actions by the Federal Reserve Board and New York officials, and charges made in U.S. Senate hearings have alleged an extraordinary range of worldwide criminal violations by BCCI and its affiliates.

WMFO requested and received operational authority to initially rent nine vehicles for a period of 90 days. PO# R109982 was issued to handle the month of September, 1991, and PO# R204460 was issued for the first 60 days of FY 1992 until 11/30/92. PO# R204460 was amended to include rental (procurement) authority for additional 60 days until 1/31/92. After 1/31/92, even though they had operational authority to rent the vehicles, procurement authority had lapsed and the vehicles were rented continually at this vendor (Thrifty Car Rental) until 5/30/92. During this time period, the AMU with the assistance of the WMFO fleet manager attempted to obtain nine vehicles for use by BCCI but was only successful in obtaining four vehicles which were not available until mid-June, 1992. WMFO was allowed to retain vehicles from their surplus listing which normally would have been disposed of through GSA sales action. Vendors were changed in June, 1992, because a cheaper price was obtained. Bucar numbers 99-6560 through 99-6568 were assigned to these rental vehicles. It is recognized that switching to GSA schedule rentals would alleviate any future problems from long-term automotive rentals.

The BCCI task force has grown tremendously in size since its origin and currently is staffed by one Inspector-in-Charge, three SSAs, twenty SAs, and nine FAs, eight of which are TDY, for a total of 33 investigative personnel. This has expressed an increased need for vehicles.

The continued use of these rental vehicles from Thrifty totals an additional amount of $21,564.00 to PO# R204460 which has not been paid. Expenditures to the Action Auto Rental currently total $9,720.00 (through 7/31/92) which have also not been paid.

2) Have the services been provided to and accepted by the Government or how will the Government benefit from this commitment?

The services have already been provided and accepted by the Government in support of the BCCI investigation. The rental vehicles have successfully been utilized by our agents and analysts to effectively carry out their investigative mission. Investigation to date has resulted in the criminal indictments of two subjects, Clark M. Clifford and [redacted] in New York. b6 b7C

3) Why and how the contractor was selected and how the price determined to be fair and reasonable?

WMFO has used Thrifty Car Rental for car rentals involving other previous investigations. Competitive bidding utilized to establish PO#s R109982 and R204460 is listed below:

a) Enterprise Leasing at $809 monthly rental with unlimited mileage.

b) Budget Car Rental at $659 monthly rental with $.03/miles for cash mile exceeding 3,000 miles a month.

c) Thrifty Car Rental at $599 a month unlimited mileage.

In May, 1992, the following bids were obtained:

a)	Enterprise Leasing	$599 month
b)	Budget Rental	$590 month
c)	Thrifty Car Rental	$599 month
d)	Action Auto Rental	$540 month

The Action Auto Rental offered a savings of $59 per vehicle per month.

4) Were funds available at the time of the unauthorized commitment, and are they still available?

Funds were available and are still available for the continued rental period of these vehicles. Appropriations are available through the WMFO travel budget, subobject cost classification 522120.

In order not to go against current procurement regulations and since there is still a continued need for these rentals, WMFO has submitted FD-369 numbered 583397 dated 7/2/92 to obtain long term rentals based on GSA schedule pricing.

5) AUTHORITY OF RATIFYING OFFICIAL: The ratifying official could have entered into a contractual commitment at the time of the unauthorized commitment was created and still possesses contracting authority.

Based on the above, it is recommended that this unauthorized commitment in the amounts of $21,564.00 for Thrifty Car Rental and $14,580.00 for Action Auto Rental be ratified in accordance with the FAR, Subpart 1.602-3 and the Justice Acquisition Regulation, Part 2801-602.3.

2

217

RECEIVED
TELETYPE UNIT
30 Oct 93 0A 1/3z
FEDERAL BUREAU
OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0029 MRI 01997

RR RUCNFB HON

DE FBINMFO #0044 3030003

ZNR UUUUU

~~R 292303Z OCT 93~~

FM FBI NMFO (29B-NF-171994) (P) (C-5)

TO DIRECTOR FBI/ROUTINE/

LEGAT HONG KONG/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: CLIA, FLU II, SSA [redacted] CID, NCCS, b6 b7C

FIFU, SSA [redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: NMFO.

RE HK TEL, DATED 10/21/93.

NMFO CONSIDERS THE FOLLOWING TO BE SUITABLE FOR

DISSEMINATION TO [redacted] b7D

[redacted]

29B-NF-171994-723

NMFO HAS REQUESTED U.S. DEPARTMENT OF JUSTICE (DOJ)

OBTAIN AND PROVIDE FORMAL LISTING OF THE FORMER BCCI OFFICIALS

111 SD12.
CC-OCIA

1325015-000-12683

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 16
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 20 ~ Referral/Consult;
Page 21 ~ Referral/Consult;
Page 22 ~ Referral/Consult;
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Page 24 ~ Referral/Consult;
Page 25 ~ Referral/Consult;

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X Deleted Page(s) X
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X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

1/32

Memorandum

To : DIRECTOR, FBI Date 4/12/94

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTEREST;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Reference: WMFO tel dated 34/7/94.

Dissemination, as outlined below, was made on dates indicated.

_____ copy of referenced

___X___ Pertinent information from referenced teletype.

Name and Location	Date Furnished
	4/12/94

b7D

29B-WF-171994-692

1 - Bureau (OLIA)
2 - Hong Kong
(1-66-94)
JMdiP/krp
(3)
LEG-7

1325015-000-13062

Memorandum

240

86

To : DIRECTOR, FBI Date 10/13/93

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE NUMBER 38;
FIF; FAG;
OO: WMFO

Reference: WMFO airtel (with LHM and indictment) dated 9/24/93.

Dissemination, as outlined below, was made on dates indicated.

___X___ copy of referenced LHM and indictment.

_____ Pertinent information from referenced

Name and Location	Date Furnished
Mr. [redacted]	10/13/93

b6
b7C
b7D

29B-WF-171994-700

1 - Bureau (OLIA)
2 - Hong Kong
(1-66-94)
JMdiP/krp
(3)
LEG-7

1325015-000-13069

FD-36 (Rev. 11-17-88)

240

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 10/25/93

TO : DIRECTOR, FBI

FROM : LEGAT, LONDON (29B-WF-171994)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE NO. 38;
OO: WMFO

Re Atlanta teletype to the Director, dated 8/12/93.

Enclosed for Atlanta are the following: (1) Records of the land registry concerning [redacted] Woodmasterne, Surrey, U. K.; (2) hand written and typed report regarding the interview of [redacted] dated 9/29/93.

b6
b7C

2 - Bureau
2 - Atlanta (Enc.)
1 - London
RJE/jag
(5)

29B-WF-171994-701

1XC 11-4-93

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-13070

5/23/94

Director Freeh:

RE: VISIT OF [redacted] b7D

On 5/12/94, [redacted] b7D

[redacted]

One of the areas suggested by Legat, Rome for discussion with [redacted] b7D

[redacted]

[redacted] b7D

[redacted]

[redacted]

1 - Mr. [redacted]
1 - Mr. Potts
1 - Mr. Verinder
1 - Mr. [redacted]

1 - Mr. [redacted]
1 - Mr. Kubic
1 - Ms. [redacted]
1 - Mr. [redacted]

1 - Mr. [redacted]
1 - Mr. [redacted]
1 - Miss [redacted]
1 - Ms. [redacted]
Mrs

b6
b7C

KBK:kbk (14)

(Rev. 3/8/94)

CRIMINAL INVESTIGATIVE DIVISION

6/8, 1994

TO	ROOM	NAME/TITLE	TO	ROOM	NAME/TITLE
2.	7176	DIRECTOR		5012	MR. [redacted]
		MR.		3012	MR.
		MS.		7116	MR. VERINDER
		MR.			
		MR.		3149	MR.
		MR.		7443	MR.
	7142	MR.		5030	MR.
				5155	MR.
	5829	MR.		3823	MR.
	7110	MR.		3028	MR.
	7427	MR.		3042	MR.
	6012	MR.		3052	MR.
	3090	MR.			
	6028	MRS.		7116	MS.
	ACADEMY	MR.		7116	MS.
	11861	MR.		3012	MS.
	7116	MR.		5012	MS.
	7125	MR.			
				5129	ADMIN. UNIT
	7240	MR.		5005	AUTO. UNIT
	7901	MR.		5129	BUDGET UNIT
				1B327	MAIL ROOM

b6
b7C

M [redacted]

ROOM [redacted]

___Call Me
___See Me
___Approp. Action
___Per Inquiry

___For Your Info.
___Prepare Response
___For Your Approval
___Status/Facts

b6
b7C

[redacted]

I spoke directly to Ambassador Lellouch re this and he agreed with the position of the DOS as stated in the attached note and saw little liklihood that [redacted] would be put on a fast burner.

b7D

[redacted]

LARRY A. POTTS
ASSISTANT DIRECTOR
ROOM 7116, EXT. 4-4260

1325015-000-13083

Financial Crimes Section

Criminal Investigative Division

5/23, 1994

b6
b7C

___7176 The Director
___7142 Mr. [redacted]
___7116 Mr. Potts
___7116 Mr. Vermeer

___7116 Ms.
___7116 Ms. [redacted]

___3823 Mr. Kubic
___3823 Ms. [redacted]

___3849 Mr.
___3634 Mr.
___5171 Mr.
___3823 Mr. [redacted]

___5012 Mr. [redacted]
___3012 Mr.

___3149 Mr. [redacted]
___7443 Mr.
___5030 Mr.
___5155 Mr.
___3028 Mr.
___3012 Mr.
___3052 Mr.

___5129 Admin./Budget Unit
Attn: _____
___5122 Supply Clerk
___7156 SAMMS Board
___1B327 Mail Room
___6248 Reading Room
___5045 SIOC
___3117 USOU
___1993 Voucher Unit

___REMOVE "T"
___PER INQUIRY
___FOR YOUR APPROVAL
___FOR YOUR INFO.
___PREPARE RESPONSE
___STATUS // FACTS
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[redacted]

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b7C

THOMAS T. KUBIC, CHIEF, FINANCIAL CRIMES SECTION,
CRIMINAL INVESTIGATIVE DIVISION, RM. 3823, X4-5590

1325015-000-13073

6/2/94

Director Freeh:

RE: EXTRADITION MATTERS WITH [redacted] b7D

Pursuant to a note dated 5/23/94 concerning the visit of [redacted]

[redacted]

As it relates specifically to Ghaith Pharaon, a fugitive in the Bank of Credit and Commerce International (BCCI) investigation, OLEI advised that the Deputy Assistant Attorney General (DAAG) for DOJ requested on 5/31/94 that [redacted] b7D

[redacted]

I will continue to monitor these events and coordinate the efforts of DOJ and DOS.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

L. A. Potts

1 - Mr. [redacted]
1 - Mr. Potts
1 - Mr. Verinder
1 - Mr. [redacted]

1 - Mr. [redacted]
1 - Mr. Kubic
1 - Ms. [redacted]
1 - Mr. [redacted]

1 - Mr. [redacted]
1 - Mr. [redacted]
1 - Miss [redacted]
1 - Ms. [redacted]
Mrs

b6
b7C

KBK:kbk (14)

6/7/94

Director Freeh:

RE: BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI);
GHAITH PHARAON - FUGITIVE

Pursuant to a note dated 5/23/94 concerning the visit of [redacted] b7D

[redacted]

As it relates specifically to Ghaith Pharaon, a fugitive in the BCCI investigation, OLEI advised that Deputy Assistant Attorney General (DAAG) [redacted] b6 b7C b7D

[redacted]

I will continue to monitor these events and coordinate the efforts of DOJ and DOS.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

L. A. Potts

1 - Mr. [redacted]
1 - Mr. Potts
1 - Mr. Verinder
1 - Mr. [redacted]

1 - Mr. [redacted]
1 - Mr. Kubic
1 - Ms. [redacted]
1 - Mr. [redacted]

1 - Mr. [redacted] b6 b7C
1 - Mr. [redacted]
1 - Miss [redacted]
1 - Ms. [redacted]
Mrs

KBK/TTK:kbk/may (14)

[redacted] b6 b7C

25015-000-13081

(Rev 2/22/94) INTERNAL ROUTING SLIP

DATE: 6/16/99

TO	ROOM	NAME	TO	ROOM	NAME
___	5012	Mr. Potts	___	3865	Mr. [redacted]
___	3012	Mr. Verinder			
			___	4330	Mr. [redacted]
___	3823	Mr. Kubic			
___	3823	Ms. [redacted]	___	5171	Mr. [redacted]
___	3835	Ms. [redacted]	___	5015	Mr. [redacted]
___	3835	Mrs [redacted]	___	5129	Admin. Unit
					Budget Unit
___	3849	Mr [redacted]	___	6226	Correspondence
___	3849	Mr	___	6712	Elsur
___	3849	Mr	___	3640	Inves. Law
___	3849	Mr	___	1B327	Mail Room
___	3849	Mr	___	7443	OLIA
___	3849	Ms	___	7240	OPCA
___	3849	Mr	___	7659	Press Office
___	3849	Ms	___	6248	Reading Room
J	3849	Mr	___	5045	SIOC
___	3849	Ms	___	6247	Teletype Room
___	___	___	___	3117	USOU
___	___	___	___	5042	Violent Crimes
___	___	___	___	1993	Voucher Unit

b6
b7C

___ Call Me
___ See Me
___ Appropriate Action
___ For Your Approval
___ For Your Information
___ Prepare Response
___ Per Inquiry
___ Status/Facts

file in BCC 1

file.

Thanks!

[redacted]

b6
b7C

Financial Institution Fraud Unit, Room 3849
Financial Crimes Section, CID

1325015-000-13082

[redacted] b7D

In summary, while [redacted] b7D

[redacted]

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

L. A. Potts

5/26/54

1325015-000-13072

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 21
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LEGAT PARIS

AT PARIS, FRANCE

(1) DETERMINE RECIPIENTS OR PRESENT WHEREABOUTS OF THE 1992 RECORDS, AND (2) THE SCHEDULE FOR DISSEMINATION OF THE 1994 RECORDS.

BT

#0023

NNNN

(BCCI). CURRENTLY, SEVERAL FUGITIVES AND WITNESSES ARE ENSCONCED IN THEIR NATIVE PAKISTAN WHERE EVEN CONTACTING THEM HAS BEEN PROBLEMATIC. THE MAIN SUBJECT/FUGITIVE IS AGHA HASAN ABEDI, FORMERLY THE FOUNDER AND CHAIRMAN OF BCCI, WHO RESIDES IN KARACHI. WMFO AND DOJ ARE ATTEMPTING TO ARRANGE A PLEA AND COOPERATION AGREEMENT WITH ABEDI.

THROUGH A NEW YORK SOURCE, [redacted] b7D

[redacted]

[redacted] REFERENCED COMMUNICATIONS CONCERNED WMFO AND NY REQUESTING AND FBIHQ GRANTING AUTHORIZATION FOR

[redacted]

[redacted] b7D

[redacted] b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

QUESTIONS REGARDING [redacted] SHOULD BE DIRECTED TO NY SA [redacted] b6 b7C b7D

QUESTIONS REGARDING [redacted] AND CAPTIONED MATTER SHOULD BE DIRECTED TO WMFO SA [redacted] b6 b7C b7D

[redacted]

3T

#0034

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1/32

RECEIVED
FBI TELETYPE UNIT

24 Feb 94 16 49 Z

FBI BUREAU
OF INVESTIGATION

0109 MRI 00759

PP RUCNFB FBIAT

DE PAN #0002 0551357

ZNR UUUUU

P 241356Z FEB 94

FM LEGAT PANAMA CITY (29B-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI ATLANTA (29B-WF-171994)/PRIORITY/

BT

UNCLAS

CITE: //5460:PAN025.053//

PASS: HQ: CID, DRUG SECTION; CID, LIAS, FLU-II.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO.

RE SAC, ATLANTA TELETYPE TO DIRECTOR, DATED AUGUST 12, 1993.

ON FEBRUARY 23, 1993, [redacted]

b6
b7C
b7D

[redacted]

-648

1325015-000-12371
ICC OCR'd

PAGE TWO DE PAN 0002 UNCLAS

IN VIEW OF THE ABOVE, THIS MATTER WILL BE PLACED IN AN RUC STATUS.

BT

#0002

NNNN

1325015-000-12372

0006 MRI 00666

OO P12

DE FBIAT #0008 0531749

ZNR UUUUU

O 221747Z FEB 94

FM FBI ATLANTA (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

BT

UNCLAS

CITE: //3040: SQ5//

PASS: SSA [redacted] DOMESTIC LIAISON UNIT, ROOM 7446.

SUBJECT: HIDDEN INTERESTS; MC 38; FIF; OO:WMFO.

RE TELCALL BETWEEN SA [redacted] ATLANTA DIVISION, AND [redacted] 2/18/94.

ENCLOSED UNDER SEPARATE COVER IS THE COMPLETED STATE DEPARTMENT DSP-82, TWO PHOTOGRAPHS AND SA [redacted] PASSPORT. AS PER THE 2/18/94 DISCUSSION, THE ABOVE DOCUMENTS ARE BEING PROVIDED IN AN ATTEMPT TO OBTAIN AN OFFICIAL PASSPORT AND A VISA TO TRAVEL TO ABU DHABI.

-649

Official passport obtained on 2/24/94 and handed over to DOJ/OIA for procuring of necessary visa/C.F./LIAS

1325015-000-12373

PAGE TWO DE FBIAT 0008 UNCLAS

BT

#0008

NNNN

FEDERAL BUREAU OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Couns.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0433 MRI 01715

PP RUCNFB LON

DE FBITP #0004 0562150

ZNR UUUUU

P 252149Z FEB 94

FM FBI TAMPA (298-WF-171994) (ORA/1) (P)

TO DIRECTOR FBI/PRIORITY/

LEGAT LONDON/PRIORITY/

BT

UNCLAS

CITE: //3880:1260//

PASS: OLIA, FBIHQ.

SUBJECT: HIDDEN INTERESTS;MAJOR CASE #38;FIF;FAG;OO: WF.

RE LEGAT, LONDON, TELETYPE TO BUREAU, FEBRUARY 14, 1994.

THE FOLLOWING INVESTIGATION WAS CONDUCTED BY INVESTIGATIVE ASSISTANT [redacted] ON FEBRUARY 23, 1994. b6 b7C

A REPRESENTATIVE OF THE POSTAL INSPECTOR'S OFFICE, ORLANDO, FLORIDA, ADVISED [redacted] APPLIED FOR A POST OFFICE BOX, ON MAY 28, 1992. THE REPRESENTATIVE STATED THAT b6 b7C

1325015-000-12375

BOX CLERK REQUESTED [redacted] UPDATE HIS BOX APPLICATION b6 b7C
APPROXIMATELY FOUR TO SIX WEEKS AGO FOR [redacted]
[redacted] FLORIDA [redacted] AT THIS TIME, [redacted]
ADVISED HIS CURRENT ADDRESS IS [redacted]
FLORID[redacted]
[redacted]

A REPRESENTATIVE OF SOUTHERN BELL TELEPHONE,
JACKSONVILLE, FLORIDA, ADVISED TELEPHONE NUMBER [redacted] b6 b7C
IS SUBSCRIBED TO BY [redacted]
[redacted] FLORIDA, [redacted]

FLORIDA DRIVER'S LICENSE NUMBER [redacted] b6 b7C
[redacted]
FLORIDA [redacted] WHITE MALE, DOB [redacted] NO SSAN LISTED.
THIS DRIVER'S LICENSE WAS ISSUED [redacted]
[redacted] THIS LICENSE WAS SUSPENDED, ON FEBRUARY 16,
1994, AS INSURANCE WAS CANCELED.

A REPRESENTATIVE OF FLORIDA POWER AND LIGHT, DAYTONA
BEACH, FLORIDA, ADVISED [redacted] DISCONTINUED POWER b6 b7C
[redacted] FLORIDA, AND LEFT A FORWARDING
ADDRESS OF [redacted] FLORIDA, [redacted]
THE REPRESENTATIVE ADVISED [redacted] DOES NOT CURRENTLY RECEIVE

PAGE THREE DE FBITP 0004 UNCLAS

POWER IN BREVARD COUNTY, FLORIDA.

BT

#0004

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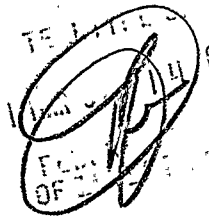
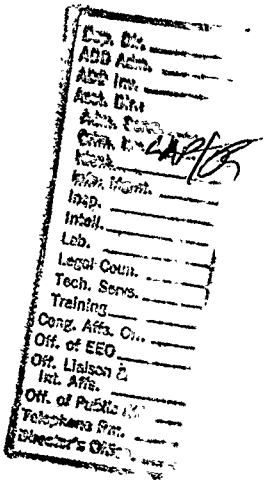
1325015-000-12377





0111 MRI 00756

PP RUCNFB FBIAT

DE LON #0001 0601233

ZNR UUUUU

P 011232Z MAR 94

FM LEGAT LONDON (298-WF-171994)

[redacted] b6 b7C

TO DIRECTOR FBI/PRIORITY/

FBI ATLANTA/PRIORITY/

BT

UNCLAS

CITE: //5200:LON607.056//

PASS: HQ FOR FLU-1, CID; NCCS, FIFU SSA [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; FAG; OO;WMFO.

RE ATLANTA TELETYPE DATED 2/24/94.

COUNTRY CLEARANCE IS GRANTED FOR SA [redacted] TO b6 b7C

ARRIVE IN LONDON ON 3/7/94 AND DEPART ON 3/12/94.

ACCOMMODATIONS HAVE BEEN ARRANGED AT THE BRITANNIA HOTEL AT

THE RATE OF 91 BRITISH POUNDS STERLING A NIGHT FOR SA [redacted]

SA [redacted]

[redacted] FOR THE DATES REQUESTED IN REFERENCED TELETYPE.

656

1325015-000-12378

PAGE TWO DE LON 0001 UNCLAS

BT

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1325015-000-12379

FEDERAL BUREAU OF INVESTIGATION

432

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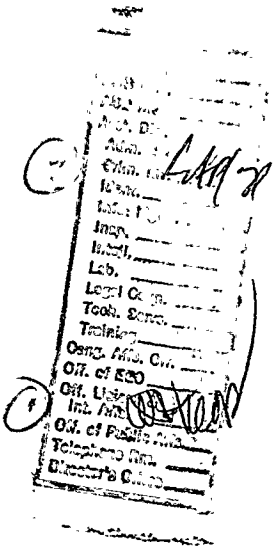
15 Mar 94 16 34z

FEDERAL BUREAU OF INVESTIGATION



0171 MRI 00895

RR RUCNFB PAR

DE FBIWMFO #0023 0741604

ZNR UUUUU

R 151603Z MAR 94

FM FBI WMFO (29B/WF/171994) (P) (C-5)

TO DIRECTOR FBI/ROUTINE/

LEGAT PARIS/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ, OLIA, FLU II, SSA [redacted] CID, WCCS, FIFU, b6 b7C

SSA [redacted] PARIS, ALAT [redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO:WMFO.

RE PA TELCAL ON 2/8/94.

WMFC WISHES TO EXPRESS APPRECIATION TO LEGAT PARIS, IN GENERAL, AND ALAT [redacted] IN PARTICULAR, FOR b6 b7C

ASSISTANCE DURING THE TRAVEL OF WMFO SAS TO AND WITHIN FRANCE BETWEEN 1/23/94 AND 2/3/94. AS IN THE PAST IN CAPTIONED

MATTER, ALAT [redacted] SUPPORT WAS CRITICAL TO THE SUCCESS b6 b7C

[redacted]

1-7458

1325015-000-12385

PAGE TWO DE FBIWMFO 0023 UNCLAS

OF WMFC'S MISSION: THE EXECUTION OF SEARCHES AND INTERVIEWS IN THREE LOCATIONS IN FRANCE, PURSUANT TO LETTERS ROGATORY ISSUED IN WASHINGTON, D.C. WMFO BENEFITTED GREATLY FROM ALAT [redacted] LANGUAGE SKILLS AND HER RAPPORT WITH [redacted] WITH [redacted] WHOM WMFO CAME IN CONTACT. b6 b7C b7D

FOR INFORMATION, [redacted] JORDAN), MENTIONED IN RETEL AS RESIDENT O[redacted] FRANCE, [redacted] GHAITH RACHAD PHARAON [redacted] ENGLAND). AS PA AWARE, [redacted] CONDORDE INTERNATIONAL, INC., IN PARIS. WMFO WILL CONFER WITH DOJ ON WHETHER TO SEEK A COMMISSION ROGATORY TO SEARCH THE CANNES RESIDENCE. b6 b7C

AS PA WILL RECALL, IN 1/24/94, MEETING, [redacted] MORE INFORMATION ABOUT WHO RECEIVED THEM AND WHEN WOULD BE APPRECIATED. b6 b7C b7D

LEADS

1325015-000-12386

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211

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OF INVESTIGATION

158

0432 MRI 01722

RR RUCNFB BAN

DE FBINY #0034 3362152

ZNR UUUUU

R 0221512 DEC 93

FM FBI NEW YORK (298-WF-171994) (P) (I-44)

TO DIRECTOR FBI/ROUTINE/

LEGAT BANGKOK/ROUTINE/

BT

UNCLAS

CITE: //3540//

PASS: HQ FOR OLIA, FLU; CID, NCCS, FIFU, SSA [redacted]

b6
b7C

SUBJECT: HIDDEN INTERESTS MC #38: FIF; FAG; OO:WMFO.

REFERENCE WMFO TELETYPES TO FBIHQ (NO COPY TO BANGKOK) DATED SEPTEMBER 26, 1993 AND OCTOBER 6, 1993; NEW YORK TELETYPE TO FBIHQ, DATED OCTOBER 14, 1993 (NO COPY TO BANGKOK); FBIHQ TELETYPES TO NEW YORK DATED OCTOBER 18, 1993, AND WMFO DATED OCTOBER 19, 1993 (NO COPIES TO BANGKOK).

LEGAT BANGKOK WILL RECALL THAT CAPTIONED MATTER IS THE INVESTIGATION OF THE BANK OF CREDIT AND COMMERCE INTERNATIONAL

298-WF-171994-636

[redacted]

b6
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CC OLIA

CC3823, 5012

00-12351

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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FEDERAL BUREAU
OF INVESTIGATION

351

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DE FBIWMFO #0002 1720414

ZNR UUUUU

R 210413Z JUN 93

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/ROUTINE/

LEGAT HONG KONG/ROUTINE/

FBI NEW YORK (INFO)/ROUTINE/

FBI TAMPA/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: OLIA, FLU; CID, WCCS, FIFU, SSA [redacted]

[redacted] NEW YORK: SSA [redacted] TAMPA: SA [redacted]

HONG KONG: LEGAT [redacted]

b6
b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE NUMBER 38; FIF; FAG;

(OO: WMFO). 29B-WF-171994-592

REFERENCE HONG KONG TELETYPE TO THE BUREAU, DATED MAY 20, 1993; AND WMFO TELETYPES TO THE BUREAU, DATED APRIL 2, 1993

ICC-olia

1325015-000-12340

AND FEBRUARY 26, 1993.

FOR INFORMATION NEW YORK AND HONG KONG, WMFO HAS A REQUEST IN WITH DEPARTMENT OF JUSTICE FOR [redacted]

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b7D

FOR INFORMATION TAMPA, REFERENCED MAY 20, 1993 HONG KONG TELETYPE RESET REQUEST FROM [redacted]

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b7D

ALSO, [redacted]

FOR INFORMATION HONG KONG, [redacted] HAS COMPLETED TESTIFYING IN NEW YORK. WMFO HAS REQUESTED DOJ PROVIDE [redacted]

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b7D

WMFO ALSO IS PLANNING TO INTERVIEW [redacted] IN VERY NEAR FUTURE (NO DATE SET) FOR INFORMATION RELATING TO MAIN REMAINING GOAL OF CAPTIONED MATTER: IDENTIFICATION AND PROSECUTION OF ANY UNITED STATES CITIZENS WHO ARE CULPABLE IN ILLEGAL ACTS BY BCCI. b6 b7C

LEADS. TAMPA. AT TAMPA, FLORIDA.

PROVIDE [redacted] b6 b7C b7D

WMFO. AT WASHINGTON, D.C.

WHEN RECEIVED, WILL PROVIDE HONG KONG WITH COPIES OF (1) [redacted]

BT

#0002

NNNN

1325015-000-12342

77

V 726

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
NEW YORK, N.Y. 10013
(212) 335-9000

ROBERT M. MORGENTHAU
DISTRICT ATTORNEY

April 2, 1993

SSA [redacted] b6 b7C
CIDWCCSFIFU
FBI Headquarters
10th & Pennsylvania Ave. NW
Washington, D.C. 20535

HIDDEN INTERESTS

Re: People v. [redacted] b6 b7C

Dear [redacted] b6 b7C

Enclosed is the original March 12, 1981 letter from [redacted] to the Board of Governors of the Federal Reserve System. [redacted] card is attached.

We obtained the letter from [redacted] Wachtell, Lipton, Rosen & Katz. As per your telephone conversation with [redacted] please examine the documents for the fingerprints of [redacted] We request that you photograph the documents prior to your testing of them so that the photographs as well as the originals may be produced in court. Thank you very much for your efforts. b6 b7C

29B-WF-171994-600X1

Sincerely,

[redacted] b6 b7C

Assistant District Attorney

Received 4-5-93
Arrangements have been made w/ latent Fingerprint Section for the expeditious handling of this request.

JWM:mvc
Enc.

29HQ116176
6-10

RECYCLED PAPER

1325015-000-12

Memorandum

To : DIRECTOR, FBI Date 8/16/93

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Reference: WMFO airtel dated 7/30/93, with transcripts.

Dissemination, as outlined below, was made on dates indicated.

___X___ copy of referenced transcripts.

___X___ Pertinent information from referenced airtel.

Name and Location	Date Furnished
[redacted]	8/16/93
[redacted]	

b6
b7C
b7D

29B-WF-171994-620

1 - Bureau (OLIA)
2 - Hong Kong
(1-66-94)
JMdiP/krp
(3)
LEG-7

3849

1325015-000-12350

175

Memorandu

To : DIRECTOR, FBI Date 8/12/93

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Reference: WMFO airtel dated 7/21/93, with TP LHM dated 7/12/93.

Dissemination, as outlined below, was made on dates indicated.

___X___ copy of referenced LHM.

___X___ Pertinent information from referenced teletype.

Name and Location	Date Furnished
	8/12/93

b6
b7C
b7D

1 - Bureau (OLIA)
2 - Hong Kong
(1-66-94)
JMdiP/krp
(3)
LEG-7

1325015-000-12345

155
196
163

RECEIVED
TELETYPE UNIT
12 Aug 93 21 35Z
FEDERAL BUREAU
OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.s
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs
Off. of Public Affs.
Telephone Rm.
Director's Office

0205 MRI 01010

RR RUCNFB LON PAN

DE FBIAT #0001 2241644

ZNR UUUUU

R 121643Z AUG 93

FM FBI ATLANTA (29B-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

LEGAT LONDON/ROUTINE/

LEGAT PANAMA CITY/ROUTINE/

BT

UNCLAS

CITE: //3040:SQ5//

PASS: FBIHQ FOR OLIA.

29B-WF-171994-609

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO.

MAJOR CASE 38 IS AN INVESTIGATION BEING CONDUCTED OUT OF THE WASHINGTON FIELD OFFICE WHICH IS LOOKING INTO THE SECRET ACQUISITION OF AMERICAN BANKS BY THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). THE ATLANTA DIVISION IS SPECIFICALLY INVESTIGATING THE SECRET ACQUISITION OF THE NATIONAL BANK OF GEORGIA (NBG), BY BCCI, THROUGH THE USE OF A

[redacted]

b6
b7C

1325015-000-12346
ICC OLIA

FRONT MAN, GHAITH PHARAON. DURING THE INVESTIGATION, IT WAS DETERMINED THAT A BCCI [redacted] WAS TRANSFERRED FROM BCCI PANAMA TO NBG. INVESTIGATION TO DATE HAS REVEALED NUMEROUS IRREGULARITIES CONCERNING [redacted] WHICH INCLUDES BANK FRAUD, IMMIGRATION FRAUD, AND TAX FRAUD. ATLANTA CURRENTLY HAS A FEDERAL GRAND JURY LOOKING INTO THESE VIOLATIONS. b6 b7C

DURING THE ENTIRE TIME [redacted] WAS WORKING AT NBG, HE RECEIVED COMPENSATION FROM BCCI. THIS COMPENSATION WAS IN THE FORM OF $550.00 PER MONTH FOR APPROXIMATELY 9 YEARS. BCCI WAS INDICTED IN TAMPA, FLORIDA DURING EARLY 1990 AND AGREED TO PLEAD GUILTY. AT THE SAME TIME, [redacted] "NEGOTIATED", ALMOST TO THE POINT OF EXTORTION, A LARGE PAYMENT TO REMAIN SILENT. IN 1991, [redacted] RECEIVED APPROXIMATELY $300,000.00 FROM BCCI. b6 b7C

PART OF [redacted] DEFENSE OF THE $550.00 MONTHLY PAYMENTS IS A CLAIM THAT HE OWNED THREE RESIDENCES: ONE IN LONDON, ONE IN PANAMA, AND ONE IN THE UNITED STATES. [redacted] IS CLAIMING THAT THE $550.00 WAS A LOAN FROM BCCI TO PAY FOR THESE RESIDENCES. INVESTIGATION IN ATLANTA REVEALS THAT [redacted] DOES OWN A RESIDENCE AND HAS AN OUTSTANDING LIEN ON IT. IT IS ATLANTA'S INTENTION TO DISCOVER IF IN FACT [redacted] OWNED THE OTHER TWO RESIDENCES. [redacted] CLAIMS TO STILL OWN THESE

RESIDENCES TODAY.

SINCE IT IS ANTICIPATED THAT THE REQUESTED RECORDS IN THE LEAD SECTION WILL BE USED IN COURT, CERTIFIED COPIES ARE REQUESTED IF AVAILABLE.

IF ANY QUESTIONS ARISE, PLEASE CONTACT SA [redacted] b6 b7C [redacted] ATLANTA DIVISION, (404) 679-6293.

LEADS

LEGAT LONDON IS REQUESTED TO PERFORM A TITLE SEARCH, ON THE FOLLOWING RESIDENCE, FOR THE TIME PERIOD OF 1975 TO THE PRESENT [redacted] b6 b7C [redacted]

LEGAT PANAMA CITY IS REQUESTED TO PERFORM A TITLE SEARCH, ON THE FOLLOWING RESIDENCE, FOR THE TIME PERIOD OF 1980 TO THE PRESENT: [redacted] ALSO b6 b7C LISTED AS [redacted] [redacted] IF POSSIBLE, PLEASE PROVIDE AN ENGLISH TRANSLATION WHICH WILL DETAIL THE EXACT OWNERSHIP OF THE PROPERTY IN QUESTION.

BT

#0001

NNNN

Memorandum

210

To : DIRECTOR, FBI Date 6/21/93

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR-CASE-38;
FIF; FAG;
OO: WMFO

Reference: WMFO tel dated 6/21/93.

Dissemination, as outlined below, was made on dates indicated.

_____ copy of referenced

___X___ Pertinent information from referenced teletype.

Name and Location	Date Furnished
[redacted]	6/21/93
[redacted]	

b6
b7C
b7D

29B-WF-171994-610

2-Bureau
(1-OLIA)
2-Hong Kong
(1-66-94)
JMdiP/krp
(4)
LEG-7

384

1325015-000-12349

DISTRICT ATTORNEY
COUNTY OF NEW YORK
ONE HOGAN PLACE
NEW YORK, N.Y. 10013

SSA [redacted]
CIDWCCSFIFU
FBI Headquarters
10th & Pennsylvania Ave., NW
Washington, D.C. 20535

b6
b7C

1325015-000-12344

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 5
Page 15 ~ Referral/Consult;
Page 16 ~ Referral/Consult;
Page 17 ~ Referral/Consult;
Page 18 ~ Referral/Consult;
Page 19 ~ Referral/Consult;

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XXXXXXXXXXXXXXXXXXXXXXX

159

TELETYPE SSA [redacted] C-5 EXT. 9301 b6 b7C

FM FBI WMFO (29B-WF-171994)(P)

TO DIRECTOR FBI/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. CID, WCCS, FIFU, SSA [redacted] LABORATORY, b6 b7C
LATENT FINGERPRINT SECTION.

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WF TELCALL TO FBIHQ FIFU, 4/2/93.

REQUESTS OF FBIHQ:

CID, WCCS, FIFU IS REQUESTED TO ACCEPT DELIVERY OF DOCUMENT FROM DISTRICT ATTORNEY FOR NEW YORK (DANY), AND CONVEY DOCUMENT TO LABORATORY FOR LATENT FINGERPRINT EXAMINATION.

LABORATORY DIVISION, LATENT FINGERPRINT SECTION (LFPS) IS REQUESTED TO EXPEDITIOUSLY EXAMINE DOCUMENT FOR EVIDENCE THAT IT WAS HANDLED BY [redacted] b6 b7C [redacted] AND TO REPORT RESULTS BOTH TO DANY AND TO WMFO.

AS DISCUSSED WITH FIFU SSA [redacted] IN RETELCALL, U.S. DEPARTMENT OF JUSTICE TRIAL ATTORNEY [redacted] 29B-WF-171994-1-557 CURRENTLY DETAILED TO DISTRICT ATTORNEY FOR NEW YORK (DANY), ASSISTING IN ONGOING NY TRIAL OF SUBJECT [redacted] CONTACTED WMFO 4/2/93 WITH REQUEST FOR LATENT FINGERPRINT EXAMINATION OF A 1981 DOCUMENT, WHICH DANY BELIEVES [redacted] MAY HAVE HANDLED AND WHICH DANY INTENDS TO PRESENT AS EVIDENCE. TRIAL HAS BEEN RECESSED UNTIL 4/13/93, BUT DANY WILL NEED RESULTS OF LATENT EXAM AS SOON AS POSSIBLE, PREFERABLY PRIOR TO THAT

LC #7-1054 4-6-93 Hallinger/mrw

DATE. IN ORDER TO EXPEDITE HANDLING OF THIS DOCUMENT, TA [redacted] b6 b7C
(TELEPHONE 212/335-9520) WAS INSTRUCTED TO FORWARD IT, VIA
EXPRESS DELIVERY, DIRECTLY TO FIFU SSA [redacted] WHO WILL
IMMEDIATELY DELIVER IT TO THE LFPS.

BT

DISTRICT ATTORNEY
OF THE
COUNTY OF NEW YORK
ONE HOGAN PLACE
NEW YORK, N.Y. 10013
(212) 335-9000

ROBERT M. MORGENTHAU
DISTRICT ATTORNEY

April 2, 1993

SSA [redacted]
CIDWCCSFIFU
FBI Headquarters
10th & Pennsylvania Ave NW
Washington, D.C. 20535

b6
b7C

Re: People v. [redacted]

b6
b7C

Dear [redacted]

b6
b7C

Enclosed is the original March 12, 1981 letter from [redacted] to the Board of Governors of the Federal Reserve System. [redacted] card is attached.

We obtained the letter from [redacted] Wachtell, Lipton, Rosen & Katz. As per your telephone conversation with [redacted] please examine the documents for the fingerprints of [redacted] We request that you photograph the documents prior to your testing of them so that the photographs as well as the originals may be produced in court. Thank you very much for your efforts.

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b7C

29B-WF-171774-558

Sincerely,

[redacted]

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b7C

JWM:mvc
Enc.

1325015-000-12297

7-227 (8-4-92)

159

V409

FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

YOUR FILE NO.
FBI FILE NO.
LATENT CASE NO. 29B-WF-171994 (P)
L-1054

4/7/93

TO: SAC, WMFO

RE: HIDDEN INTRUDER;
MC 938;
FIF;
FAG

REFERENCE: FBI, WMFO teletype 4/2/93 and District Attorney of the County of New York letter 4/2/93
EXAMINATION REQUESTED
SPECIMENS: WMFO and District Attorney of the County of New York
Copy of a three-page letter
Business card

Eight latent fingerprints of value were developed on the letter and business card.

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b7C

The latent fingerprints are not fingerprints of [redacted]

The specimens are enclosed, together with photographic copies of the specimens, which were made in the Latent Fingerprint Section.

29B-WF-171994-559

Enc. (4)

1 - District Attorney of the County of New York
Attention: Assistant District Attorney [redacted]
One Hogan Place
New York, New York 10013

b6
b7C

1 - SSA [redacted] Financial Institution Fraud Unit,
CID, Room 3849

b6
b7C

MAIL ROOM ☑

THIS REPORT IS FURNISHED FOR OFFICIAL USE ONLY

LWH:svh
(6)

1325015-000-12298

AMBASSADOR [redacted] b7D b7E

[redacted] DOES NOT KNOW THE STATUS OF THE TRIAL AND IF ANY ACTION WILL CONTINUE AGAINST PHARAON.

[redacted] SPECULATED THAT [redacted] b7D b7E

BT

#0005

NNNN

OPERATOR [ ]

FEDERAL BUREAU OF INVESTIGATION
LATENT FINGERPRINT SECTION WORKSHEET

b6
b7C

REF# 0152394

FBI FILE NO...: 29-171994-
LABORATORY NO.:

LATENT CASE NO: L-1054
REFERENCE NO: 29B-WF-171994 P

RESULT OF EXAMINATION:

4/6/93 lmb

Specs proc'd DFO . NIN - to photo

Name search conducted.

4/7/93 lmb

8 lat fgpts of val devid NIN, as follows:

2 on a business card for [ ] Attorney At Law

b6
b7C

6 on a copy of a three-page typewritten letter dated March 12, 1981, addressed to "Board of Governors of the Federal Reserve System Washington, D.C. 20551," beginning "Dear Board Members: This is in response ..."

- 3 on page 1
- 1 on page 2
- 2 on page 3

Specs proc'd PD - No add'l lats of val devid

Lat fgpts not of fgpts [ ]

b6
b7C

(Telephonically advised result to SSA [ ] FIFU, Div 6)

Specs enc, together with photographic copies of the specs, which were made in LFPS.

Encs (4)

EXAMINATION COMPLETED 4/7/93 DICTATED 4/7/93 lmb

1325015-000-12300

Memorandum

To : DIRECTOR, FBI Date 4/6/93

From : LEGAT, HONG KONG (29B-WF~~-171944~~ 171994) (P)

Subject: ~~HIDDEN INTERESTS;~~
~~MAJOR CASE #38;~~
FIF; FAG;
OO: WMFO

Reference: WMFO teletype dated 4/2/93.

Dissemination, as outlined below, was made on dates indicated.

_____ copy of referenced

___X___ Pertinent information from referenced teletype.

Name and Location	Date Furnished
	4/6/93

b6
b7C
b7D

29B-WF-171994-567

2-Bureau
(1-OLIA)
2-Hong Kong
(1-66-94)
JMdiP/krp
(4)
LEG-7

1325015-000-12301

FEDERAL BUREAU OF INVESTIGATION

0214 MRI 00575

PP RUCNFB FBIWMFO FBINY LON

DE HON #0010 1400942

ZNR UUUUU

P 200940Z MAY 93

FM LEGAT HONG KONG (298-WF-171994) (P)

TU DIRECTOR FBI/PRIORITY/

FBI WMFO (298-WF-171994)/PRIORITY/

FBI NEW YORK/PRIORITY/

INFO LEGAT LONDON/PRIORITY/

BT

UNCLAS

CITE: //5320:HK 430:5-20-93//

PASS: HQS FOR WCC SECTION, CID; SSA [redacted] FLU II,

OLTA; WMFO FOR BCCI SQUAD.

SUBJECT: HIDDEN INTEREST; MAJOR CASE 38; FIF; FAG; OO: WMFO.

RE WMFO TEL DATED 4/2/93 AND HK TEL DATED 4/20/93.

ON 5/18/93, [redacted]

[redacted]

b6
b7C
b6
b7C
b7D

298-WF-171994-576

1325015-000-12302

FOLLOWS:

[redacted] b6 b7C b7D

ANY ADDITIONAL INFORMATION WMFO, IN COORDINATION WITH DOJ AND NEW YORK OFFICE, CAN PROVIDE [redacted] IS GREATLY APPRECIATED. IT IS NOTED [redacted] FOR THE INFORMATION ALREADY PROVIDED IN THIS MATTER. b7D

BT

#0010

NNNN

0002 MRI 00707

OO P12 FBIWMFO

DE ROM #CC05 1241415

ZNR UUUUU

C 041413Z MAY 93

FM LEGAT ROME (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS

CITE: //5350:RCM710.124//

PASS: SSA [redacted] CC SECTION, FIFU, CID; FLU #1,

OLIA; WMFO - BCCI IIC [redacted]

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FAG; FIF; OO: WMFO.

REROMTEL 4/29/93.

ON 5/4/93, [redacted] TELEPHONICALLY ADVISED THAT GHAITH PHARAON DID NOT SHOW AT THE SCHEDULED HEARING ON 5/3/93. AN ASSISTANT [redacted] WAS AT THE COURT AND PHARAON WAS NOT PRESENT.

THE [redacted] ADVISED THAT DURING RECENT CONTACT BY THE AMERICAN

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

Rm 5847
Ext 4-5258

b6
b7C

b6
b7C

b7D
b7E

b6
b7C

Time 10:45

C-Olia
1-7458

5015-000-12304

OPERATOR [ ]

FEDERAL BUREAU OF INVESTIGATION
LATENT FINGERPRINT SECTION WORKSHEET

FBI FILE NO...: 29-171994-55 LATENT CASE NO: L-1054
LABORATORY NO.: REFERENCE NO: 29B-WF-171994 P

RECORDED.....: 04-06-93 [ ] RECEIVED.....: 04-06-93

EXAMINATION BY: [ ] NOTE: EXPEDITE/TRIAL 4/13/93 b6 b7C

EVIDENCE NOTED [ ]

ANSWER TO....: SAC, WMFO

RE.....: HIDDEN INTERESTS;
MC #38;
FIF;
FAG

COMMUNICATION: TELETYPE 04-02-93

WMFO TELETYPE 4/2/93 AND DISTRICT ATTORNEY, COUNTY OF NEW YORK, NEW YORK, NEW YORK, LETTER 4/2/93

CC — {SPECIMENS PERSONALLY DELIVERED TO LFPS BY SSA [ ] b6 b7C
FINANCIAL INSTITUTION FRAUD UNIT, CRIMINAL INVESTIGATION DIVISION} RM 3849

IN METHODS...: PERSONAL DELIVERY

EXAM REQ BY..: ~~ADDRESSEE~~ WMFO AND DISTRICT ATTORNEY OF NEW YORK COUNTY

COPY TO.....: DISTRICT ATTORNEY OF THE COUNTY OF NEW YORK

ONE HOGAN PLACE
NEW YORK, NY. 10013

ATTN: ASST. DISTRICT ATTORNEY [ ] b6 b7C
ASSOC REF NOS:

SPECIMENS....: COPY OF A THREE-PAGE LETTER

BUSINESS CARD

NAMED SUSPECT:

[ ] 7 WAIS b6 b7C

1325015-000-12299

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 42
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 28 ~ b6; b7C; b7D;
Page 37 ~ b6; b7C; b7D;
Page 38 ~ b6; b7C; b7D;
Page 39 ~ b6; b7C; b7D;
Page 40 ~ b7D;
Page 41 ~ b6; b7C; b7D;
Page 42 ~ b6; b7C; b7D;
Page 43 ~ b6; b7C; b7D;
Page 44 ~ b6; b7C; b7D;
Page 45 ~ b6; b7C; b7D;
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Page 47 ~ b6; b7C; b7D;
Page 48 ~ b6; b7C; b7D;
Page 49 ~ b6; b7C; b7D;
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Page 56 ~ b6; b7C; b7D;
Page 57 ~ b6; b7C; b7D;
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Page 59 ~ b6; b7C; b7D;
Page 68 ~ b6; b7C;
Page 69 ~ b6; b7C;
Page 70 ~ b6; b7C;
Page 71 ~ b6; b7C;
Page 72 ~ b6; b7C;
Page 73 ~ b6; b7C;
Page 74 ~ b6; b7C;

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X For this Page X
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Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes*

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
23	Counterfeit or Pirated Sound Recordings or Motion Pictures
24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
26	Theft from, or Fraud Against, Government Scheme Aborted
27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

Subject Description Codes*

- Enter Description Code Only When Reporting a Conviction -

Organized Crime Subjects (Include Family Name Or Group):
- 1A Boss, Underboss or Consigliere
- 1B Capodecina or Soldier
- 1C Possible LCN Member or Associate
- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

Instructions

Subject Priorities for FBI Arrest or Locates:

A - Subject wanted for crimes of violence (i.e. murder, manslaughter, forcible rape, robbery and aggravated assault) or convicted of such crimes in the past five years.

B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

Reporting Convictions:

Convictions should not be reported until the sentence has been issued. There are two exceptions to this rule. The conviction information can be submitted by itself if:

1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = White

*U.S. Government Printing Office: 1991 — 282-066/44227

1325015-000-13170

WHEREABOUTS OF THE FOLLOWING INDIVIDUALS WHO ARE BELIEVED TO HAVE COMMITTED FALSE ACCOUNTING OFFENSES INVOLVING SEVERAL HUNDRED MILLION DOLLARS:

1. [redacted] PLACE OF BIRTH: [redacted] [redacted] DATE OF BIRTH [redacted] [redacted] YEARS OF AGE; PASSPORT: [redacted] NUMBER [redacted] ISSUED IN [redacted] LAST KNOWN ADDRESS [redacted] BELIEVED TO HAVE DEPARTED [redacted] IN APRIL OR MAY 1992. b6 b7C

[redacted] MAY CURRENTLY RESIDE AT [redacted] [redacted] AND MAY HAVE ACCOUNT NUMBER [redacted] AT CHEMICAL BANK, 7 PARK AVENUE, NEW YORK, NEW YORK. ADDITIONALLY, A CREDIT CARD COMPANY HAD THE FOLLOWING ADDRESS FOR [redacted] [redacted] TELEPHONE [redacted] b6 b7C

2. [redacted] PLACE OF BIRTH: [redacted] [redacted] DATE OF BIRTH: [redacted] PASSPORT: [redacted] NUMBER [redacted] LAST KNOWN ADDRESSES IN 1987 WERE: [redacted] [redacted] b6 b7C

[redacted] MAY HAVE RESIDED AT THE FOLLOWING ADDRESS FROM 1987 TO 1991: [redacted] b6 b7C

[redacted] A MORE RECENT ADDRESS FOR [redacted] MAY BE [redacted] b6 b7C

[redacted] MAY HAVE BANK ACCOUNT NUMBER [redacted] AT TANGLEWOOD BANK N.A., 600 BERING DRIVE, HOUSTON, TEXAS. ADDITIONALLY, PRESTIGE CONSULTANCY, INC., ACCOUNT NUMBER [redacted] MAY BE CONNECTED TO THE HOUSTON, TEXAS, ACCOUNT.

LEADS:

HOUSTON AT HOUSTON, TEXAS:

WILL CONDUCT LOGICAL INVESTIGATION TO DETERMINE IF [redacted] b6 b7C [redacted] DOB [redacted] RESIDES AT [redacted] WILL ATTEMPT TO DISCRETELY OBTAIN FORWARDING ADDRESS IF [redacted] HAS MOVED. WILL DETERMINE IF [redacted] HAS A TEXAS DRIVER'S LICENSE.

WILL DETERMINE IF [redacted] HAS ACCOUNT NUMBER [redacted] AT b6 b7C TANGLEWOOD BANK N.A., 600 BERING AVENUE, HOUSTON, TEXAS. WILL DETERMINE STATUS OF ACCOUNT AND ANY FORWARDING ADDRESS [redacted] MAY HAVE PROVIDED. WILL ALSO OBTAIN ANY ACCOUNT INFORMATION AVAILABLE [redacted] b7E REQUEST THROUGH THE OFFICE OF INTERNATIONAL AFFAIRS.

WILL ATTEMPT TO DETERMINE IF ACCOUNT NUMBER [redacted] IS b6 b7C

AN ACCOUNT AT TANGLEWOOD BANK. WILL OBTAIN ANY INFORMATION AVAILABLE [redacted] b7E

LOUISVILLE AT LEXINGTON, KENTUCKY:

WILL CONDUCT DISCRETE INVESTIGATION TO DETERMINE IF [redacted] DOB [redacted] RESIDES AT [redacted] b6 b7C [redacted] WILL DETERMINE SUBSCRIBER INFORMATION FOR TELEPHONE [redacted] WILL CONDUCT ANY OTHER LOGICAL INVESTIGATION TO DETERMINE IF [redacted] RESIDES IN KENTUCKY OR IF HE HAS MOVED. WILL OBTAIN HIS FORWARDING ADDRESS.

NEW YORK AT NEW YORK CITY:

WILL DETERMINE IF [redacted] DOB [redacted] b6 b7C RESIDES AT [redacted] [redacted] WILL DETERMINE IF [redacted] HOLDS NEW YORK DRIVER'S LICENSE.

WILL CONTACT CHEMICAL BANK, 7 PARK AVENUE, NEW YORK, NEW YORK, RE ACCOUNT NUMBER [redacted] b6 b7C AND OBTAIN ANY ACCOUNT INFORMATION POSSIBLE REGARDING THIS ACCOUNT [redacted] b7E [redacted]

NEWARK AT FORT LEE, NEW JERSEY:

WILL DETERMINE IF [redacted] DOB [redacted] b6 b7C

RESIDES AT [redacted] WILL

CONDUCT ANY OTHER LOGICAL INVESTIGATION TO DETERMINE [redacted]'S

CURRENT WHEREABOUTS.

BT

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FEDERAL BUREAU
OF INVESTIGATION

20 JUL 92 01 06 Z

0245 MRI 01481

RECEIVED
TELETYPE UNIT

PP RUCNFB

DE FBIKC #0003 2092132

ZNR UUUUU

P 272122Z JUL 92

FM FBI KANSAS CITY ~~(66-KC-68406)~~ (SQ11) (P)

TO DIRECTOR FBI/PRIORITY/ 29B-WF-171994

BT

UNCLAS

CITE: //3350:SQ11//

PASS: PROGRAM MANAGER, [redacted] UNIT CHIEF [redacted] b6 b7C

[redacted] FINANCIAL INSTITUTION FRAUD, WHITE-COLLAR CRIMES

SECTION, CRIMINAL INVESTIGATION DIVISION.

SUBJECT: HIDDEN INTEREST; MAJOR CASE 38; FINANCIAL ASSISTANT/

FINANCIAL ANALYSTS (FA); OO:WMFO.

RE BUTEL, DATED 7/7/92, TO ALL FBI FIELD OFFICES AND

TELCAL, DATED 7/17/92, BETWEEN FA [redacted] KC, AND b6 b7C

PROGRAM MANAGER [redacted]

IN RESPONSE TO REFERENCED TELETYPE, FA [redacted] b6 b7C

IS INTERESTED IN TEMPORARY DUTY ASSIGNMENT (TDY) TO WMFO AS

[redacted] b6 b7C

1-D

1CC 3841

Dep. Dir.
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ADD Inv.
Asst. Dir.
Adm. Serv.
Crim. Inv.
Ident
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Intell.
Lab.
Legal
Tech.
Training
Off. of Cong. & Public Affairs
Off. of EEO
Off. of Liaison & International Affairs
Off. of Planning & Evaluation
Off. of Professional Responsibility
Off. of Public & Congressional Affairs
Off. of Public Affairs
Off. of Equal Employment Opportunity
Telephone Rm.
Director's Sec'y

[redacted] b6 b7C

CRIM INV DIV

1325015-000-13105

OUTLINED IN ABOVE REFERENCED COMMUNICATION. [redacted] b6 b7C
AVAILABILITY WILL BE DEPENDENT UPON NEEDS OF KC DIVISION.

FA [redacted] HAS SEVEN YEARS ON DUTY AS A SUPPORT EMPLOYEE, b6 b7C
WITH TWO YEARS FA EXPERIENCE. FA [redacted] HAS BEEN WORKING
WHITE COLLAR CRIME SINCE HER ASSIGNMENT AS AN FA AND HER
DUTIES HAVE INVOLVED VARIOUS FINANCIAL INSTITUTION FRAUD (FIF)
CASES AND PARTICIPATION IN PIGGYBANK; FIF; OO:KC (29D-KC-
67674) AND [redacted], CHIEF EXECUTIVE OFFICER;
EXECUTIVE HILLS NORTH, ET AL; FIF; ITSP; OO:KC (29D-5242).
INVOLVEMENT IN BOTH CASES PROVIDED [redacted] EXPERIENCE RE
NUMEROUS DATABASES, CREATION OF CHARTS AND GRAPHS, AND
ANALYSIS OF COMPLEX FINANCIAL DOCUMENTS.

[redacted] ADVISED FA [redacted] IN ABOVE REFERENCED b6 b7C
CONVERSATION THAT A COMMUNICATION SHOULD BE FORWARDED WITH SAC
APPROVAL FOR FUTURE AVAILABILITY IF THE NEED ARISES FOR
ADDITIONAL FAS.

SAC, KANSAS CITY APPROVES OF FUTURE PARTICIPATION BY
[redacted] IN AFOREMENTIONED TDY ASSIGNMENT FOR PERIOD OF 30 DAYS, b6 b7C
CONTINGENT UPON THE NEEDS OF THE KANSAS CITY DIVISION AT THE
TIME [redacted] SERVICES ARE REQUEST.

BT

#0003

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RECD TELETYPE
31 DEC 92 03

0022 MRI 00079

RR RUCNFB FBIHQ

DE FBIWMFO #0005 3660109

ZNR UUUUU

R 310107Z DEC 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

FBI [redacted]/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: CRIMINAL INFORMANT UNIT, FBIHQ.

Dep. Dir.
ADD Adm.
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Asst. Dir.:
Adm. Servs.
Crim. Inv.
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Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

b7D

[redacted]

b6
b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE NUMBER 38; FIF; FAG;

OO:WMFO; [redacted] OO [redacted]

b7D

THE PURPOSE OF THIS COMMUNICATION IS TO PROVIDE [redacted]

AN EVALUATION OF THE INFORMATION SUPPLIED BY [redacted] SOURCE, [redacted] IN REGARDS TO ABOVE CAPTIONED WMFO CASE.

b7D

[redacted] HAS PROVIDED WMFO WITH SOURCE INFORMATION SINCE MAY 16, 1990 IN RELATION TO ABOVE-CAPTIONED WMFO CASE AS SUMMARIZED BELOW.

29B-WF-171994-499

SOURCE WAS AWARE THAT [redacted]

b6
b7C
b7D

[redacted]

SOURCE PROVIDED INFORMATION AS TO [redacted]

b6
b7C
b7D

[redacted]

[redacted] b6 b7C b7D

SOURCE ADVISED THAT [redacted] b6 b7C b7D

[redacted]

SOURCE ADVISED THAT [redacted] b6 b7C b7D

[redacted]

[redacted] b6 b7C b7D

IN SUMMATION, CAPTIONED INVESTIGATION HAS BENEFITTED VERY LITTLE FROM THE INFORMATION THAT SOURCE HAS PROVIDED. NEVERTHELESS, WMFO COMMENDS THE [redacted] AGENTS WHO HAVE SPENT b7D NUMEROUS HOURS WITH SOURCE AND IS DEEPLY APPRECIATIVE OF THEIR EFFORTS IN ARRANGING FOR THE INTERVIEWS BY WMFO SAS IN

[redacted]

BT

PAGE FIVE DE FBIWMFO 0005 UNCLAS

#0005

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58

RECEIVED
TELETYPE UNIT
26 JAN 93 18 51 Z
FEDERAL BUREAU
OF INVESTIGATION

Dep. Dir.
ADD Adm.
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Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0039 MRI 00990

OO P12 FBIWMFO

DE BRU #0001 0261814

ZNR UUUUU

O 261813Z JAN 93

FM LEGAT BRUSSELS (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO (BCCI) VIA FACSIMILE DIRECT/IMMEDIATE/

BT

UNCLAS

CITE: //5220:BL958.026 26 JAN 93//

PASS: FBIHQ FOR OLIA, FLU 1; CID/WCC/FIFU, ATTN: SSA [redacted]

[redacted] WMFO: SSA [redacted] BCCI.

SUBJECT: (1) HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO: WMFO.

RE WMFO TELETYPE TO BRUSSELS, 1/21/93 AND BRUSSELS TELCALL TO WMFO, 1/25/93.

29B-WF-171994-509

ON 1/22/93, ALAT BRUSSELS TELEPHONED [redacted] BUT WAS UNABLE TO MAKE CONTACT. ON 1/25/93, [redacted] RETURNED CALL AND ADVISED

CALLED [redacted]
By [redacted] Time 4:30 pm

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b7D

1325015-000-13113

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

BASED ON HIS DISCUSSION WITH [redacted] ALAT BRUSSELS b6 b7C b7D BELIEVES THAT AT LEAST TWO WMFO AGENTS, IF NOT MORE, WILL BE REQUIRED TO EFFECTIVELY COMPLETE THE TASK AS DESCRIBED IN RE TELCALL. BRUSSELS WILL PROCEED TO MAKE APPROPRIATE HOTEL RESERVATIONS FOR SA [redacted] AS PREVIOUSLY DISCUSSED, UACB.

WMFO AT WASHINGTON, D.C.: ADVISE BRUSSELS OF TRAVEL ITINERARY OF SA [redacted] AND ANY OTHER SA(S) WHO MAY ACCOMPANY b6 b7C HIM.

LEGAT BRUSSELS AT THE HAGUE AND AMSTERDAM, THE

PAGE FOUR DE BRU 0001 UNCLAS

NETHERLANDS. WILL OBTAIN NECESSARY COUNTRY CLEARANCE(S) AND HOTEL RESERVATIONS. WILL CONTACT PUBLIC PROSECUTOR, AMSTERDAM, TO INSURE COORDINATION OF DUTCH ASSISTANCE.

BT

#0001

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DECLASSIFIED BY: NSICG [redacted]
ON 06-07-2018

b6
b7C

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

~~SECRET~~

Date 1/4/93

TO : SAC, WMFO (29B-WF-171994) (BCCI)

FROM : SAC, JACKSONVILLE (29B-WF-171994-SUB A) (RUC)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

This communication is classified ~~"Secret"~~ in its entirety.

Re WMFO teletype to Atlanta, Jacksonville, and other receiving offices dated 12/18/92.

Jacksonville [redacted] captioned, "CHINA STATE CONSTRUCTION ENGINEERING CORPORATION - FLORIDA, INC. (CSCEC-FLA, INC.); [redacted] (COMMERCIAL); OO: JACKSONVILLE, Jacksonville file number [redacted] CSCEC-FLA is a subsidiary of CSCEC-U.S., which is in turn a subsidiary of CHINA STATE CONSTRUCTION ENGINEERING CORPORATION, Baiwanzhuang, Xijiao, Beijing. The New York office of CSCEC is located at One World Trade Center, Suite 2949, New York, New York, 10048, with telephone number 212/488-8964, and facsimile number 212/488-8296. CSCEC-U.S. oversees subsidiary construction companies in New York; Atlanta; Jacksonville, Florida; and Los Angeles. These companies, with the exception of the one in Jacksonville, carry out joint ventures with American construction companies.

1, 2

b3
b7E

29B-WF-171994-511

~~SECRET~~

(2) - WMFO
1 - Jacksonville
LVB/mfs
(3)

~~Classified By:~~ G-3
~~Declassified:~~ OADR

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-13117

29B-WF-171994

CSCEC-FLA, which began its operation in the Jacksonville, Florida, area in the Fall of 1987, is involved in one major construction project known as DANTANA LAKES, a housing development intended for 400 single family homes to have been completed by the end of 1991. Because of a slow housing market, only about 70 houses have been completed and sold to date.

CSCEC-FLA was initially funded with a $10 million advance from CSCEC-CHINA through CSCEC-U.S. CSCEC-U.S. incorporates all U.S. CSCEC subsidiaries in a consolidated financial statement. CSCEC-U.S. files the corporate tax returns and pays U.S. taxes. CSCEC-FLA has an accumulated deficit of prior years expenses over income of three and a half million dollars, although it is making a profit at this time. Although CSCEC-FLA has lost a substantial amount of money, there appears to be little concern with its profitability as it appears to be a training exercise for Chinese construction engineers to familiarize themselves with U.S. management and business practices.

[redacted] b7E

[redacted] Banking contacts of CSCEC-FLA, CSCEC-U.S., and CSCEC-CHINA are unknown to Jacksonville.

Inasmuch as all logical investigation has been conducted, this matter is being placed in an RUC status.

RECEIVED
TELETYPE
UNIT

6 JAN 93 23 18

FBI
OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0431 MRI 01524

PP RUCNFB FBIWMFO LON

DE FBILS #0004 0062214

ZNR UUUUU

P 062213Z JAN 93

FM FBI LOUISVILLE (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

LEGAT LONDON/PRIORITY/

BT

UNCLAS

CITE: //3420:2163//

SUBJECT: HIDDEN INTEREST; MAJOR CASE 38; FAG-FIF; OO: WMFO.

REFERENCE LEGAT LONDON TELETYPE, DATED 1/5/93.

INVESTIGATION AT LEXINGTON, KENTUCKY, DETERMINED THAT TELEPHONE NUMBER [redacted] IS A LISTED NUMBER FOR [redacted] IS LISTED AS A [redacted] IN THE [redacted] DEPARTMENT AT THE [redacted] AND PROPERTY RECORDS INDICATE HE AND [redacted] HAVE OWNED THE PROPERTY AT

b6
b7C

29B-WF-171 [illegible] -510

1325015-000-13119

THAT ADDRESS SINCE DECEMBER, 1983.

CONTACT WITH POSTAL AUTHORITIES DETERMINED NO FORWARDING ADDRESS ON FILE FOR [redacted] NOR IS THERE A LISTING IN TELEPHONE OR CRISS CROSS DIRECTORIES FOR ANYONE WITH THAT NAME. b6 b7C

ON [redacted] (PROTECT), [redacted] b6 b7C b7D

[redacted]

A CHECK OF PROPERTY RECORDS DETERMINED THAT THE PROPERTY AT [redacted] IS OWNED BY [redacted] AND WAS b6 b7C

PURCHASED IN [redacted] b6 b7C

CONTACT WITH MANAGER OF THE LANSDOWNE EAST APARTMENTS DETERMINED [redacted] IS NOT A RESIDENT THERE. b6 b7C

LOUISVILLE DIVISION WILL AWAIT ADVISE FROM WMFO AND LEGAT LONDON RE ANY CONTACT WITH [redacted] FAMILY TO DETERMINE CURRENT LOCATION OF [redacted] b6 b7C

BT

#0004

NNNN

Memorandum

To : SAC, WMFO
ATTN: SA [redacted]

Date 2/8/93

b6
b7C

From : DIRECTOR, FBI (29B-WF-171994)
(Language Services Unit)

Subject: HIDDEN INTERESTS,
Major Case 38;
FIF; FAG
OO:WF

Enclosed are translations of documents in French and German as requested in WMFO airtel dated 11/17/92.

The foreign-language material is forwarded herewith.

Enclosures (4)

TAJ:taj

Note: Originals sent to WMFO via Fireman mail FAG

29B-WF-171994-514

Exec AD Adm. ____
Exec AD Inv. ____
Exec AD LES ____
Asst. Dir.:
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
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Legal Coun. ____
Off. Cong. & Public Affs. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Off. Liaison & Int. Affs. ____
Telephone Rm. ____
Director's Sec'y ____

MAIL ROOM

1325015-000-13122

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/5/93

[redacted], was contacted at his office located in [redacted] Washington, D.C. Also present during the interview was **ATTORNEY-ADVISOR** [redacted] **U.S. DEPARTMENT OF JUSTICE (DOJ)**, Washington, D.C. b6 b7C

After being advised of the identities of the agents and the purpose of the interview, [redacted] provided the following information: b6 b7C

Based on advice from the **OFFICE OF SENATE LEGAL COUNSEL**, [redacted] can only provide public information documents and information received from the press/media to the interviewers. Additional documents, such as those provided to the **SENATE ETHICS COMMITTEE**, may be obtained by submitting a written request to the Chairman of the Senate Subcommittee, who would then present the request to a vote in the form of a Senate Resolution. [redacted] also stated that he did not want to become a witness in any public proceeding that may result from his consent to be interviewed. b6 b7C

Pursuant to a letter written by [redacted] dated November 20, 1992 requesting information relating to the investigation conducted by the **U.S. SENATE SUBCOMMITTEE ON TERRORISM, NARCOTICS, AND INTERNATIONAL OPERATIONS (of the COMMITTEE ON FOREIGN RELATIONS)** regarding the **BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI)**, [redacted] provided photocopies of certain documents in response to the request and specifically addressed the inquiries as follows: b6 b7C

1. Regarding the alleged penny-stock market manipulation involving BCCI; [redacted] stated that the best explanation of this allegation is included in a recently published book entitled **"False Profits"** by **PETER TRUELL** and **LARRY GURWIN**. [redacted] provided photocopies of pages 172 through 176 of the book. [redacted] has also contacted [redacted] and urged [redacted] to assist federal investigators. [redacted] is b6 b7C

Investigation on 1/5/93 at Washington, D.C. File # 29B-WF-171994

by SA [redacted] : CWS Date dictated 1/5/93 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

29B-WF-171994-520

currently employed at **THE INVESTIGATIVE GROUP**, telephone number 202/778-1200. [redacted]s home telephone number is [redacted]. b6 b7C

2. Regarding [redacted] referred to one document that was reproduced in Volume 3, page 650, of the Subcommittees report entitled "THE BCCI AFFAIR." [redacted] will attempt to locate additional records that can be turned over to the interviewers at a later time. b6 b7C

3. Regarding the involvement of BCCI-related people and [redacted] provided photocopies of various news articles. b6 b7C

4. Regarding [redacted] stated that those documents are not accessible. Senate Investigators obtained their documentation primarily from two sources: (1) the BCCI document repository in New York, which is currently under the control of the **NEW YORK STATE DEPARTMENT OF BANKING** (**NYSDB**) and (2) the **RESOLUTION TRUST CORPORATION** (**RTC**). Senate investigators did spend time reviewing the [redacted] transactions and concluded that they were simply a "straight-forward fraud" against BCCI. [redacted] believes that it would be easier for the FBI to obtain the [redacted] records directly from the NYSDB rather than from the U.S. Senate Subcommittee. b6 b7C

5. Regarding documents from the **OVERSEAS PRIVATE INVESTMENT COMPANY** (**OPIC**) referred to in footnotes 161-162 of the Subcommittee report; [redacted] stated that OPIC can provide a copy of the letter of recommendation from BCCI concerning [redacted] and **ANTIGUA MELON FARM** [redacted]. The document is also on file in the U.S. District Court in Washington, D.C. b6 b7C

6. Regarding an affidavit referred to in footnote 837 of the Subcommittee report; [redacted] advised that [redacted] is a former DOJ attorney and can be contacted at telephone number 813/821-5227. [redacted] has produced several versions of the affidavit and has additional documentation relating to the Iran Arms Deals and BCCI. b6 b7C

 b6 b7C

7. Regarding the **HONG KONG DEPOSIT AND GUARANTY COMPANY** and **TETRA FINANCE** references in footnotes 842 and 852-854 of the Subcommittee report and the identification of individuals involved; [redacted] provided photocopies of the documents requested as well as information obtained from press reports and legal decisions involving [redacted] that came about as a result of the financial collapse of the aforementioned companies. b6 b7C

8. Regarding documents referred to in footnote 849 of the Subcommittee report; [redacted] provided the requested documents. b6 b7C

9. Regarding the identification of the law enforcement document referenced in the last paragraph of page 601 of the Subcommittee report; [redacted] would not discuss this matter whatsoever. [redacted] explained that he utilizes confidential sources in the same manner as law enforcement and by disclosing the identity of a source, he would impair his ability to perform his job. [redacted] guaranteed confidentiality to the person that provided the document and advised that he could not provide the document or describe it inasmuch as it would reveal the identity of the person that provided it to him. [redacted] admitted that he is in possession of the document. b6 b7C

10. Regarding assistance in contacting a particular source; [redacted] said that he would again ask his former colleague to provide [redacted] with a telephone number for the source. b6 b7C

11. Regarding the Minutes of Evidence taken before the **HOUSE OF COMMONS**; [redacted] advised that his copy has been filed in storage and recommended that a copy be obtained from the HOUSE OF COMMONS or **DISTRICT ATTORNEY FOR NEW YORK(DANY)** [redacted] s office. b6 b7C

12. As requested, [redacted] provided two (2) computer data diskettes containing the **"KERRY REPORT"** in electronic format. b6 b7C

 b6 b7C

13. Regarding the report references to the activities of **MOHAMMED HAMMOUD:**

a) Records showing that HAMMOUD borrowed over $110 million from BCCI (one loan guaranteed by **FIRST AMERICAN BANK**); [redacted] referred to the **PRICE-WATERHOUSE** reports that were reprinted in volume 1 of the hearings, pages 356-358. b6 b7C

b) Records showing that HAMMOUD's real estate investments were managed by the current **U.S. AMBASSADOR TO BAHRAIN CHARLES W. HOSTLER** and his contacts with the **U.S. STATE DEPARTMENT** regarding the release of U.S. hostages from Beirut; [redacted] referred to the documents reprinted in volume 4 of the hearings, pages 741-778. [redacted] explained that a request for documents was made to the STATE DEPARTMENT for records and the records were provided. However, some of the documents were classified as "eyes only," and therefore, photocopies could not be obtained. [redacted] recommended that a request be made directly to the STATE DEPARTMENT regarding HAMMOUD. b6 b7C

c) Records showing that HAMMOUD met with high officials from the **U.S. TREASURY DEPARTMENT** and **DOJ** regarding BCCI are from attorney notes which have been turned over to the Senate Ethics Committee.

d) Documents regarding allegations that HAMMOUD's companies were front companies for BCCI; [redacted] referred to the PRICE-WATERHOUSE reports reprinted in volume 1 of the hearings, pages 356-358. b6 b7C

e) Documents showing FIRST AMERICAN BANK issued a $4 million letter of credit to HAMMOUD; [redacted] explained that the only published reference is contained in volume 3 of the hearings, page 429. Further, [redacted] knew about this transaction and detailed records were reviewed by the FBI at BCCI-New York. b6 b7C

f) The Power of Attorney held by [redacted] for HAMMOUD is reprinted in volume 3 of the hearings, page 427. b6 b7C

g-k) All records regarding [redacted] were personally turned over to the **SENATE ETHICS COMMITTEE** by [redacted] in early October 1992. b6 b7C

l) Regarding the videotape recording of the HAMMOUD funeral, [redacted] stated that he has not seen the tape and has only heard that it exists. [redacted] believes that [redacted] (supra) may have viewed the film. b6 b7C

[redacted] admitted that Senate investigators are not held to the same high degree of standards as the FBI when conducting its investigation and subsequent reporting of results. [redacted] also admitted that much of the information contained in the Subcommittee report was obtained from media sources and other journalists and contains speculation and conclusions drawn by the investigators as well as their sources. [redacted] made frequent references to author LARRY GURWIN's work ("False Profits") during the interview. b6 b7C

[redacted] has no knowledge regarding any new developments involving BCCI and is no longer involved in any matters relating to the investigation of BCCI. b6 b7C

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 1/7/93

TO : DIRECTOR, FBI
ATTN: CID, WCCS, FIFU & PCU

FROM : SAC, WMFO (29B-WF-171994)(P)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
(OO: WMFO)

Enclosed are: (1) a copy of a 7-page article, dated 12/29/92, entitled, [redacted] and (2) a 2-page article, entitled, "BCCI and Iran/Contra," by CHRISTOPHER BYRON. b6 b7C

The enclosed article by [redacted] was received from him, via facsimile, on 1/7/93. [redacted] is [redacted], who resides at [redacted] telephone [redacted] He sent the article following a conference-telephone call to him by WMFO SSA [redacted] and DOJ Trial Attorney [redacted] The call was precipitated by a reference made to [redacted] on page 401 of the 9/30/92 "...Report to the Senate Committee on Foreign Relations," by Sen. JOHN KERRY and Sen. HANK BROWN; i.e., the so-called "Kerry Report on BCCI." b6 b7C

(1)

During the telephone conversation, [redacted] reiterated essentially [redacted] entitled "BCCI and Iran/Contra," which appeared in an article by CHRISTOPHER BYRON in the 11/25/91 issue of New York magazine, and which was supplied by T/A [redacted]. b6 b7C

3-FBIHQ (Enc. 1) ENCL 29B-WF-171994-5.22
2-WMFO

JNR:jnr
(5)

1-CC w/enclosures furnished to SSA [redacted] in PCU b6 b7C

38

Contact w/ IC office has been coordinated w/ SSA [redacted]

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-13151

[redacted] b6 b7C

and TA [redacted] agreed with each other that, if the 30 pages of OLIVER NORTH's diary (which are still a classified part of the evidence collected in the Iran/Contra affair) bear out [redacted] contention that the "weapons-for-hostages" deal was an American initiative and not an Israeli one, then an Obstruction of Justice violation has occurred, along with a conspiratorial coverup, involving NORTH, National Secruity Council officials DONALD GREGG and RICHARD SECORD, and GEORGE BUSH.

T/A [redacted] notified his superior at DOJ, DAAG [redacted] about the allegations, and was instructed to take appropriate steps to ascertain the credibility of [redacted] claims. T/A [redacted] was also told that DOJ would consider prosecution of those involved. b6 b7C

Still pending as part of the captioned matter is a WMFO request for disclosure of, and access to, any BCCI-related material--including OLIVER NORTH's diary--discovered during the Iran/Contra investigation. If WMFO's anticipated review of any such material corroborates [redacted] allegations, FBIHQ will be advised. Absent such corroboration, WMFO will take no further action. b6 b7C

1325015-000-13152

FACSIMILE COVER PAGE

To: SSA [redacted] FBI From: [redacted]
Time: 03:48:47 Date: 1/7/93
Pages (including cover): 8

HERE IS A DRAFT OF THE ARTICLE I AM WORKING ON FOR THE WASHINGTON POST. IT IS A SHORT OVERVIEW OF A VERY COMPLEX SUBJECT. I SHALL ALSO TRY AND FAX A COPY OF MY AFFIDAVIT AS SOON AS I SORT THRU MY BCCI FILES. b6 b7C

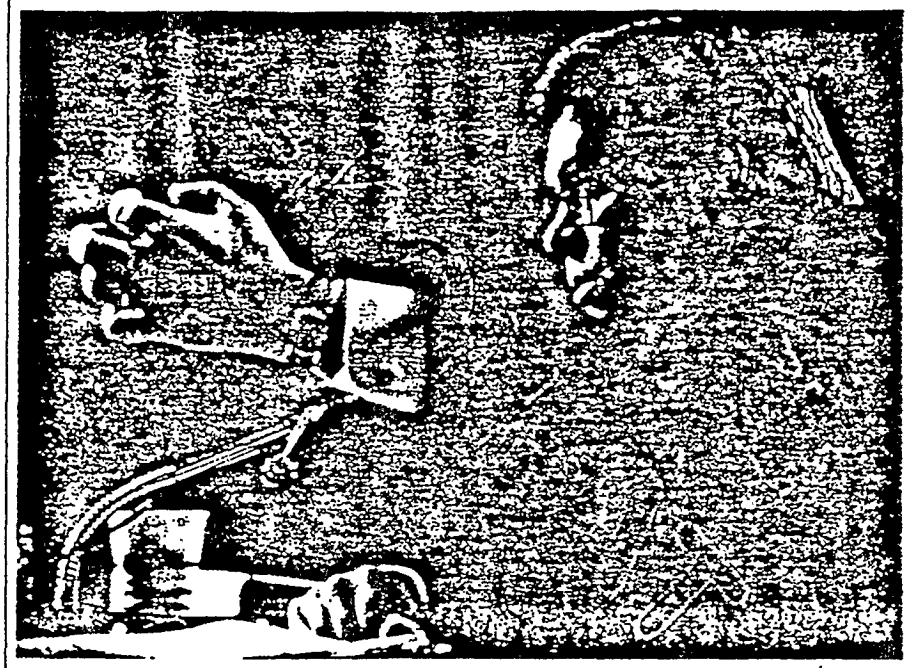
[redacted]

246-WF-111794-522

1325015-000-13153

The Bottom Line / Christopher Byron

BCCI AND IRAN-*CONTRA*



FAMILIAR OFFICIALESE: *Barr at his confirmation hearings.*

WHAT HAPPENED IN 1984?

OVERALL, WILLIAM BARR ACQUITTED HIMself well last week in his confirmation hearings to become the next attorney general. Unfortunately, when the question of BCCI came up, Barr adopted a too familiar bit of officialese. "All allegations that have surfaced are being pursued," he declared, promising that under his leadership the Justice Department would "follow the evidence anywhere and everywhere it leads."

In fact, nothing like that seems to be happening at all—and the reason may well be a dawning awareness in Barr's own department that a freewheeling investigation could start brushing against some powerful people indeed, perhaps even including George Bush.

During his confirmation hearings, Barr spoke of the "37 prosecutors" and "dozens of agents" he'd assigned to the case, with active investigations now under way in five different districts. Yet even as Barr was speaking, one prosecutor told me that the prevailing investigative strategy among his colleagues is to "draw a little circle and stay inside it."

As a result, key leads simply aren't being followed up. Take, for example, Capcom Financial Services, Ltd. This BCCI-linked commodities-trading company is a swamp of wrongdoing, from allegedly conspiring to launder Medellín-cartel drug money to helping Manuel Noriega loot millions from the Banco Nacional de Panama ("The Bottom Line," August 19 and 26). Surprisingly, Capcom's founding shareholders turn out to be two top officials of America's largest operator of cable-television systems—Tele-Communications, Inc., of Denver, Colorado. Yet amazingly enough, a federal prosecutor in the case tells me he knows of no plans to probe what connections, if any, exist between BCCI and the cable business.

There's also a seeming reluctance on the part of Washington to ask some tough questions of BCCI's accounting firm, Price Waterhouse. The firm has been involved at least once before in a see-no-evil banking scandal, when it audited the books of Nugan Hand, Ltd., a fraud-riddled offshore bank that collapsed in 1979 after being infiltrated by drug-dealers and the Central Intelligence Agency. Details of the scandal can be found in Jonathan Kwitny's 1987 book *The Crimes of Patriots, a True Tale of Dope, Dirty Money, and the CIA.*

Now Price Waterhouse is mired in the same sort of thing all over again—only a hundred times bigger and uglier. Nonetheless, with the apparent exception of Manhattan D.A. Robert Morgenthau, no one in government, in either Britain or the U.S., seems even the slightest bit skeptical of P/W's dog-ate-my-homework excuses for being so tardy in uncovering what is clearly the biggest financial fraud of modern times.

Nor do the Feds seem much interested in the activities of BCCI's shareholders, several of whom have ties to the world of spooks and spies. The most obvious hot potato in that regard is Kamal Adham, onetime head of Saudi Arabian secret intelligence in the seventies. ("The Bottom Line," October 7.)

Scarcely had BCCI begun making headlines when Adham hired away an aide to White House chief of staff John Sununu to represent him in Washington, D.C. The apparent hope: that the aide, Ed Rogers, could curry favor with the White House and get it to call off the Justice Department in any pending criminal investigation.

Unfortunately for Adham, news of his ploy leaked out late last month, giving rise to calls for an investigation into Adham's attempt to buy influence at the White House. Yet no one in the Justice Department apparently even winced when George Bush, who headed the Central Intelligence Agency at exactly the time when Adham headed its Saudi counterpart, looked straight into a network-television camera and declared that he had no idea who Adham was until he began reading about him in the papers.

In reality, not only was Adham one of BCCI's most important shareholders but over the years, he treated BCCI as virtually his own cash register. Price Waterhouse documents reportedly show, for example, that as of December 31, 1989, Adham had $313.3-million worth of BCCI loans on its books—with no formal loan agreements or repayment terms in the records of the bank.

Why hasn't the Justice Department moved more aggressively on these and a dozen other fronts? As I argued two weeks ago, one possible reason for the foot-dragging may be certain secrets involving BCCI and the origins of the Iran/*contra* scandal ("The Bottom Line," November 11).

Conventional wisdom has it that the Iran/*contra* scandal grew out of Israeli intrigues with the National Security Council in the spring of 1985. But new evidence, unearthed by researcher Peggy Adler Robohm and a former Justice Department prosecutor named John Loftus, suggests a different possibility. According to this new evidence, the scandal may actually have begun at least a year earlier, as a BCCI-financed Anglo-U.S. intelligence operation, put together by then-CIA head

Photograph by J.L. Atlan/Sygma.

290-WF-171994-5-2
1325015-000-13161

William Casey and run, in part at least, out of the office of then–vice-president George Bush.

If that is so, an aggressive prosecutorial effort to dig out wrongdoing inside BCCI could prove sensationally embarrassing, uncovering a financial record of arms deals tracing not just to the White House but to Downing Street as well.

Much of the evidence for this hypothesis is found in the recently declassified office diaries of Oliver North. Of particular interest in this regard are some seven volumes of spiral-bound notebooks that chronicle North's activities day by day in 1984, the year before the "arms for hostages" deals to Iran were thought to have begun.

No "official" investigation of the Iran/*contra* scandal—from the Tower Commission to the Senate Select Committee to the office of the special prosecutor, Lawrence Walsh—seems to have probed this aspect of North's activities in 1984, a subject that North as well avoids discussing in his new book, *Under Fire*.

Yet North's diaries show page after page of details as to how the Anglo–U.S. covert initiative apparently evolved. Its purpose: to use private British arms dealers not just to supply weapons to the Nicaraguan *contras* once the Boland Amendment cut off U.S. aid to those forces but, it would seem, to ship TOW missiles to Iran in hopes of winning the release of American hostages held in Lebanon.

Though North's diaries don't mention him by name, one of the individuals involved in all this was a British CIA man named Leslie Aspin. Prior to his death in 1989, Aspin signed a ten-page statement, which has now become public, that details his role in the affair. Beginning in June 1984 and apparently acting on orders from CIA boss William Casey, Aspin entered into a deal with a British arms broker, Ben Banneriee, to ship TOW missiles from Portugal to Iran. The purpose of the deal: to persuade the Iranian government to bring pressure on Arab terrorists holding hostages in Lebanon.

The Aspin statement describes numerous meetings and conversations between Aspin and North, as well as briefings with retired general Richard Secord. According to the affidavit, Aspin also spoke with a top North subordinate on the National Security Council, Robert Earl, as well as with Robert Owen, who had only recently resigned from the staff-of-then–Indiana senator Dan Quayle.

There is little doubt that Aspin's statement, dated May 1, 1987, is authentic. Last week, I obtained further corroboration on the matter through interviews with two arms dealers not mentioned in the statement who nonetheless had knowledge of the events Aspin described.

One such individual, who agreed to talk only on condition that he not be publicly identified, did not know that Aspin had died. When informed of that fact, the source then described his involvement in events Aspin had set forth, asserting he, too, had been operating on instructions from Casey.

Independently, I was able to confirm the man's claim of involvement with Casey by obtaining, through a source in Washington, a two-page U.S. Justice Department stipulation in an unrelated criminal case. The stipulation, signed by a U.S. Attorney in the matter, asserts that the source was indeed known personally to Casey and was working in behalf of the CIA during the period in question.

North's diaries, when examined in light of Aspin's ten-page statement, simply overflow with revelations. For example, in his statement, Aspin claimed that on November 15, 1984, he, North, Banneriee, and an Iranian go-between named Manucher Ghorbanifar turned up at the Paris branch office of BCCI and opened four different accounts to finance the TOW-missile deal.

As of now, there is no direct corroboration of Aspin's voice-from-the-grave assertion that such a get-together took place. But the claim seems at least indirectly corroborated by the bizarre manner in which the government censored various portions of North's diaries before releasing them to the public in May 1990.

On most pages of the diaries, only one or two words, or at most an occasional paragraph, is blacked out by the censors. Yet beginning with the entry for November 13, 1984—two days before North's BCCI meeting in Paris—State Department and CIA censors deleted 30 consecutive pages of notes from his diaries, blanking out literally everything North did, said, or thought about anything as he prepared to leave for Europe and open the BCCI accounts. The stated reason by the censors: to protect CIA and State Department secrets regarding negotiations to win the release of hostages.

How much George Bush knew of these events is for now an open question. But North's diaries show him to have been in regular and frequent contact with the vice-president during the period, and it defies common sense to believe that North would not have discussed his BCCI adventures with the vice-president even once.

In his 1987 campaign autobiography, George Bush claimed not to have known the Iran/*contra* "picture as a whole" until December of 1986. But as time passes and documents accumulate, the real "picture as a whole" is starting to come into view—and as it does, one can begin to understand why BCCI is a case the Feds seem to wish they'd never heard of. ■

1325015-000-13162

Memorandum

To : DIRECTOR, FBI Date 2/3/93

From : LEGAT, BERN (29B-WF-171994)

Subject: HIDDEN INTEREST
MAJOR CASE NUMBER 38
FIF; FAG
OO: WMFO

Reference: HO TEL DATED 1/29/93.

Dissemination, as outlined below, was made on dates indicated.

X Pertinent information from referenced communication.

Name and Location	Date Furnished
[redacted]	2/2/93

b7D

29B-WF-171994-524

(2) - Bureau
(1 - OLIA)
2 - Bern (29B-WF-171994)
(1 - 66-120)
jr
(4)

LEG-7

1325015-000-13163

RECEIVED
TELETYPE
2 FEB 93 16 46
FEDERAL BUREAU
OF INVESTIGATION

0172 MRI 00738

RR RUCNFB

DE FBIWMFO #0026 0331426

ZNR UUUUU

R 021425Z FEB 93

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: CID, WCCS, FIFU, SSA [redacted]

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SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

FOR INFORMATION OF FBIHQ, DURING THE COURSE OF INVESTIGATING CAPTIONED MATTER, WMFO HAS SOUGHT TO ESTABLISH, INTER ALIA, THE EXISTENCE, NATURE, AND EXTENT OF ANY ACTIONS OF BCCI VIS-A-VIS THE "IRAN/CONTRA AFFAIR"; ACTIONS WHICH MAY HAVE VIOLATED FEDERAL LAWS. CERTAIN ALLEGATIONS HAVE COME TO WMFO'S ATTENTION, E.G., THOSE FOUND IN THE 9/30/92 REPORT FILED BY U.S. SENATORS JOHN KERRY AND HANK BROWN AT THE CONCLUSION OF THE "KERRY COMMITTEE" HEARINGS ON BCCI, WHICH

2-D

INDICATE THAT BCCI PLAYED ROLES, SPECIFICALLY, IN THE "IRAN/CONTRA AFFAIR", AND, GENERALLY, IN OTHER U.S. AND FOREIGN INTELLIGENCE COMMUNITY OPERATIONS. ALSO CONTAINED IN THE "KERRY REPORT" IS A REFERENCE TO AN ALLEGATION MADE BY A [redacted] I.E., THAT A REVIEW OF THE UNCENSORED VERSION OF LT. COL. OLIVER NORTH'S DIARY WOULD SHOW EVIDENCE THAT THE FIRST BCCI ACCOUNT NORTH OPENED IN PARIS, FRANCE, ON 11/15/84, WAS PART OF A U.S., NOT ISRAELI, OPERATION, DONE WITH THE FULL KNOWLEDGE AND ACCEPTANCE OF THEN-VICE-PRESIDENT GEORGE BUSH, AND THAT A CONSPIRACY, PERJURY, AND OBSTRUCTION OF JUSTICE RESULTED FROM SUBSEQUENT, FALSE TESTIMONY BY NORTH, GENERAL SECORD, ET AL. DOJ, THROUGH THE "KERRY REPORT" AND THROUGH CORRESPONDENCE WITH [redacted] IS AWARE OF THESE ALLEGATIONS.

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AS PART OF THE CAPTIONED INVESTIGATION, DOJ FORMALLY REQUESTED THE "IRAN/CONTRA" INDEPENDENT COUNSEL'S OFFICE SEARCH ITS RECORDS FOR INFORMATION WITHIN THE PURVIEW OF THE CAPTIONED MATTER AND HAS RECEIVED A WRITTEN RESPONSE INDICATING THAT IN 7/91--IN RESPONSE TO INTENSE MEDIA REPORTS ABOUT BCCI--THE OIC DID WHAT IT DESCRIBED AS ITS "LAST COMPREHENSIVE SEARCH...FOR BCCI-RELATED MATERIALS" IN ITS

FILES, "IN ORDER TO ASCERTAIN WHETHER BCCI HAD ANY CONNECTION TO IRAN/CONTRA EVENTS THAT WOULD MAKE FURTHER INQUIRY INTO THE BANK'S OPERATIONS APPROPRIATE." ACCORDING TO THE RESPONSE, THE SEARCH WAS UNPRODUCTIVE AS FAR AS FINDING EVIDENCE OF CRIMINAL ACTIVITY ON THE PART OF BCCI IN THE "IRAN/CONTRA AFFAIR".

AS PART OF THE AFOREMENTIONED DOJ-TO-OIC REQUEST, DOJ ATTORNEY/CONSULTANT [redacted] ARRANGED A MEETING AT THE OIC TO FURTHER DISCUSS THE POSSIBILITY THAT THE OIC'S RECORDS MIGHT CONTAIN REFERENCES TO, OR EVIDENCE OF, OTHER ACTS OF BCCI WHICH VIOLATED FEDERAL LAWS, E.G., THE UNLAWFUL ACQUISITION AND CONTROL OF U.S. BANKS. ON 1/27/93, A/C [redacted] ACCOMPANIED BY IIC [redacted] AND WMFO SSA [redacted] MET WITH ASSOCIATE INDEPENDENT COUNSEL [redacted] AT THE OIC. [redacted] REITERATED WHAT HE HAD SAID IN HIS 1/19/93 LETTER TO A/C [redacted] BUT AGREED THAT A FURTHER REVIEW OF THE DATABASES AT THE OIC WOULD BE APPROPRIATE. BY PRIOR AGREEMENT BETWEEN A/C [redacted] IIC [redacted] AND SSA [redacted] WAS TOLD THAT, GIVEN THE MANDATE OF THE CAPTIONED MATTER, THE FBI WOULD NOT BE PARTICIPATING IN THE

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PAGE FOUR DE FBIWMFO 0026 UNCLAS

DATABASE INQUIRY; THAT A/C [redacted] WILL CONDUCT THE REVIEW ON b6 b7C

BEHALF OF DOJ, AND REPORT HIS FINDINGS TO HIS DOJ SUPERVISOR,

DAAG LAURENCE A. URGENSON.

FOR INFORMATION OF FBIHQ, IF DOJ DECIDES THAT ANY

INVESTIGATION IS WARRANTED BY THE RESULTS OF A/C [redacted] b6 b7C

REVIEW OF OIC RECORDS, DOJ WILL REQUEST IT THROUGH FBIHQ.

WMFO ANTICIPATES SUCH A REQUEST WOULD BE HANDLED AS A SEPARATE

MATTER.

BT

#0026

NNNN

Memorandum

To : DIRECTOR, FBI Date 3/12/93

From : LEGAT, HONG KONG (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference: WMFO tel dated 2/26/93.

Dissemination, as outlined below, was made on dates indicated.

_____ copy of referenced

___X___ Pertinent information from referenced teletype.

Name and Location	Date Furnished
[redacted]	3/10/93

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29B-WF-171994 535

2-Bureau
(1-OLIA)
2-Hong Kong
(1-66-94)
JMdiP/krp
(4)
LEG-7

C-251

1325015-000-13168

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, ATLANTA (P)

SUBJECT:

HIDDEN INTERESTS
MC 38
OO:WMFO

Bureau File Number
29B-WF-171994
Field Office File Number
0005
Squad or RA Number
Agent's Social Security No.

☐ X if a joint operation with: _____ (identity of other agency)

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 1/25/93

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 2 = Helped, but only minimally 3 = Helped, substantially 4 = Absolutely essential

1. Acctg Tech Assistance Rating	8. Eng. Sect. Tape Exams Rating	15. Photographic Coverage Rating	22. Telephone Toll Recs Rating
2. Aircraft Assistance	9. Hypnosis Assistance	16. Polygraph Assistance	23. UCO Group I
3. Computer Assistance	10. Ident Div Assistance	17. Search Warrants Executed	24. UCO Group II
4. Consensual Monitoring	11. Informant Information	18. Show Money Usage	25. UCO Other
5. ELSUR FISC	12. Lab Div Exams	19. Surveil Sqd (SOG) Asst	26. NCAVC/ VI-CAP
6. ELSUR Title III	13. Lab Div Field Support	20. SWAT Team Action	27. Visual Invest - Analysis (VIA)
7. Eng. Sect. Field Support	14. Pen Registers	21. Tech. Agt. or Tech Equip	

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A. Preliminary Judicial Process (Number of subjects)	Complaints	Informations	Indictments
			1

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions	Civil Suits Amount of Suit	Government Defendant	Government Plaintiff
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District / District State | Conviction or Pretrial Div. Date | Sentence Date | No. of Subjects | Acquitted | Dismissed

Subject 1 Subject Description Code* -	Conviction: Title	Section	Counts	Combined Sentence: In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.
☐ Felony						
☐ Misdemeanor						
☐ Parole Revocation						
☐ Probation Revocation				Total Fines $		
☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		
☐ Pretrial Diversion						

Subject 2 Subject Description Code* -	Conviction: Title	Section	Counts	Combined Sentence: In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.
☐ Felony						
☐ Misdemeanor						
☐ Parole Revocation						
☐ Probation Revocation				Total Fines $		
☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		
☐ Pretrial Diversion						

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
GHAITH R. PHARAON	9/7/40	O	M		060-60-1841
		O	M		
AGHA HASAN ABEDI	1/2/21	O	M		

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29B-WF-171994-537

Explanation of accomplishment claimed:

During 11/91 a 3 count indictment was returned in the District of Columbia charging BCCI, PHARAON, [redacted] AND ASEDI. Subsequently, BCCI pled guilty to the indictment. On 1/15/93 a superceding indictment was returned in the District of Columbia charging PHARAON, [redacted] and ABEDI. This superceding indictment was 3 counts charging T18 USC, 371, 1343, 1962 and 2. This superceding indictment incorporated the work of the Atlanta Division regarding the secret acquisition of the National Bank of Georgia by BCCI. The NBG material was not in the original indictment.

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b7C

(2) Bureau
2 - Field Office
ATLANTA (1 - 29B-WF-171994) (1 - 66F-685SF1) (1 - [redacted])
SJM/mkw (5)

b6
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* See codes on reverse side.

1325015-000-13169

5 JAN 93 13 36

FEDERAL BUREAU OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0119 MRI 00635

RR RUCNFB FBIHO FBILS FBINY FBINK FBIWMFO

DE LON #0002 0051302

ZNR UUUUU

R 051300Z JAN 93

FM LEGAT LONDON (298-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI HOUSTON/ROUTINE/

FBI LOUISVILLE/ROUTINE/

FBI NEW YORK/ROUTINE/

FBI NEWARK/ROUTINE/

FBI WMFO (INFO)/ROUTINE/

BT

UNCLAS

CITE: //5200:LON010.004//

SUBJECT: HIDDEN INTEREST; MAJOR CASE 38; FAG-FIF; OO: WMFO.

FOR INFORMATION OF RECEIVING OFFICES, [redacted]

[redacted] IS ATTEMPTING TO TRACE THE

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298-WF-171994-496

3641
2446

1325015-000-13100

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 11
Page 22 ~ Referral/Consult;
Page 23 ~ Referral/Consult;
Page 24 ~ Referral/Consult;
Page 25 ~ Referral/Consult;
Page 26 ~ Referral/Consult;
Page 40 ~ Referral/Consult;
Page 41 ~ Referral/Consult;
Page 42 ~ Referral/Consult;
Page 43 ~ Referral/Consult;
Page 44 ~ Referral/Consult;
Page 45 ~ Referral/Consult;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
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[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

BT

#0002

NNNN

WHO BUILT AND OPERATED A LARGE SHIPPING COMPANY, MOSTLY FINANCED BY BCCI LOANS. THEIR NON-PERFORMING LOANS EVENTUALLY REACHED A POINT THAT, WERE BCCI TO FORECLOSE, BCCI WOULD HAVE COLLAPSED ITSELF.

BT

#0017

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TELETYPE

5 Nov 92 at 3[illegible]Z

0537 MRI 01920

PP RUCNFB FBIBA

DE FBIWMFO #0081 3092329

ZNR UUUUU

P 042329Z NOV 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

FBI BALTIMORE/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; OO: WMFO.

FOR INFORMATION OF BALTIMORE, WMFO IS CONDUCTING A FINANCIAL INSTITUTION FRAUD CASE REGARDING THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) CRIMINAL ACTIVITIES. BASED ON INVESTIGATIONS, IT IS BELIEVED THAT BCCI ORCHESTRATED A SUSTAINED AND DELIBERATE TAKEOVER OF U.S. BANKS WITHOUT MAKING REQUIRED DISCLOSURES AND APPLICATIONS.

A REPORT TO THE SENATE COMMITTEE ON FOREIGN RELATIONS FROM SENATOR JOHN KERRY, DATED 9/30/92, PORTRAYS [redacted]

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b6
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1-9

[redacted] DRUG TRAFFICKER, TERRORIST, AND ARMS b6 b7C

TRAFFICKER WITH ASSETS IN BCCI. A GLOBAL INDICES CHECK

REVEALED THAT [redacted]'S NAME WAS INDEXED AT THE BALTIMORE

DIVISION ON 6/12/86, UNDER FILE NUMBER 12D-0000389-M.

LEAD.

BALTIMORE AT BALTIMORE, MARYLAND.

REVIEW CASE FILE 12D-0000389-M AND PROVIDE WMFO WITH ANY

PERTINENT INFORMATION REGARDING [redacted] AND BCCI. b6 b7C

BT

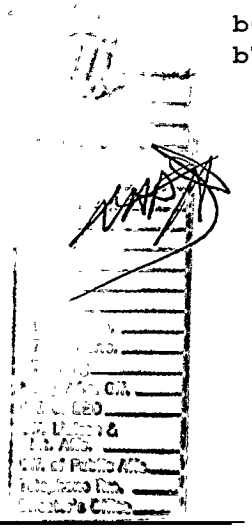
#0081

NNNN

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 06-06-2018 BY: [redacted]

b6
b7C

RECEIVED
FBI TELETYPE UNIT
14 Nov 92 02 11
FEDERAL BUREAU
OF INVESTIGATION



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PP RUCNFB FBIWMFO

DE FBIDL #0009 3182122

ZNY SSSSS

P 132122Z NOV 92

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FM FBI DALLAS (298-WF-171994) (RUC)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (298-WF-171994) (P) (SCCI)/PRIORITY/

BT

~~S E C R E T~~

CITE: //FBI DALLAS: WCC1//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; FAG; OO: WMFO.

THIS COMMUNICATION IS CLASSIFIED "~~SECRET~~" IN ITS ENTIRETY.

RE WMFO TELETYPE TO DALLAS DATED 11/13/92.

DALLAS REVIEWED INDICES CONCERNING CHINA NORTH INDUSTRIES CORPORATION (NORINCO) AND DETERMINED THAT IT WAS INDEXED AS A REFERENCE IN FILE NUMBERS [redacted]

b3
b7E

[redacted]

298-WF-171 [illegible]-455

A REVIEW OF THESE REFERENCES REVEAL THAT NORINCO IS A

1-D

111.3823

COMPLEX MANUFACTURING COMPANY LOCATED IN THE PEOPLES REPUBLIC OF CHINA WHICH IS UNDER THE CONTROL OF THE PEOPLES LIBERATION ARMY (PLA). NORINCO MANUFACTURES TEXTILES, LEATHER GOODS, ETC., AS WELL AS DEFENSE RELATED ITEMS. NORINCO ALSO PROVIDES, IN PART, COVER FOR PLA MILITARY INTELLIGENCE DIVISION OFFICERS.

INASMUCH AS INVESTIGATION REQUESTED BY WMFO HAS BEEN COMPLETED, DALLAS CONSIDERS THIS MATTER RUC.

C BY G-3 DECL: OADR.

BT

#0009

NNNN

1325015-000-13413

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 10/26/92

TO : DIRECTOR, FBI

FROM : SAC, DETROIT (29B-WF-171994)(C-5)(RUC)

SUBJECT : HIDDEN INTEREST;
MAJOR CASE 38;
OO: WMFO

Re WMFO teletype to Director and Detroit dated 9/10/92 and Detroit teletype to Director and WMFO dated 9/11/92.

Enclosed for WMFO are the following: the original and two copies of an FD-302 reflecting the interview of [redacted] a 1A envelope containing Agent interview notes of the aforementioned interview; one copy of a 10/27/83 COMERICA prospectus provided by COMERICA BANK; and the original and two copies of an FD-302 reflecting the interview of [redacted] COMERICA, INCORPORATED. b6 b7C

For the information of WMFO, through review of numerous newspaper articles, FBI Detroit advised WMFO on 8/22/91 via teletype, that in February of 1975, GHAITH PHARAON purchased 40 percent of BANK OF THE COMMONWEALTH preferred stock and 32 percent of BANK OF THE COMMONWEALTH common stock which gave PHARAON control of BANK OF THE COMMONWEALTH. This transaction was approved by the FDIC on 5/30/75. PHARAON was represented in this transaction by Attorney [redacted] b6 b7C

-456

2 - Bureau
2 - WMFO (Enc.-4)
1 - Detroit
MPO/lmd
(5)

[redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-13414

of Houston, Texas, who may still have documentation relating to this transaction.

In referenced Detroit teletype dated 9/11/92, FBI Detroit advised that FDIC officials in Detroit could provide no records relating to the aforementioned transaction and that any remaining records could be located through [redacted] b6 Assistant Regional Director, FDIC, Chicago, Illinois. FDIC b7C officials further advised that former FDIC examiner [redacted] was the most knowledgeable individual regarding this transaction.

On 10/15/92, [redacted] who has since retired from b6 the FDIC and is currently employed by the FEDERAL RESERVE b7C BANK, advised that he vaguely recalled PHARAON's purchase of BANK OF THE COMMONWEALTH stock in the early 1970s. It is [redacted]s recollection that FIRST ARABIAN CORPORATION, owned by [redacted] acted as the intermediary for this purchase. At the time [redacted] heard that FIRST ARABIAN CORPORATION had initially interested PHARAON in purchasing the BANK OF THE COMMONWEALTH stock. [redacted] believes that PHARAON held the stock for approximately two years and then sold it to FIRST ARABIAN CORPORATION. Then in approximately 1983, FIRST ARABIAN CORPORATION sold their interest in BANK OF THE COMMONWEALTH to COMERICA, INCORPORATED, who took over BANK OF THE COMMONWEALTH at that time. [redacted] is aware that the FDIC closely monitored and approved the aforementioned stock transactions due to loans made by FDIC to BANK OF THE COMMONWEALTH previously. [redacted] advised that due to FDIC's interest in BANK OF THE COMMONWEALTH, some records of these transactions may still exist in the FDIC's Washington archives. [redacted] is also aware that the aforementioned stock transactions obtained a great deal of media attention which resulted in detailed articles of the transactions appearing in area newspapers, therefore, details of these transactions may be available in archived news articles. [redacted] was aware of no interest in BANK OF THE COMMONWEALTH by BCCI.

On 10/23/92, [redacted] COMERICA, INCORPORATED, b6 provided a copy of a 10/27/83 COMERICA, INCORPORATED, b7C prospectus, which she had obtained from the COMERICA, INCORPORATED, corporate legal department. [redacted] was provided this document when she requested documentation relating to the aforementioned stock transactions and is not aware if further documentation exists. If after review of the aforementioned document WMFO requires additional information, a grand jury subpoena should be directed to COMERICA, INCORPORATED.

1325015-000-13415

In reviewing the aforementioned document, it appears that COMERICA purchased from FIRST ARABIAN CORPORATION 3,450,530 shares of BANK OF THE COMMONWEALTH common stock representing approximately 77.03 percent of all the outstanding shares of BANK OF THE COMMONWEALTH common stock, for a subordinated note in the original amount of $12,323,321.43, due and payable on 9/22/88. FIRST ARABIAN CORPORATION received a warrant certificate entitling them to purchase 424,942 shares of COMERICA common stock. Also apparent on the cover of this document are evidence exhibit tags, presumably from resulting civil litigation.

In the absence of any further request for investigation, Detroit considers this matter RUC.

1325015-000-13416

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Lab.
Legal
Tech. Servs.
Training
Cong. Aff. Off.
Off. of E.E.O.
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

b6
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0139 MRI 00757

PP RUCNFB PAR FBIHQ

DE FBIWMFO #0012 3111457

ZNR UUUUU

P 061454Z NOV 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

LEGAT PARIS/PRIORITY/

FBI HOUSTON/PRIORITY/

BT

UNCLAS

SECTION ONE OF TWO SECTIONS

CITE: //3920//

PASS: FBIHQ:SSA [redacted] (PCU), SSA [redacted] (FIF)

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WCCS; PARIS:ALAT [redacted] HOUSTON:SA [redacted]

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FAG; FIF; OO: WMFO.

THE INVESTIGATION OF THE ABOVE-CAPTIONED CASE HAS RESULTED IN MANY ALLEGATIONS OF PUBLIC CORRUPTION IN WASHINGTON, D.C., AS WELL AS ACROSS THE NATION. ONE OF THE

WF-171994-457

V.C. 3823
V.C. 3849

ALLEGATIONS IS THAT AN INDIVIDUAL BY THE NAME OF MOHAMMED HAMMOUD MADE POLITICAL PAYOFFS FOR THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). HAMMOUD WAS THE BCCI NOMINEE WHO PURCHASED APPROXIMATELY $15 MILLION OF FIRST AMERICAN BANK (FAB) STOCK FROM CLARK CLIFFORD AND [redacted] IN 10/88. b6 b7C HAMMOUD DIED IN 5/90.

FOR THE INFORMATION OF PARIS, CLARK CLIFFORD IS KNOWN AS THE "ADVISOR TO THE DEMOCRATIC PRESIDENTS". CLIFFORD ADVISED OR HELD PRESIDENTIAL APPOINTED POSITIONS UNDER PRESIDENT HARRY TRUMAN, PRESIDENT JOHN F. KENNEDY, PRESIDENT LYNDON B. JOHNSON, AND PRESIDENT JIMMY CARTER. [redacted] WHO IS b6 b7C [redacted] IN THE PRESTIGIOUS WASHINGTON, D.C. LAW FIRM OF CLIFFORD AND [redacted] HAS CLOSE TIES TO THE REPUBLICAN PARTY AND ITS LEADERS. BOTH CLIFFORD AND ALTMAN WERE INDICTED BY A FEDERAL GRAND JURY AND A NEW YORK DISTRICT OF MANHATTAN GRAND JURY ON 7/29/92, FOR FALSE STATEMENTS TO THE FEDERAL RESERVE AND NEW YORK BANKING COMMISSION, RESPECTIVELY, AND CONSPIRACY. AT THIS TIME, NO TRIAL DATE HAS BEEN SCHEDULED FOR THE FEDERAL CHARGES, WHILE NEW YORK HAS A TRIAL DATE OF 1/4/93.

[redacted] MOHAMMED HAMMOUD, NOW RESIDES IN LEBANON AND HAS AGREED TO MEET WITH THE FBI IN PARIS, FRANCE, TO BE INTERVIEWED. [redacted] LIVED IN WASHINGTON, D.C. WITH [redacted] AND WAS KNOWN TO BE A SOCIALITE WITH POLITICAL FIGURES. THEREFORE, WMFO BELIEVES THAT [redacted] WAS INVOLVED IN OR AT LEAST KNOWLEDGEABLE OF [redacted] ACTIVITIES IN WASHINGTON, D.C., INCLUDING HAMMOUD'S RELATIONSHIP WITH BCCI, CLIFFORD, AND [redacted] AS SUCH, THE FOLLOWING LEADS ARE BEING SET. ANY QUESTIONS SHOULD BE DIRECTED TO CO-CASE AGENT [redacted], WMFO, TELEPHONE (202) 324-9302.

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LEADS.

LEGAT PARIS AT PARIS, FRANCE.

1) ATTEMPT TO ARRANGE AND INTERVIEW WITH [redacted] THROUGH CLERGYMAN [redacted], TELEPHONE NUMBERS: (HOME) 40-727398, (OFFICE) 47-559204. WMFO REQUESTS A TWO WEEK NOTIFICATION OF ANY SCHEDULED INTERVIEW.

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ALTHOUGH WMFO AGENTS EXPECT TO BE PRESENT TO CONDUCT SAID INTERVIEW, THE FOLLOWING TOPICS ARE PROVIDED TO LEGAT PARIS IF WMFO AGENTS ARE NOT AVAILABLE:

2) QUESTION [redacted] ABOUT [redacted]'S RELATIONSHIP WITH BCCI, MORE SPECIFICALLY, HIS POSITION AS A NOMINEE FOR BCCI IN THE PURCHASE OF CLIFFORD AND [redacted]S FAB STOCK. ACQUIRE ALL DOCUMENTATION TO SUPPORT HER BELIEF THAT [redacted] FAB STOCK AND WAS NOT A NOMINEE, I.E., SUCH AS THE STOCK CERTIFICATES. b6 b7C

3) DETERMINE IF HAMMOUD REPRESENTED OR ACTED ON BEHALF OF BCCI IN MAKING OR ATTEMPTING TO MAKE BRIBES TO PUBLIC OFFICIALS IN WASHINGTON, D.C. AND THROUGHOUT THE UNITED STATES.

4) DETERMINE HAMMOUD'S RELATIONSHIP WITH UNITED STATES SENATOR ORRIN G. HATCH. HATCH HAS ADMITTED THAT HE HAD A CLOSE RELATIONSHIP WITH HAMMOUD. HATCH GAVE A SPEECH ON THE SENATE FLOOR IN 2/90, PRAISING THE DOJ IN THEIR PROSECUTION OF BCCI AND THEIR THIRD TIER EMPLOYEES. WMFO BELIEVES HAMMOUD OF BEING A NOMINEE FOR BCCI, MAY HAVE INFLUENCED HATCH TO PROVIDE THIS SPEECH, EVEN THOUGH THE SPEECH WAS DRAFTED BY [redacted] FURTHERMORE, [redacted], WHILE A STAFF MEMBER OF HATCH, SIMULTANEOUSLY CONSULTED HAMMOUD ON A BOOK HAMMOUD WAS WRITING. [redacted] IDENTIFIED HAMMOUD'S BODY IN GENEVA AFTER HAMMOUD'S DEATH. HAMMOUD'S INSURANCE COMPANY REFUSES TO PAY b6 b7C

[redacted] A LIFE INSURANCE POLICY DUE TO THE BODY [redacted] IDENTIFIED BEING FOUR INCHES SHORTER THAN HAMMOUD'S MEASUREMENTS AT HIS LAST PHYSICAL. [redacted] LOST HIS SECURITY CLEARANCE AND THEREFORE, HIS GOVERNMENT POSITION DUE TO ALLEGATIONS THAT HE WAS A LEAK TO THE MEDIA. AT THIS TIME, [redacted] IS PROVIDING INFORMATION TO THE NEW YORK TIMES ALLEGING IMPROPRIETIES BY HATCH. THEREFORE, QUESTION [redacted] AS TO HER KNOWLEDGE OF [redacted]'S RELATIONSHIP TO [redacted] SUCH AS WHAT TYPE OF BOOK WAS HAMMOUD WRITING AND WHAT CONSULTATION [redacted] WAS ABLE TO PROVIDE. DETERMINE THE PURPOSE OF HAMMOUD'S TRIP TO GENEVA WITH [redacted] WHERE HAMMOUD DIED. ACQUIRE RECORDS OF ANY PAYMENTS MADE BY HAMMOUD TO [redacted]

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5) DETERMINE THE RELATIONSHIP BETWEEN HAMMOUD AND [redacted] A HOUSTON REAL ESTATE DEVELOPER WHO ALSO HAS A RELATIONSHIP WITH HATCH. QUESTION [redacted] AS TO [redacted]'S RELATIONSHIP TO BCCI. UNITED STATES SENATOR JOHN KERREY, DURING HIS SENATE INVESTIGATION INTO THE MONEY LAUNDERING ACTIVITIES OF BCCI, HAS OPINED THAT [redacted] WAS ONE OF THE BIGGEST "BAG MEN" FOR BCCI AND THAT [redacted] FUNNELED

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b7C

SOME OF THIS MONEY TO HATCH. FURTHER INQUIRE AS TO ANY LOANS [redacted] MAY HAVE RECEIVED FROM BCCI. b6 b7C

6) QUESTION [redacted] AS TO [redacted]'S RELATIONSHIP WITH [redacted] OF ST. GEORGE, UTAH. [redacted] INTRODUCED HAMMOUD TO SENATOR HATCH, ACCORDING TO HATCH.

7) QUESTION [redacted] AS TO [redacted]'S b6 b7C RELATIONSHIP TO [redacted] IS ALLEGED TO HAVE BOASTED OF MAKING PAYOFFS TO PUBLIC OFFICIALS IN WASHINGTON, D.C. DETERMINE [redacted]S BUSINESS RELATIONSHIP TO HAMMOUD'S COMPANY, INVESTRADE.

8) DETERMINE ANY POLITICAL CONTRIBUTIONS HAMMOUD MIGHT HAVE MADE.

9) DETERMINE THE IDENTITY OF AN INDIVIDUAL NAMED [redacted] WHOM HAMMOUD SPOKE ABOUT JUST PRIOR TO HIS DEATH. b6 b7C THIS INDIVIDUAL MAY HAVE BEEN A HIGH RANKING UNITED STATES GOVERNMENT EMPLOYEE.

10) DETERMINE THE CAUSE OF DEATH OF [redacted] b6 b7C [redacted] DETERMINE IF ANY AUTOPSY WAS PERFORMED.

BT

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PP RUCNFB PAR FBIHO

DE FBIWMFO #0013 3111458

ZNR UUUUU

P 061457Z NOV 92

FM FBI WMFO (298-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

LEGAT PARIS/PRIORITY/

FBI HOUSTON/PRIORITY/

BT

UNCLAS

SECTION TWO OF TWO SECTIONS

CITE: //3920//

PASS: FBIHQ:SSA [redacted] (PCU), SSA [redacted] (FIF) b6 b7C

WCCS; PARIS:ALAT [redacted] HOUSTON:SA [redacted]

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FAG; FIF; OO:

WMFO.

TEXT CONTINUES:

11) KNOWLEDGE OF ANY SWISS BANK ACCOUNTS OF CLARK

CLIFFORD OR [redacted] MANAGED BY HAMMOUD. b6 b7C

12) DETERMINE HAMMOUD'S RELATIONSHIP WITH [redacted] b6 b7C

[redacted] AN AMERICAN ATTORNEY WORKING IN SWITZERLAND.

13) DETERMINE HAMMOUD'S RELATIONSHIP TO CHARLES HOSTLER, CURRENT AMERICAN AMBASSADOR TO BAHRAIN.

14) REQUEST ALL OF HAMMOUD'S CALENDARS OR TRAVEL LOGS TO SHOW MEETINGS, TRAVEL, ETC., FOR THE PERIOD 1981 UNTIL HIS DEATH.

15) REPORT TO WMFO ALL ATTEMPTS TO ARRANGE MEETINGS WITH [redacted] THROUGH [redacted] b6 b7C

BT

#0013

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FBI UNIT
NOV 24 1992
FEDERAL BUREAU OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dirs:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0319 MRI 01441

PP RUCNFB PAR FBINY FBIWMFO

DE FBIHO #0019 3112054

ZNR UUUUU

P 062054Z NOV 92

FM FBI HOUSTON (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

LEGAT PARIS/PRIORITY/

FBI NEW YORK/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3290//

PASS: WCC SECTION FIF UNIT AND WMFO SSA [redacted]

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SUBJECT: HIDDEN INTERESTS; MC # 38; FIF; FAG; OO: WMFO.

ON [redacted] ADVISED AS FOLLOWS:

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[redacted]

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29B-WF-171994-459

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111-3823

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

HOUSTON WILL ADVISE WHEN ADDITIONAL INFO IS RECEIVED.

BT

#0019

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RECEIVED
TELETYPE UNIT

17 Nov 92 02 24z

FEDERAL BUREAU
OF INVESTIGATION

0033 MRI 00080

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DE FBIHO #0004 3220115

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P 170059Z NOV 92

FM FBI HOUSTON (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

LEGAT BERN/PRIORITY/

INFO FBI NEW YORK/ROUTINE/

BT

UNCLAS

CITE: //3290//

PASS: FBIHQ, WCCS, FIFU, SSA [redacted] OLIA; FLU 1.

SUBJECT: HIDDEN INTERESTS; MC # 38, FIF; FAG; OO: WMFO.

RE BERN TEL DATED 10/15/92.

29B-WF-171994-463

INFORMATION DEVELOPED IN HOUSTON REGARDING [redacted]

[redacted] DOB [redacted] [redacted] REPORTEDLY CURRENTLY RESIDES AT

[redacted] TELEPHONE [redacted]

[redacted] AN ALTERNATE POSSIBLE ADDRESS FOR [redacted] IS [redacted]

[redacted] HOLDS SOCIAL SECURITY

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Dep. Dir.
ADD Adm.
ADD In
Asst. Dir.
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

1325015-000-13432

ACCOUNT NUMBER [redacted], A WHITE FEMALE (PROBABLY A TYPOGRAPHICAL ERROR) DATE OF BIRTH [redacted] 5"9", 175 LBS., BROWN HAIR AND BROWN EYES, [redacted] HOLDS TEXAS DRIVER'S LICENSE [redacted] EXPIRATION DATE [redacted] WAS A LICENSED DRIVER IN THE STATE OF NEW JERSEY ON 9/29/87, AND SURRENDERED THAT LICENSE IN TEXAS ON 1/18/90. b6 b7C

[redacted] IS CURRENTLY REPORTED AS [redacted] OF VISTA INTERNATIONAL. HE WAS REPORTEDLY [redacted] OF MERCANTILE AND MARINE TEXAS, INC. AS OF MAY 1981, AND A [redacted] FOR MARCOTRADE SA, SWITZERLAND IN 1978. (NO ADDRESS INFORMATION LOCATED FOR ABOVE COMPANIES). b6 b7C

[redacted] DRIVES A 1976 MERCEDES BENZ 2 DOOR, VIN [redacted], TEXAS TAG [redacted] b6 b7C

HOUSTON POLICE DEPARTMENT AND HARRIS COUNTY SHERIFF'S OFFICE RECORDS NEGATIVE REGARDING [redacted] b6 b7C

BT

#0004

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FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 11/5/92

TO : DIRECTOR, FBI

FROM : LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Encls rec'd WMFO 11/17/92

Enclosed for SSA [redacted] are four packages containing optical disks related to document review at London. The enclosures were received by Legat London from [redacted] Aspen Systems Corporation, 11/3/92.

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(4) - Bureau
(2 - WMFO, Attn: SSA [redacted] (Enc. 4)
1 - London
RJT:cms
(5)

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[redacted]

b6
b7C

29B-WF-171994-465

Approved: JWG/RJT Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-13434

RECEIVED
TELETYPE UNIT

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FEDERAL BUREAU
OF INVESTIGATION

0005 MRI 00442

OO P12 FBIWMFO

DE PAR #0006 3071322

ZNR UUUUU

O 021317Z NOV 92

FM LEGAT PARIS (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //5250:PAR899.307//

PASS: FBIHQ, ATTN: WCC, FIFU, SSA [redacted]; AND SSA [redacted] OLIA.

SUBJECT: HIDDEN INTEREST; OO: WMFO.

REPATELCALLS TO WMFO ON OCTOBER 15, 1992, AND OCTOBER 19, 1992, BETWEEN ALAT [redacted] AND SA [redacted] AND WFTEL DATED OCTOBER 30, 1992.

FOR INFORMATION OF THE BUREAU, BY RETELCALL TO WMFO ON OCOTBER 15, 1992, ALAT [redacted] ADVISED WMFO THAT ON SAME DATE [redacted] HAD ADVISED THAT HE DID NOT KNOW WHEN

29B-WF-171994-466

[redacted]

[redacted]

62-1325015-000-13435

[redacted] WOULD BE TRAVELING TO AVIGNON OR ANYWHERE ELSE IN FRANCE. AT THE SAME TIME, WMFO WAS ADVISED THAT CONTACT WOULD BE MAINTAINED WITH [redacted] REGARDING THE TRAVEL PLANS OF HAMMOUD AND SHOULD LEGAT PARIS LEARN OF A PROPOSED TRIP, WMFO WOULD BE IMMEDIATELY NOTIFIED. WMFO WAS ALSO ADVISED THAT LEGAT PARIS WOULD REPORT ONLY POSITIVE INFORMATION. b6 b7C

RETELCALL OF OCTOBER 19, 1992, WAS IN RESPONSE TO A FACSIMILE OF A MEMORANDUM DATED OCTOBER 14, 1992, RECEIVED AT LEGAT PARIS ON OCOTBER 19, 1992. THIS COMMUNICATION REQUESTED AUTHORIZATION FROM THE BUREAU FOR SA [redacted] TO TRAVEL TO AVIGNON, FRANCE. THIS COMMUNICATION PROMPTED LEGAT PARIS TO TELEPHONICALLY CONTACT SA [redacted] TO ADVISE THAT IN FACT, LEGAT PARIS COULD NOT VERIFY THAT [redacted] WAS TRAVELING TO FRANCE ON THAT OR ANY OTHER DATE. AT THIS TIME, SA [redacted] ADVISED THAT LEGAT PARIS SHOULD DISREGARD THE FACSIMILE. b6 b7C

ON OCTOBER 20, 1992, LEGAT PARIS AGAIN ATTEMPTED TO TELEPHONICALLY CONTACT [redacted] WHO WAS NOT IN AT THE TIME AND HAS NOT RETURNED THE CALL. b6 b7C

IN VIEW OF THE ABOVE, LEGAT PARIS IS SOMEWHAT PUZZLED BY

REWFTEL DATED OCTOBER 30, 1992, WHEREIN THE BUREAU IS BEING REQUESTED TO AUTHORIZE TRAVEL TO AVIGNON, FRANCE FROM OCTOBER 14-17, 1992, WHEN WMFO HAS BEEN ADVISED THAT LEGAT PARIS DOES NOT HAVE ANY INFORMATION TO INDICATE THAT HAMMOUD WILL BE IN FRANCE ON THAT OR ANY OTHER DATE.

WMFO IS REQUESTED TO CLARIFY REASONS FOR ITS REQUEST IN REFERENCED TELETYPE.

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RECEIVED
TELETYPE UNIT
FEDERAL BUREAU
OF INVESTIGATION

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PP RUCNFB PAR

DE FBIWMFO #0017 3241419

ZNR UUUUU

P 191418Z NOV 92

FM FBI WMFO (298-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

LEGAT PARIS/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: OLIA; CID, WCCS, FIFU, SSA [redacted]

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; FIF; FAG; OO: WMFO.

ARMED AND DANGEROUS.

FOR BACKGROUND INFORMATION OF RECEIVING OFFICES, GHAITH PHARAON, WITH AGHA HASAN ABEDI AND SWALEH NAQVI, WERE INDICTED IN THE U.S. DISTRICT COURT IN WASHINGTON, D.C., ON 11/15/91. THE DEFENDANTS WERE CHARGED WITH DECEIVING STATE AND FEDERAL REGULATORS IN THE BANK OF CREDIT AND COMMERCE INTERNATIONAL'S (BCCI) SECRET ACQUISITION OF THE INDEPENDENCE BANK, AND

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298-WF-171994-469

1325015-000-13438

FRAUDULENT SECURITIES TRANSACTIONS INVOLVING CENTRUST SAVINGS BANK. ON 11/18/91, THE U.S. DISTRICT FOR THE DISTRICT OF COLUMBIA ISSUED AN ARREST WARRANT FOR PHARAON. PHARAON AND OTHERS INVOLVED IN THIS MATTER WERE ALSO INDICTED BY THE SOUTHERN DISTRICT OF FLORIDA ON 5/29/92. ALL THESE INDICTMENTS WERE IN CONNECTION WITH THE UNLAWFUL ACTIVITIES OF BCCI.

PHARAON IS BY BIRTH A CITIZEN OF SAUDI ARABIA AND IS DESCRIBED AS A WHITE MALE, 5'9", DOB: 9/7/41, 250 LBS., WITH GRAYING HAIR. PHARAON IS VERY WEALTHY AND HAS THE CAPABILITIES TO TRAVEL NEARLY EVERYWHERE BY PRIVATE TRANSPORTATION. PHARAON IS TO BE CONSIDERED ARMED AND DANGEROUS. DURING A RECENT SEARCH OF HIS YACHT, "LE PHARAON", BY THE CYPRIOT AUTHORITIES IN LARNICA, CYPRUS, NUMEROUS FIREARMS WERE FOUND. THESE FIREARMS INCLUDED SHOTGUNS, HANDGUNS, AND AUTOMATIC SHOULDER WEAPONS.

U.S. BASED AGENCIES SUCH AS INS, PASSPORT SERVICES, AND THE STATE DEPARTMENT, ALONG WITH INTERNATIONAL AGENCIES SUCH AS INTERPOL, AND VARIOUS JUSTICE DEPARTMENTS IN NUMEROUS FOREIGN COUNTRIES HAVE BEEN UTILIZED IN THE ATTEMPTS TO LOCATE AND APPREHEND PHARAON. AS OF THIS DATE, EFFORTS TO CAPTURE

PHARAON HAVE BEEN NEGATIVE.

THE "LE PHARAON" IS CAPTAINED BY [redacted] b6 b7C

[redacted] CURRENTLY RESIDING IN FRANCE. IN MID 10/92, THE "LE PHARAON" DEPARTED LARNICA ENROUTE TO SYRIA AND PARTS UNKNOWN. EFFORTS ARE NOW BEING MADE TO CONTACT [redacted] AND REQUEST HIS ASSISTANCE IN THE CAPTURE OF PHARAON.

REQUEST OF LEGAT PARIS:

ATTEMPT TO CONTACT [redacted] AT [redacted] b6 b7C

[redacted] FRANCE (TELE [redacted]

AND QUESTION IN REGARDS TO THE CURRENT WHEREABOUTS OF PHARAON AND DETERMINE [redacted] S WILLINGNESS TO ASSIST IN THE LOCATION AND CAPTURE OF PHARAON.

BT

#0017

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0156 MRI 00668

RR RUCNFB FBIHO FBITP FBIWMFO

DE PAR #0001 3151122

ZNR UUUUU

R 101120Z NOV 92

FM LEGAT PARIS (29B-WF-171094) (P)

TO DIRECTOR FBI/ROUTINE/

FBI HOUSTON/ROUTINE/

FBI TAMPA (245B-TP-23845)/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //5250:PAR931.315//

PASS: FBIHQ: SSA [redacted] PCU; SSA [redacted]

FIFU; WCCS; SSA [redacted] HOUSTON; SA [redacted]

WMFO.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FAG; FIF; OO:

WMFO.

REWMFOTEL ON 11/6/92.

THE PURPOSE OF THIS COMMUNICATION IS TO UPDATE RECEIVING

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29B-WF-171094-466

1325015-000-13441

OFFICES REGARDING STATUS OF REQUEST TO INTERVIEW [redacted] b6 b7C

[redacted] AND EXECUTION OF SUPPLEMENTAL INTERNATIONAL COMMISSION ROGATORY (ICR) PERTAINING TO INVESTIGATION OF GHAITH PHARAON.

REGARDING REQUEST TO INTERVIEW [redacted] b6 b7C b7D

[redacted]

REGARDING INTERVIEW OF [redacted] LEGAT PARIS b6 b7C

ATTEMPTED TO CONTACT [redacted] AND WAS ADVISED THAT [redacted] IS PRESENTLY IN LEBANON AND WILL BE THERE FOR ONE WEEK. A MESSAGE WAS LEFT AT [redacted] RESIDENCE THAT HE CONTACT LEGAT PARIS UPON HIS RETURN. LEGAT PARIS WILL MAINTAIN CONTACT WITH

[redacted] REGARDING INTERVIEW OF [redacted]

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b7C

FOR INFORMATION OF WMFO, U.S. CONSULATE IN PARIS WAS CONTACTED TO DETERMINE STATUS OF SUPPLEMENTAL ICR. LEGAT PARIS WAS ADVISED THAT EXECUTION OF THE SUPPLEMENTAL MAY WELL BE SOME TIME AWAY SINCE THE MAGISTRATE IN EACH DISTRICT AFFECTED WILL HAVE TO RENDER HIS/HER OWN DECISION. THAT IS, SINCE THERE ARE SEARCHES TO BE CONDUCTED OUTSIDE PARIS, MAGISTRATES IN THOSE DISTRICTS HAVE JURISDICTION OVER THOSE SEARCHES.

LEGAT PARIS WILL KEEP RECEIVING OFFICES ADVISED OF DEVELOPMENTS IN ALL ASPECTS OF CAPTIONED MATTER.

BT

#0001

NNNN

Memorandum

To : DIRECTOR, FBI Date 11/18/92

From : LEGAT, BERN (29B-WF-171994)(P)

Subject: HIDDEN INTERESTS;
MC 38; FIF; FAG; OO: WMFO

Reference: Houston teletype, 11/17/92.

Dissemination, as outlined below, was made on dates indicated.

X Pertinent information from referenced communication.

Name and Location	Date Furnished
	11/18/92

b7D

29B-WF-171994-481

2 - Bureau
(1 - OLIA)
2 - Bern
(1 - 66-120)
hac
(4)

LEG-7

1325015-000-13444

7-227 (8-4-92)

FBI LABORATORY

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

YOUR FILE NO.
FBI FILE NO.
LATENT CASE NO. 29B-WF-171994 (P)
L-1051

12/14/93

TO:
SAC, WMFO

RE: HIDDEN INTEREST;
MAJOR CASE #98;
FIP; FAO

REFERENCE: Mirtel 11/30/93
EXAMINATION REQUESTED BY: WMFO
SPECIMENS: Three-page telex;
Fingerprints of [redacted]
and [redacted]

b6
b7C

29B-WF-171994-485

This report confirms and supplements information furnished telephonically on 12/8/93.

The requested latent print examination was conducted, but no latent prints of value were detected.

The specimens are enclosed.

Enc. (4)

LWH:kmf (4)

MAILED 29
DEC 14 1992

MAIL ROOM

THIS REPORT IS FURNISHED FOR OFFICIAL USE ONLY

1325015-000-13451

OPERATOR MAT

FEDERAL BUREAU OF INVESTIGATION
LATENT FINGERPRINT SECTION WORK SHEET

REF# 0148383

FBI FILE NO...: 29-171994-1165 LATENT CASE NO: L-1054
LABORATORY NO.: REFERENCE NO: 29B-WF-171994 P

RECORDED.....: 12-02-92 MAT RECEIVED.....: 12-02-92

EXAMINATION BY: [redacted] NOTE: TELEPHONE ANSWER b6 b7C

EVIDENCE NOTED BY:

ANSWER TO....: SAC, WMFO

RE.....: HIDDEN INTEREST;
MAJOR CASE #38;
FIF; FAG

COMMUNICATION: AIRTEL 11-20-92

SPECIMENS RECEIVED 12/2/92, FROM SA [redacted] WMFO b6 b7C

IN METHODS...: PERSONAL DELIVERY

EXAM REQ BY..: ADDRESSEE

COPY TO.....:
ASSOC REF NOS:

SPECIMENS....: THREE-PAGE TELEX

FINGERPRINTS SUBMITTED OF: b6 b7C

[redacted]

RESULT OF EXAMINATION:

12/4/92 lwh

Specs exam'd DFO + NIN - No lifts of val

ansd
12-14 92
LWh:kmf

12/8/92 lwh

Specs reprac NIN - procid PD
No lifts of val devid
Telephonically furnished result to SA [redacted] WMFO, b6 b7C
Specs ENC,
EXAMINATION COMPLETED 12/8/92 DICTATED 12/8/92 lwh

Encs (4)

1325015-000-13452

1-450 (Rev. 9-15-82)

Identification Division
Latent Fingerprint Section

Date 12/2/92
Time 10:20 am
Accepted [redacted]

b6
b7C

EVIDENCE ACKNOWLEDGEMENT

Received from [redacted] of the FBI WMFO
(Department or Agency)

(Address)

three-page fax and 3 fingerprint cards
sealed envelope(s), box(es), bag(s) of evidence for examination in connection with case number 29B-WF-171994

entitled HIDDEN INTEREST; MC #38; FIF; FAG.

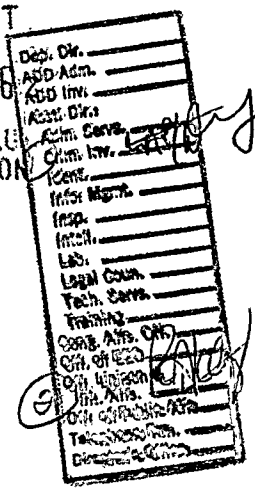
This evidence will remain in the custody of the Latent Fingerprint Section while the examination is being conducted. Following completion of the examination, a report containing the results of the examination and the disposition of the evidence will be forwarded to your department.

Director
Federal Bureau of Investigation

FBI/DOJ

1325015-000-13453

RECEIVED
TELETYPE UNIT
7 DEC 92 14 38
FEDERAL BUREAU
OF INVESTIGATION



0004 MRI 00063

RR RUCNFB FBIWMFO FBITP LON

DE HON #0004 3420338

ZNR UUUUU

R 070335Z DEC 92

FM LEGAT HONG KONG (29F-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

INFO FBI TAMPA/ROUTINE/

LEGAT LONDON/ROUTINE/

BT

UNCLAS

CITE: //5320:HK 012: 12-7-92//

PASS: HQ FOR WCC SECTION, CID: SSA [redacted] FLU II, OLIA; WMFO FOR BCCI SQUAD.

b6
b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; FAG; OO: WMFO.

RE HK TEL, 9/28/92, WMFO TEL, 9/11/92. 29B-WF-171994-488

ON 12/3/92, LEGAT, HONG KONG MET WITH [redacted]

b6
b7C
b7D

AND [redacted]

[redacted]

b6
b7C

CC 3823

CC OLIA

[redacted]

IN REGARD TO [redacted]

[redacted]

AS PART OF [redacted]

[redacted]

IN RESPONSE TO THE INFORMATION CONTAINED IN REFERENCED MMFO COMMUNICATION, ADVISING THAT CAPCOM FINANCIAL SERVICES, LIMITED AND 11 INDIVIDUALS, INCLUDING [redacted], HAVE BEEN INDICTED, IN THE MIDDLE DISTRICT OF FLORIDA (MDF), ON RICO, MONEY LAUNDERING AND CONSPIRACY CHARGES, [redacted] HAS REQUESTED ADDITIONAL INFORMATION RE THE 'CAPCOM' CASE, INCLUDING THE IDENTITIES OF THE OTHER INDIVIDUALS CHARGED WITH [redacted]

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b7D

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b7C
b7D

b6
b7C
b7D

b6
b7C
b7D

WMFO, IN COORDINATION WITH TAMPA, IS REQUESTED TO PROVIDE THE INFORMATION REQUESTED BY [redacted] AND HONG KONG LEGAL DEPARTMENT. b7D

ADMINISTRATIVE: [redacted] b7D

[redacted]

[redacted] b7D

WMFO IS REQUESTED TO REVIEW THIS PROPOSAL AND ADVISE WHAT FURTHER ACTION, IF ANY, LEGAT SHOULD TAKE IN THIS MATTER.

BT

#0004

NNNN

FEDERAL BUREAU OF INVESTIGATION

2 Dec 92 12 14Z

RECEIVED TELETYPE UNIT

0144 MRI 00569

RR RUCNFB FBIWMFO

DE TOK #0002 3371057

ZNR UUUUU

R 021055Z DEC 92

FM LEGAT TOKYO (298-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO/ROUTINE/

BT

UNCLAS

CITE: //5400:T0525.327//

PASS: HQ, ATTN: CID, WCC SECTION; SSA [redacted] OLIA; b6 b7C

WMFO, ATTN: SSA [redacted]

SUBJECT: HIDDEN INTEREST; MAJOR CASE NUMBER 38; FIF; FAG; (OO: WMFO).

278-WF-171994-489

RETOKTEL TO THE BUREAU, NOVEMBER 19, 1992, AND WFTEL TO LEGAT, TOKYO, DATED NOVEMBER 2, 1992.

ON [redacted] THE CONFIDENTIAL SOURCE (CS) CONTACTED ALAT, TOKYO, AND ADVISED THAT [redacted] b6 b7C b7D

[redacted] b6 b7C

1325015-000-13457

[redacted] b6 b7C b7C

THE SOURCE REPORTED THE FOLLOWING ADDITIONAL INFORMATION:

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

326 (418)

FEDERAL BUREAU
OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

3844

34 OCT 92 02 29Z

RECEIVED
TELETYPE UNIT

0013 MRI 01559

PP RUCNFB BER

DE FBIWMFO #0017 3080107

ZNR UUUUU

P 022348Z NOV 92

FM FBI WMFO (298-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

LEGAT BERN/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE NUMBER 38; FIF; FAG; (OO: WMFO).

REFERENCE LEGAT BERN TELETYPE TO WMFO, DATED OCTOBER 16, 1992.

UPON REVIEW OF WMFO FILES PERTAINING TO THE ONGOING BCCI INVESTIGATION, IT DOES NOT APPEAR THAT [redacted] OR [redacted] ARE OF PARTICULAR IMPORTANCE TO WMFO'S CASE AT THIS TIME.

298-WF-171994-453

[redacted] IS KNOWN TO BE ONE OF [redacted]

b6
b7C

1325015-000-13408

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 13
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 14 ~ Referral/Consult;
Page 16 ~ Referral/Consult;
Page 17 ~ Referral/Consult;
Page 18 ~ Referral/Consult;
Page 19 ~ Referral/Consult;
Page 20 ~ Referral/Consult;
Page 21 ~ Referral/Consult;
Page 22 ~ Referral/Consult;
Page 23 ~ Referral/Consult;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

PAGE TWO DE FBIWMFO 0019 UNCLAS

DETERMINE IF SOURCE WILL BE COMPROMISED IF INQUIRIES REGARDING

THE ACCOUNTS OF [redacted] ARE MADE AT [redacted]

[redacted]

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b7D

BT

#0019

NNNN

FD-36 (Rev. 8-29-85)

726 74

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 10/5/92

TO : DIRECTOR, FBI
ATTN: AUTOMOTIVE MANAGEMENT UNIT
ROOM 6863, [redacted] b6 b7C

FROM: SAC, Washington Field Office (29B-WF-171994) (P)

SUBJECT : "HIDDEN INTERESTS"
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

RE 8/14/92 WMFO airtel to FBIHQ, Auto Mgmt Section.

On 9/30/92, upon approval of [redacted] FBIHQ b6 b7C Procurement Section, WMFO acquired nine vehicles from THRIFTY AUTO RENTAL, Alexandria, Virginia, for use in captioned case. WMFO understands that these vehicles have been leased for a 90 day period.

The following are the vehicle descriptions and BUCAR number assignments:

THRIFTY AUTO RENTAL

1. 1992 Mitsubishi Expo - Silver
   Unit # 321169
   VA Tag RTV-898
   Bucar # 99-6560

   29B-WF-171994-406

2. 1992 Mitsubishi Expo - Grey
   Unit # 321286
   VA Tag RXB-138
   Bucar # 99-6561

(2) - Bureau – 1 cc attn rm 6863 (Val)
2 - WMFO
MTU:mtu
(4)

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12578

3. 1992 Mitsubishi Expo - White
   Unit # 321284
   VA Tag RVJ-699
   Bucar # 99-6562

4. 1993 Dodge Spirit - Red
   Unit # 330086
   VA Temp Tag Z701-547
   Bucar # 99-6563

5. 1993 Dodge Spirit - Black Cherry
   Unit # 330125
   VA Temp Tag Z701-592
   Bucar # 99-6564

6. 1993 Dodge Spirit - Green
   Unit # 330122
   VA Temp Tag Z701-589
   Bucar # 99-6565

7. 1993 Dodge Spirit - White
   Unit # 330057
   VA Temp Tag Z701-518
   Bucar # 99-6566

8. 1992 Pontiac Grand Am - White
   Unit # 320636
   VA Tag RWT-708
   Bucar # 99-6567

9. 1993 Chrysler Lebaron - White
   Unit # 430373
   VA Tag RXF-279
   Bucar # 99-6568

7-1 (Rev. 4-26-78)

REPORT
of the
FBI LABORATORY

1- Ms James

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, WMFO (29B-WF-171994) (P) (C-5) September 30, 1992

FBI FILE NO. 29B-WF-171994

LAB NO. 20306026 D ZC

Re: HIDDEN INTERESTS
MAJOR CASE 38
OO: WMFO

YOUR NO.

Examination requested by: Addressee

Reference: Communication dated March 5, 1992

Examination requested: Magnetic Media

March 6, 1992

Specimens:

Q2 ALR computer system, S/N 0245462 and keyboard S/N 05251161 labelled "Room M"

Q3 80 Data computer system (no serial number) and 2001 keyboard labelled "Room G"

Q4 Intel computer system, S/N P70096330 and CSR keyboard labelled "Room J"

Q5 ALR computer system S/N 0230354 and keyboard S/N 00891191 labelled "Room L"

Q6 NEC computer system S/N 6700470 and IBM keyboard number 261013704 labelled "Room E"

Q6a One 5 1/4" floppy disk found in Q6

Q7 IBM PS2 model 30 computer system and IBM keyboard S/N 2014793 labelled "Room F"

Q8 IBM AT computer system, bar code # 5178-7253163 and keyboard S/N 6106755 labelled "Room O"

MAILED 16
OCT 2 1992

(over)

2- Atlanta

MAIL ROOM ☑

1325015-000-12582

Results of Examination:

This laboratory report completes and supplements laboratory report dated August 10, 1992.

Directory listings have been produced for the Q4 computer system.

Hardcopy printouts of the requested data files have been produced.

No duplicate magnetic media copies or hardcopy printouts have been produced.

Q4 and Q5, directory listings and hardcopy printouts will be personally picked up by a representative of the Washington Metropolitan field office.

1325015-000-12583

LAB NUMBER 20306026
PAGE 1 OF 2 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
4	✓			Q/unk.	Q4 runs SCO XENIX SYSTEM V. Release 2.3.2. This machine acted as a network file server for a DOS lan. The networking software was CocoNet, an ethernet based LAN. Ran fdisk to confirm there is no DOS partition.
					CHANGES :- Determined root passwd with Tech Support from SCO. Changed /etc/passwd; assigned "Password" as the new password.
					- Reconfigured printer "main" to be the be a standard (dumb) printer. Parallel port was blown, so configured it as a serial port.
					- Various files with names like "lp", "lpØ", etc. may now reside on hard disk due to printer/port reconfiguration.
					- Created script files to automate tasks like ls-R, etc. These are in the / directory and called /sn.... Also created a file called /names - containing list of names to grep for
					- various entries in /lost+found, printer queue, etc
					/- ns
					/appl - Solomon Acctg.
					/dev - System files
					/drive - Network files for DOS Machines.
					/bin - System executables
					/etc - System config files * Edited passwd to get access * Copied original passwd to save-pas
					/lib - System files
					/lost+found - printer messages, ns

1325015-000-12584

LAB NUMBER 2030626
PAGE 2 OF 2 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
4					/mnt - system files
					/mnt1 - system files
					/once - system files
					/printers - empty
					/sh/lib - system files
					/tmp - logs of backup files; ns
					/trashcan - empty
					/u - system files
		(4)			/usr - printed 3 files in print queue for "forms"
					2 files contained binary info, could not be printed.
					- sri.wks in the /usr directory. Copied to DOS and printed.
		(6)			Printed chart of Accts Solomon db
		(2)			Printed Chart of Accts, Great Plains Trust, NewCo
					Grepd for Beta* (/acct/appl/gb/*) in cfi90v7 — Attny wanted Receivables printed on 1st & 2nd pass
					Found [redacted] (Address List) in cfi91 cfi91v7

b6
b7C

Memorandum

To : DIRECTOR, FBI Date 9/16/92

From : LEGAT, HONG KONG (29B-WF-17994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG
OO: WMFO

Reference: WMFOtel, 9/11/92.

Dissemination, as outlined below, was made on dates indicated.

1 copy of retel.

Name and Location	Date Furnished
[redacted]	9/16/92

b7D

2-Bureau
(1-OLIA)
2-Hong Kong
(1-66-94)
JMdiP/bc
(4)

LEG-7

29B-WF-171994-412

1325015-000-12589

[redacted]

b6
b7C

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI DCI/FBI

FROM: SAC, ATLANTA

SUBJECT:

(P) HIDDEN INTERESTS
MC 38
OO:WMFO

Bureau File Number
29B-WF-171994
Field Office File Number
0005
Squad or RA Number
Agent's Social Security No

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 9/23/92

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 3 = Helped, substantially
2 = Helped, but only minimally 4 = Absolutely essential

1. Acctg Tech Assistance Rating	8. Eng. Sect. Tape Exams Rating	15. Photographic Coverage Rating	22. Telephone Toll Recs Rating
2. Aircraft Assistance	9. Hypnosis Assistance	16. Polygraph Assistance	23. UCO Group I
3. Computer Assistance	10. Ident Div Assistance	17. Search Warrants Executed	24. UCO Group II
4. Consensual Monitoring	11. Informant Information	18. Show Money Usage	25. UCO Other
5. ELSUR FISC	12. Lab Div Exams	19. Surveil Sqd (SOG) Asst	26. NCAVC/ VI-CAP
6. ELSUR Title III	13. Lab Div Field Support	20. SWAT Team Action	27. Visual Invest. Analysis (VIA)
7. Eng. Sect. Field Support	14. Pen Registers	21. Tech. Agt. or Tech Equip	

b6 b7C b7E

A. Preliminary Judicial Process (Number of subjects)	Complaints	Informations	Indictments
			1

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -		1	
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

		Government Defendant	Government Plaintiff
RICO -Civil Convictions	Civil Suits Amount of Suit	$	$
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District _____ District State _____ Conviction or Pretrial Div. Date _____ Sentence Date _____ No. of Subjects _____ Acquitted _____ Dismissed

Subject 1	Subject Description Code* -						Subject 2	Subject Description Code* -					
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion	Conviction Title	Section	Counts	Combined Sentence In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.	☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation ☐ Plea ☐ Trial ☐ Pretrial Diversion	Conviction Title	Section	Counts	Combined Sentence In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.
				Total Fines $							Total Fines $		
				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.							Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
		W	M	Columbus, GA	
GHAITH R. PHARAON	9/7/40	O	M		060-60-1841
		O	M		
		O	M		

b6 b7C

Explanation of accomplishment claimed:

On 9/17/92 a seven count indictment was returned in the NDGA charging [redacted] PHARAON, [redacted] with violations of [redacted]

b6 b7C

On [redacted] was arrested by BuAgents without incident.

(2) Bureau
2 - Field Office
* See codes on reverse side.

ATLANTA (1 - 29B-WF-171994) (1 - 66F-685SF1)
SJM/mkw (5)

[redacted] b6 b7C

1325015-000-12598

Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes*

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
23	Counterfeit or Pirated Sound Recordings or Motion Pictures
24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
26	Theft from, or Fraud Against, Government Scheme Aborted
27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

Subject Description Codes*

- Enter Description Code Only When Reporting a Conviction -

Organized Crime Subjects (Include Family Name Or Group):
- 1A Boss, Underboss or Consigliere
- 1B Capodecina or Soldier
- 1C Possible LCN Member or Associate
- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

Instructions

Subject Priorities for FBI Arrest or Locates:

A - Subject wanted for crimes of violence (i.e. murder, manslaughter, forcible rape, robbery and aggravated assault) or convicted of such crimes in the past five years.

B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

Reporting Convictions:

Convictions should not be reported until the sentence has been issued. There are two exceptions to this rule. The conviction information can be submitted by itself if:

1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = White

*U.S. Government Printing Office: 1991 — 282-066/44227

1325015-000-12599

155

76

RECEIVED
TELETYPE UNIT

8 OCT 92 01 20Z

FEDERAL BUREAU OF INVESTIGATION

Dep. Dir.	
ADD Adm.	
ADD Inv.	
Asst. Dir.:	
Adm. Servs.	
Crim. Inv.	
Ident.	
Info. Mgmt.	
Insp.	
Intell.	
Lab.	
Legal Coun.	
Tech. Servs.	
Training	
Cong. Affs. Off.	
Off. of EEO	
Off. Liaison & Int. Affs.	
Off. of Public Affs.	
Telephone Rm.	
Director's Office	

0323 MRI 01298

PP RUCNFB FBILA

DE FBIWMFO #0049 2811849

ZNR UUUUU

P 071848Z OCT 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

FBI LOS ANGELES/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO: WMFO.

DURING THE COURSE OF THE BCCI INVESTIGATION SEVERAL REFERENCES IN NEWSPAPER ARTICLES HAVE BEEN MADE OF A CONNECTION BETWEEN BCCI AND INSLAW, A COMPUTER SOFTWARE COMPANY THAT HAS MADE ALLEGATIONS OF FORCED BANKRUPTCY BY DOJ. THESE ALLEGATIONS WERE BEING INVESTIGATED BY FREELANCE REPORTER DANIEL CASOLARO.

29B-WF-171994-419

IN 8/91, CASOLARO COMMITTED SUICIDE (OFFICIAL VERDICT BY

1325015-000-12600

THE MARTINSBURG, WEST VIRGINIA, POLICE DEPARTMENT) OR WAS MURDERED.

IN A RECENT WASHINGTON POST ARTICLE BY [redacted] AND [redacted] IT WAS IMPLIED THAT SA [redacted] OF THE FBI LOS ANGELES DIVISION, IN HIS TESTIMONY TO THE COMMITTEE ON THE JUDICIARY INVESTIGATING THE "INSLAW AFFAIR" OFFERED SUSPICIONS THAT CASOLARO'S DEATH WAS A RESULT OF CASOLARO'S INVESTIGATION INTO THE INSLAW AFFAIR. b6 b7C

LEAD.

LOS ANGELES AT LOS ANGELES, CALIFORNIA.

LOS ANGELES DIVISION IS REQUESTED TO FORWARD A COMPLETE COPY OF SA [redacted] TESTIMONY TO THE COMMITTEE ON THE JUDICIARY TO THE BCCI SPECIAL SQUAD AT WMFO FOR REVIEW OF ANY CONNECTION BETWEEN BCCI AND INSLAW OR CASOLARO'S DEATH AND BCCI. b6 b7C

BT

#0049

NNNN

425

TELETYPE UNIT

6 AUG 92 19 47

FEDERAL BUREAU OF INVESTIGATION

0224 MRI 01067

PP RUCNFB FBIWMFO

DE FBILA #0013 2191756

ZNY EEEEE

P 061755Z AUG 92

FM FBI LOS ANGELES (294-LA-176283)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO (29B-WF-171994)/PRIORITY/

BT

UNCLAS E F T O

CITE: //3410:WCC-3//

PASS: SSA [redacted] FIFU; SSA [redacted], WMFO; SA [redacted]

b6
b7C

Hidden Interest

SUBJECT: INDEPENDENCE BANK, ENCINO, CALIFORNIA; BCCI, LOS ANGELES, CALIFORNIA, FIF; OO: LOS ANGELES.

RE TELCAL BETWEEN SSA [redacted] AND SA [redacted] ON 7/31/92 AND TELCAL BETWEEN SA [redacted] ON 7/27/92.

b6
b7C
b7D

CONTACT WAS MADE WITH LA CW [redacted]

29B-WF-171994 420

[redacted]

b6
b7C

[redacted] b6 b7C b7D

IN OTHER UNRELATED MATTERS, LA CONTACTED [redacted] b6 b7C REGARDING TRANSFER OF BCCI-LA RECORDS TO POSSESSION OF FBI. [redacted] CONCERNS DO NOT APPEAR MAJOR AND WERE EASILY ADDRESSED. AS A RESULT [redacted] WILL BE DRAFTING A LETTER DETAILING THE AGREEMENT. THIS WILL BE FORWARDED TO WMFO. WMFO ADMINISTRATIVE SUPERVISOR WILL THEN BE IN POSITION TO FOLLOW UP AND MAKE NECESSARY DECISIONS.

IN REFERENCED CALL TO SSA [redacted], WMFO WAS ADVISED b6 b7C THAT AN INTERVIEW OF [redacted] MAY BE ARRANGED IN WASHINGTON D.C. DURING WEEK OF AUGUST 17. IT IS EXPECTED THAT LA AGENTS [redacted] AND [redacted] WILL BE REQUIRED TO ATTEND. THIS

[redacted] b6 b7C

1325015-000-12603

WILL ALLOW LA AGENTS THE OPPORTUNITY TO REVIEW RECENTLY OBTAINED DOCUMENTS REGARDING BOTH [redacted] AND THE JOINT VENTURES. LA WILL ALSO BE ABLE TO DISCUSS AND ASSIST DOJ/WMFO IN PREPARATION OF INDICTMENT OF [redacted]

b6
b7C

BT

#0013

NNNN

Hidden Interest

29B-WF-171994

1325015-000-12604

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 9/3/92

TO : DIRECTOR, FBI

FROM : LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT : CLARK McADAMS CLIFFORD; [redacted] b6 b7C
BCCI
OO: WMFO

Enclosed for WMFO are four pages listing 19 boxes of [redacted] on September 2, 1992. b7D

The 19 boxes have been mailed separately to SSA [redacted] at the BCCI off-site location. b6 b7C

3 - Bureau (4 encls)
(2 - WMFO Attn: SSA [redacted]) b6 b7C
1 - London
EJK/bt
(4)

29B-WF-171994-423

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-12605

	120 X NO.	MAG. NO	ITEMS	FROM [redacted]
1.	64		10 - 12 - 14 - 15 - 16	
	65		6 - 7 - 8 - 14 - 15 - 20 - 23 - 24	
	66		2 - 4 - 8	
	67		1 - 2	
	71		1	
	74		1	
	75		1	
	76		7 - 9	
2	79		2 - 4 - 7	
	80		1 - 2 - 3 - 4	
	84		4 - 5 - 6	
	88		4 - 5 - 21	
3	90		3 - 10 - 17	
	93		1 - 13 - 14 - 17 - 18	
	94		9 - 10 - 14 - 13 - 18	
	97		1 - 3 - 7	
	104		1 - 17 - 19 - 24 - 26 - 27 - 28 - 29 - 31 - 33	
			34 - 36 - 40 - 43 - 46	
	105		3 - 6 - 7 - 10 - 13	
	107		8 - 9 - 10 - 13 - 14 - 15 - 16 - 17	
	110		1 - 2 - 6 - 9 - 13	
4	111		1 (2 Parts) - 15 - 16 - 10 - 18	
	112		19 - 22	
	125		1 - 2	
	189		1 - 2 - 3 - 4 - 5 - 6 - 7 - 8 - 9 - 10 - 11 - 12	
	217		2 - 3 - 5 - 7 - 11 - 22 - 23.	
5	219		2 - 4 - 5 - 7	
6	224		1 - 5	
7	224		2 - 3 - 4	

b6
b7C

1325015-000-12606

29B-WF-171994-423

BOX NO.	FOLDER NO.	ITEMS	FROM
8	225	4 - 5 / 6 - 7	DOJ WASHINGTON
	235	1	
	255	4 - 8	
	287	1	
	295	1 - 2	
	311	1	
	683	3 - 10 - 13 - 11 / 16	
9	300	1 - 5 - 7 - 8	
	302	1	
	314	2 - 3 / 4	
	360	1	
10	610	1	
	629		
	633	2	
	635	15 - 32 - 34	
	640	4 - 7	
	644	1	
	650	1	
	651	1	
	652	1	
	653	1	
	674	1	
	684	4 - 6 - 7 - 9 / 10 - 12 / 15	
	700	1	
	739	1 - 2 / 4	
11	20	1 - 4 - (6 FILE COVER ONLY SEE BAG 21 ITEM 7) / 9 / 16	
	21	2 - 3 / 4 / 5	
	299	1 - 2 / 4	
	465		
	487	1	
	492	1	

b6
b7C

1325015-000-12607

298-WF-171994-423

12	238	1 – 17 INCLUSIVE
13	265	1 – 10 – 11 – 21 – 22 – 23 – 25 – 27 – 28 – 32 – 33 – 37 – 46 – 48 – 49 – 53 – 51
	699	1 – 2 – 3 – 4 – 5 – 6 – 8 – 9 – 10 – 16 – 17 – 18 – 19 – 21 – 22 – 23
14	697	1 – 2 – 3 – 4 – 5 – 6 – 7 – 10 – 18 – 19
15	14	20 – 21 – 22 – 23 – 24 – 25 – 26 – 27 – 29 – 30 – 35 – 36 – 37 – 38
16	266	1 – 9 – 19 – 32 – 37 – 43 – 44
	268	1
	325	7
	465	1
	676	6 – 7 – 11 – 16 – 20 – 25 – 26 – 28
	677	5
	685	1 – 2 – 3 – 4 – 5 – 6 – 7 – 8 – 9 – 10 – 12
	687	4 – 7
	742	1 – 3 – 4 – 5 – 7 – 8 – 10 – 11 – 12 – 13 – 14 – 15 –
17	328	3 – 5
17	698	1 – 2 – 3 – 4 – 11 – 12 – 13

1325015-000-12608

29B-MF-171994-423

b6
b7C

Box No	Bates No	Items	Visit
1	6	4	
	11	19	
	14	72	
	15	19 - 20	
	669	3 - 6 - 7	
	682	3 - 7	
	699	2 - 4	
	735	5	
	732	2 - 5	
	736	3	
	782	4 - 5	
	788	7 - 8 - 34	
	792	22	
	807	-	
	808	-	
	911	2 - 3 - 5 - 7 - 8 - 9 - 10 - 11 - 12 - 13 - 15 - 16	
		17 - 18 - 21 - 22 - 23 - 24	
	940	2 - 10	
	941	1 - 2	
	1019	1 - 2 - 3	
2	7	2 - 3 - 4.	

1325015-000-12609
29B-WF-171994-423

FEDERAL BUREAU OF INVESTIGATION

4/64

V-355 (1)

13 Oct 92 22 29z

RECEIVED TELETYPE UNIT

0227 MRI 01117

PP RUCNFB FBIWMFO PAR

DE FBIHO #0005 2871950

ZNR UUUUU

P 131949Z OCT 92

FM FBI HOUSTON (29B-WF-171994)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

LEGAT PARIS/PRIORITY/

BT

UNCLAS

CITE: //3290//

PASS: FBIHQ - FIF UNIT, OLIA; WMFO - SA [redacted] & SA [redacted] LEGAT PARIS ALEGAT [redacted]

SUBJECT: HIDDEN INTEREST; OO: WMFO.

RE HOUSTON TELCALLS TO SA [redacted] 10/9/92 & 10/11/92.

FOLLOWING IS CONFIRMATION OF INFORMATION PROVIDED IN REFERENCED TELCALLS:

1. ON 10/9/92, [redacted] AGAIN ADVISED THAT HE WAS

DOES NOT ASK FOR HOST COUNTRY CLEARANCE

29B-WF-171994 - 425

b6 b7C b7D

1325015-000-12610

[redacted] b6 b7C b7D

2. ON 10/11/92 SAME SOURCE ADVISED THAT [redacted] b6 b7C b7D

[redacted]

3. THERE ARE TWO PERSONS IN BCCI WITH SURNAME OF [redacted] b6 b7C

[redacted] IS IN PAKISTAN. ANOTHER, FNU [redacted] BCCI AND ALLEGEDLY [redacted] FROM SWITZERLAND TO SAUDI ARABIA WHEN HAMMOUD DIED IN 1990.

4. BCCI HAS FILED A MULTI-MILLION LAWSUIT AGAINST [redacted] AND THE ESTATE OF MOHAMMED HAMMOUD. OTHER b6 b7C

DETAILS UNKNOWN AT THIS TIME.

LEADS

LEGAT, PARIS & WMFO

USING ABOVE INFORMATION, COORDINATE INTERVIEWS OF

[redacted] b6 b7C

BT

#0005

NNNN

RECEIVED
TELETYPE UNIT
8 OCT 92 04 42Z
FEDERAL BUREAU
OF INVESTIGATION

0546 MRI 01780

RR RUCNFB FBIMM

DE FBIWMFO #0065 2812126

ZNR UUUUU

R 072125Z OCT 92

FM FBI WMFO (298-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

FBI MIAMI/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: OLIA; CID, WCCS, FIFU, SSA [redacted] b6 b7C

MIAMI: SSA [redacted] AND SSA [redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

REQUEST OF FBIHQ:

TO APPROVE THE OFFICIAL TRAVEL OF WMFO SA [redacted]

[redacted] AND SA [redacted] ALONG WITH FINANCIAL

ANALYSTS TDY TO THE BCCI SPECIAL, FA [redacted] AND FA b6 b7C

[redacted] TO GRAND CAYMAN ON 10/13/92, TO RETURN ON

10/20/92, FOR THE PURPOSE OF SEARCHING FOR AND REVIEWING

cc - Olia

cc: 823

1325015-000-12613

DOCUMENTS FROM BCCI (OVERSEAS).

IT IS ANTICIPATED THAT THE U.S. DEPARTMENT OF JUSTICE (DOJ) FRAUD SECTION WILL BE NOTIFIED THAT, BASED ON EARLIER APPROVALS AND PURSUANT TO MUTUAL ASSISTANCE TREATY, CAYMAN ISLANDS AUTHORITIES WILL GRANT ACCESS TO RECORDS OF BCCI (O). IN ADDITION TO THE TRANSACTIONS INVOLVING BCCI SECRETLY ACQUIRING AN INTEREST IN U.S. FINANCIAL INSTITUTIONS, BCCI (O) LOANED BETWEEN $10 AND $12 MILLION TO SUBJECTS ASSOCIATED WITH CAPCOM AND WINTERWOOD ASSOCIATES. FBI DENVER CONTINUES EFFORTS TO PROSECUTE THESE INDIVIDUALS AND FBI WMFO SEEKS TO FORFEIT ASSETS PURSUANT TO THE PLEA AGREEMENT WITH BCCI EQUAL TO THE AMOUNT LOANED TO THE SUBJECTS. MANY RECORDS RELATING TO THESE LOANS HAVE BEEN OBTAINED IN THE DENVER DIVISION OR THROUGH A SEARCH OF DOCUMENTS PREVIOUSLY OBTAINED AT GRAND CAYMAN. THESE DOCUMENTS ARE INCOMPLETE AND IT IS HOPED THAT DOCUMENTATION OF THE BALANCE OF THE AMOUNTS LOANED MAY BE OBTAINED DURING THIS REVIEW AND ALLOW FORFEITURE OF THE ENTIRE $10 TO $12 MILLION.

THE ABOVE PERSONNEL WILL BE DEPARTING WASHINGTON DULLES ON 10/13/92, ON AMERICAN FLIGHT NUMBER 925 CONNECTING IN MIAMI WITH NORTHWEST FLIGHT NUMBER 857, AND RETURNING ON 10/18/92,

VIA NORTHWEST FLIGHT NUMBER 996 CONNECTING IN MIAMI WITH UNITED AIRLINES FLIGHT NUMBER 1266.

ESTIMATED EXPENSES FOR THE TRIP ARE $1,244 PER PERSON CALCULATED ON FOUR DAYS PER DIEM AT $148 PER DAY AND AIRFARE OF $642 FOR A TOTAL TRIP EXPENSE OF $4,936.

LEAD.

MIAMI AT GRAND CAYMAN, BWI.

WILL SECURE HOST COUNTRY CLEARANCE FOR SAS [redacted]

[redacted]

[redacted]

b6
b7C

BT

#0065

NNNN

FEDERAL BUREAU OF INVESTIGATION

11 JUL 92 00 :16Z

RECEIVED TELETYPE UNIT

0367 MRI 01496

RR RUCNFB

DE FBIBA #0012 1922013

ZNR UUUUU

R 102013Z JUL 92

FM FBI BALTIMORE (66-0)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //3050:SQ 7//

PASS: [redacted]-GFU.

SUBJECT: HIDDEN INTERESTS: MAJOR CASE 38; FINANCIAL ASSISTANTS/FINANCIAL ANALYSTS (FA); OO:WMFO.

REFERENCE IS MADE TO BUREAU TELETYPE TO ALL OFFICES DATED JULY 7, 1992, CAPTIONED ABOVE.

FA [redacted], SOCIAL SECURITY NUMBER [redacted] IS VOLUNTEERING FOR TEMPORARY ASSIGNMENT TO THE WMFO IN SUPPORT OF THE ABOVE CAPTIONED MAJOR CASE.

SAC BALTIMORE CONCURS WITH THIS TEMPORARY ASSIGNMENT.

BT

#0012

1325015-000-12616

NNNN

0493 (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

TRANSMIT VIA:
[X] Teletype

PRECEDENCE:
[X] Immediate
[ ] Priority
[ ] Routine

CLASSIFICATION:
[ ] TOP SECRET
[ ] SECRET
[ ] CONFIDENTIAL
[ ] UNCLAS E F T O
[X] UNCLAS

DATE: JUL 02 1992

^PAGE 1 OF 3

FM DIRECTOR FBI

TO ALL FBI FIELD OFFICES/IMMEDIATE/

BT

UNCLAS

CITE: //0624//

PASS: PERSONAL ATTENTION.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FINANCIAL ASSISTANTS/ FINANCIAL ANALYSTS (FA); 00: WMFO.

ON 6/26/92, EXECUTIVE MANAGEMENT AT FBIHQ AUTHORIZED 90-DAY TEMPORARY DUTY (TDY) ASSIGNMENTS FOR EIGHT FAS TO BE ASSIGNED TO THE WMFO IN SUPPORT OF THE ABOVE-MENTIONED MAJOR CASE.

THE FAS SELECTED FOR THIS ASSIGNMENT WILL BE BASED AT WMFO. THIS TDY ASSIGNMENT MAY INVOLVE INTERNATIONAL TRAVEL. ALL COSTS INCURRED WITH THIS TDY ASSIGNMENT WILL BE PAID FOR FROM THE

428

****** FOR COMM CENTER USE ONLY ******

NOTE: Copy Designations Are On The Last Page Of This Teletype!!!

Approved By WAD

MRI/JUL 1488/189

Transmitted 2114 JUL

ISN 115

1325015-000-12617

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

HEADQUARTERS "SPECIAL FUND."

FBIHQ IS SEEKING FAS WHO ARE WILLING TO VOLUNTEER AND REMAIN IN THE WASHINGTON, D.C. AREA FOR A MINIMUM OF 90 DAYS WITH NO RETURN TRAVEL TO THEIR PERMANENT DUTY STATION. CANDIDATES SHOULD HAVE A GOVERNMENT CREDIT CARD AND A GOVERNMENT DRIVER'S LICENSE OR BE WILLING TO OBTAIN THESE ITEMS. CANDIDATES SHOULD BE AVAILABLE FOR TRAVEL NO LATER THAN 7/20/92.

FBIHQ IS REQUESTING THAT EACH DIVISION CANVASS THEIR FAS FOR POSSIBLE CANDIDATES. CANDIDATES' NAMES SHOULD BE FURNISHED TO THE FA [redacted] BY PHONE (202) 324-5650 OR FACSIMILE (202) 324-6492 NO LATER THAN CLOSE OF BUSINESS 7/8/92. b6 b7C

CANDIDATES SELECTED FOR THIS ASSIGNMENT WILL BE NOTIFIED BY PHONE ON 7/10/92. IT SHOULD BE NOTED THAT THOSE FA CANDIDATES WHO HAD PREVIOUSLY ASSISTED IN THIS INVESTIGATION WILL BE GIVEN PREFERENCE.

ANY QUESTIONS REGARDING THIS ASSIGNMENT SHOULD BE DIRECTED TO THE FA PROGRAM MANAGER OR UNIT CHIEF [redacted] FINANCIAL INSTITUTION FRAUD UNIT, WHITE-COLLAR CRIMES SECTION, CRIMINAL b6 b7C

0-93A (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

^PAGE 3 UNCLAS

INVESTIGATIVE DIVISION, PHONE (202) 324-5594.

BT

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1325015-000-12619

0-93B (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

ADMINISTRATIVE NOTE/TICKLER COUNT:

TDY ASSIGNMENTS WERE AUTHORIZED BY AD LARRY A. POTTS, CID, AS A RESULT OF A MEETING WITH SAC ROBERT M. BRYANT, WMFO INSPECTOR-IN-CHARGE [redacted], AND THE WCCS, CID. FUNDING HAS BEEN AUTHORIZED BY SECTION CHIEF [redacted], ACCT. SECTION, ADMINISTRATIVE SERVICES DIVISION. b6 b7C

Drafted By: KAS:vf Room/TL #: 3835 Phone No: 4-5650

COPY DESIGNATIONS:

1 - MR. POTTS
1 - MR. VERINDER
1 - MR. [redacted]
1 - MR. [redacted]
(ATTN: MS. [redacted])
1 - MR. [redacted]
(ATTN: MR. [redacted])
1 - MR. [redacted]
(ATTN: MR. [redacted])
1 - MRS. [redacted]

APPROVED:

Director	Adm. Servs.	Crim. Inv.	Laboratory	Off. of Liaison & Int. Affs.
Dep. Dir.	Ident.	Info. Mgnt.	Legal Coun.	Off. of Public Affs.
ADD-Adm.	Inspection	Intell.	Tech. Srvs.	
ADD-Inv.			Training	
			Cong. Affs. Off.	
			Off. of EEO	

b6 b7C

1325015-000-12620

77-24
V356

RECEIVED
TELETYPE UNIT
14 OCT 92 13 0Hz
FEDERAL BUREAU
OF INVESTIGATION

0223 MRI 01047

RR RUCNFB FBITP

DE FBIWMFO #0014 2881547

ZNR UUUUU

R 141546Z OCT 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

FBI TAMPA/ROUTINE/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE NUMBER 38; FIF; FAG; (OO: WMFO).

REGARDING FUGITIVE [redacted], WHITE MALE, DATE OF BIRTH [redacted] b6 b7C

A REVIEW OF WMFO FILES ON BCCI AND [redacted] REVEALED THAT WMFO FILES ARE INCOMPLETE ON SUBJECT [redacted] b6 b7C

WMFO REQUEST THAT TAMPA DIVISION FORWARD TO WMFO, BCCI SQUAD, COPIES OF THE FOLLOWING FOR INCLUSION INTO ITS FILES; THE [redacted] ARREST WARRANT, THE FD-65, THE INS STOP NOTICE, THE b6 b7C

29B-WF-171994-429

1325015-000-12621

INTERPOL RED NOTICE, AND ANY OTHER PERTINENT PAPER REGARDING

THE SEARCH AND ANTICIPATED ARREST OF SUBJECT [redacted]

b6
b7C

BT

#0014

NNNN

RECEIVED
FBI TYPE UNIT
10 Oct 92 02 09
FEDERAL BUREAU
OF INVESTIGATION

0470 MRI 01829

PP RUCNFB MON

DE FBIWMFO #0015 2832244

ZNR UUUUU

P 092243Z OCT 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

LEGAT MONTEVIDEO/PRIORITY/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: OLIA, FLU; CID, WCCS, FIFU, SSA [redacted] b6 b7C

[redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WMFO TELCALL TO LEGAT MONTEVIDEO, 10/8/92.

AS DISCUSSED IN RE TELCALL, WMFO RECEIVED COPY OF 9/30/92, CABLE FROM AMEMBASSY BUENOS AIRES AFTER RECEIVING TELCALL DIRECT FROM ARGENTINE BUSINESSMAN [redacted] b6 b7C IN CALL FROM [redacted] WMFO WAS TOLD THAT U.S. AMBASSADOR IN BUENOS AIRES HAD ASKED HIM TO CALL WMFO. BEING UNPREPARED FOR

29B-WF-171994-438

111.3823
111.Olia

PAGE TWO DE FBIWMFO 0015 UNCLAS

THE CALL, IT TOOK SOME TIME FOR WMFO TO UNDERSTAND WHY [redacted] WAS CALLING. EVENTUALLY, HOWEVER, WMFO WAS ABLE TO DETERMINE THAT [redacted] WOULD BE IN WASHINGTON, D.C., AND WOULD MEET WITH WMFO SAS ON 11/9/92, ABOUT BCCI-RELATED MATTERS. b6 b7C

LEAD.

LEGAT MONTEVIDEO AT BUENOS AIRES.

THROUGH APPROPRIATE CHANNELS, CONTACT [redacted] TELEPHONE: [redacted] AREA [redacted] TO CONFIRM THAT WMFO SAS WOULD LIKE TO MEET WITH HIM AT 10:00 A.M. ON 11/9/92, EITHER AT 500 FIRST STREET, NORTHWEST, SUITE 400, WASHINGTON, D.C. OR AT A PLACE AND TIME OF HIS CHOOSING. b6 b7C

BT

#0015

NNNN

1-9-90)
ERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

DATE: 3/16/92

Re:

RECEIVED
MAR 16 10 12 AM '92

TO: SAC, Atlanta
2635 Century Pkwy, Ne Suite 400
Atlanta, GA 30345

ATTN: SA [redacted]

b6
b7C

Invoice of Contents

Description of Contents:

hardcopy printouts , directory listings of Q3

FBI File# [redacted]
20306026 D SC

Case# 281B-WF-171994

[redacted]

b6
b7C

Your#

Return to

Room 3223 TL 2111

Ext. 44760.

Shipping# _____

SHIPPING METHODS

Air Freight and Express Services

- [X] Overnight
- [ ] 2-Day Standard Service
- [ ] Saturday Delivery
- [ ] Economy (2-3 Days Service)
- [ ] Deferred (4-5 Days Service)

- [ ] Mail Room: 1B327, TL 152 (registered mail)
- [ ] FMSS - Supply Room, 1B353 (not registered)

Hazardous Materials Only

Weight of Hazardous Materials:

Packaged By _____
Signature

Date _____

All items listed above are contained in this package.

A detailed description items will be found in Bureau communication dated _____.

(SHIPPING HOURS - 9:00 A.M. TO 4:00 P.M.)

1325015-000-12625

O-4 (Rev. 1-9-90)
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

RECEIVED
MAR 12 2 50 PM '92

DATE: 3/12/92 Re:

TO: SAC, Atlanta
2635 Century Pkwy, NE Suite 400
Atlanta, GA 30345

ATTN: SA [redacted] b6 b7C

Invoice of Contents

Description of Contents:

Ø directory listings of Q2, Q5, Q6, hardcopy printouts of Selected files on Q2

FBI File# [redacted] 1179F

Case# 28306026 D ZC

Your# [redacted] b6 b7C

Return t [redacted]

Room 3223 TL 241

Ext. 4476

Shipping# _____

SHIPPING METHODS

Air Freight and Express Services

- [X] Overnight
- [ ] 2-Day Standard Service
- [ ] Saturday Delivery
- [ ] Economy (2-3 Days Service)
- [ ] Deferred (4-5 Days Service)

- [ ] Mail Room: 1B327, TL 152 (registered mail)
- [ ] FMSS - Supply Room, 1B353 (not registered)

Hazardous Materials Only

Weight of Hazardous Materials:

Packaged By _____
Signature

Date _____

All items listed above are contained in this package.

A detailed description items will be found in Bureau communication dated _____.

(SHIPPING HOURS - 9:00 A.M. TO 4:00 P.M.)

1325015-000-12626

RECEIVED
TELETYPE UNIT
22 OCT 92 37 Z
FEDERAL BUREAU
OF INVESTIGATION

0593 MRI 02024

RR RUCNFB LON

DE FBIWMFO #0063 2952343

ZNR UUUUU

R 212342Z OCT 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

LEGAT LONDON/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: OLIA, FLU; CID, WCCS, FIFU, SSA [redacted]

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO: WMFO.

FOR INFORMATION OF RECEIVING OFFICES, GHAITH PHARAON, CURRENTLY UNDER INDICTMENT AS A NOMINEE FOR THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI), OWNED A SAUDI ARABIAN BASED COMPANY KNOWN AS SAUDI RESEARCH AND DEVELOPMENT CORPORATION, ALSO KNOWN AS REDEC. IN 1985, THE COMPANY WAS INVOLVED IN A RESTRUCTURING OF DEBT IN EXCESS OF $270 MILLION. THE

1325015-000-12627

CC-OLIA CC 38 23

RESTRUCTURING WAS NEGOTIATED BY REDEC'S LARGEST CREDITOR, MANUFACTURERS HANOVER TRUST, [redacted] b6 b7C [redacted] WMFO HAS DEVELOPED INFORMATION INDICATING THAT [redacted] RECEIVED A PERSONAL CASH PAYMENT OF $500,000 AND/OR A FLAT IN LONDON, ENGLAND, FROM PHARAON, IN ORDER TO MAXIMIZE THE BENEFITS OF THE DEBT RESTRUCTURING TO PHARAON. FURTHER, BCCI ALLEGEDLY RECEIVED FULL PAYMENT FOR THE LIABILITIES OWED TO IT BY REDEC AT THE EXPENSE OF THE OTHER CREDITORS.

WMFO HAS REVIEWED DOCUMENTS PURSUANT TO CAPTIONED CASE AND IDENTIFIED SIX (6) MAJOR CREDITORS INCLUDED IN THE DEBT RESTRUCTURING.

WMFO REQUESTS THAT [redacted] NOT BE DISCUSSED b6 b7C UNLESS THE INDIVIDUAL(S) INTERVIEWED IDENTIFIES [redacted] AS BEING INVOLVED IN ANY OF THE IMPROPRIETIES MENTIONED ABOVE.

PREVIOUS TELEPHONE CONTACT BETWEEN [redacted] b6 b7C b7D [redacted] AND SA [redacted] WMFO, HAS BEEN ESTABLISHED. FOR ANY QUESTIONS REGARDING MATTER, CALL SA [redacted] AT (202) 324-9346. WMFO CONSIDERS THIS COMMUNICATION SUITABLE FOR DISSEMINATION.

LEADS.

LONDON AT LONDON, ENGLAND.

1) INTERVIEW [redacted] BANKERS TRUST COMPANY, 1 APPOLD STREET, BROADGATE, LONDON, EC2A2HE, ENGLAND, TELEPHONE: [redacted] ABOUT THE REDEC DEBT RESTRUCTURING AND ANY IMPROPRIETIES WHICH MAY HAVE RESULTED IN THE FINAL DEBT SETTLEMENT.

b6
b7C

2) BY MEANS OF LAND REGISTRY RECORDS, ESTABLISH AND DOCUMENT OWNERSHIP OF ANY REAL PROPERTY IN THE NAME OF [redacted] [redacted]

b6
b7C

BT

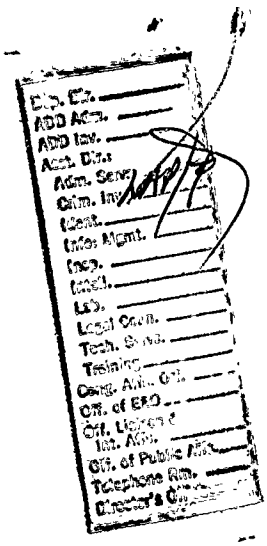
#0063

NNNN

RECEIVED
TELETYPE UNIT

27 Oct 92 13:13Z

FEDERAL BUREAU OF INVESTIGATION



0195 MRI 00847

RR RUCNFB FBIWMFO

DE ROM #0005 3011548

ZNY EEEEE

R 271544Z OCT 92

FM LEGAT ROME (298-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI WMFO (298-WF-171994)/ROUTINE/

BT

UNCLAS E F T O

CITE: //5350:ROM095.301//

PASS: HQ - CID, WCCS, FIFU; OLIA/FLU 1; WMFO - BCCI.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; FAG; OO: WMFO.

REFERENCE ROME TELETYPE DATED SEPTEMBER 15, 1992.

[redacted] AMERICAN EMBASSY, RIYADH, SAUDI ARABIA, WILL NOT BE AVAILABLE FOR FOLLOW-UP REGARDING AMERICANS WORKING FOR [redacted] (NOTED IN REFERENCED ROMTEL) UNTIL AFTER NOVEMBER 2, 1992. ROME WILL FOLLOW AND PROVIDE RESULTS AS AVAILABLE.

b6
b7C

b6
b7C

1325015-000-12630

PAGE TWO DE RGM 0005 UNCLAS E F T O

BT

#0005

NNNN

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

388

TO: Director, FBI

FROM: SAC, WMFO

SUBJECT:
HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

[redacted]-HQ-116176
Bureau File Number

29B-WF-171994
Field Office File Number

BCCI
Squad or RA Number

Agent's Social Security No.

☐ X if case involves corruption of a public official (Federal, State or Local).

Date 10/9/92

Investigative [redacted]tance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 2 = Helped, but only minimally 3 = Helped, substantially 4 = Absolutely essential

1. Acctg Tech Assistance		8. Eng. Sect. Tape Exams		15. Photographic Coverage		22. Telephone Toll Recs	
2. Aircraft Assistance		9. Hypnosis Assistance		16. Polygraph Assistance		23. UCO Group I	
3. Computer Assistance		10. Ident Div Assistance		17. Search Warr Executed		24. UCO Group II	
4. Consensual Monitoring		11. Informant Information		18. Show Money Usage		25. UCO Other	
5. ELSUR FISC		12. Lab Div Exams		19. Surveil Sqd (SOG) Asst		26. NCAVC/ VI-CAP	
6. ELSUR Title III		13. Lab Div Field Suppo		20. SWAT Team Action		27. Visual Invest Analysis (VIA	
7. Eng. Sect. Field Suppo		14. Pen Registers		21. Tech. Agt. or Tech Equip			

b6
b7C
b7E

A. Preliminary Judicial Process (Number of subjects)

Complaints	Informations	Indictments
	2	

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____; Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
1	$	$ 95,000,000.00		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions _____ No. of Subj.

Civil Suits Amount of Suit

Settlement of Award

Government Defendant	Government Plaintiff
$	$
$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District DC (District) (State)

9-14-92 Conviction or Pretrial Div. Date

9-14-92 Sentence Date

No. Subjects _____ Acquitted _____ Dismissed

b7E

Subject 1 [redacted] Subject 2 [redacted]

	Conviction Title	Section	Counts	Combined Sentence In-Jail Yrs.	Mos.	Suspended Yrs.	Mos.	Probation Yrs.	Mos.
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation	18	1005	1					4	0
Total Fines $ 200.00									
XX Plea ☐ Trial ☐ Pretrial Diversion	Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.								

	Conviction Title	Section	Counts	Combined Sentence In-Jail Yrs.	Mos.	Suspended Yrs.	Mos.	Probation Yrs.	Mos.
☐ Felony ☐ Misdemeanor ☐ Parole Revocation ☐ Probation Revocation	18	1005	1					4	0
Total Fines $ 200.00									
XX Plea ☐ Trial ☐ Pretrial Diversion	Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.								

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
ARABIAN INDUSTRIAL & COMMERCIAL COMPANY, LTD.					
(Saudi Arabian Corporation)					
BNK HOLDINGS S.A.					
(Panamanian Corporation)					

Explanation of accomplishment claimed:

*** SEE ATTACHMENT *** 29B-WF-171994-445

PM 1 b7C

(2) Bureau
2 - Field Office - WMFO
* See codes on reverse side.

CWS

1325015-000-12632

Attachment to FD-515

29B-WF-171994

On July 29, 1992, **ARABIAN INDUSTRIAL & COMMERCIAL COMPANY, LTD. (AICCL)** and **BNK HOLDINGS S.A. (BHSA)** entered into a plea agreement with the UNITED STATES DEPARTMENT OF JUSTICE (USDOJ) in connection with the ongoing investigation of the **BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).**

On September 14, 1992, an information was filed by the USDOJ in the U.S. District Court for the District of Columbia, Washington, D.C. charging AICCL and BHSA with one count each for violation of Title 18 USC Section 1005 entitled False Entries.

On September 14, 1992, AICCL and BHSA were sentenced. AICCL was ordered to pay restitution totalling $95,000,000.00 as follows: (1) $45 million to the FEDERAL RESERVE BOARD (FRB) in connection with the illegal acquisition of FIRST AMERICAN BANK, Washington, D.C.; and (2) $50 million to the World-Wide Liquidator for BCCI. Both AICCL and BHSA were also placed on four (4) years supervised probation and ordered to pay a Special Assessment of $200.00 each.

155

RECEIVED
TELETYPE UNIT
28 OCT 92 1816Z
FEDERAL BUREAU
OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0314 MRI 01453

PP RUCNFB FBIMM

DE FBIWMFO #0032 3021907

ZNR UUUUU

P 281906Z OCT 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/PRIORITY/

FBI MIAMI/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTEREST; MAJOR CASE #38; OO: WMFO.

RE BUREAU TELETYPE TO MIAMI, DATED 9/6/92.

FOR INFORMATION OF MIAMI, WMFO IS CONDUCTING A FINANCIAL INSTITUTION FRAUD CASE REGARDING BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) CRIMINAL ACTIVITIES. BASED ON INVESTIGATIONS, IT IS BELIEVED THAT BCCI ORCHESTRATED A SUSTAINED AND DELIBERATE TAKEOVER OF U.S. BANKS WITHOUT MAKING REQUIRED DISCLOSURES AND APPLICATIONS.

29B-WF-171994-4440

b6
b7C

b7D

[redacted]

b6
b7C
b7D

HOWEVER, PER TELEPHONE CONVERSATION WITH [redacted] b6 b7C b7D

AUSA, MIAMI, [redacted] FURTHER ADVISED THAT [redacted] IS COOPERATING WITH FBI, MIAMI.

LEADS.

MIAMI AT MIAMI, FLORIDA.

1) LOCATE [redacted] AND INTERVIEW HIM REGARDING BCCI; b6 b7C b7D

SPECIFICALLY:

[redacted]

[redacted]

2) REVIEW U.S. ATTORNEY RECORDS CONCERNING [redacted]

b6
b7C
b7D

AND PROVIDE WMFO WITH ANY PERTINENT INFORMATION REGARDING BCCI.

BT

#0032

NNNN

1175

RECEIVED
F.B.I.
COMMUNICATIONS
OCT 30 11 04 PM '91

American Embassy
London

FAX: 71-499-7944

UNCLASSIFIED

FROM: [redacted] ASSISTANT LEGAL ATTACHE

PERMIT WEAVER. EXT. 5594, ROOM 3839, TL 231

SUBJECT: BCCI

NO. OF PGS. 4 (including cover and last page)

SENDER: BT DATE: OCTOBER 30, 1991

RECD BY: _____ DATE: _____

COMMENTS: PLEASE CALL RECIPIENT AND HAVE SOMEONE PICK THIS UP ASAP FOR [redacted]

b6
b7C

29B-WF-171994-448

29HQ-116176

PAGE.001

FROM LEGAT LONDON 30 '92 22:56

1329015-000-12637

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.)

Date: 21 OCT 91
Edition: INDEPENDENT / GUARDIAN

Title: BCCI

Character: 1634-LO-10193 SUB A
or
Classification:
Submitting Office:

Indexing:

Accountant in BCCI inquiry is charged

AN INVESTIGATOR at the Serious Fraud Office has been charged with conspiracy to pervert the course of justice, following a police investigation into the theft and sale of confidential documents from the SFO's inquiry into the collapse of the Bank of Credit and Commerce International, writes Peter Rodgers.

Mark Braley, who was seconded to the SFO two months ago by his employers, the City accountants Coopers & Lybrand, is to appear in court in London this morning. With Bernard Lynch, a self-employed accountant, he has been charged with conspiring on or before 19 October to remove, destroy or deface documentary evidence relating to fraud trials resulting from the BCCI collapse.

Both men are to appear at Horseferry Road magistrates' court. Mr Braley, 24, is from Bexleyheath, Kent. Mr Lynch, 28, from Forest Hill, London, is not thought to have any connection with the BCCI inquiry. They were arrested in a police operation on Saturday. Mr Braley is part of a full-time team of accountants seconded by Coopers & Lybrand to the SFO to work on the BCCI inquiry.

The investigation into the theft and sale of documents was by the Metropolitan police at the request of the City of London police, the SFO said in a statement last night.

Last week the SFO raided the property and leisure group Control Securities as part of its investigation into BCCI. The raids were partly the result of a confidential paper prepared by accountants.

Barbados loan, page 20

Fraud Office investigator charged over BCCI inquiry

Dan Atkinson

AN accountant on the Serious Fraud Office inquiry into the Bank of Credit and Commerce International has been arrested on charges of conspiracy to pervert the course of justice, it emerged last night.

He faces charges of attempting to remove, destroy or deface documents connected with the investigation.

Mark Braley, aged 24, of Bexleyheath, South-east London, will appear before Horseferry Road magistrates court, London, today.

He is employed by Britain's biggest accounting firm, Coopers and Lybrand Deloitte, and has been on full-time secondment to the BCCI investigation — one of about 100 City professionals on loan to the fraud office at any one time.

A second man, Bernard Lynch, aged 28, of Forest Hill, south London, will appear in court charged with the same offence. He is not connected with the Serious Fraud Office. The two were arrested on Saturday.

FBI/DOJ

OCT 30 '92 22:57 FROM LEGAT LONDON PAGE.003
1325015-000-12638

** TOTAL PAGE.004 **

FD-350 (Rev. 5-8-81)

(Indicate page, name of newspaper, city and state.)

(Mount Clipping in Space Below)

Date: 21 OCT 91
Edition: FINANCIAL TIMES
Title: BCCI
Character: 163A-LO-101935454A
or
Classification:
Submitting Office:

Indexing:

(1)

Investigator with SFO is arrested

By Robert Rice, Legal Correspondent

AN INVESTIGATOR with the Serious Fraud Office working on the Bank of Credit and Commerce International inquiry was arrested and charged yesterday with conspiracy to pervert the course of justice.

His arrest follows a Metropolitan Police investigation into the theft and sale of confidential SFO documents relating to the BCCI inquiry.

Mr Mark Braley, 28, of Bexleyheath, Kent, an accountant with Coopers and Lybrand, is on full-time secondment to the BCCI inquiry. A second man, Mr Bernard Lynch, 28, a self-employed accountant, of Forest Hill, south-east London, is also charged with the same offence. Mr Lynch has no connection with the SFO.

Both men will appear at Horseferry Road magistrates' court in London today charged that "on or before October 19 they conspired to commit an offence by removing, destroying or defacing documentary evidence relating to fraud trials resulting from the collapse of BCCI last July".

Among the documents they are accused of stealing is believed to be one widely circulated to the national press relating to the SFO's investigation into links between Control Securities, the property and leisure group, and BCCI.

Last Thursday, share dealing in Control Securities, which is run by Mr Nazmudin Virani and his two brothers Alnashir and Zulfikar, was suspended by the London Stock Exchange after a raid on the company's headquarters in London.

The document is understood to be a "position paper" dated October 4 which outlines the SFO's interest in finding out whether BCCI was using the accounts of companies within the Virani group to dress up its annual results.

Money may have been borrowed from Virani companies by BCCI to improve the bank's results shortly before they were audited, to be returned

Continued on Page 18

Arrest

Continued from Page 1

after the bank audit had been completed.

The document is also understood to detail investigators' interest in "charges of $22.5m (£13m) made by BCCI's Cayman Islands branch to Virani company accounts. Former BCCI officers have claimed that the bank used this procedure to hoodwink its auditors.

Virani group company accounts under investigation include those of NM Properties, Virani Group UK, Zelva Anstalt, Winstonglen and Greencrest Trading.

The SFO is thought to be looking into four possible offences: theft, false accounting, insider trading and creating a false market.

FAX/DOJ

PAGE.004 FROM LEGAT LONDON 30 '92 22:58

1325015-000-12639

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

Fraud office raids Control Securities HQ

By Richard Donkin

THE Serious Fraud Office launched a series of dawn raids yesterday on companies and private addresses in London in connection with its investigation into the collapsed Bank of Credit and Commerce International.

The police raids were centred on the Gillingham Street headquarters of Control Securities, the property and leisure group run by the millionaire Virani brothers. The London Stock Exchange suspended dealing in the company's shares at 16¼p before the market opened.

Mr Nazmudin Virani, the 42-year-old chairman and chief executive of Control Securities, supported on the board by his brothers, Alnashir and Zulfikar, yesterday denied any wrongdoing. He was reported to have been a victim of BCCI's collapse after it was shut down by the Bank of England in July.

The SFO action involved visits to the homes of all three brothers and the removal of documents from Control Securities and the Virani Group which share the same headquarters.

Control Securities recorded a pre-tax loss of £3.3m in the financial year to the end of March. The loss was blamed on the falling property market and £5.4m in provisions to cover the group's exposure to BCCI.

The company was forced to write off £2m in deposits at BCCI and to provide for the loss of rent on two properties leased to the bank.

Before the suspension, shares in Control Securities had recovered most of the ground lost when they fell 33 per cent after the BCCI collapse but they are far

Lex ..... Page 26
Too far, too fast on an increasingly rocky course ..... Page 28

below their 1987 peak of 107p.

The Control Securities empire, which owns more than 100 properties, 23 hotels and 720 public houses, was started six years ago by the brothers, who were expelled from Uganda in 1972 by the country's former president Mr Idi Amin.

Investigators are aware of a deal involving Virani and Control Securities subsidiaries in which they joined forces with a company run from the London headquarters of Mr Gaith Pharaon, the Saudi Arabian financier who is alleged to have acted as a frontman for BCCI in some of its purchases of stakes in US banks.

The companies held equal shares in a company called Tapiute which was formed to buy Ocarina Hotels, a group of 27 Spanish Hotels, from Bass Holdings, the UK brewing company, for £145m. Bass has refused to say what payments it has received on the deal.

According to the report from an investigation carried out into BCCI between October 1990 and April 1991 on behalf of the Abu Dhabi government, BCCI had a charge over the shares in Ocarina backed by guarantees from Control Securities and Balace, the Pharaon-related company, for £17.5m each.

The report says that BCCI holds share certificates in Control Securities representing 10 per cent of the group. This contrasts with a Virani statement earlier this year that BCCI's holding was 5.5 per cent.

(Indicate page, name of newspaper, city and state.)

Date: 18 OCT. 91
Edition: FINANCIAL TIMES

Title: BCCI

Character: 163A-10193 SUB A
or
Classification:
Submitting Office:

Indexing:

(1)

FBI/DOJ

OCT 30 '92 22:56 FROM LEGAT LONDON PAGE.002

1325015-000-12640

FD-263 (Rev. 4-30-85)

155
417

FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD
WMFO	WMFO	10/27/92	8/10/92 - 10/26/92

TITLE OF CASE	REPORT MADE BY	TYPED BY:
HIDDEN INTERESTS; MAJOR CASE #38; GHAITH PHARAON - FUGITIVE	SA	gf

b6
b7C

CHARACTER OF CASE
FIF; FAG; FUGITIVE

INVESTIGATIVE SUMMARY

(P)

ARMED AND DANGEROUS

2 - CC/SENT BY FBIHQ

APPROVED _____ SPECIAL AGENT IN CHARGE

DO NOT WRITE IN SPACES BELOW

COPIES MADE:
(2)-Bureau (CID, ~~WCCS~~, FIFU, ~~SSA~~)
2-Boston
2-Los Angeles
2-Legat Montevideo
2-WMFO (29B-WF-171994)

29B-WF-171994-449

b6
b7C

11/6/92

DISSEMINATION RECORD OF ATTACHED REPORT				
Agency				
Request Recd.				
Date Fwd.				
How Fwd.				
By				

Notations

1325015-000-12641

WMFO 29B-WF-171994

LEADS

BOSTON

AT BROOKLINE, MASSACHUSETTS

Locate and interview [redacted] re GHAITH PHARAON; specifically, his current location, future travel plans to the U.S. and other countries, their contacts (letter, telephone, etc.) with PHARAON in the last three years, and their willingness to assist in locating PHARAON. b6 b7C

LOS ANGELES

AT LOS ANGELES, CALIFORNIA

Determine if [redacted] still resides at [redacted] and if so, interview covering same as for [redacted] and [redacted] b6 b7C

NEW YORK

AT NEW YORK, NEW YORK

Determine if [redacted] still maintains a residence at [redacted] Street, and if so, interview covering same as for [redacted] b6 b7C

MONTEVIDEO LEGAT, URUGUAY

AT ARGENTINA

Contact Argentina Immigration Service to determine whether or not GHAITH PHARAON has applied for citizenship to Argentina, and if so, the status of such application.

ARMED AND DANGEROUS

1325015-000-12642

FD-204 (Rev. 3-3-59)

UNITED STATES DEPARTMENT OF JUSTICE
Federal Bureau of Investigation

Copy to:

Report of: SA [redacted] Office: WMFO b6 b7C
Date: October 27, 1992

Field Office File #: 29B-WF-171994 Bureau File #: 29B-WF-171994

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
GHAITH PHARAON - FUGITIVE

Character: FINANCIAL INSTITUTION FRAUD; FRAUD AGAINST THE GOVERNMENT; FUGITIVE

Synopsis: GHAITH R. PHARAON is wanted to stand trial for Federal Wire Fraud and Racketeering offenses. He is one of the subjects of indictment number 91-655-7 (JHG), filed in the U.S. District Court for the District of Columbia (Washington, D.C.) on November 15, 1991. The indictment charges PHARAON with (1) Conspiracy to Commit Wire Fraud, in violation of Title 18, USC, 371; (2) Wire Fraud, in violation of Title 18, USC, 1343; (3) Conspiracy to Commit Racketeering, in violation of Title 18, USC, 1962(d); and (4) Aiding and Abetting, in violation of Title 18, USC, 2. A warrant for his arrest was issued on November 15, 1991, by U.S. Magistrate Judge ALAN KAY of the above-named court.

PHARAON is believed to have fled the U.S. and was last reported to have been traveling between Morocco, Egypt, and Saudi Arabia. Extradition will be requested if arrested in any country which has an extradition treaty with the U.S. for crimes that are clearly extraditable. Assistant U.S. Attorney (AUSA) MARK DUBESTER concurs with request for extradition of GHAITH R. PHARAON.

ARMED AND DANGEROUS

(P)

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

1325015-000-12643

OBTAINING OF FEDERAL PROCESS:

On November 15, 1992, GHAITH PHARAON was indicted in the U.S. District Court (USDC) for the District of Columbia (DC), Washington, D.C., for deceiving state and federal regulators in the Bank of Credit and Commerce International's (BCCI's) secret acquisition of the Independence Bank, and fraudulent securities transactions involving Centrust Savings Bank. On November 18, 1991, the USDC for the DC issued an arrest warrant for PHARAON. This warrant for PHARAON's arrest was signed by U.S. Magistrate Judge ALAN KAY. PHARAON was also indicted by the Southern District of Florida on May 29, 1992. These indictments were also in connection with the unlawful activities of PHARAON and BCCI.

SUMMARY OF OFFENSE:

Beginning in or about January, 1984, and continuing until in or about December, 1989, in the District of Columbia and elsewhere, GHAITH PHARAON and others knowingly and willfully combined, conspired, and confederated with others to defraud the United States, in particular, the Board, FDIC, FHLBB, and FSLIC, of and concerning their right to have their business and affairs conducted free from deceit, dishonesty, impairment, and obstruction, by impeding, hindering, obstructing, and defeating by deceitful and dishonest means the lawful functions and operations of said agencies of the United States in regulating and supervising activities of the BCCI group and their United States branches or agencies. From this conspiracy, PHARAON and others would enrich themselves by taking advantage of opportunities to deceive and exploit United States financial institutions, deceive United States federal regulatory agencies, and deceive persons and entities throughout the United States.

BCCI, with the assistance of GHAITH PHARAON, through deceptive stock purchases by way of hidden stock pledges, nominee agreements, non-recourse loans, loan releases, beneficial interest agreements, and outright falsehoods, fabrications, and omissions on applications in reports filed with state and federal regulatory agencies, would acquire and maintain control and influence over the Independence Bank and the Centrust Savings Bank.

Also during this time frame, GHAITH PHARAON took part in a conspiracy in the Northern District of Georgia that defrauded the United States, in particular, the Internal Revenue Service (IRS). PHARAON was also involved in misapplication of bank funds and bank bribery. These illegal activities centered

around PHARAON, BCCI, and their connection with the National Bank of Georgia.

DESCRIPTION OF SUBJECT:

Name	GHAITH RACHAD PHARAON
Aliases/Nicknames	Dr. Ghaith Pharaon
Sex	Male
Race	White
Date of Birth	September 7, 1941
Place of Birth	Riyadh, Saudi Arabia
Height	Five feet nine inches
Weight	250 pounds
Hair Color	Black and gray
Occupation	Businessman
Identifying Documents	Saudi Arabian passport (number 100132/31)
Languages Spoken	Arabic, English, French, some Greek

b6
b7C

PRIOR/OTHER ARREST HISTORY:

None.

DETAILS OF INVESTIGATION:

AT WMFO (WASHINGTON, D.C.):

Through WMFO, the following has been completed in an effort to ensure the arrest and extradition of PHARAON to the United States:

- Provisional arrest requests have been submitted to France and the United Kingdom.

- United States Embassies in Spain, Greece, Morocco, Egypt, Tunisia, Algeria, Italy, Turkey, Cyprus, Malta, and Saudi Arabia, have been requested to notify the Ministries of Justice of those countries of our request for the arrest and extradition of PHARAON.

- Interpol has issued a Red Notice regarding PHARAON.

- Stop notices have been placed with INS.

- PHARAON has been entered into NCIC.

ARMED AND DANGEROUS

● Legats in Europe and the Middle East have been notified of the arrest warrant and desire to extradite PHARAON to the United States.

● The United States Passport Services have been advised of the arrest warrant issued for PHARAON.

● [redacted] has been requested to give any assistance possible in locating GHAITH PHARAON. b7E

OTHER OFFICE INVESTIGATIONS:

AT MOBILE, ALABAMA:

Mobile Division conducted discreet physical surveillance of [redacted] on August 7 and 8, 1992, in an effort to determine his travel plans and destination. It was believed that [redacted] may have been meeting GHAITH PHARAON for a cruise on PHARAON's yacht, "Le Pharaon." The results of this surveillance was negative, as [redacted] did not meet PHARAON, nor did he leave the area of Mobile, Alabama. b6 b7C

AT ST. LOUIS, MISSOURI:

St. Louis Division located and forwarded to WMFO the United States Air Force (USAF) personnel file on [redacted] date of birth: [redacted] Social Security Account Number: [redacted] as [redacted] is the Captain for PHARAON's personal yacht, "Le Pharaon." b6 b7C

LEADS FOR FOREIGN LEGATS:

BANGKOK LEGAT AT PAKISTAN:

Bangkok Legat attempted to verify rumors that GHAITH PHARAON was attempting to buy citizenship into the country of Pakistan. Bangkok Legat was unable to verify said rumors, but will continue to investigate this matter, and if said rumor is found to be accurate, will contact WMFO immediately.

ROME LEGAT AT CYPRUS:

Rome Legat coordinated with the Cyprus authorities to conduct a discreet surveillance on PHARAON's yacht, "Le Pharaon," which had arrived in Cyprus at the Port of Larnica after setting sail from Syria. Cyprus authorities are maintaining surveillance on "Le Pharaon" to determine whether or not GHAITH PHARAON is on

1325015-000-12646

FD-263 (Rev. 4-30-85)

FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE	OFFICE OF ORIGIN	DATE	INVESTIGATIVE PERIOD
WMFO	WMFO	10/27/92	8/10/92 - 10/26/92

TITLE OF CASE	REPORT MADE BY	TYPED BY:
HIDDEN INTERESTS; MAJOR CASE #38; GHAITH PHARAON - FUGITIVE	SA [redacted]	gf
	CHARACTER OF CASE FIF; FAG; FUGITIVE	

b6
b7C

INVESTIGATIVE SUMMARY

(P)

ARMED AND DANGEROUS

APPROVED	SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW
COPIES MADE: (2)-Bureau 2-Boston 2-Los Angeles 2-Legat Montevideo 2-WMFO (29B-WF-171994)		

DISSEMINATION RECORD OF ATTACHED REPORT				
Agency				
Request Recd.				
Date Fwd.				
How Fwd.				
By				

Notations

1325015-000-12647

326
V-355

FEDERAL BUREAU OF INVESTIGATION

34 OCT 92 02 30Z

RECEIVED
TELETYPE UNIT

Dep. Dir.
ADD Adm.
ADC Inv.
Asst. Dir.s
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

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DE FBIWMFO #0019 3080107

ZNR UUUUU

P 022349Z NOV 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

LEGAT TOKYO/PRIORITY/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE NUMBER 38; FIF; FAG; (OO: WMFO).

REFERENCE LEGAT TOKYO TELETYPE TO BUREAU, OCTOBER 16, 1992.

29B-WF-171994-451

PURSUANT TO REFERENCED TELETYPE, WMFO REQUESTS ALAT TOKYO DETERMINE THROUGH CONFIDENTIAL SOURCE ADDITIONAL DETAILS REGARDING [redacted] ALAT ALSO REQUESTED TO

b6
b7C
b7D

326

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 9/15/92

TO : DIRECTOR, FBI
(ATTN: FIF, PC UNITS, WCCS)

FROM : SAC, HOUSTON (29B-WF-171994)(P)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE 38;
(OO: WMFO)
(29B-WF-171994)

[redacted]

(2)
MDW/JGF

b7D [redacted]

b7D [redacted]

Re HO teletype to the Bureau et al, 9/10/92.

Enclosed for WMFO are four copies of investigative insert reflecting information provided by [redacted] on 9/11/92.

Also enclosed for WMFO is 1A envelope containing copies of documents relating to [redacted] (First Name Unknown) [redacted] in Washington, D.C.

29B-WF-171994-403

4-Bureau
(2-29B-WF-171994, FIFU (Info.))
(2 [redacted] PCU (Info.))
3-WMFO
(2-29B-WF-171994 Attn: BCCI Squad (Encs. 3))
(1 [redacted] (Info.)
2-Houston
LEY/ly
(9)

29HQ116176

b6 b7C b7D

Approved: MDW/JGF Transmitted _____ (Number) (Time) Per _____

1325015-000-12577

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 50
Page 13 ~ Referral/Consult;
Page 14 ~ Referral/Consult;
Page 15 ~ Referral/Consult;
Page 16 ~ Referral/Consult;
Page 17 ~ Referral/Consult;
Page 18 ~ Referral/Consult;
Page 19 ~ Referral/Consult;
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Page 69 ~ Referral/Consult;
Page 70 ~ Referral/Consult;
Page 71 ~ Referral/Consult;

** TOTAL PAGE.002 **

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.)

Date: 15 NOV 91
Edition: FINANCIAL TIMES
Title: BCCI
Character: 163A-10193-Sub A
or
Classification:
Submitting Office:

Indexing: (1)

b6
b7C

Please FAX To

BCCI suspicions raised 16 months before closure

By David Lascelles in London and Alan Friedman in New York

SUSPICIONS that led to the discovery of fraud at Bank of Credit and Commerce International were first put to the bank's executives in March 1990, 18 months before the bank was closed down, an FT investigation has revealed.

So far the Bank of England, which supervised BCCI's UK activities, and Price Waterhouse, the auditor, have insisted that although "false or deceitful" accounting was uncovered in early 1990, there was no evidence of systematic fraud until a detailed investigation in 1991.

Evidence of manipulation of the loan accounts of the Gulf shipping group, BCCI's largest customer, was uncovered by PW in the course of preparation of the bank's 1989 accounts. It was discussed at two meetings at the PW offices in early March 1990. One description of the meetings was given yesterday by Mr Maqbool Rahman, BCCI's chief financial officer, who was at both. The first was attended by three PW auditors and the second a day later, included Mr Swaleh Naqvi, the bank's chief executive.

The meetings were called at the instigation of Mr Christopher Cowan, the PW partner in charge of the audit. Mr Rahman's notes of the meeting, copies of which have been obtained by the FT, quote Mr Cowan as condemning "lies and concealment" by the staff of Mr Naqvi. The notes, taken by Mr Rahman, record Mr Cowan as saying: "As long as there are bogus transactions on the books we can't proceed."

The word "fraud" is not used in the notes, but Mr Rahman claimed yesterday: "Price Waterhouse's whole emphasis was that it was no longer a question of our provisions being too little. It was that fraudulent transactions had been found."

Last night PW declined to comment on the meetings, citing customer confidentiality. It is understood that the second meeting, in particular, reviewed the evidence of account manipulation, as well as highlighting problem areas in the 1989 accounts.

The information was passed to the Bank of England. But at this stage BCCI's known financial problems were so severe that the regulators agreed to pursue a $2.2bn rescue proposed by Abu Dhabi, the bank's largest shareholder.

As part of that arrangement, the bank's headquarters would move to Abu Dhabi. Files from BCCI's London offices were flown to Abu Dhabi with PW's approval. These files were later discovered to include the private files kept by Mr Naqvi, detailing the BCCI frauds.

PW has said it was happy for the documents to go to Abu Dhabi.

'Watchdogs who failed to bark?' Page 8

NOV 20 '92 18:22 FROM LEGAT LONDON PAGE.002

1325015-000-13057

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
X ☐ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 8/7/92

TO : DIRECTOR, FBI
ATTN: AUTOMOTIVE MANAGEMENT UNIT
ROOM 6863, SSA [redacted] b6 b7C

ATTN: WCCS, FIFU; SSA [redacted]

FROM : SAC, Washington Field Office (29B-WF-171994) (P)

SUBJECT : "HIDDEN INTERESTS" b6 b7C
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

[redacted]

Re 8/6/92 telecall between WMFO SA [redacted] b6 b7C
and [redacted] Automotive Management Unit.

Captioned case, which is a "SPECIAL", is currently staffed by one Inspector-in-Charge, three supervisors, twenty SA's, and nine FA's, eight of which are TDY, for a total of thirty three BU personnel. The BCCI Squad currently has access to thirteen vehicles, as detailed below.

The current lease with ACTION CAR RENTAL for nine vehicles (PO# R209045) expires 8/31/92. WMFO will be submitting an FD-369 requesting extension of the current lease through 9/30/92 at an estimated cost of $4860.

361

Since GSA has not established an auto rental schedule for FY 1993, WMFO will, per telecall, solicit bids for 90 day auto leases for the period 10/1/92 - 12/31/92. The number of required vehicles is not yet known due to the fact that a currently undeterminable number of personnel may be assigned TDY to London. For planning purposes, WMFO estimates

④ - BUREAU - ICC AMU RM 6863 (Hal); ICC Procurement Unit RM 6833 (Hal)
2 - WMFO
MTU:mtu
(6)

Approved amu Vol 3
Bucar #'s:
99-6560 through 99-6568
Expire [redacted] b6 b7C

OK
FIFU, WCCS [redacted] 8-14-92

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-12977

car rental expenses for this period to be $27,000 (15 cars x $600/month x 3 months).

WMFO requests that the Auto Management Unit continue to advise WMFO as to the possibility of obtaining long-term GSA rentals as this appears to be the most cost-effective solution to the investigative needs of captioned case, absent the availability of Bucars.

The following vehicles are currently assigned to the BCCI SPECIAL:

ACTION AUTO RENTALS

1. 1992 White Pontiac Sunbird
   VA Tag # RUZ-986
   BUCAR # 99-6561

2. 1992 White Pontiac Sunbird
   VA Tag # RUZ-985
   BUCAR # 99-6562

3. 1991 White Chev. Lumina
   MD Tag # DR 11869
   BUCAR # 99-6563

4. 1991 Burgundy Chev. Lumina
   OH Tag # LCS-375
   BUCAR # 99-6564

5. 1992 White Chev. Corsica
   OH Tag # LCU-996
   BUCAR # 99-6565

6. 1991 White Chev. Corsica
   MD Tag # DR 07036
   BUCAR # 99-6566

7. 1991 Black Chev. Lumina
   VA Tag # RSV-867
   BUCAR # 99-6567

8. 1991 Blue Pontiac Sunbird
   MD Tag # DR 11769
   BUCAR # 99-6568

(Bucar # 99-6560, an ACTION rental, is authorized but currently not in service as a cost savings measure as several SA's are currently either TDY or have not yet arrived on the squad.)

1325015-000-12978

WMFO VEHICLES

9. 1987 Red Ford Thunderbird
   DC Tag # 176-785
   WMFO # 561
   Bucar # 87-1044

10. 1987 Brown Ford Thunderbird
    DC Tag # 179-477
    WMFO # 411
    Bucar # 84-2351

11. 1988 White Buick Regal
    DC Tag # 168-645
    WMFO # 536
    Bucar # 86-2736

12. 1987 Brown Ford Mustang
    DC Tag # 173-177
    WMFO # 450
    Bucar # 84-3135

1325015-000-12979

Department of Justice

155
Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs. ✓
Telephone Rm.
Director's Office
Rm 3873

FOR IMMEDIATE RELEASE
WEDNESDAY, JULY 29, 1992

CRM
202-514-2007
TDD 202-514-1888

HIDDEN INTEREST

FORMER FIRST AMERICAN BANK OFFICIALS CLARK M. CLIFFORD AND ROBERT A. ALTMAN INDICTED IN BCCI CASE

WASHINGTON, D.C.--The Department of Justice announced today that a federal grand jury has indicted Clark M. Clifford and Robert A. Altman, former top officials of the First American Bank, on charges of conspiring to defraud the Board of Governors of the Federal Reserve System (FED) and concealing material facts in connection with the FED's investigation of the Bank of Credit and Commerce International (BCCI).

The three-count indictment, returned in U.S. District Court in Washington, alleged among other things that Clifford and Altman enriched themselves through loans and other agreements with BCCI, performed a number of acts to curry favor with BCCI, concealed their BCCI loan arrangements from the Board of Governors of the Federal Reserve System, and breached their duty of loyalty to the First American banks.

Clifford, 85, is a former chairman of the board of the holding companies over the First American Corporation. Altman, 45, is a former president of First American Corporation. Both are attorneys in Washington, D.C.

Attorney General William P. Barr said: "Today's indictment represents another significant step in the Department of Justice

29HQ 116176

1325015-000-12980

investigation of the complex BCCI case. The federal investigation is continuing on a number of fronts."

Barr added that "The Justice Department has worked in close coordination with the Office of District Attorney Robert M. Morgenthau of the County of New York and the Federal Reserve Board, and we are grateful for their assistance in this investigation."

At the same time, the Justice Department and the District Attorney's Office said that Sheik Kamal Adham, a businessman in Saudi Arabia, and Sayed Jawhary, Adham's accountant, pleaded guilty on Monday in New York State Supreme Court to charges arising out of the BCCI case and Adham agreed to pay $105 million in reparations and fines.

Adham and Jawhary were accused of playing a significant role in the secret ownership of First American Bankshares by an enterprise called the BCC Group.

Both the Justice Department and the District Attorney's Office agreed to the state court sentence, which imposed the $105 million penalty and requires Adham and Jawhary to fully cooperate with the continuing federal and state investigations of BCCI.

The federal indictment said Clifford and Altman concealed and covered up facts material to the Board of Governors of the Federal Reserve System.

The indictment also said Clifford and Altman received loans from BCCI for the purchase of shares in Credit and Commerce American Holdings, N.V., the top-tier bank holding company that owned the First American banks.

1325015-000-12981

"Aware that the loan and related agreements would be important to the Board of Governors of the Federal Reserve System and might trigger FED regulatory action," Clifford and Altman deliberately concealed those agreements from the regulators, the indictment said.

The indictment alleged that Clifford and Altman, while serving as attorneys for BCCI and as officers and directors of First American Bank, enriched themselves through secret financial arrangements with BCCI, which resulted in millions of dollars of profits to them, and then conspired to keep those arrangements from the federal regulators.

The Department said that two other legal actions were brought against Clifford and Altman at the same time. In one, both were indicted on criminal charges in New York City today by District Attorney Robert M. Morgenthau of Manhattan. In the other, the FED brought an administrative action against Clifford and Altman.

Attorney General Barr stressed on December 19, 1991, that a global settlement against BCCI at that time--requiring the bank to forfeit all of its assets in the United States, valued at approximately $550 million, and plead guilty to racketeering charges--was the result of intensive cooperation between the Justice Department, Morgenthau's office, and the FED.

The legal actions being announced today are the results of the continuing cooperation among all of the agencies.

1325015-000-12982

Today's federal indictment was developed by a Justice Department Task Force that included prosecutors from the Fraud Section of the Criminal Division and the Office of the United States Attorney for the District of Columbia, and agents of the Federal Bureau of Investigation.

The charges and maximum penalties upon conviction are:

-- Title 18, U.S. Code, Section 371 (Conspiracy): five years in prison and a $250,000 fine (one count).

-- Title 18 U.S. Code, Section 1001 (Concealing Material Facts by Trick and Device): five years in prison and a $250,000 fine (two counts).

The Justice Department said a number of agencies and officials made major contributions to development of today's indictment. They include:

-- District Attorney's staff--John W. Moscow, Deputy Chief of the Investigation Division; James M. Kindler, Executive Assistant District Attorney; Michael G. Cherkasky, chief of the Investigation Division.

-- Justice Department--G. Allen Carver and Anthony L. Leffert, prosecutors in the Fraud Section of the Criminal Division; and Mark Dubester and Larry Parkinson, prosecutors in the U.S. Attorney's Office for the District of Columbia.

-- Federal Reserve Bank of New York; and the Board of Governors of the Federal Reserve, J. Virgil Mattingly, Richard A. Small, Katherine Wheatley, and Thomas C. Baxter.

1325015-000-12983

-- Overseas:

o The United Kingdom's Serious Fraud Office, George Staples and Christopher Dickson.

o The Court Appointed Fiduciaries of BCCI and Commissaire of Bank of Credit and Commerce Brian Smouha.

# # # #

92-233

1325015-000-12984

163

OF INVESTIGATION

LS

14 JUL 92 17 03Z

RECEIVED
TELETYPE UNIT

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Serv.
Crim.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Serv.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.

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ZNR UUUUU

R 141456Z JUL 92

FM FBI CHICAGO (29B-WF-171994)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //3150:SQ 7//

PASS: [redacted], FA COORDINATOR; UNIT CHIEF [redacted]

b6
b7C

FINANCIAL INSTITUTION FRAUD UNIT, WCC SECTION, CID.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FINANCIAL ASSISTANTS/ANALYSTS, OO: WMFO.

RE TELCON BETWEEN [redacted] FA COORDINATOR, FBIHQ, AND SSA [redacted] CHICAGO, ON JULY 13, 1992; CHICAGO TELETYPE TO FBIHQ DATED JULY 11, 1992; AND BUREAU TELETYPE TO ALL FIELD OFFICES DATED JULY 7, 1992.

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b7C

FOR INFORMATION OF THE BUREAU, THE FIRST SENTENCE OF REFERENCED CHICAGO TELETYPE SHOULD READ "CHICAGO FA [redacted]

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b7C

29B-WF-171994-365

[redacted]

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C [redacted]

1325015-000-12985

PAGE TWO DE FBICG 0008 UNCLAS

[redacted] SSAN [redacted], HAS EXPRESSED AN INTEREST IN THE TDY ASSIGNMENT TO WMFO RE CAPTIONED CASE, AND IS WILLING TO VOLUNTEER AND REMAIN IN THE WASHINGTON, D.C. AREA FOR A MAXIMUM (REPEAT MAXIMUM, RATHER THAN MINIMUM) OF 90 DAYS..."

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b7C

THERE ARE NO FURTHER CHANGES TO REFERENCED CHICAGO TELETYPE.

BT

#0008

NNNN

Memorandum

374

Dep. Dir. _____
ADD Adm. _____
ADD Inv. _____
Asst. Dir.:
Adm. Servs. _____
Crim. Inv. _____
Ident. _____
Insp. _____
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Lab. _____
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Tech. Servs. _____
Training _____
Cong. Affs. Off. _____
Off. of EEO _____
Off. Liaison & Int. Affs. _____
Off. of Public Affs. _____
Telephone Rm. _____
Director's Sec'y _____

To : Mr. Potts

Date 4/30/92

From : F. B. Verinder

Subject : HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO

PURPOSE: To obtain authorization for WMFO Special Agent [redacted] (SA) and Los Angeles (LA) SA [redacted] to travel to [redacted]

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b7D

RECOMMENDATION: That SAs [redacted] be authorized to travel to [redacted]

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b7D

APPROVED:

Director	Adm. Servs.	Laboratory	Off. of Liaison & Int. Affs.
Dep. Dir.	Crim. Inv. LAPT *	Legal Coun.	
ADD-Adm.	Ident.	Tech. Servs.	Off. of Public Affs.
ADD-Inv.	Info. Mgmt.	Training	
	Inspection	Off. of Liaison	
	Intell.	Off. of EEO	

* FOR AD Potts

DETAILS: In February 1991, WMFO initiated a financial institution fraud matter predicated upon a criminal referral from the Board of Governors of the Federal Reserve System (BGFRS) alleging that false and fraudulent statements had been made concerning BCCI's ownership and control of Credit and Commerce American Holdings (CCAH), the parent-holding company of First American Bankshares (FABS), Washington, D.C. FABS is the parent-holding company of First American Bank (FAB), Washington, D.C.

On 5/21/91, WMFO received additional criminal referrals from the BGFRS concerning BCCI's use of Saudi Arabian businessman Ghaith Pharaon as a nominee in the acquisition of the IB, Encino, California, and the National Bank of Georgia (NBG), Atlanta, Georgia.

29B-WF-171991-371

On 12/19/91, BCCI agreed to plead guilty to Federal and state charges of racketeering, fraud, and money-laundering. Specifically BCCI was charged with secretly acquiring control and influence over FAB, IB, and NBG. The plea agreement required that BCCI forfeit all of its assets in the United States to the

1 - Mr. Potts
1 - Mr. Verinder
1 - Mr. [redacted]
1 - Mr. [redacted]
1 - Mr. [redacted]
1 - Mr. [redacted]
1 - Mr. [redacted]
1 - Acting UC, FIFU

b6
b7C

DRW:drw/vf (10)

(Continued-Over)

1325015-000-13031
FBI/DOJ

Federal Government and that BCCI liquidators provide full cooperation to American enforcement agencies in the ongoing investigation. This cooperation specifically included access to documents and witnesses and the waiving of applicable privileges. On 1/9/92, liquidators for BCCI entered a guilty plea on behalf of BCCI to Federal racketeering charges in the District of Columbia, Washington, D.C.

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

The White-Collar Crimes Section concurs in the need for this travel. SAs [redacted] have extensive knowledge of the BCCI investigation making them logical choices for travel. SACs WMFO and LA also concur in the need for this travel. b6 b7C

On 4/28/92, Legat [redacted] Legat Rome advised that he had initiated coordination for this travel. On 4/29/92, ALAT [redacted] Legat Rome, advised that he has obtained appropriate host country clearance. b6 b7C

1325015-000-13032

On 4/28/92, DOJ [redacted] advised that she concurs with this travel and that she has coordinated this matter with Linda Candler, DOJ-Office of International Affairs (DOJ-OIA). On 4/28/92, Candler concurred with this travel. b6 b7C

On 4/28/92, SSA [redacted] Domestic Liaison Unit, Office of Liaison and International Affairs, FBIHQ concurred with this travel and advised that he will make the appropriate notifications to Department of State by the attached "DOJ Notification of Foreign Travel" form following approval. b6 b7C

The anticipated cost of travel for WMFO SA [redacted] is $2,250 and $2,499 for LA SA [redacted] b6 b7C

1325015-000-13033

ADDENDUM: (5/1/92)

b6
b7C

Travel plans of WMFO SA [redacted] have been amended per request from the Department of Justice, Fraud Section (DOJ-FS) for SA [redacted] assistance to conduct interviews in captioned investigation of two individuals in Saudi Arabia with DOJ [redacted] during the period 5/8/92-5/14/92. Legat Rome has initiated requests to obtain host country clearance for SA [redacted] for Jeddah, Saudi Arabia. It is requested that SA [redacted] travel to Jeddah, Saudi Arabia be approved pending receipt of host country clearance,

APPROVED:

Adm. Servs.		Laboratory	Off. of Liaison
Crim. Inv.		Legal Coun.	& Int. Affs.
Ident.		Tech. Servs.	Off. of
Info. Mgmt.		Training	Public Affs.
Inspection		Cong. Affs. Off.	
Intell.		Off. of EEO	

For AD Potts

1325015-000-13034

Memorandum

To : LABORATORY DIVISION
ATTN: LANGUAGE SERVICES UNIT

Date 8/12/92

From : SAC, WMFO

Subject: HIDDEN INTERESTS
MAJOR CASE #38
OO:WMFO

Attached hereto are copies of various documentation written in foreign languages that relate to a current investigation into the BCCI scandal that need to be translated for investigative purposes. A breakdown of the documents to be translated is as follows:

Language	Number pages to be translated
Spanish	2
French	36
Arabic	61

Of the total 61 Arabic written pages, approximately half of those are illegible. To the extent that the pages are legible translation will be required.

Each separate document comes attached to a Document Coding Form that identifies the document and will need no translation. Please ensure these coding forms remain attached to their respective documents.

Since these documents may have an impact on an upcoming trial in October, it is requested these documents be translated as soon as possible and provided to WMFO no later than September 10, 1992. b6 b7C

Any questions should be directed to SSA [redacted] telephone number (202) 324-9332. [redacted]

29B-WF-171994-372

2-Bureau (enc.)
2-WMFO (enc.)
(1-29B-WF-171994)
(1-Administrative)

encls. to NY 8/17/92 for translation

ABL:dml
(4)

1325015-000-13035

3835 326

FEDERAL BUREAU OF INVESTIGATION

0001 MRI 00042 14 JUL 92 02 13Z

00 P12

DE FBISD #0002 1960036 RECEIVED TELETYPE UNIT

ZNR UUUUU

O 140035Z JUL 92

FM FBI SAN DIEGO (RUCNFB 0015)

TO DIRECTOR FBI/IMMEDIATE/

BT

UNCLAS

CITE: //3780//

PASS: [redacted]

b6
b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FINANCIAL ASSISTANTS/FINANCIAL ANALYSTS (FA); OO: WMFO.

RE TELETYPE, DATED 6/7/92, CALLING FOR VOLUNTEERS FOR CAPTIONED INVESTIGATION.

BECAUSE OF THE EOD DATE OF CURRENT FA (APRIL 19, 1992), AND THE EXTENSIVE WORKLOAD AT THE SAN DIEGO DIVISION, THE FA FROM SAN DIEGO WILL BE UNABLE TO VOLUNTEER.

BT

#0002

270-WF-171999-373

NNNN

1325015-000-13036

326

11 JUL 92 06 51

0068 MRI 00184

RR RUCNFB

DE FBIPX #0005 1930215

ZNR UUUUU

R 110213Z JUL 92

FM FBI PHOENIX

TO DIRECTOR FBI (29B-WF-171991)//ROUTINE/

BT

UNCLAS

CITE: //3630:0004//

PASS: [redacted], ROOM 3835, NCC SECTION.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 35; FINANCIAL ASSISTANTS/FINANCIAL ANALYSTS (FA); OO: WMFO.

RE BUREAU TELETYPE TO ALL FIELD OFFICES, 7/7/92, AND TELCALLS 7/8/92 AND 7/10/92.

PHOENIX DIVISION CURRENTLY HAS NO FA'S AVAILABLE FOR CAPTIONED ASSIGNMENT.

29B-WF-171114-374

BT

#0005

1-D

NNNN

100-3823

b6
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b6
b7C

1325015-000-13037

Memorandum

To : DIRECTOR, FBI Date 5/7/92

From : LEGAT, BERN (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS; MC 38; FIF; FAG; OO: WMFO.

Reference: WMFO tel, 4/27/92.

Dissemination, as outlined below, was made on dates indicated.

X Pertinent information from referenced communication.

Name and Location	Date Furnished
	5/7/92

b7D

375

2 - Bureau
(1 - OLIA)
2 - Bern
(1 - 66-120)
hac
(4)

LEG-7

1325015-000-13038

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, WMFO (P)

SUBJECT: HIDDEN INTEREST
Major Case #38
FIF;FAG
OO:WMFO

Bureau File Number: 29B-WF-171994

Field Office File Number: BCCI

Squad or RA Number:

Agent's Social Security No.:

☐ X if case involves corruption of a public official (Federal, State or Local).

Date: 7/30/92

Investigative Assistance or Technique Used

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help 3 = Helped, substantially
2 = Helped, but only minimally 4 = Absolutely essential

1	Acctg Tech Assistance	8	Eng Sec Tape Ex	15	Photographic Coverage	22	Telephone Toll Recs
2	Aircraft Assistance	9	Hypnosis Assistan	16	Polygraph Assistance	23	UCO Group I
3	Computer Assistance	10	Ident Div Assistan	17	Search Warrant Executed	24	UCO Group II
4	Consensual Monitoring	11	Informan Informat	18	Show Money Usage	25	UCO Other
5	ELSUR FISC	12	Lab Div Exams	19	Surveil Sqd (SOG) Asst	26	NCAVC VI-CAP
6	ELSUR Title III	13	Lab Div Field Su	20	SWAT Team Action	27	Visual Inves Analysis Vi
7	Eng Sect Field Supp	14	Pen Register	21	Tech Agt or Tech Equip		

b6
b7C
b7E

A. Preliminary Judicial Process (Number of subjects)	Complaints	Informations	Indictments
			2

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted_____ : Armed_____

Subpoenas Served_____

Criminal Summons_____

Local Crim. Summons_____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists:_____ All Other Hostage Situations:_____

Missing or Kidnaped Children Located:_____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

RICO -Civil Convictions

No. of Subj.

Civil Suits Amount of Suit

Settlement of Award

Government Defendant	Government Plaintiff
$	$
$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District / District State / Conviction or Pretrial Div. Date / Sentence Date / No. of Subjects / Acquitted / Dismissed

Subject 1 — Subject Description Code* -	Conviction: Title	Section	Counts	Combined Sentence: In-Jail Yrs. Mos.	Suspended Yrs Mos.	Probation Yrs. Mos.
☐ Felony						
☐ Misdemeanor						
☐ Parole Revocation						
☐ Probation Revocation				Total Fines $		
☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		
☐ Pretrial Diversion						

Subject 2 — Subject Description Code* -	Conviction: Title	Section	Counts	Combined Sentence: In-Jail Yrs. Mos.	Suspended Yrs. Mos.	Probation Yrs. Mos.
☐ Felony						
☐ Misdemeanor						
☐ Parole Revocation						
☐ Probation Revocation				Total Fines $		
☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.		
☐ Pretrial Diversion						

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
Clark McAdams Clifford	12/25/06	W	m		[redacted]
[redacted]		W	m		[redacted]

b6
b7C

Explanation of accomplishment claimed:

On 7/29/92, Clark McAdams Clifford and [redacted] were indicted on two counts of concealing material facts by trick and device (18 use 1001) and one count of conspiracy (18 use 371) by a Federal Grand Jury, Washington, D.C.

b6
b7C

2 - Bureau
2 - Field Office
* See codes on reverse side.

SA [redacted]

1325015-000-13039

b6
b7C

TMK 9-11-92

Property Type Codes*

Code No	Description
1.	Cash (U.S. and foreign currency)
2.	Stock, Bonds or Negotiable instruments (checks, travelers checks, money orders, certificates of deposit, etc)
3.	General Retail Merchandise (clothing, food, liquor, cigarettes, TVs, etc)
4.	Vehicles (autos, trucks, tractors, trailers, campers, motorcycles, etc)
5.	Heavy Machinery & Equipment (heavy equipment, computers, etc)
6.	Aircraft
7.	Jewelry (including unset precious and semiprecious stones)
8.	Vessels
9.	Art, Antiques or Rare Collections
11.	Real Property
20.	All Other Recoveries (not falling in any category above)

Potential Economic Loss Prevented (PELP) Type Codes*

Code No	Description
22	Counterfeit Stocks, Bonds, Currency or Negotiable Instruments
23	Counterfeit or Pirated Sound Recordings or Motion Pictures
24	Bank Theft Scheme Aborted
25	Ransom, Extortion or Bribe Demand Aborted
26	Theft from, or Fraud Against, Government Scheme Aborted
27	Commercial or Industrial Theft Scheme Aborted
30	All Other Potential Economic Loss Prevented (not falling in any category above)

*Except for cash, the Remarks section must contain an explanation of the computation of the recovery value or loss prevented. An explanation airtel must accompany this report if the recovery is $1 million or more, or if the PELP is $5 million or more.

Subject Description Codes*

- Enter Description Code Only When Reporting a Conviction -

Organized Crime Subjects (Include Family Name Or Group):
- 1A Boss, Underboss or Consigliere
- 1B Capodecina or Soldier
- 1C Possible LCN Member or Associate
- 1D OC Subject Other Than LCN
- 1E Not a Member or Associate of LCN Family or OC Organization

Known Criminals (Other Than OC Members):
- 2A Top Ten or I.O. Fugitive
- 2B Top Thief
- 2C Top Con Man

Foreign Nationals:
- 3A Legal Alien
- 3B Illegal Alien
- 3C Foreign Official Without Diplomatic Immunity
- 3D U.N. Employee Without Diplomatic Immunity
- 3E Foreign Students
- 3F All Others

Terrorists:
- 4A Known Member of a Terrorist Organization
- 4B Possible Terrorist Member or Sympathizer.

Union Members:
- 5A International or National Officer
- 5B Local Officer
- 5C Union Employee

Government Officials Or Employees:

Federal	State	Local
6A Presidential Appointee	6J Governor	6R Mayor
6B U.S. Senator	6K Lt. Governor	
6C U.S. Representative	6L Legislator	6S Legislator
6D Judge	6M Judge	6T Judge
6E Prosecutor	6N Prosecutor	6U Prosecutor
6F Law Enforcement Officer	6P Law Enforcement Officer	6V Law Enforcement Officer
6G Fed Empl - GS 13 & above	6Q All Others - State	6W All Others - Local
6H Fed Empl - GS 12 & below		

Bank Officers or Employees:
- 7A Bank Officer
- 7B Bank Employee

All Others:
- 8A All Other Subjects (not fitting above categories)
- 8B Company / Corporation

*If a subject can be classified in more than one of the categories, select the most appropriate in the circumstance.

Instructions

Subject Priorities for FBI Arrest or Locates:

A - Subject wanted for crimes of violence (i.e. murder, manslaughter, forcible rape, robbery and aggravated assault) or convicted of such crimes in the past five years.

B - Subjects wanted for crimes involving the loss or destruction of property valued in excess of $25,000 or convicted of such crimes in the past five years.

C - All others

Claiming Non-Federal Arrests, Summonses, Recoveries or Convictions:

It is permissible to claim a local arrest, summons, recovery or conviction **if the FBI significantly contributed to the accomplishment.** A succinct narrative setting forth the basis for the claim must accompany this report. When claiming a local recovery, enter the word "LOCAL" to the right of the amount. Enter "LF" in the "In-Jail" block for all life sentences and "CP" for capital punishment sentences.

Reporting Convictions:

Convictions should not be reported until the sentence has been issued. There are two exceptions to this rule. The conviction information can be submitted by itself if:

1. The subject becomes a fugitive after conviction but prior to sentencing.
2. The subject dies after conviction but prior to sentencing.

An explanation is required in the Remarks section for either of the above exceptions.

Rule 20 Situations:

The field office that obtained the process (normally the office of origin) is the office that should claim the conviction, **not** the office where the subject enters the plea in cases involving Rule 20 of the Federal Rules of Criminal Procedures.

Investigative Assistance or Techniques (IA/Ts) Used:

-Since more than one IA/T could have contributed to the accomplishment, each IA/T used must be rated.

-The IA/T used must be rated **each time** an accomplishment is claimed. (For example - if informant information was the basis for a complaint, an arrest, a recovery and a conviction and if separate FD-515s are submitted for each of the aforementioned accomplishments, the "Informant Information" block must be rated on each FD-515 even if it was the same information that contributed to all the accomplishments.)

Race Codes:

C = Chinese; I = Indian/American; J = Japanese; B = Black; O = All other; U = Unknown; W = W[redacted]

1325015-000-13040

FD-515 (Rev. 7-19-91)

Accomplishment Report

(Submit within 30 days from date of accomplishment)

TO: Director, FBI

FROM: SAC, WMFO (P)

SUBJECT: HIDDEN INTEREST
Major Case #38
FIF; FAG
OO:WMFO

1399

Date 7/30/92

Bureau File Number: 29B-WF-171994

Field Office File Number: BCCI

Squad or RA Number:

Agent's Social Security No.:

☐ X if case involves corruption of a public official (Federal, State or Local).

Investigative Assistance or Technique Used

b6 b7C b7E

Rate each Investigative Assistance or Technique used in connection with the accomplishment being claimed.

1 = Used, but did not help
2 = Helped, but only minimally
3 = Helped, substantially
4 = Absolutely essential

1 Acctg Tech Assistance		8 Eng Sect Tape Exams		15 Photographic Coverage		22 Telephone Toll Recs	
2 Aircraft Assistance		9 Hypnosis Assistance		16 Polygraph Assistance		23 UCO Group I	
3 Computer Assistance		10 Ident Div Assistance		17 Search Warrant Executed		24 UCO Group II	
4 Consensual Monitoring		11 Informant Information		18 Show Money Usage		25 UCO Other	
5 ELSUR FISC		12 Lab Div Exams		19 Surveil Sqd (SOG) Asst		26 NCAVC VI-CAP	
6 ELSUR Title III		13 Lab Div Field Supp		20 SWAT Team Action		27 Visual Invest Analysis (VIA	
7 Eng Sect Field Support		14 Pen Registers		21 Tech Aot or Tech Equip			

A. Preliminary Judicial Process (Number of subjects)	Complaints	Informations	Indictments
			2

B. Arrests, Locates, Summonses or Subpoenas Served (No. of Subjects)

	Subject Priority* A	B	C
FBI Arrests -			
FBI Locates -			
Local Arrests -			

FBI Subj. Resisted _____ : Armed _____

Subpoenas Served _____

Criminal Summons _____

Local Crim. Summons _____

C. Release of Hostages or Children Located: (Number of Hostages or Children Located)

Hostages Held By Terrorists: _____ All Other Hostage Situations: _____

Missing or Kidnaped Children Located: _____

D. Recoveries, Restitutions, or Potential Economic Loss Prevented (PELP) (Explain valuation in remarks)

Property Type Code*	Recoveries	Restitutions	PELP Type Code*	Potential Economic Loss Prevented
	$	$		$
	$	$		$
	$	$		$

E. Civil Matters

		Government Defendant	Government Plaintiff
RICO -Civil Convictions	Civil Suits Amount of Suit	$	$
No. of Subj.	Settlement of Award	$	$ Enter AFA Payment Here

F. Administrative Sanctions

Subject 1 Subject Description Code* -

☐ Suspension ☐ Debarment Time Frame - Years: Months: ☐ Permanent

G. Final Judicial Process: Judicial District _____ District _____ State _____ Conviction or Pretrial Div. Date _____ Sentence Date _____ No. of Subjects: Acquitted _____ Dismissed _____

Subject 1 — Subject Description Code* -	Conviction			Combined Sentence						Subject 2 — Subject Description Code* -	Conviction			Combined Sentence					
	Title	Section	Counts	In-Jail Yrs.	Mos.	Suspended Yrs.	Mos.	Probation Yrs.	Mos.		Title	Section	Counts	In-Jail Yrs.	Mos.	Suspended Yrs.	Mos.	Probation Yrs.	Mos.
☐ Felony										☐ Felony									
☐ Misdemeanor										☐ Misdemeanor									
☐ Parole Revocation										☐ Parole Revocation									
☐ Probation Revocation				Total Fines $						☐ Probation Revocation				Total Fines $					
☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.						☐ Plea ☐ Trial				Add consecutive sentences together. Enter longest single concurrent sentence. Do not add concurrent sentences together. Sentence 10 yrs.- 8 yrs susp. = 2 yrs. In-Jail.					
☐ Pretrial Diversion										☐ Pretrial Diversion									

Attach additional forms if reporting final judicial process on more than two subjects, and submit a final disposition form (R-84) for each subject.

H. Identifying Data: For every subject reported in Sections A, B, E, F, or G above, provide the following: *Attach additional forms for more than four subjects.*

Name	Date of Birth	Race*	Sex	Place of birth (if available)	Social Security Number (if available)
Clark McAdams Clifford	12/25/[illegible]	W	M		577-54-5387
[redacted]		W	M		[redacted]

b6 b7C

Explanation of accomplishment claimed:

On 7/29/92, Clark McAdams Clifford and [redacted] were indicted on two counts of concealing material facts by trick and device (18 use 1001) and one count of conspiracy (18 use 371) by a Federal Grand Jury, Washington, D.C.

FILED
1992
FBI - [illegible] FIELD OFFICE

3891

1427C

2 - Bureau
2 - Field Office
See codes on reverse side.

SA [redacted]

1325015-000-13041

b6 b7C

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 06-12-2018 BY [redacted]

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411

CONFIDENTIAL

TRANSLATION FROM SPANISH

Our Ref. C./ID2/9061/7-25-91

INFORMATIVE NOTE

SUBJECT: REQUEST FOR INFORMATION ON BCCI.

Last July 5 the Bank of Credit and Commerce International (BCCI) was forced to close its Madrid branch when it license was suspended by Banco de España [Bank of Spain]. This paralleled actions taken in LUXEMBOURG, CANADA, FRANCE, GREAT BRITAIN, and the CAYMAN ISLANDS.

Banco de España has followed the activities of the Spanish branch of BCCI for several years. The scrutiny became more intense in 1990 when it declared a loss of 1.246 billion pesetas and earmarked 1.041 billion to guarantee insolvencies.

BCCI began to operate in SPAIN in 1983 when it bought the old Banco de Descuento [Discount Bank] from the Fondo de Garantía de Depósitos (FGD) [Deposit Insurance Fund] at an auction. The license suspension means relying on the FGD again. It will be in charge of the liquidation and search for either a Spanish or foreign buyer who will be responsible for the eighteen offices BCCI has in SPAIN, which employ 267 people.

The FGD will return the money from the accounts to the bank customers up to a maximum of one and a half million pesetas. Those customers whose deposits exceed said amount should wait for liquidation of the assets.

When the Spanish branch of BCCI was audited, it had 4.383 billion pesetas in capital available and reserves of 87 (million pesetas).

The BCCI case is one of the most well-known in which a financial institution has been used to launder money and finance internationally condemned activities. Examples are laundering the profits from illegal activities carried out by MANUEL ANTONIO NORIEGA and other traffickers, or the economic support that this bank has given terrorist organizations which have acted during the last few years in Europe.

Request: information on institutions and persons, directors or executives, relating to illegal arms and drug

Translated by [redacted]
9/23/91

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transactions, money laundering and the financing of terrorist organizations in which BCCI has participated. Also, anything with regard to pressure that has been applied at a specific time to individuals in the business, financial, or political field, as well as any other information that will complete our data bases.

Drafted: 7/23/91

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 06-08-2018 BY [redacted]

b6
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CONFIDENCIAL

N/Ref.C/ ID2/9061/250791

S/Ref.

NOTA INFORMATIVA

ASUNTO: SOLICITUD DE INFORMACION SOBRE EL BCCI.

El 5 de julio pasado el Bank of Credit and Commerce International (BCCI) se vio obligado a cerrar su filial en Madrid al ser suspendida su licencia por el Banco de España. Esta acción fue paralela a las llevadas a cabo en LUXEMBURGO, CANADA, FRANCIA, REINO UNIDO e ISLAS CAIMAN.

El Banco de España mantenía desde hace varios años un seguimiento de las actividades de la filial española del BCCI, que ha sido más intenso a partir de 1.990 al declarar pérdidas por el valor de 1.246 millones de pesetas y destinar 1.041 millones al saneamiento de insolvencias.

El BCCI comenzó a operar en ESPAÑA durante el año 1.983 cuando compró, a través de subasta, el antiguo Banco de Descuento al Fondo de Garantía de Depósitos (FGD). La retirada de la licencia supone volver a depender otra vez de F.G.D., que se encargará de realizar la liquidación y de buscar un comprador bien nacional bien extranjero, que se responsabilice de las dieciocho oficinas que el BCCI tiene en ESPAÑA, manteniendo de esta forma el empleo de los 267 trabajadores de las mismas.

El F.G.D. devolverá el dinero de las cuentas a los clientes del banco hasta un máximo de un millón y medio de pesetas. Aquellos clientes cuyos depósitos superen dicha cifra deberán esperar a la liquidación de los activos.

En el momento de la intervención de la filial española del BCCI disponía de un capital de 4.383 millones de pesetas y unas reservas de 87.

El caso del BCCI es uno de los más notorios en los que una institución financiera se ha utilizado para blanquear dinero negro y financiar operaciones internacionalmente condenadas. Ejemplos son el blanqueo de beneficios procedentes de actividades ilegales llevadas a cabo por MANUEL ANTONIO NORIEGA y otros traficantes, o el apoyo económico que este banco ha prestado a organizaciones terroristas los cuales han actuado durante estos últimos años en Europa.

CONFIDENCIAL

Se solicita: información sobre instituciones y personas, directivos o ejecutivos, relacionados con operaciones de comercio ilegal de armas y droga, blanqueo de dinero negro y financiación de organizaciones terroristas en las que haya intervenido el BCCI. De igual forma, en lo referente a las presiones que en un momento determinado, se hayan podido ejercer sobre personalidades del mundo empresarial, financiero o político, así como cualquier otra información que complete nuestras bases de datos.

Fecha de Redacción: 23.07.91

CONFIDENCIAL

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- X ☐ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 3/5/92

TO : DIRECTOR, FBI
ATTN: FBI LABORATORY DIVISION,
COMPUTER ANALYSIS RESPONSE TEAM (CART)

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5)

SUBJECT : HIDDEN INTERESTS
MAJOR CASE 38
OO:WMFO

20306026

Personally Delivered By

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b7C

ORIGINAL
Copy & Specs Detached

REQUEST OF FBIHQ
LABORATORY DIVISION - CART:

CART is requested to examine enclosed computers for all directories and files (to include hidden and erased files) for the creation of an index/directory list for review by the field office to determine which, if any, files will need to be printed for additional analysis by the field.

Enclosed for the Bureau are seven computers and keyboards described as follows:

(1) ALR Computer, 85 mg hard drive, #0230354
ALR Keyboard, #00891191
(2) ALR Computer, 85 mg hard drive, #0245467
ALR Keyboard, #05251161
(3) ACER Computer, 33 mg hard drive, #A1120019365M
CSR Keyboard, model 2001T

-Bureau (Enc. 14)
1-WMFO

MRM:mm
(4)

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-13052

(4) IBM PC Computer, #3694718
Keytonic Keyboard, 6106755
(5) NEC Computer, 30 mg hard drive, #6700470
IBM Keyboard, #261013704
(6) IBM Computer, 20 mg hard drive, #721067678
IBM Keyboard, #2014793
(7) IBM Compatible 286 Computer, no serial number
CSR 2001 Keyboard

ADMINISTRATIVE:

For information, FBI Laboratory Division - CART, captioned matter is a very sensitive and high profile case. The enclosed computers and respective keyboards were obtained through the execution of a search warrant on a company owned and operated by an indicted individual of captioned matter. The company was the indicted individual's U.S. base of operations and requires more extensive investigation. It is both critical and essential that the above request be handled as expeditiously as possible.

1325015-000-13053

7-125 (Rev. 3-19-82)

FBI LABORATORY
Washington, D. C.

Date 3-6-92
Time 11:35A

EVIDENCE ACKNOWLEDGMENT

b6
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Received from SA [redacted] of the
(Name and Title)

FBI WMFO - NVMRA
(Department or Agency)

7999 Leesburg Pike Falls Church, VA (202) 324-9124
(Address) (Phone Number)

____ box(es), ____ bag(s), ____ envelope(s), ____ vial(s), 14 object(s)
of sealed evidence for examination in connection with case number 29B-WF-171994
entitled Hidden Interests; MAJOR CASE 38; OO:WMFO

Evidence Should Be
☐ Mailed Back
☒ Picked Up By Contributor

This evidence will remain in the custody of the FBI Laboratory while the examinations are being conducted. Following completion of the examinations, a report containing the results of the examinations and the disposition of the evidence will be forwarded to your department. If evidence is picked up personally, your representative should identify it with the Laboratory case number(s) assigned in the FBI Laboratory report.

Director
Federal Bureau of Investigation

FBI/DOJ
1325015-000-13054

7 - 195 (7-20-81)

FBI LABORATORY
WASHINGTON, D.C.

Date 5/20/92

Time 11 30 AM

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EVIDENCE RECEIPT

Delivered To [redacted] (Name and Title) Of The

FBI (WMFO- NVMRA) (Address) X9300 (Phone Number)
(Department or Agency)

b6
b7C

Received From [redacted]

of the FBI Laboratory Division, Room 3223 Phone Number 202-324-4476

____ Box (es) ____ Bag (s) ____ Envelope (s) ____ Vial (s) ____ Object (s)

Containing The Following Specimens: Q's 3,6,8,7,2 + Handcopy Printouts K's ____ Items ____

Being Returned In Connection With FBI Laboratory Number 20306026 ZC

Bureau File Number 29B-WF-171994 Contributor Number ____

Case Entitled: Hidden Interests

This Receipt Form Is To Document The Transfer Of The Above Evidence To The Person Whose Signature Appears Below.

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[redacted]

1325015-000-13055

RECEIVED
F.B.I.
COMMUNICATIONS
NOV 20 8 26 AM '91

American Embassy
London

FAX: 71-499-7944

UNCLASSIFIED

FROM: [redacted] ASSISTANT LEGAL ATTACHE

TO: [redacted] EXT. 5594, ROOM 3839, TL 231

SUBJECT: BCCI

NO. OF PGS. 2 (including cover and last page)

SENDER: BT DATE: NOVEMBER 20, 1991

RECD BY: _____ DATE: _____

COMMENTS: _____

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29B-WF-171994-396X2

29-HQ-116176

1D

1325015-000-13056

Page 72 ~ Referral/Consult;
Page 73 ~ Referral/Consult;

XXXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

Memorandum

Dep. Dir. 418
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Insp.
Intell.
Lab.
Legal Coun.
Rec. Mgnt.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Sec'y

To : Mr. Potts

Date 5/7/92

From : F. B. Verinder

Subject : (1) HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO

PURPOSE: To obtain authorization for WMFO Special Agents (SAs) [redacted] to travel to Paris, France. [redacted] The anticipated dates of travel are 5/30/92-6/6/92.

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RECOMMENDATION: That SAs [redacted] be authorized to travel to Paris, France.

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b7C

APPROVED:

Director	Adm. Servs.	Laboratory	Off. of Liaison & Int. Affs.		
Dep. Dir.	Crim. Inv. LAP/T*	Legal Coun.			
ADD-Adm.	Ident.	Tech. Servs.	Off. of Public Affs.		
ADD-Inv.	Info. Mgnt.	Training			
	Inspection	Cong. Affs. Off.			
	Intell.	Off. of EEO			

*Approved For DD Potts

DETAILS: In February 1991, WMFO initiated a financial institution fraud matter predicated upon a criminal referral from the Board of Governors of the Federal Reserve System (BGFRS) alleging that false and fraudulent statements had been made concerning BCCI's ownership and control of Credit and Commerce American Holdings (CCAH), the parent-holding company of First American Bankshares (FABS), Washington, D.C. FABS is the parent-holding company of First American Bank (FAB), Washington, D.C.

On 5/21/91, WMFO received additional criminal referrals from the BGFRS concerning BCCI's use of Saudi Arabian businessman Ghaith Pharaon as a nominee in the acquisition of the Independence Bank (IB), Encino, California, and the National Bank of Georgia (NBG), Atlanta, Georgia. 29B-WF-171994-346

On 11/15/91, the Federal grand jury (FGJ), District of Columbia, Washington, D.C. (DOCWDC), indicted BCCI Holdings (Luxembourg), S.A.; Bank of Credit and Commerce International S.A.; Bank of Credit and Commerce International (Overseas) Limited; International Credit and Investment Company (Overseas) Limited; Agha Hasan Abedi; Swaleh Naqvi; and Ghaith Pharaon charging violations of the conspiracy, wire fraud, and RICO statutes. Abedi, Naqvi, and Pharaon are currently fugitives.

1 - Mr. Potts
1 - Mr. Verinder
1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - Acting UC, FIFU

b6
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DRW:drw/vf (10)

(Continued-Over)

1325015-000-12143

Abedi, the founder of BCCI, is believed to be in Karachi, Pakistan. Naqvi, the Acting President of the BCCI Group, is believed to be in Abu Dhabi. Information has been received variously placing Pharaon in France, Korea, and travelling between Riyadh, Saudi Arabia; Cairo, Egypt; and Morocco.

On 4/2/92, [redacted] Principal Deputy Chief, Department of Justice Fraud Section (DOJ-FS), advised that a French Magistrate had issued a search warrant for evidence for Pharaon's offices and properties in Paris, France, and that the French authorities had requested that the FBI participate in the search. This was pursuant to an American Commission Rogatory. [redacted] stated that it is believed that documents concerning Centrust Savings Bank, Miami, Florida, and other areas of importance to the BCCI investigation may be located in Pharaon's offices. b6 b7C

On 4/27/92, Legat Paris advised that [redacted] b7D

[redacted]

The White-Collar Crimes Section concurs in the need for this travel. SAs [redacted] have extensive knowledge of the BCCI investigation making them logical choices for travel. SAC, WMFO concurs in the need for this travel. b6 b7C

Legat Paris teletype to Director, FBI dated 4/27/92 advised that the French authorities had approved this travel. On 5/4/92, Legat [redacted] Legat Paris advised that host country clearance had been obtained for [redacted] b6 b7C

On 5/4/92, DOJ-FS Attorney [redacted] advised that she concurs with this travel and that she has coordinated this matter with Linda Candler, DOJ-Office of International Affairs. On 5/5/92, Candler concurred with this travel.

On 5/5/92, SSA [redacted] Domestic Liaison Unit, Office of Liaison and International Affairs, FBIHQ concurred with this travel and advised that he will make the appropriate notifications to Department of State by the attached "DOJ Notification of Foreign Travel" form following approval. b6 b7C

The total estimated cost of travel per Agent for [redacted] is $3,863.40. b6 b7C

1325015-000-12144

Memorandum

Dep. Dir. 15C
ADD Adm. ____
ADD Inv. ____
Asst. Dir.:
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Cong. Affs. Off. ____
Off. of EEO ____
Off. Liaison & Int. Affs. ____
Off. of Public Affs. ____
Telephone Rm. ____
Director's Sec'y ____

To : Mr. Potts

Date 6/19/92

From : F.B. ~~Verinder~~

Subject : HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO

PURPOSE: To obtain authorization for WMFO Special Agent (SA) [redacted] to travel to Ottawa, Canada to conduct interviews and review documents in conjunction with the ongoing investigation concerning the Bank of Credit and Commerce International (BCCI). The anticipated dates of travel are 6/21-24/92.

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RECOMMENDATION: That SA [redacted] be authorized to travel to Ottawa, Canada.

b6
b7C

BE
DRW

APPROVED:

Director	Adm. Servs.	Laboratory	Off. of Liaison & Int. Affs.
Dep. Dir.	Crim. Inv. CAPT	Legal Coun.	
ADD-Adm.	Ident.	Rec. Mgmt.	Off. of Public Affs.
ADD-Inv.	Info. Mgmt.	Training	
	Inspection	Cong. Affs. Off.	
	Intell.	Off. of EEO	

* Approved for AD Potts

DETAILS: In February 1991, WMFO initiated a financial institution fraud matter predicated upon a criminal referral from the Board of Governors of the Federal Reserve System (BGFRS) alleging that false and fraudulent statements had been made concerning BCCI's ownership and control of Credit and Commerce American Holdings (CCAH), the parent-holding company of First American Bankshares (FABS), Washington, D.C. FABS is the parent-holding company of First American Bank, Washington, D.C. (FAB).

On 5/21/91, WMFO received additional criminal referrals from the BGFRS concerning BCCI's use of Saudi Arabian businessman Ghaith Pharaon as a nominee in the acquisition of the Independence Bank (IB), Encino, California, and the National Bank of Georgia (NBG), Atlanta, Georgia. 29B-WF-171961-349

On 11/15/91, the Federal Grand Jury (FGJ), District of Columbia, Washington, D.C. (DOCWDC), indicted BCCI Holdings (Luxembourg), S.A.; Bank of Credit and Commerce International S.A.; Bank of Credit and Commerce International (Overseas) Limited; International Credit and Investment Company (Overseas)

1- Mr. Potts
1- Mr. Verinder
1- [redacted]
1- [redacted]

1- [redacted]
1- [redacted]
1- [redacted]
1- Acting UC, FIFU

1- [redacted]

b6
b7C

DRW:drw
DRW

(Continued-Over)

Memorandum from F. B. Verinder to Mr. Potts
RE: Hidden Interests; Major Case 38; OO: WMFO

Limited; Agha Hasan Abedi; Swaleh Naqvi; and Ghaith Pharaon charging violations of the conspiracy, wire fraud, and RICO statutes. In January 1992, BCCI plead guilty in the U. S. District Court for the District of Columbia, and BCCI was ordered to forfeit all of its assets in the United States (approximately $550 million in cash and other assets). In addition, the BCCI plea agreement required that BCCI liquidators provide full cooperation in the ongoing investigation, to include access to documents and witnesses.

By teletype dated 6/17/92, SAC, WMFO requests authorization for the official travel of SA [redacted] to Ottawa, Canada for the purpose of interviewing [redacted] International Credit and Investment Corporation, Ltd. (ICIC). [redacted] has agreed to be interviewed [redacted] ICIC and BCCI. b6 b7C

On 2/6/92, a representative from the Department of Justice Asset Forfeiture Program notified WMFO that, under the BCCI plea agreement, the assets of BCCI and its subsidiaries are forfeitable and WMFO has been working to identify all assets subject to forfeiture. ICIC, ICIC Investment, and ICIC Holdings, Ltd. are all related companies and WMFO is attempting to determine their ties with BCCI in order for their assets to be forfeited. The United States government currently has frozen $47 million worth of assets, which are held in the United States, however, the freeze on these assets expires 6/30/92.

The White-Collar Crimes Section concurs in the need for this travel. SA [redacted] has extensive knowledge of the BCCI investigation making him the logical choice for travel. SAC, WMFO concurs in the need for this travel. b6 b7C

On 6/19/92, ALAT [redacted] Legat, Ottawa advised that he had obtained appropriate host country clearance for SA [redacted] to travel during the period 6/21-24/92. b6 b7C

On 6/17/92, Department of Justice, Fraud Section (DOJ-FS) Attorney [redacted] advised that she concurs with this travel. On 6/19/92, [redacted] Department of Justice, Office of International Affairs (DOJ-OIA) concurred with this travel. b6 b7C

On 6/17/92, [redacted] Domestic Liaison Unit, Office of Liaison and International Affairs, FBIHQ concurred with this travel and advised that he will make the appropriate notifications to Department of State by the attached "DOJ Notification of Foreign Travel" form following approval. b6 b7C

The estimated cost of travel for SA [redacted] is $899.39 and, as of 6/17/92, WMFO had $39,000 remaining in the office travel budget. b6 b7C

7-1 (Rev. 4-26-78)

74

REPORT
of the
FBI LABORATORY

1- [redacted]

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FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

To: SAC, WMFO (29B-WF-171994) (P) (C-5) August 10, 1992

FBI FILE NO. 29B-WF-171994

LAB NO. 20306026 D ZC

YOUR NO.

Re: HIDDEN INTERESTS
MAJOR CASE 38
OO: WMFO

Examination requested by: Addressee

Reference: Communication dated March 5, 1992

Examination requested: Magnetic Media

March 6, 1992

29B-WF-171994-352

Specimens:

Q2 ALR computer system, S/N 0245462 and keyboard S/N 05251161 labelled "Room M"

Q3 80 Data computer system (no serial number) and 2001 keyboard labelled "Room G"

Q4 Intel computer system, S/N P70096330 and CSR keyboard labelled "Room J"

Q5 ALR computer system S/N 0230354 and keyboard S/N 00891191 labelled "Room L"

Q6 NEC computer system S/N 6700470 and IBM keyboard number 261013704 labelled "Room E"

Q6a One 5 1/4" floppy disk found in Q6

Q7 IBM PS2 model 30 computer system and IBM keyboard S/N 2014793 labelled "Room F"

Q8 IBM AT computer system, bar code # 5178-7253163 and keyboard S/N 6106755 labelled "Room O"

FBI AUG 11 1992 MAILED 28

EMJ:clj
2- Atlanta

(over)

MAIL ROOM ☑

1325015-000-12147
FBI/DOJ

Results of Examination:

The Q2 through Q8 hard disk drives and Q6a floppy disk were analyzed using the computer resources currently available to the FBI Laboratory.

The following is the drive configuration of the submitted items: Q3, Q6, Q7 and Q8 are partitioned for logical drive C:\, Q2, Q5 and Q8 are configured for logical drives C:\ and D:\.

The operating system used on Q2, Q3, Q5 through Q8 is either MS/DOS or PC/DOS.

Directory listings have been produced for Q2, Q3, and Q5 through Q8.

A directory listing could not be produced for Q6a. This disk is probably a blank unformatted floppy disk.

The hidden files located on Q2, Q3, and Q5 through Q8 are either system, program or batch files. No hidden data files were located.

Hardcopy printouts of the deleted files contained on Q2, Q7 and Q8 have been produced. The remaining deleted files are either not recoverable, empty program files or contain no relevant text data.

Hardcopy printouts have been produced of the data files contained on Q2, Q3, and Q5 through Q8.

No duplicate diskcopies or hardcopy printouts have been retained by the FBI Laboratory.

You will be advised separately of the results of the examination of the Q4 computer system.

The Q5 computer system is being retained to assist in the examination of the Q4 computer system.

The Q2, Q3, Q6, Q7 and Q8 computer systems, Q6a floppy disk, and hardcopy printouts were personally picked up by Special Agent [redacted] on May 20, 1992. b6 b7C

1325015-000-12148

7-2 (Rev. 5-12-82)

FEDERAL BUREAU OF INVESTIGATION
UNITED STATES DEPARTMENT OF JUSTICE

Laboratory Work Sheet

To: SAC, WMFO (29B-WF-171994) (P) (C-5)

FBI FILE NO. 29B-WF-171994

LAB NO. 20306026 D ZC

Re: HIDDEN INTERESTS
MAJOR CASE 38
OO: WMFO

YOUR NO.

Examination by:

Examination requested by: Addressee

Reference: Communication dated March 5, 1992

Examination requested: Magnetic Media

Specimens received: March 6, 1992

Specimens:

Q2 ALR computer system, S/N 0245462 and keyboard S/N 05251161 labelled "Room M"

Q3 80 Data computer system (no serial number) and 2001 keyboard labelled "Room G"

Q4 Intel computer system, S/N P70096330 and CSR keyboard labelled "Room J"

Q5 ALR computer system S/N 0230354 and keyboard S/N 00891191 labelled "Room L"

Q6 NEC computer system S/N 6700470 and IBM keyboard number 261013704 labelled "Room E"

Q6a One 5 1/4" floppy disk found in Q6

Q7 IBM PS2 model 30 computer system and IBM keyboard S/N 2014793 labelled "Room F"

Q8 IBM AT computer system, bar code # 5178-7253163 and keyboard S/N 6106755 labelled "Room O"

(over)

1325015-000-12149
FBI/DOJ

LAB NUMBER 20306026ZC
PAGE 1 OF 5 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
2	X	—	MSDOS 5.0	Y / Y	C:\ Hidden system files, DOS minor recovery file, system batch files, network batch files 13 del files recovered using NORTON menuse, they were temporary files created by Windows and didnt contain anything significant
2	X	—		N / N	C:\123R3 Lotus 123 V3.1 program files and samples
	X	—		N / N	C:\123R3\ADDINS Lotus 123 "add in" application files WYSIWYG.
	X	—		N / N	C:\123R3\WYSINYG Lotus 123 "add in" application files WYSIWYG
	X	—		N / N	C:\AFTERDRK After Dark, commercial screen blanking programs for windows
	X	—		N / N	C:\AFTERDRK\ADMODULE.SDK After dark support files
	X	—		N / N	C:\AFTERDRK\ADMODULE.SDK\BLANKER After dark support files
	X	—		N / N	C:\AFTERDRK\BITMAPS after dark support files
	X	—		N / Y	C:\AXCESS Atlantis Access network software 2 del files, 1 recovered with Norton, nothing significant
	X	—		N / N	C:\AXCESS\NETWARE Atlantis Access network software, drivers
	X	—		N / N	C:\COCONET Western Digital Coconet network software
	X	—		N / N	C:\MENU Direct Access "Menu software
	X	—		N / N	C:\NETROOM Helix Netroom networking utility software
	X	—		N / N	C:\SYMPH Lotus Symphony and "add ons" applications allways, @Base, DOS, Import, Outliner, Manus Manager, Backutil Sideways, Speller, Star, Viewer, VT100 Notefile, Baseframe
	X	—		N / Y	C:\SYSTEM, DOS files & programs 1 Del file, could not recover
	X	—		N / N	C:\UTIL ALR american Logic Research, system configuration utilities
	X	—		N / N	C:\WDNET Western digital setup program and files for adapter card

1325015-000-12150

LAB NUMBER 20306026
PAGE 2 OF 5 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
2	X	X	MSDOS 5.0	N/Y	C:\WINDOWS Windows 3.0 program and support files including user created pif and group files 2 files printed, 1 del file couldn't recover
2	X	—		N/N	C:\WINDOWS\SYSTEM Windows 3.0 system files
2	X	X		N/Y	C:\WP51\ Wordperfect 5.1 program files 5 del files, 1 recovered using Nortons and printed
	X	—		N/N	C:\WP51\LEARN Wordperfect 5.1 tutorial and learning files
	X	—		N/N	C:\PROHANCE Prohance Power Mouse software
	X	—		N/N	C:\PSFONTS PS adobe fonts
	X	—		N/N	C:\PSFONTS\PFM PS adobe fonts

1325015-000-12151

LAB NUMBER 20306026 ZC
PAGE 3 OF 5 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
2	X	X	MSDOS 5.0	Y / Y	D:1 Hidden files is central Point Software + anti virus!! 1 WP 5.1 file listed stable file 2 del files, could not recover
	X	X		N / N	D:\USR Symphony & Lotus spreadsheets 8 files printed
	X	X		N / N	D:\USR\MGMT Symphony spreadsheets, allways files 29 files printed
	X	X		N / N	D:\USR\ACT Symphony, Lotus spreadsheets, allways files 44 files printed
	X	X		N / Y	D:\USR\BUDGET91 Symphony & allways files 21 files printed, 2 del files couldn't recover
	X	X		N / N	D:\USR\PHL-90 Symphony, Lotus spreadsheets allways files 25 files printed
	X	X		N / N	D:\USR\CONSOL90 Symphony & allways files 26 files printed Lotus 123 spreadsheet
	X	X		N / N	D:\USR\UPHOLD Lotus & Symphony spreadsheets, allways files 15 files printed
	X	X		N / N	D:\USR\KRESS Symphony & Lotus spreadsheets & allways files 4 files printed
	X	X		N / N	D:\USR\ADMIN Symphony spreadsheets & allways files 16 files printed
	X	X		N / Y	D:\USR\EOTYSTMT Symphony & Lotus spreadsheets, Allways files 23 files printed 1 del file, empty
	X	X		N / Y	D:\USR\TEMP Symphony spreadsheets, allways and PK fils 7 files printed 1 del file, couldn't recover
	X	X		N / Y	D:\USR\CONS-691 Symphony spreadsheets & allways files 13 files printed 4 del files, couldn't recover
	X	X		N / Y	D:\USR\PERMFILE Symphony spreadsheets & PK files 4 files printed 2 del files, couldn't recover
	X	X		N / N	D:\USR\CASHFLOW Symphony spreadsheets & PK file 6 files printed allways files
	X	X		N / N	D:\USR\TAXES Lotus 123 spreadsheets 12 files printed
	X	X		N / Y	D:\USR\BUDGET92 Symphony + Lotus spreadsheets & allways files 21 del files 13 recovered with Norton utilities 16 files printed 10 were printed, 3 didn't contain anything significant
	X	X		N / Y	D:\USR\MCE Symphony, spreadsheet & allways file 1 file printed 13 del files, 11 recovered with Norton utilities & printed

1325015-000-12152

LAB NUMBER 20306026 ZC
PAGE 4 OF 5 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
2	X	X	MSDOS 5.0	N / N	D:\WP Wordperfect documents 11 files printed
	X	—		N / N	D:\QPRO Quattro Pro program files & clip art
	X	—		N / N	D:\QPRO\FOUTS Quattro Pro fonts

LAB NUMBER 20306026
PAGE 5 OF 5 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
2	X	—	NSDOS 5	Y/Y	E:\ Hidden file is a Norton status file from CPS 1 del file, couldn't recover Anti Virus
	X	—		N/Y	E:\PCTOOLS PCTools program files & misc DOS utilities 1 del file, couldn't recover Central Point Software Inc.
	X	—		N/N	E:\PCTOOLS\SYSTEM support & help files for PCTOOLS
	X	—		N/Y	E:\PCTOOLS\DATA 1 del file, was empty Directory support & sample files for PCTOOLS
	X	—		N/N	E:\PCTOOLS\INBOX empty, no files
	X	—		N/N	E:\PCTOOLS\OUTBOX empty, no files
	X	—		N/N	E:\PCTOOLS\SENT empty, no files
	X	—		N/N	E:\PCTOOLS\OLDPCT Old PCTools support & sample files
	X	—		N/N	E:\CPAV Central Point Anti Virus Software
	X	X		N/N	E:\SOL-CONV [redacted] account Data to DIF 10 files printed converter
	X	—		N/N	E:\GOLF accolade Mean 18 golf game
	X	—		N/N	E:\MISC DOS tools, games & amusement programs
	X	—		N/N	E:\123W\ Lotus 123 for Windows
	X	—		N/N	E:\123W\SAMPLE Sample & lesson files for Lotus 123 for Windows
	X	—		N/N	E:\123W\GRAPHICO Lotus 123 for Windows icons and macros
	X	—		N/N	E:\123W\SHEETICO Lotus 123 for Windows icons & macros
	X	—		N/N	E:\123W\ADDINS empty, no files
	X	—		N/N	E:\RELAY Turbo Pascal, dir utilities Rapid Relay CPU to CPU transfer

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1325015-000-12154

LAB NUMBER 20306026
PAGE 1 OF 1 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
3	✓	(1)		5/24	4 Hidden system files, 1 other hidden file BOOT.CPS – Nothing significant. Deleted files – NS. Directories: 1 prt out running Usage.exe
	✓			/2	SYSTEM – Program & system files deleted files – NS
	✓			/27	OLD DOS.1 – DOS files Deleted files are empty
	✓			/NO	BIN – empty
	✓			/10	WP5.1 – WP51 program files & tutorial; wouldn't run Deleted files = NS
	✓			/NO	LEARN – Tutorial
	✓			/1	MENU – Program files to bring up a menu; Del file – NS
	✓			/9	SYM22 – Symphony program files 9 deleted files recovered with GETERASE – NS
	✓	(5)		/NO	SKPLUS – 4 prt outs using SKPLUS 1 prt out using MAGE
	✓	(1)		/NO	BOSS – 1 prt out using MAGZ 2 .DBF files contained only field headings & No data
	✓			/2	PCTOOLS – PCTOOLS prgm files Del files – NS
	✓			/NO	OLDPCT – empty
	✓			/NO	CPAV – Central Point Anti-Virus prgm files
					Ran FERASE + GETERASE to retrieve Symphony deleted files – Nothing significant recovered. Symphony files were viewed with MAGZ because Symphony would not recognize them

1325015-000-12155

LAB NUMBER 20306026
PAGE 1 OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
5				5 yes	C:\ - Five hidden system files deleted files - can't do anything with program - no data.
	✓	NO		NO	SYSTEM - System and program files
	✓	NO		NO	ACCESS - Network prgm files
	✓	NO		NO	NETWARE - packet drivers
	✓	NO		yes	MOUSE1 - prgm files for mouse; deleted files = System & prgm files for mouse
	✓	NO		yes	OLD_DOS.1 - DOS prgm files deleted files were empty
	✓	27		yes	123R3 - 27 prtouts using LOTUS, MAGZ + DBASE; deleted files temp file - not recoverable.
	✓	NO		NO	WYSIWYG - prgm to generate fonts
	✓	NO		NO	ADDINS - Additional files for Lotus
	✓	NO		NO	COCONET - Network utility prgms
	✓	(8)		NO	SYM22 - Eight prtouts using Symphony DBASE, SYMPHONY + LOTUS; + ALL WP'S prgm files
	✓	NO		NO	TT - TinyTerm Communications prgm (Used to connect to modem)
	✓	NO		NO	WDNET - Western Digital prgm for adapters for LAN
	✓	NO		NO	NETROOM - Various prgms for use on a network
	✓	NO		NO	QPRO - Quattro Pro prgm files
	✓	NO		NO	FONTS - Font files
	✓	(1)		NO	MENU - 1 prtout using type command; MENU prgm files

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PAGE 2 OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
5					C: (CONT'd) two print outs using MAG 2;
	✓	②		NO	SOL_CONV – prgm to convert account files [redacted] to DIF format for entry into SYMPHONY
	✓	NO		NO	UTIL.ALR – System setup files for the ALR computer
	✓			1	WINDOWS – Windows prgm files deleted file – .SWP – swap files for .TMP files – system files
	✓			NO	SYSTEM – Windows prgm files
	✓	NO		Yes	TEMP – empty deleted files – temp files not retrieved
	✓	NO		NO	PSFONTS – font files
	✓	NO		NO	PFM – font files
	✓	NO		NO	AFTERDARK – Program to blank the screen
				NO	BITMAPS – images used by Afterdark
				NO	ADMODULE.SDK – Source code programs for Afterdark
				NO	BLANKER – files used to blank the screen

b6
b7C

LAB NUMBER 20306026
PAGE 3 OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
5	✓	~~D~~		1 / NO	D! – one hidden system file
	✓	~~✓~~		/ NO	NORTON – Norton prgm utility files
	✓	~~✓~~		/ NO	ORG – ORG Plus prgm files (Organizational Chart prgm)
	✓	~~✓~~		/ NO	PASCAL – Turbo Pascal prgm files
	✓	(18)		/ NO	SOL – Prgm to convert [redacted] acct prgms to DIF format to use in SYMPHONY Eighteen prt outs using Sym + type Command
	✓	(72)		/ NO	SYMPHONY – Seventy-two prt outs using Symphony + Quattro Pro
	✓	(9)		/ NO	CANSU – Nine prtouts using Symphony
	✓			NO / NO	CONSOLS – Dir only 1988 – Dir only
	✓	(5)		/ NO	~~1989~~ FINAL – Five prtouts using Lotus + Symphony
	✓	(45)		NO / NO	1989 FINAL – 47 prtouts using Lotus + Symphony
	✓	(11)		/ NO	~~PHL~~ PHLPACIC – 11 prtouts using Symphony
	✓	(22)		NO / NO	PHL – 22 prtouts using Symphony
	✓	(4)			1990 – 4 prtouts using Symphony
	✓	(12)		/ NO	JUNE – twelve prtouts using Symphony
	✓	(22)		/ yes	deleted files PHL – twenty-two prtouts were all .WK1 & unlikely to retrieve using Lotus + Symphony
	✓	(23)		/ NO	TAX – Twenty-three prtouts using Symphony + Lotus
	✓	(9)		/ NO	PERM_FIL – Nine prtouts using Symphony + Lotus

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PAGE ___ OF ___ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
5					(D! cont'd)
	✓			NO	123W — Lotus for Windows
	✓	(2)		NO	SAMPLE - sample programs 2 print outs using MAGZ
	✓			NO	GRAPHICO - macros
	✓			NO	SHEETICO - macros
	✓			NO	ADDINS - empty
	✓	(3)		yes	123R23 - Three print outs using Lotus; deleted file - unlikely to retrieve
	✓			yes	WYSIWYG - program to generate fonts; deleted file = unlikely
					[illegible]
	✓			NO	WYSYGO - Files pertaining to Lotus documentation
	✓			NO	& TUTOR - Lotus tutorial

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PAGE 4 OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
5				1 / NO	E: One hidden System file
	✓			NO / Yes	PCTOOLS – deleted files = empty + unlikely to retrieve
	✓			NO / NO	SYSTEM – Central Point backup prgm files + other help files
	✓	(1)		NO / Yes	DATA – Various prgm setup files; 1 prt out using MAGZ; deleted file = empty
	✓			— / NO	INBOX – empty
	✓			— / NO	OUTBOX – empty
	✓			— / NO	SENT – empty
	✓			— / NO	CPAV – Central Point Anti-Virus prgm files
	✓			/ NO	GAMES – animated graphic; RUN from Graphic Animation System for Professionals

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Q#	DIR	PO	SYS	H/D	COMMENTS
6	X		MSDOS 3.3	Y / Y	C:\ Hidden files are system files / 3 deleted files, 1 recovered with GETERASE.EVE using geterase.exe was part of a menu program
	X			N / N	C:\SYSTEM DOS system files
	X	X		N / N	C:\SYMDD Lotus & symphony program files & samples 3 files printed
	X			N / Y	C:\BIN Jumbo Pascal 6 deleted files, could not recover utility programs. DOS batch files
	X	X		N / Y	C:\WP50 WordPerfect 5.0 program files, graphics, macros, printer files 8 files printed / 11 deleted files, 3 recovered with geterase.exe had to remove spaces from PERS WEL using Norton Disk Editor / but did not contain anything significant
	X			N / N	C:\WP50\LEARN Wordperfect 5.0 Tutorial & learning files
	X			N / Y	C:\WP50\PERM empty, no files 25 del files, 2 recovered with geterase.exe. but were not ascii files (Shift files)
	X	X		N / Y	C:\WP50\PERS Printed with WP5.1 / 70 del files, 9 recovered with geterase, nothing significant 2 files printed had to remove spaces from file name with Disk Editor
	X			N / N	C:\WP50\INFO empty, no files
	X	X		N / Y	C:\WP50\JAS Printed with WP5.1 / 267 del files, 33 files recovered with GETERASE / printed, the rest contained nothing significant 1 file printed, used Disk Editor to remove spaces from filename
	X	X		N / Y	C:\WP50\BU 2 del files, could not recover. 1 file printed with WP5.1
	X			N / Y	C:\WP50\DEC 2 del files, 1 file recovered with GETERASE.EVE didn't contain anything significant
	X	X		N / N	C:\WP50\FEMR 1 file printed with WP5.1
	X	X		N / N	C:\WP50\SRI 1 file printed with WP5.1

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PAGE 2 OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
1e		—	MSDOS POS 3.3	N / N	C:\RUN empty, no files
		—		N / Y	C:\WF 2 del files, both recovered with GETERASE but didn't contain anything significant 1 file printed with WP5.1
	X	X		N / N	C:\WF\JAS 202 files printed with WP5.1
	X	X		N / N	C:\WF\GPP 21 files printed with WP5.1
	X	X		N / N	C:\WF\PERM 28 files printed with WP5.1
	X	X		N / Y	C:\WF\PERS 1 del file, recovered with GETERASE, nothing significant 70 files printed with WP5.1
	X	X		N / N	C:\WF\FRMK 2 files printed with WP5.1
	X	X		N / Y	C:\WF\FID 1 del file 1 file printed with WP5.1
	X	—	—	N / Y	C:\WF\BV 2 del files, 1 file recovered with GETERASE was empty empty, no files
	X	X		N / N	C:\WF\SBI 2 files printed with WP5.1
	X	X		N / N	C:\WF\DEC 8 files printed with WP5.1
	X	—		N / N	C:\WF\MACRO Wordperfect macros for document creation and formatting
	X	—		N / N	C:\WF\LGP empty, no files
	X	—		N / Y	C:\WP51 Wordperfect 5.1 program files 6 del files, 1 recovered with geterase, nothing significant
	X	—	—	N / N	C:\WP51\LEARN Wordperfect 5.1 Tutorial and Learning files
	X	—		N / Y	C:\MENU Basic Compiler 1 del file, could not recover Direct Access Menu Program & support files
	X	—		N / Y	C:\PCTOOLS 2 del files, could not recover PCTools Disk utility programs
	X	—		N / N	C:\PCTOOLS\SAMPLES Sample files for PCTOOLS viewer

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Q#	DIR	PO	SYS	H/D	COMMENTS
6	X	X	MSDOS 3.3	N / N	C:\SYMFILES Symplony data files .WR1 and allways .ALL formats 14 files printed Printed 16 files using Lotus 123 with allways installed
	X			N / N	C:\SAS empty, no files
	X			N / N	C:\GRP empty, no files
	X			N / N	C:\DEC empty no files
6a	—	—			5.25" floppy was unreadable, probably unformatted

48 3/144

46 144/190

LAB NUMBER 20306026 ZC
PAGE 1 OF 2 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
7	X	X	IBM DOS 3.30	Y / N	C:\ Hidden files are system files, batch files 1 file printed
	X	X		N / N	C:\BIN DOS utilities and batch files 1 files printed
	X	—		N / N	C:\DOS DOS system files, PCTools, directory utility
	X	—		N / N	C:\LOST$000 1 files, all empty 0 byte count
	X	X		N / Y	C:\PKLINK Directory Utility program 'BOSS' 1 file printed 4 del files, none would recover
	X	X		N / Y	C:\PCTOOLS PCTools Disk and file utilities 2 del files, both recovered with GETERASE, 1 printed
	X	—		N / N	C:\PCTOOLS\SAMPLES empty, no files
	X	—		N / N	C:\RELAY Rapid Relay, computer to computer file transfer software
	X	X		N / Y	C:\SKPLUS Sidekick Plus program and data files 11 files printed 3 del files, none would recover
	X	X		N / Y	C:\WF Wordperfect documents 2 files printed 4 del files, none would recover
	X	X		N / N	C:\WF[redacted] Wordperfect documents 2 files printed
	X	X		N / Y	C:\WF[redacted] Wordperfect documents 38 files printed 1 del file, could not recover
	X	X		N / Y	C:\WF\BU Wordperfect documents 1 file printed 2 del files, could not recover
	X	X		N / N	C:\WF[redacted] Wordperfect documents, macros 297 files printed
	X	X		N / N	C:\WF[redacted] Wordperfect documents 5 files printed
	X	X		N / N	C:\WF\PHAROAN Wordperfect documents and macros 38 files printed
	X	X		N / N	C:\WF[redacted] Wordperfect documents 3 files printed
	X	X		N / Y	C:\WF[redacted] Wordperfect documents 106 files printed 1 del file, could not recover

b6
b7C

1 3½ floppy tape [illegible]

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LAB NUMBER 20306026 ZC
PAGE 2 OF 2 PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
7	X	X	IBM DOS 3.30	N / N	C:\WF[redacted] Wordperfect documents 1 file printed
	X	X		N / N	C:\W[redacted] Wordperfect documents 2 files printed
	X	—		N / Y	C:\WP51 Wordperfect 51 program files, macros, & drivers 6 del files, 1 recovered with GETERASE, nothing significant
	X	—		N / N	C:\QUICKEN5 Quicken 5 program & sample files, no data

b6
b7C

LAB NUMBER R030602-6 D2C
PAGE 1 OF ____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
8	C:	—	IBM PC/DOS MS/DOS	yes/yes	Hidden-.comFilest.FILFile (IBM$loCom+IBM4Dos.com+Mirorsav.FIL. Deleted-used Notons And Ferase vaterase - Printed Dulu All other Files DO Scan of Files to Coconot Net Work System to CTOOL Program -7 subdirectories and system Files,
	✓	—	IBM	no/no	C:\BIN - .bat Files, .com Files that access Pro Jouson hard drive and/or Changes to a particular directory, Novell network Files
	✓	(3) ✓	"	no/yes	C:\Menu - 2 ##Files - boo KFile.txt printed, Logo.txt - prints Logo symbol - did not print, Brun30.exe - prints Copyright and Version to Microsoft Quick Basic compiler, Config.exe - Direct access v4.1 - printed menus Usage.exe + Direct access Usage Tracking System - Printed menus usage.Log - data - printed →
	✓	(1)	"	no/no	C:\PCTOOLS - PCTOOLS Program Files Deleted - used Notons, Ferase vaterase recovered 2 files printed one - xcshell.inv, xreathers is point PCTOOLS program - XSDFILE.DAT Printed
	✓	—	"	no/no	C:\PCTOOLS\SAMPLES - Sample Files to PCtools
	✓	(1) ✓	"	no/no	C:\SYMFIL - Symphony work Sheets Printed checking.WK1 using Symphony on hard drive. MIRIES.WRT and MOVES.WK1 - list of moves. Printout
	✓	—	"	no/no	C:\SYMP - Symphony Program & tutorial
	✓	—	"	no/no	C:\SYSTEM - DOS utilities Mortgage.bas - mortgage analyses program - no data
	✓	(7) ✓	"	no/yes	C:\WF - Deleted - used Words, vaterase, Ferase recovered, Printed IFile Subdirectories of WPS\DOC - No empty 7 Printouts
	✓	(150) ✓	"	no/no	C:\WF\BAT - 150 word Perfect documents Printed using our WPS\ 150 printouts
	✓	—	"	no/yes	C:\WF\BK - Directory is empty Deleted - used Words, Deleted - recovered File seems to be a Program
	✓	—	"	no/no	C:\WF\CORP. Directory is empty
	✓	(56) ✓	"	no/yes	C:\WF\EB - 55 WPS\ Documents Printed using our WPS\ 56 printouts
					Deleted - used Notons, Vaterase, Ferase Recovered \ printed File

3 3½" floppy. Take Notes

1325015-000-12166

C:\Menu - Mainboat, Mainmenu.exe, Mainmenu.mnu, submenu.mnu, menu.CNF. Access to main menu of HARD Drive, Quotes.tst - List of Quotes
TT.exe, TT.HIS, TT.HLP, TT.wld - Typing Tutor

3 printouts + menus
Deleted - used Norton's, Setmouse + Erase recovered file - empty

LAB NUMBER 20306026 DZC
PAGE ___ OF ___ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
8	✓	✓ (8)	IBM	NO / NO	C:\WF\GRP - 8 WPS.1 documents printed & printed (wang on WPS)
	✓	✓ (75)	"	NO / yes	C:\WF\JAS - 74 WPS1 documents printed using our WPS1 75 printouts
				yes	Deleted - used Norton, Erase, Utilities - recovered & printed 1 file
	✓	✓ (5)	"	NO / NO	C:\WF\Perm - 5 WPS1 documents printed using our WPS1 5 printouts
	✓	✓ (6)	"	NO / NO	C:\WF\SRI - 6 WPS1 documents printed using our WPS1 6 printouts
	✓	D:✓	"	NO / yes	C:\WPS1 - WPS1 Program files Deleted - used Norton Recovered 3 of files - no data program files the other 4 could be recovered.
					1 file contains words, 1 file printed memo
8	D:\	✓ (1)	IBM	NO / NO	Deleted - used Nortons + Erase together recovered 265 files printed 1.
					Deleted files - Solomon III Program files, xywrite files. 1 Printout
	✓	—	"	NO / NO	D:\Spinrite - Spinrite II V 1.0 Program
		Note:			used Nortons 6.0 did not list all files as Erase program. Also when Recovering files to a floppy using Norton Files would have the same file size used Erase program recovered files to floppy.
					xywrite files - used word for word program to convert files - No data maybe programs

3 floppies containing recovered deleted files

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Q#	DIR	PO	SYS	H/D	COMMENTS
2	✓			yes/yes	hidden = system files on C:; BOOT.CPS. on D:; BOOT.CPS on E:
		(12)			Ran FDSR (see attached search lists) Nothing on C + E - twelve printouts from D: using Lotus 123 R3
		1			
					Ran FERASE on C:, D:, + E: - NS

20306026
02
Drive C

```
fdsr a:\bcci c:
vide error

   FDSR will look for the following 51 keywords:
         1 -
         2 -
         3 -
         4 -
         5 -
         6 -
         7 -
         8 -
         9 -
        10 -
        11 -
        12 -
        13 -
        14 -
        15 -
        16 -
        17 -
        18 -
        19 -
        20 -
        21 -
        22 -
        23 -
        24 -
        25 -
        26 -
        27 -
        28 -
        29 -
        30 -
        31 -
        32 -
        33 -
        34 -
        35 -
        36 -
        37 -
        38 -
        39 -
        40 -
        41 -
        42 - YOUNG IDEAS, INC.
        43 - STONEY COOKS
        44 - THE CARTER CENTER
        45 - GLOBAL 2000 INC.
        46 - JONES, OSTEEN, JONES & A
        47 - RNOLD
        48 - ANDREW YOUNG & ASSOCIATE
        49 - S, INC.
        50 - SOUTH-NORTH DEVELOPMENT
        51 - GROUP
```

b6
b7C

Program completed...
FDSR will look for the following 44 keywords:

1 - [redacted]
2 -
3 -
4 -
5 -
6 -
7 -
8 -
9 -
10 -
11 -
12 -
13 -
14 -
15 -
16 -
17 -
18 -
19 -
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22 -
23 -
24 -
25 -
26 -
27 -
28 -
29 -
30 -
31 -
32 -
33 -
34 -
35 -
36 -
37 -
38 - YOUNG IDEAS, INC
39 - STONEY COOKS
40 - THE CARTER CENTER
41 - GLOBAL 2000 INC
42 - JONES, OSTEEN, JONES
43 - ANDREW YOUNG & ASSOC
44 - SOUTH-NORTH DEVELOP

b6
b7C

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted]

b6
b7C

RZ. 20306 026 ZC C:\CONFIG.SYS (original)

```
DEVICE=C:\SYSTEM\SETVER.EXE
device=c:\system\himem.sys
DOS=HIGH,UMB
rem device=c:\system\emm386.exe 1536 M9 ram
device=c:\system\emm386.exe 1024 M9 ram x=cc00-d700
shell=c:\system\command.com c:\system\ /e:512 /p
break=on
lastdrive=r
FILES=40
buffers=20
DEVICEHIGH=E:\PCTOOLS\VDEFEND.SYS
DEVICEHIGH=C:\SYSTEM\ANSI.SYS
```

LAB NUMBER 20306026 TC
PAGE ___ OF ___ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
3	✓	✓	MSDOS/ RDOS	yp/ yp	C: FDSR search + oper -, FDSR encountered error at Track 9 + aborted.
					C:\SKPLUS - printed 3 files - only ones found from string searches
					hidden files - System deleted files didn't show up with string searches.
					D:\ FDSR - string search found nothing
					D:\SF
					D:\WF
					~~D:\MARC~~ D:\WF\MARK 1 file printed
					~~D:\MARC~~ D:\WF [redacted] 17 files printed
					D:\WF\GRP
					D:\WF\JAS
					D:\WF\JODI 1 file printed
					D:\WF\CORP 6 files printed
					D:\WF\INS

b6
b7C

Q3 203060262E

Drives

FDSR will look for the following 44 keywords:

1 - [redacted]
2 -
3 -
4 -
5 -
6 -
7 -
8 -
9 -
10 -
11 -
12 -
13 -
14 -
15 -
16 -
17 -
18 -
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23 -
24 -
25 -
26 -
27 -
28 -
29 -
30 -
31 -
32 -
33 -
34 -
35 -
36 -
37 -
38 - YOUNG IDEAS, INC
39 - STONEY COOKS
40 - THE CARTER CENTER
41 - GLOBAL 2000 INC
42 - JONES, OSTEEN, JONES
43 - ANDREW YOUNG & ASSOC
44 - SOUTH-NORTH DEVELOP

b6
b7C

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted]

b6
b7C

ERROR encountered reading Track:9 Head:5

Q3 20320026 zc

Drive D

FDSR will look for the following 44 keywords:

1 - [redacted] b6 b7C
2 -
3 -
4 -
5 -
6 -
7 -
8 -
9 -
10 -
11 -
12 -
13 -
14 -
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16 -
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24 -
25 -
26 -
27 -
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29 -
30 -
31 -
32 -
33 -
34 -
35 -
36 -
37 -
38 - YOUNG IDEAS, INC
39 - STONEY COOKS
40 - THE CARTER CENTER
41 - GLOBAL 2000 INC
42 - JONES, OSTEEN, JONES
43 - ANDREW YOUNG & ASSOC
44 - SOUTH-NORTH DEVELOP

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted] b6 b7C

Program completed...

A-109

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Q#	DIR	PO	SYS	H/D	COMMENTS
					D:\WF\SR\ 1 file printed
					D:\WF\ [redacted]
					D:\WF\ [redacted]
					D:\WF\TRO 1 file printed
					D:\WF\BAT 1 file printed
					D:\WF\UPHL
					D:\WF\ [redacted]

b6
b7C

LAB NUMBER 203 06026
PAGE ___ OF ___ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
4	✓	1	Xenix	Ø / Unknown	• SCO XENIX on a PC. Version 2.3.2 Needed to find root password. Called SCO - used installation diskettes & instructions provided by SCO. Modified the /etc/passwd file; changed root password to "Password."
					• Modified printer "main" to work through the serial port. (I believe the parallel port is blown)
					• Used [redacted] to search [redacted]
					• Put LAN together (Coconet); SCO box acting as a file server w/ DOS files on it.
					• Found Solomon Accounting • Found Symphony & Lotus files
					• printed 1 spreadsheet

b6
b7C

LAB NUMBER 20306026 ZC
PAGE ___ OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
5	✓	∅		1/4	Hidden-System Files C:
					FDSR (see attached) - nothing printed
	✓	∅			D:
					FDSR - see attached - nothing printed
	✓	∅			E:
					FDSR - see attached - nothing printed

FDSR will look for the following 36 keywords:

1 [redacted]
2
3
4
5
6
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35
36

b6
b7C

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted]

Found [redacted] sector 975. NS
Found [redacted] in sector 1556. NS
Found [redacted] sector 2201. NS
Found [redacted] sector 2214. NS
Found [redacted] in sector 2246. NS
Found [redacted] in sector 3554. NS
Found [redacted] sector 3550. NS
Found [redacted] in sector 3548. NS
Found [redacted] in sector 3666. NS
Found [redacted] in sector 3918 NS
Found [redacted] in sector 4829. NS
Found [redacted] in sector 4861.
Found [redacted] in sector 4858.
Found [redacted] in sector 4862.
Found [redacted] in sector 4869.
Found [redacted] in sector 4887.
Found [redacted] in sector 4894.
Found [redacted] in sector 4894.
Found [redacted] in sector 4909. NS
Found [redacted] sector 4918. NS

FDSR will look for the following 2 keywords:

1 - [redacted]
2 - [redacted]

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted]

Program completed...

b6
b7C

LAB NUMBER 20306026
PAGE ___ OF ___ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
6	✓	—		~~✓~~	C:
					FDSR {see attached → Corrupt do not read because ~~FAT~~ MFT corrupted + ERASE + ERASED
6A	NO	—			Disk cannot be read
					Looked at WP files for names in other searches - nothing significant

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LAB NUMBER 03060026 ZC
PAGE ___ OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
7	✓	(5¼)	MS DOS/ IBM DOS	yes	C:\ hidden sys files Ran FOSR, Erase, ERASED.
					C:\ Phone.adr - file was damaged Sidekick plus repaired it to print 3/18/92.
					C:\WF\Gulbents - printed 50 WP51 files printed
					C:\WF\Sasser - 3 WP51 files printed
					FOSR String Search - Keyword file - [redacted] b6 b7C
					[redacted] Young Lossed Inc. [redacted] Ra Center Center, Global 2000 Inc, Jones, Osteen, Jones Andrew Young & Assoc, South-North Develop
					C:\WF\BU\ - file printed
					NO D:\

LAB NUMBER 20306026 DZC
PAGE ___ OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
8	C:\	—	IBM	yes/yes	Hidden - .COM FILES (IBMBIO.COM and IBMDOS.COM), and .FIL FILE (MIRSAV.FIL) Deleted - 17 files used Nortons to view
			Note: *		no data Found used program FDSR to search FOR KEYWORDS (see attachment) program did not Finish - Harddrive damaged. Did a Manual Search through documents
	✓	—	"	no/no	C:\BIN - .Bat Files and .com Files (no keywords Found using FDSR Program)
	✓	—	"	no/yes	C:\MENU - Deleted - used Nortons - no data seems to be a Program Main menu to access Programs on harddrive
	✓	—	"	no/no	C:\PCTOOLS - Deleted - 2 files - used Nortons to View Files - no data to match keywords.
	✓	—	"	no/no	C:\PCTOOLS\SAMPLES - Sample File to PCTOOLS
	✓	① ✓	"	no/no	C:\SYMFIL - Symphony worksheets Printed Checking.WR1 using Symphony on harddrive, Movies.WR1 and movies3.WR1 list of movies Printout
	✓	—	"	no/no	C:\SYMP - Symphony program/tutorial
	✓	—	"	no/no	C:\System - Dos utilities
	✓	① ✓	"	no/yes	C:\WPSI - Deleted - 7 files used Nortons to view files no data to match Keywords
					WordPerfect Files - printed (1) File using our WPSI - to do Printout
	✓	—	"	no/yes	C:\WF - 8 subdirectories, 6 WordPerfect Files - no data to match Keywords
					Deleted - used Nortons to view file no data Found to make keywords
	✓	34 ✓	"	no/no	C:\WF\BAT - WordPerfect documents 34 printouts - documents that have keywords [redacted] Jimmy Carter - President Carter;
	✓	—	"	no/yes	C:\WF\DOC - Deleted - used Nortons to View no data to match Keywords

b6
b7C

LAB NUMBER 20306026-EC
PAGE 1 OF _____ PAGES

Q#	DIR	PO	SYS	H/D	COMMENTS
8	✓	—	IBM	NO/NO	C:\WF\CORP - NO FILES
	✓	✓	"	NO/yes	C:\WF\EB - Deleted - used Doctors to view document - INFO same AS RES File - Already printed. WORD Perfect documents - printed 3 files - matches of keywords - Charles Jones, Johnson + 3 printouts @ LIST OF GUNS
	✓	—	"	NO/NO	C:\WF\GKP - word Perfect documents NO matches on key words
	✓	✓	"	NO/yes	C:\WF\JAS - Deleted - used Doctors to View Files - NO DATA to match Keywords WORD Perfect Files - b[redacted] Matches of keywords [redacted]
	✓	✓	"	NO/NO	C:\WF\Perm - word Perfect documents Printouts Printed + Files - matches of keywords →
	✓	—	"	NO/NO	C:\WF\SLT - word Perfect documents NO data matches keywords
8	D:\				NOTE: used Program 'FLEX.exe' to search drive for keywords, Program would have drive has 6 discrepancies
	✓	—	IBM	NO/yes	Deleted - used Doctors to View Files NO data to match Keywords 1 Subdirectory
	✓	—	"	NO/NO	D:\SPINRITE - Spinrite Program Program Files

b6
b7C

C:\WF1\Perm-

b6
b7C

28 20306026 ZC

Drive C:\

FDSR will look for the following 45 keywords:

1 - [redacted] b6 b7C
2 -
3 -
4 -
5 -
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8 -
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26 -
27 -
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30 -
31 -
32 -
33 -
34 -
35 -
36 -
37 -
38 -
39 - YOUNG IDEAS, INC
40 - STONEY COOKS
41 - THE CARTER CENTER
42 - GLOBAL 2000 INC
43 - JONES, OSTEEN, JONES
44 - ANDREW YOUNG & ASSOC
45 - SOUTH-NORTH DEVELOP

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted] b6 b7C

Found [redacted] in sector 903. C:\WF\BAT\92Ø87
Found sector 903. C:\SymFil\Checking.WR1
Found in sector 916. C:\WP51\WP{WP3US.SUP
Found sector 1006.
Found in sector 1007
Found in sector 1926. NS
Found in sector 2800. NS
Found C:\WF\BAT\92Ø11

1325015-000-12186

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted]

b6
b7C

Found [redacted] in sector 903. C:\WF\BAT\92007
Found [redacted] sector 903.
Found [redacted] n sector 916. - C:\SymFil\Checking. OR1
Found [redacted] sector 1006.
Found [redacted] in sector 1007. C:\WPS11\WP{WP3.US.SUP
Found [redacted] n sector 1926. ns
Found [redacted] n sector 2800. ns
Found [redacted] in sector 3273. - C:\WF\BAT\92011
Found [redacted] sector 3264. - C:\WF\BAT\92011
Found [redacted] sector 3313. - C:\WF\BAT\92009

ERROR encountered reading Track:41 Head:2

Q8 203D60026
Drive D:1

FDSR will look for the following 45 keywords:

b6
b7C

1 - [redacted]
2 -
3 -
4 -
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13 -
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33 -
34 -
35 -
36 -
37 -
38 -
39 - YOUNG IDEAS, INC
40 - STONEY COOKS
41 - THE CARTER CENTER
42 - GLOBAL 2000 INC
43 - JONES, OSTEEN, JONES
44 - ANDREW YOUNG & ASSOC
45 - SOUTH-NORTH DEVELOP

Fixed Disk Search Routine (FDSR) - (C) 1992 by [redacted]

Found [redacted] in sector 556. not significant

ERROR encountered reading Track:4 Head:7

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 7/9/92

4/51
V-355

TO : DIRECTOR, FBI
(ATTN: FIFU, WCCS)

FROM : SAC, TAMPA

SUBJECT : HIDDEN INTERESTS; MAJOR CASE 38;
OO:WMFO

Re FBIHQ teletype to ALL SACs, 7/7/92.

All Financial Analysts assigned to the Tampa Division are fully occupied with long-term investigative assignments and are not available for temporary assignment to captioned investigation at WMFO.

29B-WF-171991/-354

2 - Bureau
1 - Tampa
AWS:llw*
(1)

1*

b6
b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12189

0-93 (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

4/8

TRANSMIT VIA:
☒ Teletype

PRECEDENCE:
☐ Immediate
☐ Priority
☒ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

DATE: 7/24/92

^PAGE 1 OF 4

FM DIRECTOR FBI

TO FBI BALTIMORE/ROUTINE/

FBI CHICAGO/ROUTINE/

FBI HOUSTON/ROUTINE/

FBI LOS ANGELES/ROUTINE/

FBI MEMPHIS/ROUTINE/

FBI MIAMI/ROUTINE/

FBI MINNEAPOLIS/ROUTINE/

FBI NEW ORLEANS/ROUTINE/

WMFO (29B-WF-171994) (INFO.)/ROUTINE/

BT

UNCLAS

CITE: //0624//

SUBJECT: (1) HIDDEN INTEREST; MAJOR CASE 38; FINANCIAL ASSISTANT/FINANCIAL ANALYST (FA); OO: WMFO.

29B-WF-171994-355

******* FOR COMM CENTER USE ONLY *******

NOTE: Copy Designations Are On The Last Page Of This Teletype!!!

Approved By [illegible]

MRI/JUL 1275/206

Transmitted 20032 JUL 24 1992

ISN 068

1325015-000-12190

0-93A (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

^PAGE 2 UNCLAS

BUTEL TO ALL FIELD OFFICES, JULY 7, 1992, AND TELEPHONE CALLS TO ABOVE FIELD OFFICES ON 7/13/92.

THIS IS TO CONFIRM THE SELECTION OF FINANCIAL ASSISTANTS/ANALYSTS [redacted] BALTIMORE; [redacted] [redacted] CHICAGO; [redacted] HOUSTON; [redacted] LOS ANGELES; [redacted] MEMPHIS; [redacted] MIAMI; [redacted] MINNEAPOLIS; AND [redacted] NEW ORLEANS FOR 90 DAY TEMPORARY DUTY ASSIGNMENT (TDY) TO WMFO EFFECTIVE 7/27/92. b6 b7C

ALL FAS ARE TO BE ADVISED THAT 7/27/92 WILL BE THEIR TRAVEL DAY. FAS SHOULD MAKE FLIGHT ARRANGEMENTS TO WASHINGTON, D.C. NATIONAL AIRPORT. FBIHQ RECOMMENDS THAT THE FAS CONTACT THE EMBASSY SUITES HOTEL, CRYSTAL CITY, VIRGINIA, PHONE NUMBER (703) 979-9799 TO RESERVE LODGING FOR AT LEAST ONE WEEK.

ALL FAS ARE TO REPORT TO THE [redacted] [redacted] WHITE-COLLAR CRIMES SECTION, CRIMINAL INVESTIGATIVE DIVISION, FBIHQ, ROOM 3835, AT 8:15 A.M. ON TUESDAY, 7/28/92. ALL FAS ARE TO BRING WITH THEM CERTIFIED COPIES OF THEIR BIRTH CERTIFICATES AND PASSPORTS IF THEY HAVE ONE. b6 b7C

1325015-000-12191

0-93A (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

^PAGE 3 UNCLAS

ALL FAS WHO DO NOT ALREADY HAVE A GOVERNMENT CREDIT CARD AND/OR GOVERNMENT DRIVERS LICENSE ARE TO APPLY FOR THESE ITEMS BEFORE DEPARTING THEIR FIELD OFFICES.

THE FOLLOWING INFORMATION IS TO BE PROVIDED TO THE ABOVE-MENTIONED FAS FOR VOUCHERING PURPOSES. "IT IS IMPERATIVE THAT AUTHORIZATION NUMBER TR15-SE-9236 APPEAR ON THE FD-540, SF-1012, GTRS, AND PURCHASE ORDERS ASSOCIATED WITH THIS TRAVEL. IF THE FBIHQ AIRLINE TICKET OFFICE IS UTILIZED, THEY MUST BE ADVISED OF THE AUTHORIZATION NUMBER WHEN THE TICKET IS REQUESTED. THE USE OF THE AFOREMENTIONED AUTHORIZATION NUMBER WILL ENSURE THAT THE TRAVEL EXPENSES ASSOCIATED WITH THIS ASSIGNMENT ARE CHARGED TO BUDGET CATEGORY TR15 - BUREAU SPECIALS, RATHER THAN TO YOUR DIVISION'S TRAVEL BUDGET. TRAVEL EXPENSES THAT ARE SUBMITTED WITHOUT THE AUTHORIZATION NUMBER WILL BE CHARGED TO YOUR DIVISION'S TRAVEL BUDGET WITHOUT RECOURSE."

UPON COMPLETION OF THIS ASSIGNMENT, A PERFORMANCE APPRAISAL SHOULD BE PREPARED BY WMFO AND SUBMITTED TO EACH FA'S RESPECTIVE SUPERVISORY SPECIAL AGENT. A COPY OF THIS PERFORMANCE APPRAISAL SHOULD ALSO BE FURNISHED TO THE PROGRAM MANAGER [redacted] b6 b7C ROOM 3835, FBIHQ.

1325015-000-12192

0-93A (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

^PAGE 4 UNCLAS

ANY QUESTIONS REGARDING THIS ASSIGNMENT SHOULD BE DIRECTED TO THE PROGRAM MANAGER PHONE NUMBER (202) 324-5650.

BT

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0-93B (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

ADMINISTRATIVE NOTE/TICKLER COUNT:

TDY ASSIGNMENTS WERE AUTHORIZED BY AD LARRY A. POTTS, CID, AS A RESULT OF A MEETING WITH SAC ROBERT M. BRYANT, WMFO; INSPECTOR-IN-CHARGE [redacted] AND WCCS, CID. SELECTION OF CANDIDATES WAS FROM RESPONSES TO TELETYPE, DATED 7/7/92, TO ALL FBI FIELD OFFICES. FUNDING FOR THIS ASSIGNMENT HAS BEEN COORDINATED WITH SECTION CHIEF TED PING, ACCOUNTING SECTION, ADMINISTRATIVE SERVICES DIVISION. b6 b7C

Drafted By: KAS:amp Room/TL #: 3835/231 Phone No: 5650

COPY DESIGNATIONS:

1 - MR. POTTS

1 - MR. VERINDER

1 - [redacted] b6 b7C

1 - [redacted]

(ATTN: [redacted]

1 - [redacted] (VPS, ASD)

1 - [redacted]

(ATTN: [redacted]

1 - [redacted]

(ATTN: [redacted]

1 - [redacted]

APPROVED:

Director	Adm. Servs.	Laboratory	Off. of Liaison & Int. Affs.
Dep. Dir.	Crim. Inv.	Legal Coun.	Off. of Public Affs.
ADD-Adm.	Ident.	Training	
ADD-Inv.	Info. Mgmt.	Cong. Affs. Off.	
	Inspection	Off. of EEO	
	Intell.		

1325015-000-12194

29B-WF-171994
MTR/jsb

The following investigation was conducted by Financial Analyst [redacted] Tallahassee Resident Agency, on July 21, 1992. b6 b7C

Fourteen (14) file cabinets seized from the State of Florida, Department of Insurance, containing records of THE INSURANCE EXCHANGE OF THE AMERICAS, INC., was reviewed by writer. The review was limited to computerizing names of individuals and businesses and their addresses which were contained in the files for any such future use.

The results of that review are contained in the attached computer printout, which consists of an alphabetical listing of the individuals and businesses, along with the location of the document, the type of document, and the date of the specific document that the name and address was taken from.

On July 20, 1992, a cross-reference check was conducted by writer to the computer printout prepared by writer to the twelve (12) page listing titled "BCCINAME" prepared by FBIHQ for any matches on individuals and/or businesses on either lists.

This review was conducted with negative results.

29B-WF-171994 - 359

Listing Of Individuals/Businesses From The Files Of Date: 07/21/92
THE INSURANCE EXCHANGE OF THE AMERICAS, INC.
File Number: 29B-WF-171994

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business
[redacted]
Company: ALC INSURANCE, INC.

Address
[redacted]
FL

b6
b7C

File Cabinet#: 07 Drawer#: 4 Folder#: 792 Type: DEPO. To/From: Date: 12/09/87

Referenced Individual/Business
[redacted]
Company: LARAMIE INSURANCE COMPANY

Address
[redacted]
WY

File Cabinet#: 02 Drawer#: 2 Folder#: 252 Type: LETTER To/From: TO Date: 04/28/83

Referenced Individual/Business
[redacted]
[redacted]RICHARD ADELINE AND COMPANY
Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC.

Address
EXCHANGE BUILDING
[redacted]
FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 12/07/79

Referenced Individual/Business
[redacted]
Company: REYNOLDS, SMITH, AND HILL

Address
[redacted]
FL

File Cabinet#: 03 Drawer#: 1 Folder#: 402 Type: LETTER To/From: TO Date: 04/04/83

Referenced Individual/Business
[redacted]
Company: ASSOCIATED INSURANCE SYNDICATE, INC.

Address
[redacted]
FL

1325015-000-12196

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/Fr[redacted]O Date: 11/30/81

Referenced Individual/Business

[redacted]

Company: BANCO CONSOLI DADO

Address

[redacted]

[redacted] VENEZUELA

b6
b7C

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Company: ANTON AVIATION, INC.

Address

[redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business

[redacted]

Company: C.A. NACIONAL DE SEGUROS CONSOLIDADOS

Address

[redacted] VENEZULA

File Cabinet#: 02 Drawer#: 4 Folder#: 320 Type: LETTER To/From: Date:

Referenced Individual/Business

[redacted]

Company: LATIN ANDINA INSURANCE ADVISORY SERVICES, INC.

Address

[redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business

[redacted]

Company:

Address

[redacted] VENEZULA

File Cabinet#: 03 Drawer#: 2 Folder#: 486 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Company: LAHUS I,II,III, INC.

Address

[redacted] FL

1325015-000-12197

File Cabinet#: 02 Drawer#: [redacted] Folder#: 209 Type: MEMO To/From: [redacted] Date: 05/12/82

Referenced Individual/Business [redacted]

Address [redacted]

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC. [redacted] FL

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 08/05/81

Referenced Individual/Business [redacted]

Address [redacted]

Company: ARKY, FREED, STEARNS, WATSON AND GREER [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: ALL RISK CORPORATION OF FLORIDA FL

File Cabinet#: 03 Drawer#: 1 Folder#: 448 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: FLORIDA RISK MANAGERS, INC. FL

File Cabinet#: 02 Drawer#: 3 Folder#: 273 Type: LETTER To/From: TO Date: 04/27/87

Referenced Individual/Business [redacted]

Address [redacted]

Company: MACDUFF AMERICA, INC. FL

File Cabinet#: 03 Drawer#: 4 Folder#: 555 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: TRANSWORLD ASSURANCE SYNDICATE [redacted] FL

1325015-000-12198

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

BLUE LAGOON CORPORATE CENTER
5757 N.W. 11TH ST.

Company: MIAMI FL

b6
b7C

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: GREAT SOUTHERN UNDERWRITERS INTERNATIONAL, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 445 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: FIRST INTER-CONTINENT INSURANCE SYNDICATE, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 405 Type: LETTER To/From: TO Date: 06/19/85

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: BARNHARDT MARINE INSURANCE, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: SOUTHEAST BANK EXEC. COMMITTEE FL

File Cabinet#: 02 Drawer#: 1 Folder#: 206 Type: DOC To/From: Date:

Referenced Individual/Business

[redacted]

Address

Company: RAM SYNDICATE, INC.

1325015-000-12199

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Address

b6
b7C

Company: FLORIDA RISK MANAGERS, INC.

File Cabinet#: 03 Drawer#: 2 Folder#: 462 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: HISPANO AMERICAN REINSURANCE BROKERS, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: LETTER To/From: TO Date: 12/04/86

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: LINCOLN UNDERWRITING MANAGMENT, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 242 Type: LETTER To/From: FR Date: 04/20/87

Referenced Individual/Business

[redacted]

Address

S.E. FINANICAL CENTER, SUITE 3000

Company: PRICE WATERHOUSE MIAMI FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/12/79

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: DREXEL, BURNHAM, LAMBERT, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: FR Date: 06/26/80

Referenced Individual/Business

[redacted]

Address

Company: DEPT. OF INSURANCE

1325015-000-12200

File Cabinet#: 03 Drawer#: 1 Folder#: 444 Type: LETTER To/From: TO Date: 12/03/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: FIRST EQUITY CORPORATION OF FLORIDA [redacted] FL

b6
b7C

File Cabinet#: 03 Drawer#: 1 Folder#: 406 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: BELTRAN-ALEXANDER AND ALEXANDER, INC. [redacted] FL

File Cabinet#: 06 Drawer#: 3 Folder#: 713 Type: LETTER To/From: FR Date: 02/19/88

Referenced Individual/Business [redacted]

Address [redacted]

Company: SUTHERLAND, ASBILL, AND BRENNAN [redacted] GA

File Cabinet#: 02 Drawer#: 1 Folder#: 207 Type: LETTER To/From: FR Date: 03/10/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: ARKY, FREED, STEARNS, WATSON, GREER, & WEAVER, P.A [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 478 Type: LETTER To/From: TO Date: 03/10/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: EASLEY, MASSA, AND RILLITS, P.A. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business [redacted]

Address [redacted]

Company: PAN AMERICAN DE VENEZUELA [redacted] VENEZULA

1325015-000-12201

File Cabinet#: 04 Drawer#: [redacted] Folder#: Type: To/From: [redacted] Date:

Referenced Individual/Business
[redacted]

Address
[redacted]

Company: BELTRAN ALEXANDER AND ALEXANDER, INC. FL

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 08/22/79

Referenced Individual/Business
[redacted]

Address
[redacted]

Company: BROWN INSURANCE ORGANIZATION, INC. FL

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business
[redacted]

Address
[redacted]

Company: BROWN AND BROWN, INC. FL

File Cabinet#: 02 Drawer#: 1 Folder#: 206 Type: LETTER To/From: TO Date: 09/09/86

Referenced Individual/Business
[redacted]

Address
[redacted]

Company: ROYAL AMERICAN MANAGERS, INC. MO

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 08/18/81

Referenced Individual/Business
[redacted]

Address
[redacted]

C FL

File Cabinet#: 03 Drawer#: 1 Folder#: 412 Type: LETTER To/From: TO Date: 05/07/87

Referenced Individual/Business
[redacted]

Address
[redacted]

Company: STEEL HECTOR AND DAVIS FL

1325015-000-12202

File Cabinet#: 02 Drawer#: [redacted] Folder#: 231 Type: LETTER To/From: [redacted] Date: 03/21/82

Referenced Individual/Business ---------- Address --------

[redacted]

Company: ORMAND REINSURANCE GROUP, INC. [redacted] FL

b6
b7C

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business ---------- Address --------

[redacted]

Company: CAPACITY RENINSURANCE, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business ---------- Address --------

[redacted]

Company: RICOP INTERNATIONAL, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 11/28/79

Referenced Individual/Business ---------- Address --------

Comp [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 399 Type: LETTER To/From: TO Date: 12/22/82

Referenced Individual/Business ---------- Address --------

[redacted]

Company: ARMCO SYNDICATE [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 419A Type: LETTER To/From: TO Date: 11/17/86

Referenced Individual/Business ---------- Address --------

[redacted]

Company: CARMICHAEL LEASING COMPANY, INC. [redacted] FL

1325015-000-12203

File Cabinet#: 03 Drawer#: [redacted] Folder#: 412 Type: LETTER To/From: [redacted] Date: 04/28/87

Referenced Individual/Business Address

[redacted]

Company: SEALOGIC INSURANCE AGENCY [redacted] FL

b6
b7C

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business Address

[redacted] [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY IN

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: FRED S. JAMES COMPANY, OF FLORIDA [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 10/02/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: GENERAL INSURANCE COMPANY OF FLORIDA, INC. FL

File Cabinet#: 02 Drawer#: 4 Folder#: 353 Type: LETTER To/From: TO Date: 11/01/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: CLEARWATER DOWNTOWN DEVELOPEMENT BOARD [redacted] FL

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business Address

[redacted]

Company: CARRIER SERVICE INSURANCE, INC. [redacted] FL

1325015-000-12204

File Cabinet#: 02 Drawer#: [redacted] Folder#: 209 Type: LETTER To/From: [redacted] Date: 03/12/80

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: FL

b6
b7C

File Cabinet#: 03 Drawer#: 1 Folder#: 395 Type: LETTER To/From: FR Date: 04/18/85

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: FREEDOM SAVINGS FL

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: BRITISH INSURANCE MANAGERS, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: SOUTHERN UNDERWRITERS, INC. FL

File Cabinet#: 02 Drawer#: 4 Folder#: 320 Type: LETTER To/From: Date:

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: LENA CHANG, LTD. MA

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: CHAZAL-BLAIR INSURANCE AGENCY, INC. FL

1325015-000-12205

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 01/17/80

Referenced Individual/Business [redacted] Address [redacted]

Company: CHEEZEM DEVELOPMENT CORP. FL

b6
b7C

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: STANDARD UNDERWRITERS, MGA. FL

File Cabinet#: 02 Drawer#: 4 Folder#: 364 Type: LETTER To/From: FR Date: 03/27/87

Referenced Individual/Business [redacted] Address [redacted]

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/23/81

Referenced Individual/Business [redacted] Address [redacted]

Company: INTRA-AMERICAN INVESTMENTS, INC. FL

File Cabinet#: 02 Drawer#: 1 Folder#: 206 Type: LETTER To/From: FR Date: 09/15/86

Referenced Individual/Business [redacted] Address [redacted]

Company: UNITED MANAGEMENT SERVICES, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/11/79

Referenced Individual/Business [redacted] Address [redacted]

Company: BURDINES FL

1325015-000-12206

File Cabinet#: 03 Drawer#: [redacted] Folder#: 423 Type: DOC. To/From: [redacted] Date:

Referenced Individual/Business

[redacted]

Company: COLE ASSOCIATES, INC.

Address

[redacted]

FL

b6
b7C

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Company:

Address

[redacted]

FL

File Cabinet#: 03 Drawer#: 1 Folder#: 404 Type: LETTER To/From: FR Date: 01/04/83

Referenced Individual/Business

[redacted]

Company: MIDLAND BANK

Address

[redacted]

ENGLAND

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Company: POE MANAGEMENT CORPORATION

Address

[redacted]

FL

File Cabinet#: 03 Drawer#: 2 Folder#: 476 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Company: INTERBROKER OVERSEAS, INCL.

Address

[redacted]

FL

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Company: FRANK B. HALL AND COMPANY OF FLORIDA

Address

[redacted]

FL

1325015-000-12207

File Cabinet#: 02 Drawer#: [redacted] Folder#: Type: To/From: [redacted] Date: 08/08/85

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY [redacted] IN

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 235 Type: LETTER To/From: TO Date: 06/21/83

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: LLOYD'S BANK INTERNATIONAL, LTD. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 03/12/80

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: [redacted] FL

File Cabinet#: 03 Drawer#: 4 Folder#: 548 Type: LETTER To/From: TO Date: 04/04/83

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: SYNDICATE ONE, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: ROBERT DAUM MANAGEMENT COMPANY [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 325 Type: LETTER To/From: TO Date: 05/03/82

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: STATE BOARD OF INSURANCE-TEXAS [redacted] TX

1325015-000-12208

File Cabinet#: 07 Drawer#: 4 Folder#: 795 Type: DEPO. To/From: Date: 07/27/87

Referenced Individual/Business Address

[redacted]

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Company: [redacted] NB

File Cabinet#: 03 Drawer#: 2 Folder#: 462 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted]

Company: HISPANO AMERICAN REINSURANCE BROKERS, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 466 Type: LETTER To/From: FR Date: 09/05/85

Referenced Individual/Business Address

[redacted]

Company: HULL AND COMPANY, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 214 Type: LETTER To/From: TO Date: 08/08/79

Referenced Individual/Business Address

[redacted]

Company: TOWERS, PERRIN, FORSTER, AND CROSBY [redacted] PA

File Cabinet#: 03 Drawer#: 2 Folder#: 480 Type: LETTER To/From: TO Date: 01/29/86

Referenced Individual/Business Address

[redacted]

Company: JOHNSON AND HIGGINS OF FLORIDA, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 320 Type: LETTER To/From: Date:

Referenced Individual/Business Address

[redacted]

Company: ATLANTIC UNDERWRITERS, INC. [redacted] FL

1325015-000-12209

File Cabinet#: 02 Drawer#: [redacted] Folder#: 320 Type: LETTER To/From: [redacted] Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: [redacted]

[redacted] FL

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 212 Type: LETTER To/From: TO Date: 09/28/87

Referenced Individual/Business

[redacted]

Address

Company: DEPT. OF INSURANCE

[redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 11/23/81

Referenced Individual/Business

[redacted]

Address

Company: ST. JOSEPHS HOSPITAL

[redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

Company: AM-EX BROKERAGE CO.

[redacted] FL

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business

[redacted]

Address

Company: ALLIED FIDELITY INSURANCE COMPANY

[redacted] IN

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business

[redacted]

Address

Company: ALLIED FIDELITY INSURANCE COMPANY

[redacted] IN

1325015-000-12210

File Cabinet#: 03 Drawer#: [redacted] Folder#: 430 Type: DOC. To/From: [redacted] Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: CREDIT GENERAL INSURANCE COMPANY OH

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File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business [redacted]

Address [redacted]

Company: AV. ANDRES BELLO [redacted] VENEZULA

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: L.F. EVERETT CO., INC. ATLANTIC BEACH FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 05/19/82

Referenced Individual/Business [redacted]

Address [redacted]

Company: FLORIDA INTERNATIONAL UNIVERSITY FL

File Cabinet#: 03 Drawer#: 4 Folder#: 564 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: ZIONPA CORPORATION NY

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: AMERICAN INSURANCE RISKS, INC. [redacted] FL

1325015-000-12211

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 01/28/83

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: UNIVERSAL CASUALTY INSURANCE CO. FL

b6
b7C

File Cabinet#: 02 Drawer#: 4 Folder#: 353 Type: LETTER To/From: TO Date:

Referenced Individual/Business

FERRE,MAURICE
MAYOR
Company: CITY OF MIAMI

Address

CITY HALL
3500 PANAMERICAN DR.
MIAMI FL

File Cabinet#: 03 Drawer#: 1 Folder#: 428 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: COMMERCIAL INSURANCE AND REINSURANCE MANAGEMENT [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: PROFESSIONAL INSURANCE AGENTS [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 320 Type: LETTER To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: ARMCO REINSURANCE MANAGERS, INC. [redacted] FL

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: FLORIDA PLACEMENT SERVICE, INC. FL

1325015-000-12212

File Cabinet#: 04 Drawer#: [redacted] Folder#: Type: To/From: [redacted] Date:

Referenced Individual/Business Address

[redacted]

Company: FRANZESE AND ASSOCIATES OF ORLANDO, INC. [redacted] FL

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File Cabinet#: 03 Drawer#: 1 Folder#: 452 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: FRASER AND COMPANY INSURANCE, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 452A Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: DENNIS B. FREEMAN, P.A. LAW OFFICES [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 210 Type: LETTER To/From: TO Date: 06/07/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: GREATER MIAMI CHAMBER OF COMMERCE [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: GABOR AND COMPANY FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: GABOR AND COMPANY FL

1325015-000-12213

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 07/26/79

Referenced Individual/Business [redacted] Address [redacted]

Company: GADOY-SAYAN, INC. [redacted] FL

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File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business [redacted] Address [redacted]

Company: LA PRIMERA ROLANDESA DE SEGUROS C.A.P. [redacted] VENEZULA

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: GALLAGHER-COLE ASSOCIATES, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business [redacted] Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY CARMEL IN

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business [redacted] Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY [redacted] IN

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: AFFORDABLE INSURANCE AGENCY [redacted] FL

1325015-000-12214

File Cabinet#: 02 Drawer#: [redacted] Folder#: 210 Type: LETTER To/From: [redacted] Date: 06/07/79

Referenced Individual/Business | Address

[redacted]

Company: DEPT. OF COMMERCE OF FLORIDA [redacted] FL

File Cabinet#: 03 Drawer#: 3 Folder#: 522 Type: DOC. To/From: Date:

Referenced Individual/Business | Address

[redacted]

Company: PEARSON AND GEORGI INTERNATIONAL, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 12/18/80

Referenced Individual/Business | Address

[redacted]

Company: GODOY-SEYAN, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 1 Folder#: 206 Type: LETTER To/From: TO Date: 09/15/86

Referenced Individual/Business | Address

[redacted]

Company: DEPT. OF INSURANCE [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business | Address

[redacted]

Company: CHAMBER OF COMMERCE [redacted] FL

File Cabinet#: 03 Drawer#: 4 Folder#: 554 Type: LETTER To/From: FR Date: 03/12/87

Referenced Individual/Business | Address

[redacted]

Company: TITON HOLDINGS, INC. [redacted] TX

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1325015-000-12215

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 01/18/82

Referenced Individual/Business Address

[redacted]

Company: VOYAGER LIFE INSURANCE CO. [redacted] FL

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File Cabinet#: 07 Drawer#: 4 Folder#: 797 Type: DEPO. To/From: Date: 11/30/87

Referenced Individual/Business Address

[redacted]

Company: [redacted] KS

File Cabinet#: 02 Drawer#: 2 Folder#: 221 Type: LETTER To/From: TO Date: 12/05/84

Referenced Individual/Business Address

[redacted]

Company: STANFORD INVESTMENT GROUP [redacted] AZ

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: POE AND ASSOCIATES, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 11/21/80

Referenced Individual/Business Address

[redacted] [redacted]

Company: FLORIDA FEDERAL SAVINGS AND LOAN ASSOC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 10/19/79

Referenced Individual/Business Address

[redacted]

Company: GEORGE H. GREENE INSURANCE AGENCY, INC. [redacted] FL

1325015-000-12216

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: CHAMBER OF COMMERCE FL

b6
b7C

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY IN

File Cabinet#: 03 Drawer#: 2 Folder#: 497 Type: LETTER To/From: TO Date: 08/12/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: LON WORTH CROW INSURANCE AGENCY FL

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: GLOBAL UNDERWRITING MANAGEMENT, INC. FL

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: FRED S. JAMES AND COMPANY OF FLORIDA, INC. FL

File Cabinet#: 03 Drawer#: 3 Folder#: 540 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: SELF-FUNDING MANAGEMENT, INC. FL

1325015-000-12217

File Cabinet#: 03 Drawer#: [redacted] Folder#: 517 Type: DOC. To/From: [redacted] Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: PALACIO AND WEINRAUB FL

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 06/11/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: JACKSONVILLE AREA CHAMBER OF COMMERCE FL

File Cabinet#: 03 Drawer#: 1 Folder#: 396 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: AMERICAN ROYALE SYNDICATE,INC. MI

File Cabinet#: 03 Drawer#: 1 Folder#: 433 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: DANCO CORPORATION NJ

File Cabinet#: 03 Drawer#: 3 Folder#: 514 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: S. MANAGEMENT SERVICES, INC. FL

File Cabinet#: 03 Drawer#: 4 Folder#: 553 Type: LETTER To/From: FR Date: 03/12/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: TEXAS FIRE AND CASUALTY IN

1325015-000-12218

File Cabinet#: 03 Drawer#: [redacted] Folder#: 561 Type: DOC. To/From: Date:

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: UNIVERSAL SECURITY INSURANCE COMPANY [redacted] FL

b6
b7C

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: REPUBLIC HOGG ROBINSON OF FLORIDA, INC. FL

File Cabinet#: 02 Drawer#: 3 Folder#: 273 Type: LETTER To/From: TO Date: 03/17/87

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: ZYLICZ AND HALVERSON, INC. LO

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 11/08/79

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: JACKSONVILLE CHAMBER OF COMMERCE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 02/08/80

Referenced Individual/Business | Address

[redacted] | [redacted]

PRES.

Company: LAWYERS PROFESSIONAL LIABILITY INSURANCE CO. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 07/15/80

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: DEPT. OF INSURANCE FL

1325015-000-12219

File Cabinet#: 03 Drawer#: [redacted] Folder#: 552 Type: LETTER To/From: FR Date: 12/27/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: SAGE GRAY TODD AND SIMS [redacted] NY

b6
b7C

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: SELF FUNDING ADMINISTRATORS, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 02/15/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: CUSHMAN AND WAKEFIELD OF FLORIDA, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 394 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: AMERICAN AND BRITISH INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 440 Type: LETTER To/From: FR Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: AIA PUBLIC INSURANCE AGENCY, INC.

File Cabinet#: 02 Drawer#: 2 Folder#: 230 Type: LETTER To/From: FR Date: 11/07/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: DEPT. OF INSURANCE [redacted] FL

1325015-000-12220

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 07/12/79

Referenced Individual/Business Address

[redacted]

Company: S.E. BANKING CORPORATION [redacted] FL

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: CHAMBER OF COMMERCE FL

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business Address

[redacted] [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY IN

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 11/09/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business Address

[redacted]

Company: [redacted] VENEZULA

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: FRANK B. HALL & CO. OF FLORIDA [redacted] FL

1325015-000-12221

File Cabinet#: 02 Drawer#: [redacted] Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business | Address

[redacted]

Company: REGAL WOOD PRODUCTS, INC. [redacted] FL

b6
b7C

File Cabinet#: 03 Drawer#: 2 Folder#: 470 Type: DOC. To/From: Date:

Referenced Individual/Business | Address

[redacted]

Company: INDIAN LIFE INSURANCE COMPANY [redacted] NJ

File Cabinet#: 03 Drawer#: 1 Folder#: 438 Type: DOC. To/From: Date:

Referenced Individual/Business | Address

[redacted]

Company: E. & S. AGENCIES [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 11/30/79

Referenced Individual/Business | Address

[redacted]

Company: STATE OF FLORIDA [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 06/26/80

Referenced Individual/Business | Address

HONORABLE BOB GRAHAM | THE CAPITAL

GOVERNOR

Company: STATE OF FLORIDA | TALLAHASSEE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 08/05/81

Referenced Individual/Business | Address

[redacted]

Company: VOYAGER LIFE INSURANCE COMPANY [redacted] FL

1325015-000-12222

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: [redacted] Date: 03/10/80

Referenced Individual/Business	Address
HONORABLE HOWELL SPAET REPRESENTATIVE 101ST DISTRICT	223-C THE CAPITAL BUILDING
Company:	TALLAHASSEE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 06/26/80

Referenced Individual/Business	Address
HONORABLE JOHN T. WARE SENATE MINORITY LEADER	SENATE OFFICE BUILDING
Company: STATE OF FLORIDA	TALLAHASSEE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 03/13/80

Referenced Individual/Business	Address
HONORABLE LAWRENCE R. HAWKINS REPRESENTATIVE, 119 DISTRICT	[redacted]
Company:	[redacted] FL

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 04/28/82

Referenced Individual/Business	Address
[redacted]	FL

File Cabinet#: 03 Drawer#: 4 Folder#: 546 Type: LETTER To/From: TO Date: 11/09/79

Referenced Individual/Business	Address
[redacted]	
Company: LOPEZ AND SALDISE ATTORNEYS AT LAW	[redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 11/15/79

Referenced Individual/Business	Address
HONORABLE PETER M. DUNBAR REPRESENTATIVE 53RD DISTRICT	HOUSE OFFICE BUILDING, ROOM 325, SPACE C
Company: FLORIDA HOUSE OF REPRESENTATIVES	TALLAHASSEE FL

1325015-000-12223

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 08/06/79

Referenced Individual/Business Address

[redacted]

Company: [redacted] FL

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 06/26/80

Referenced Individual/Business Address

HONORABLE PHILIP D. LEWIS THE CAPTIAL
SENATE PRESIDENT
Company: STATE OF FLORIDA TALLAHASSEE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 06/26/80

Referenced Individual/Business Address

HONORABLE S. CURTIS KISER THE CAPITAL
HOUSE MINORITY LEADER
Company: STATE OF FLORIDA TALLAHASSEE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 10/03/79

Referenced Individual/Business Address

HONORABLE TERRANCE T. O'MALLEY [redacted]
REPRESENTATIVE 85TH DISTRICT
Company: [redacted] FL

b6
b7C

File Cabinet#: 03 Drawer#: 2 Folder#: 462 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted] ST ST.
Company: HISPANO AMERICAN REINSURANCE BROKERS, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted]
Company: TRITON INSURANCE BROKERS, LTD. [redacted] ENGLAND

1325015-000-12224

File Cabinet#: 03 Drawer#: [redacted] Folder#: 447 Type: DOC. To/From: [redacted] Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: FLORIDA POWER AND LIGHT COMPANY FL

b6
b7C

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: REX HUFFMAN AND ASSOCIATES, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 214 Type: LETTER To/From: TO Date: 08/08/79

Referenced Individual/Business [redacted] Address [redacted]

Company: ROBERT HUGHES ASSOCATES TX

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: HULL AND COMPANY, INC. FL

File Cabinet#: 03 Drawer#: 2 Folder#: 467 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: HUNT INSURANCE GROUP, INC. FL

File Cabinet#: 03 Drawer#: 2 Folder#: 492 Type: LETTER To/From: FR Date: 09/09/81

Referenced Individual/Business [redacted] Address [redacted]

Company: CHARLES A. INTRIAGO LAW OFFICES FL

1325015-000-12225

File Cabinet#: 02 Drawer#: [redacted] Folder#: 320 Type: LETTER To/From: [redacted] Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: LAHUS MANAGEMENT AND UNDERWRITERS, INC. [redacted] NJ

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File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 01/17/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: RAYMOND JAMES AND ASSOCIATES, INC. FL

File Cabinet#: 03 Drawer#: 2 Folder#: 465 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: HUDIG-LANGEVELDT REINSURANCE AMSTERDAM

File Cabinet#: 03 Drawer#: 1 Folder#: 385 Type: LETTER To/From: FR Date: 06/10/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: EXCHANGE AVIATION UNDERWRITING GROUP, INC. FL

File Cabinet#: 07 Drawer#: 4 Folder#: 799 Type: DEPO. To/From: Date: 01/05/88

Referenced Individual/Business [redacted]

Address [redacted]

Company: [redacted] NB

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 03/12/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: BANK OF PASCO COUNTY [redacted] FL

1325015-000-12226

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: [redacted] Date: 09/25/79

Referenced Individual/Business [redacted] Address [redacted]

Company: FLORIDA OF ASSOC. OF INSURANCE AGENTS FL

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File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: FR Date: 06/27/80

Referenced Individual/Business [redacted] Address [redacted]

Company: DON JONES INSURANCE AGENCY, INC. FL

File Cabinet#: 2 Drawer#: 1 Folder#: 207 Type: LETTER To/From: TO Date: 09/13/85

Referenced Individual/Business [redacted] Address [redacted]

Company: KANSAS CITY BUSINESS JOURNAL MO

File Cabinet#: 2 Drawer#: 1 Folder#: 207 Type: LETTER To/From: TO Date: 03/02/87

Referenced Individual/Business [redacted] Address [redacted]

Company: MISSOURI DIVISON OF INSURANCE MO

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/24/80

Referenced Individual/Business [redacted] Address [redacted]

Company: WELLBAUM, ZOOK, JONES, AND WILLIAMS FL

File Cabinet#: 03 Drawer#: 2 Folder#: 481 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: FL

1325015-000-12227

File Cabinet#: 07 Drawer#: [redacted] Folder#: 800 Type: DEPO. To/From: [redacted] Date: 08/17/87

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: KS

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File Cabinet#: 03 Drawer#: 3 Folder#: 518 Type: LETTER To/From: FR Date: 09/03/86

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: PALM BEACH COUNTY BOARD OF COMMISSIONERS FL

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: KALMANSON EXCESS AND SURPLUS LINES AGENCY [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 235 Type: LETTER To/From: TO Date: 06/21/83

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 01/17/80

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: INDEPENDENT FIRE INSURANCE COMPANY FL

File Cabinet#: 02 Drawer#: 2 Folder#: 233 Type: LETTER To/From: FR Date: 10/01/79

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: COMMERICAL MARINE AND INSURANCE SERVICES, INC. [redacted] FL

1325015-000-12228

File Cabinet#: 02 Drawer#: 2 Folder#: 210 Type: LETTER To/From: Date: 06/07/79

Referenced Individual/Business Address

[redacted]

Company: MARSH AND MCLENNIN, INC. [redacted] FL

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File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business Address

[redacted]

Company: GENERAL INSURANCE BROKERAGE, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: CHAMBER OF COMMERCE FL

File Cabinet#: 02 Drawer#: 4 Folder#: 353 Type: LETTER To/From: TO Date: 03/03/82

Referenced Individual/Business Address

[redacted]

Company: CUSHMAN AND WAKEFIELD OF FLORIDA, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 02/14/80

Referenced Individual/Business Address

[redacted] [redacted]

Company: THE KLOCK COMPANY FL

File Cabinet#: 03 Drawer#: 2 Folder#: 485 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: KOPPEN, WATKINS, PARTNERS AND ASSOCIATES, P.A. [redacted] FL

1325015-000-12229

File Cabinet#: 02 Drawer#: [redacted] Folder#: 210 Type: LETTER To/From: [redacted] Date: 06/07/79

Referenced Individual/Business [redacted] Address [redacted]

Company: PEAT, MARWICK, MITCHELL AND CO. FL

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File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 01/17/80

Referenced Individual/Business [redacted] Address [redacted]

Company: ARVIDA CORP. FL

File Cabinet#: 02 Drawer#: 4 Folder#: 364 Type: LETTER To/From: TO Date: 03/27/87

Referenced Individual/Business [redacted] Address [redacted]

Company: KROLL, TRACT, POMERANTZ, AND CAMERON NY

File Cabinet#: 2 Drawer#: 1 Folder#: 207 Type: LETTER To/From: FR Date: 03/02/87

Referenced Individual/Business [redacted] Address [redacted]

Company: DEPT. OF INSURANCE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 08/22/79

Referenced Individual/Business [redacted] Address [redacted]

Company: LACAPRA AND MASSIE, COUNSELORS AT LAW FL

File Cabinet#: 03 Drawer#: 4 Folder#: 554 Type: LETTER To/From: TO Date: 03/12/87

Referenced Individual/Business [redacted] Address [redacted]

Company: INSURANCE INDUSTRY CONSULTANTS FL

1325015-000-12230

File Cabinet#: 02 Drawer#: [redacted] Folder#: 320 Type: LETTER To/From: [redacted] Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: INTERNATIONAL UNDERWRITING AGENCY, INC. [redacted] FL

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File Cabinet#: 03 Drawer#: 1 Folder#: 419A Type: LETTER To/From: FR Date: 11/17/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: LAYNE INSURANCE, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 444 Type: LETTER To/From: TO Date: 12/22/82

Referenced Individual/Business [redacted]

Address [redacted]

Company: FIRST INSURANCE INVESTORS GROUP, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 325 Type: LETTER To/From: FR Date: 05/19/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: EISNER AND LUBIN, CPAs [redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 273 Type: LETTER To/From: FR Date: 04/20/87

Referenced Individual/Business [redacted]

Address [redacted]

Company: SAN SOUCI INSURANCE [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 07/15/81

Referenced Individual/Business [redacted]

Address [redacted]

Company: FLORIDA DEPT. OF COMMERCE [redacted] FL

1325015-000-12231

File Cabinet#: 02 Drawer#: [redacted] Folder#: 217 Type: LETTER To/From: FR Date: 05/19/80

Referenced Individual/Business | Address

[redacted]

Company: FSU BUSINESS-CTR. FOR INSURANCE RESEARCH [redacted] FL

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File Cabinet#: 03 Drawer#: 2 Folder#: 494 Type: LETTER To/From: TO Date: 08/12/85

Referenced Individual/Business | Address

[redacted]

Company: LINDER INDURSTRIAL MACHINERY COMPANY [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 459A Type: LETTER To/From: FR Date: 05/19/86

Referenced Individual/Business | Address

[redacted]

Company: HIGH COUNTRY INSURANCE AGENCY, INC. [redacted] UT

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business | Address

[redacted]

Company: LODDERHOSE INC. [redacted] IL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/23/81

Referenced Individual/Business | Address

[redacted]

Company: LONG AND COMPANY, INC. [redacted] FL

File Cabinet#: 2 Drawer#: 1 Folder#: 207 Type: LETTER To/From: FR Date: 09/09/85

Referenced Individual/Business | Address

[redacted]

Company: DEPT. OF INSURANCE [redacted] FL

1325015-000-12232

File Cabinet#: 07 Drawer#: [redacted] Folder#: 801 Type: DEPO. To/From: [redacted] Date: 01/13/88

Referenced Individual/Business | Address

[redacted]

Company:

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business | Address

[redacted]

Company: LYON UNDERWRITERS, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 404 Type: LETTER To/From: TO Date: 01/04/83

Referenced Individual/Business | Address

[redacted]

Company: BARLOW LYONS INTERNATIONAL, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 10/09/79

Referenced Individual/Business | Address

[redacted]

Company: SOCIETY OF CHARTERED PROPERTY&CASUALTY UNDERWRITER [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 483 Type: LETTER To/From: TO Date: 07/22/86

Referenced Individual/Business | Address

[redacted]

Company: KENSINGTON REINSURANCE CORP. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 385 Type: LETTER To/From: FR Date: 04/09/86

Referenced Individual/Business | Address

[redacted]

Company: AIR CLAIMS INC. [redacted] FL

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1325015-000-12233

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: SENATE COMMERCE COMMITTEE FL

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File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: MEMO To/From: Date: 05/12/82

Referenced Individual/Business [redacted]

Address [redacted]

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 230 Type: LETTER To/From: FR Date: 06/04/87

Referenced Individual/Business [redacted]

Address [redacted]

Company: NATIONAL OCEANANIC AND ATMOSPHERIC ADMIN. DC

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 11/14/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: COSMOPOLITIAN TRAVEL SERVICE INC. FL

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: LARIOUS MAYS AND ASOCIADOS [redacted]ONDURAS

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 11/14/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: ROBERT HUGHES ASSOCIATES, INC. TX

1325015-000-12234

File Cabinet#: 02 Drawer#: [redacted] Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY [redacted] IN

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File Cabinet#: 03 Drawer#: 1 Folder#: 450 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: FORTUNE INSURANCE COMPANY [redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: MACDUFF AND MCCORKLE FL

File Cabinet#: 03 Drawer#: 3 Folder#: 529 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: PROTECTIVE CASUALTY INSURANCE COMPANY LO

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 11/13/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: FLORIDA ASSOCIATION OF INSURANCE AGENTS [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 03/12/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: [redacted] FL

1325015-000-12235

File Cabinet#: 02 Drawer#: [redacted] Folder#: 210 Type: LETTER To/From: [redacted] Date: 06/07/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: THOMPSON, WADSWORTH, MESSER, TURNER, AND RHODES [redacted] FL

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File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 12/17/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 486 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: LAHUS I,II,III, INC. [redacted] CA

File Cabinet#: 03 Drawer#: 2 Folder#: 486 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: LAHUS I,II,III, INC. CA

File Cabinet#: 03 Drawer#: 1 Folder#: 419A Type: LETTER To/From: FR Date: 01/05/87

Referenced Individual/Business [redacted]

Address [redacted]

Company: FLAMER V. COMPANY OF SAN FRANCISCO [redacted] CA

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: MITCHELL AND COMPANY [redacted] FL

1325015-000-12236

File Cabinet#: 03 Drawer#: [redacted] Folder#: 418 Type: LETTER To/From: TO Date: 11/29/86

Referenced Individual/Business [redacted] Address [redacted]

Company: A.I.B. SYNDICATE, INC. FL

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File Cabinet#: 02 Drawer#: 1 Folder#: 206 Type: LETTER To/From: FR Date: 09/15/86

Referenced Individual/Business [redacted] Address [redacted]

Company: C. MANAGEMENT SERVICES, INC. FL

File Cabinet#: 02 Drawer#: 4 Folder#: 349 Type: LETTER To/From: TO Date: 02/12/82

Referenced Individual/Business [redacted] Address [redacted]

Company: SOUTHEAST FIRST NATIONAL BANK OF MIAMI FL

File Cabinet#: 02 Drawer#: 1 Folder#: 207 Type: LETTER To/From: TO Date: 08/27/86

Referenced Individual/Business [redacted] Address [redacted]

Company: RAM SYNDICATE, INC. MO

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: UNIVERSITY OF MIAMI/GRADUATE STUDIES FL

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: HUDIG-LANGEVELDT REINSURANCE AMSTERDAM

1325015-000-12237

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 07/12/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: FLORIDA DEPT. OF COMMERCE FL

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File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: LETTER To/From: FR Date: 12/04/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: FRANK MOYA, M.D., AND ASSOC., P.A. FL

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: AVIATION INSURANCE AGENCY, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business [redacted]

Address [redacted]

Company: LA CONFEDERACION DEL CANADA [redacted] VENEZULA

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: SHELLY, MIDDLEBROOKS, AND O'LEARY, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 349 Type: LETTER To/From: FR Date: 02/12/82

Referenced Individual/Business [redacted]

Address [redacted]

Company: STEELE HECTOR AND DAVIS [redacted] FL

1325015-000-12238

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business

[redacted]

Company:

Address

[redacted]

[redacted] VENEZULA

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File Cabinet#: 07 Drawer#: 5 Folder#: 804 Type: DEPO. To/From: Date: 08/04/87

Referenced Individual/Business

[redacted]

Company:

Address

[redacted] NB

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Company: PANTIN INSURANCE

Address

[redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business

[redacted]

Company: PENINSULAR FIRE INSURANCE COMPANY

Address

[redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Company: INTERNATIONAL REINSURANCE BROKERS CORP.

Address

[redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Company: INTER BROKER OVERSEAS, INC.

Address

[redacted] FL

1325015-000-12239

File Cabinet#: 03 Drawer#: 2 Folder#: 498 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: MACDUFF AMERICA, INC. [redacted] FL

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File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 02/20/80

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 462 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: HISPANO AMERICAN REINSURANCE BROKERS, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: UNITED MANAGEMENT SERVICES, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 217 Type: LETTER To/From: TO Date: 01/14/80

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: DEPT. OF INSURANCE [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/15/81

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: CHAMBER OF INSURANCE COMPANIES [redacted] VENEZULA

1325015-000-12240

File Cabinet#: 03 Drawer#: [redacted] Folder#: 521 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: GORDON B. PHILLIPS AND COMPANY, INC. [redacted] FL

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File Cabinet#: 07 Drawer#: 5 Folder#: 806 Type: DEPO. To/From: Date: 10/09/87

Referenced Individual/Business [redacted] Address [redacted]

Company: NB

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: INTERSTATE REINSURANCE BROKERS, INC. FL

File Cabinet#: 02 Drawer#: 3 Folder#: 279 Type: LETTER To/From: FR Date: 08/01/86

Referenced Individual/Business [redacted] Address [redacted]

Company: AKERMAN, SENTERFITT, AND EIDSON FL

File Cabinet#: 07 Drawer#: 5 Folder#: 808 Type: DEPO. To/From: Date: 09/14/87

Referenced Individual/Business [redacted] Address [redacted]

Company: C. MANAGEMENT SERVICES, INC./BAYSIDE UNDERWRITERS

File Cabinet#: 02 Drawer#: 2 Folder#: 235 Type: LETTER To/From: TO Date: 06/21/83

Referenced Individual/Business [redacted] Address [redacted]

Company: POE AND ASSOCIATES, INC. FL

1325015-000-12241

File Cabinet#: 03 Drawer#: [redacted] Folder#: 453 Type: DOC. To/From: [redacted] Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: GENERAL INSURANCE BROKERAGE, INC. [redacted] FL

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File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: PRIMIER INSURANCE AND REINSURANCE, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 06/25/80

Referenced Individual/Business [redacted] Address [redacted]

Company: FLORIDA ASSOCIATION OF DOMESTIC INSURANCE CO., INC TALLAHASSEE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 221 Type: LETTER To/From: TO Date: 12/19/84

Referenced Individual/Business [redacted] Address [redacted]

Company: FLORIDA CUSTOM BROKERS AND FORWARDERS ASSOC. [redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 259 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: PALACIO AND REINRAUB [redacted] FL

File Cabinet#: 03 Drawer#: 3 Folder#: 535 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: [redacted] FL

1325015-000-12242

File Cabinet#: 02 Drawer#: [redacted] Folder#: 338 Type: DOC. To/From: [redacted] Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: PATREX, INC. NY

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File Cabinet#: 07 Drawer#: 5 Folder#: 809 Type: DEPO. To/From: Date: 10/05/87

Referenced Individual/Business [redacted]

Address [redacted]

Company: NB

File Cabinet#: 03 Drawer#: 3 Folder#: 534 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: REGENCY EXCESS AND SURPLUS UNDERWRITERS, INC. GA

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: LETTER To/From: TO Date: 07/16/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: ASSOCIATION CONSULTANTS OF FLORIDA FL

File Cabinet#: 02 Drawer#: 3 Folder#: 273 Type: LETTER To/From: FR Date: 04/19/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: MACFARLANE, FERGUSON, ALLISON, AND KELLY FL

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: LYONS INTERNATIONAL, INC. FL

1325015-000-12243

File Cabinet#: 02 Drawer#: [redacted] Folder#: 269 Type: DOC. To/From: [redacted] Date: [redacted]

Referenced Individual/Business [redacted] Address [redacted]

Company: ALL RISK CORPORATION OF FLORIDA FL

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File Cabinet#: 05 Drawer#: 1 Folder#: [redacted] Type: [redacted] To/From: [redacted] Date: [redacted]

Referenced Individual/Business [redacted] Address [redacted]

Company: DANA ROEHRIG AND ASSOCIATES, INC. FL

File Cabinet#: 02 Drawer#: 3 Folder#: 266 Type: LETTER To/From: TO Date: 09/09/82

Referenced Individual/Business [redacted] Address [redacted]

Company: FL

File Cabinet#: 02 Drawer#: 2 Folder#: 233 Type: LETTER To/From: TO Date: 02/21/83

Referenced Individual/Business [redacted] Address [redacted]

Company: DEPT. OF INSURANCE FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/11/79

Referenced Individual/Business [redacted] Address [redacted]

Company: BURDINES FL

File Cabinet#: 02 Drawer#: 1 Folder#: [redacted] Type: [redacted] To/From: [redacted] Date: 08/08/85

Referenced Individual/Business [redacted] Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY IN

1325015-000-12244

File Cabinet#: 02 Drawer#: [redacted] Folder#: 274 Type: LETTER To/From: TO Date: 03/20/87

Referenced Individual/Business [redacted] Address [redacted]

Company: AMBERCO BROKERS CORP. CT

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File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 02/06/80

Referenced Individual/Business [redacted] Address [redacted]

Company: HERNDON, ILES, & SCOTT FL

File Cabinet#: 03 Drawer#: 1 Folder#: 414 Type: LETTER To/From: TO Date: 05/10/84

Referenced Individual/Business [redacted] Address [redacted]

Company: BURT AND SCHELD SPECIALITY UNDERWRITERS, INC. FL

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business [redacted] Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY IN

File Cabinet#: 07 Drawer#: 5 Folder#: 810 Type: DEPO. To/From: Date: 12/10/87

Referenced Individual/Business [redacted] Address [redacted]

Company: OMAHA INDEMNITY COMPANY

File Cabinet#: 03 Drawer#: 1 Folder#: 419A Type: LETTER To/From: FR Date: 11/11/86

Referenced Individual/Business [redacted] Address [redacted]

Company: SCHWARTZ BROTHERS INSURANCE AGENCY, INC. [redacted] IL

1325015-000-12245

File Cabinet#: 03 Drawer#: [redacted] Folder#: 440 Type: LETTER To/From: TO Date:

Referenced Individual/Business [redacted] Address

Company: FLORIDA INSURANCE REPRESENTATIVE-MIAMI SERVICE [redacted] FL

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File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address

Company: INTERNATIONAL RISK MANAGERS OF FLORIDA, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: MEMO To/From: Date: 05/12/82

Referenced Individual/Business [redacted] Address

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 3 Folder#: 519 Type: LETTER To/From: TO Date: 12/22/82

Referenced Individual/Business [redacted] Address

Company: PAN AMERICAN UNDERWRITERS SYNDICATE [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 400 Type: LETTER To/From: TO Date: 07/22/86

Referenced Individual/Business [redacted] Address

Company: ASHFORD RAY [redacted] NY

File Cabinet#: 08 Drawer#: 4 Folder#: 847 Type: LETTER To/From: FR Date: 07/15/87

Referenced Individual/Business [redacted] Address

Company: COOPERS AND LYBRAND [redacted] FL

1325015-000-12246

File Cabinet#: 02 Drawer#: [redacted] Folder#: 213 Type: LETTER To/From: [redacted] Date: 12/21/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: ROBERT HUGHES ASSOCIATES [redacted] TX

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 04/11/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: STATE OF NEW JERSEY DEPT. OF INSURANCE [redacted] NJ

File Cabinet#: 02 Drawer#: 3 Folder#: 273 Type: LETTER To/From: TO Date: 01/14/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: BUSINESS CONSULTING SERVICE, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 501 Type: DOC.' To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: MAYFAIR MARKETING INTERNATIONAL [redacted] FL

File Cabinet#: 03 Drawer#: 2 Folder#: 469 Type: LETTER To/From: TO Date: 11/24/81

Referenced Individual/Business [redacted]

Address [redacted]

Company: ILLIONIS INSURANCE EXCHANGE [redacted] IL

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: R.B.I. BROKERAGE OF FLORIDA [redacted] FL

1325015-000-12247

File Cabinet#: 08 Drawer#: [redacted] Folder#: 813 Type: DEPO. To/From: [redacted] Date: 11/20/87

Referenced Individual/Business [redacted]

Address [redacted]

Company:

NB

b6
b7C

File Cabinet#: 03 Drawer#: 1 Folder#: 444 Type: LETTER To/From: FR Date: 01/13/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: CAPLAN AND DRYSDALE LAW OFFICES

DC

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: SMITH AND HART INSURANCE ORGANIZATION

FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business [redacted]

Address [redacted]

Company: STEEL, HECTOR AND DAVIS

FL

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: JOHNSON AND HIGGINS

FL

File Cabinet#: 03 Drawer#: 1 Folder#: 418 Type: LETTER To/From: FR Date: 11/29/86

Referenced Individual/Business [redacted]

Address [redacted]

Company: CADILLAC INSURANCE COMPANY

MI

1325015-000-12248

File Cabinet#: 05 Drawer#: [redacted] Folder#: Type: To/From: [redacted] Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: AMERICAN INSURANCE RISKS, INC. FL

b6
b7C

File Cabinet#: 02 Drawer#: 4 Folder#: 320 Type: LETTER To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: INTERCONTINENT MANAGEMENT AGENCY, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/12/79

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: FLORIDA INTERNATIONAL UNIVERSITY FL

File Cabinet#: 03 Drawer#: 2 Folder#: 478 Type: LETTER To/From: FR Date: 03/10/86

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: INTERNATIONAL UNDERWRITERS-BROKERS, INC. VA

File Cabinet#: 02 Drawer#: 3 Folder#: 267 Type: LETTER To/From: TO Date: 09/09/82

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: BROWARD FEDERAL FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 10/31/79

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: FL

1325015-000-12249

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/From: [redacted] Date: 11/30/81

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: BANCO CONSOLIDADO [redacted] VENEZULEA

b6
b7C

File Cabinet#: 02 Drawer#: 1 Folder#: 207 Type: LETTER To/From: TO Date: 03/10/86

Referenced Individual/Business

[redacted]

Address

Company: SPARBER, SHEVIN, SHAPO, HEILBRONNER, & BOOK, P.A. [redacted] FL

File Cabinet#: 02 Drawer#: 1 Folder#: 206 Type: DOC To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: RAM SYNDICATE, INC. [redacted] FL

File Cabinet#: 08 Drawer#: 1 Folder#: 814 Type: DEPO. To/From: Date: 01/12/88

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: [redacted] NB

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: RISK UNDERWRITERS INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 432 Type: LETTER To/From: TO Date: 01/26/82

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: CRUM AND FORSTER CORP. [redacted] NJ

1325015-000-12250

File Cabinet#: 2 Drawer#: [redacted] Folder#: 207 Type: LETTER To/From: FR Date: 09/09/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: IEA FL

b6
b7C

File Cabinet#: 08 Drawer#: 1 Folder#: 815 Type: DEPO. To/From: Date: 01/04/88

Referenced Individual/Business [redacted]

Address [redacted]

Company: NB

File Cabinet#: 03 Drawer#: 4 Folder#: 547 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: SYMONS UNDERWRITING MANAGERS, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: MEMO To/From: Date: 05/12/82

Referenced Individual/Business [redacted]

Address [redacted]

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC. FL

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: MACDUFF UNDERWRITERS, INC. FL

File Cabinet#: 02 Drawer#: 2 Folder#: 228 Type: LETTER To/From: FR Date: 06/25/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC. FL

1325015-000-12251

File Cabinet#: 02 Drawer#: [redacted] Folder#: 338 Type: DOC. To/From: [redacted] Date:

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: DEREK BRYANT ASSOC., INC. [redacted] SC

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 214 Type: LETTER To/From: TO Date: 07/10/79

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: FLORIDA SURPLUS LINES ASSOC. FL

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: SYMONS UNDERWRITING MANAGERS, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 325 Type: LETTER To/From: TO Date: 05/19/86

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, INC. [redacted] FL

File Cabinet#: 2 Drawer#: 1 Folder#: 207 Type: LETTER To/From: FR Date: 02/25/86

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: FREEDOM SAVINGS AND LOAN ASSOC. FL

File Cabinet#: 03 Drawer#: 4 Folder#: 562 Type: DOC. To/From: Date:

Referenced Individual/Business | Address

[redacted] | [redacted]

Company: USHER SYNDICATE, LTD. [redacted] FL

1325015-000-12252

File Cabinet#: 05 Drawer#: [redacted] Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: FL

b6
b7C

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: ARTHUR J. GALLAGHER AND COMPANY-MIAMI [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 01/17/80

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: AMERICAN HERITAGE LIFE INSURANCE CO. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 01/17/80

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: CHARLES H. VODICKA AND ASSOC. FL

File Cabinet#: 08 Drawer#: 1 Folder#: 815 Type: DEPO. To/From: Date: 07/20/87

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: [redacted] VA

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 09/25/79

Referenced Individual/Business

[redacted]

Address

[redacted]

Company: FLORIDA ASSOC. LIFE & CASUALTY INSURERS, INC. FL

1325015-000-12253

File Cabinet#: 02 Drawer#: [redacted] Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business [redacted] Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY [redacted] IN

b6
b7C

File Cabinet#: 05 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: CAPACITY REINSURANCE, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/12/79

Referenced Individual/Business [redacted] Address [redacted]

Company: S. E. BANKING CORPORATION [redacted] FL

File Cabinet#: 02 Drawer#: 4 Folder#: 338 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: INTERMEDIARIES OF AMERICA, INC. [redacted] NY

File Cabinet#: 03 Drawer#: 1 Folder#: 442 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted] Address [redacted]

Company: FEICO SYNDICATE, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 209 Type: MEMO To/From: Date: 05/12/82

Referenced Individual/Business [redacted] Address [redacted]

Company: THE INSURANCE EXCHANGE OF THE AMERICAS, IN [redacted] FL

1325015-000-12254

File Cabinet#: 04 Drawer#: [redacted] Folder#: Type: To/Fro[redacted] Date:

Referenced Individual/Business Address

[redacted]

Company: PALACIO AND WEINRAUB [redacted] FL

b6
b7C

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: I.R. WEINRAUB AND COMPANY, INC. [redacted] FL

File Cabinet#: 03 Drawer#: 1 Folder#: 436 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: DEPENDABLE INSURANCE COMPANY, INC. [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 253 Type: LETTER To/From: FR Date: 10/22/85

Referenced Individual/Business Address

[redacted] [redacted]

Company: DEPT. OF INSURANCE [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/12/79

Referenced Individual/Business Address

[redacted] [redacted]

Company: DOSS, LYNCH, AND CASTRO [redacted] FL

File Cabinet#: 02 Drawer#: 3 Folder#: 269 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: AMBERCO BROKERS CORP. [redacted] FL

1325015-000-12255

File Cabinet#: 02 Drawer#: [redacted] Folder#: Type: To/Fro[redacted] Date: 08/08/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY IN

b6
b7C

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/07/80

Referenced Individual/Business [redacted]

Address [redacted]

Company: FL

File Cabinet#: 02 Drawer#: 1 Folder#: Type: To/From: Date: 08/08/85

Referenced Individual/Business [redacted]

Address [redacted]

Company: ALLIED FIDELITY INSURANCE COMPANY IN

File Cabinet#: 03 Drawer#: 4 Folder#: 545 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: STERLING OFFICES OF CANADA, LTD. CANADA

File Cabinet#: 03 Drawer#: 4 Folder#: 544 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: STEMBLER-ADAMS AND SWEET, INC. FL

File Cabinet#: 03 Drawer#: 3 Folder#: 533 Type: DOC. To/From: Date:

Referenced Individual/Business [redacted]

Address [redacted]

Company: RAM SYNDICATE, INC. MO

1325015-000-12256

File Cabinet#: 03 Drawer#: [redacted] Folder#: 413 Type: LETTER To/From: TO Date: 12/06/85

Referenced Individual/Business Address

[redacted]

Company: BURNS AND WILCOX, LTD. [redacted] FL

b6
b7C

File Cabinet#: 2 Drawer#: 1 Folder#: 207 Type: LETTER To/From: FR Date: 08/18/86

Referenced Individual/Business Address

[redacted]

Company: INSURANCE EXCHANGE OF THE AMERICAS, INC. (IEA) [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: FR Date: 11/28/79

Referenced Individual/Business Address

[redacted]

Company: ST. PETERSBURG AREA CHAMBER OF COMMERCE [redacted] FL

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 02/08/80

Referenced Individual/Business Address

[redacted] [redacted]

Company: WITTNER AND COMPANY FL

File Cabinet#: 03 Drawer#: 3 Folder#: 532 Type: DOC. To/From: Date:

Referenced Individual/Business Address

[redacted] [redacted]

Company: RBI BROKERAGE OF FLORIDA, INC. NJ

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 04/29/82

Referenced Individual/Business Address

[redacted] [redacted]

Company: FLORIDA INTERNATIONAL UNIVERSITY FL

1325015-000-12257

File Cabinet#: 02 Drawer#: [redacted] Folder#: 234 Type: LETTER To/Fro[redacted]O Date: 11/27/79

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: WORLD TRADE COUNCIL OF CENTRAL FLORIDA FL

b6
b7C

File Cabinet#: 2 Drawer#: 1 Folder#: 207 Type: LETTER To/From: TO Date: 08/28/86

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: DEPT. OF INSURANCE FL

File Cabinet#: 04 Drawer#: 1 Folder#: Type: To/From: Date:

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: ASSOCIATED UNDERWRITERS, INC. FL

File Cabinet#: 08 Drawer#: 2 Folder#: 824 Type: DEPO. To/From: Date: 03/10/88

Referenced Individual/Business: [redacted]

Address

Company:

File Cabinet#: 02 Drawer#: 2 Folder#: 234 Type: LETTER To/From: TO Date: 07/12/79

Referenced Individual/Business: [redacted]

Address: [redacted]

Company: S.E. BANKING CORPORATION FL

File Cabinet#: 03 Drawer#: 1 Folder#: 386 Type: LETTER To/From: TO Date: 04/28/86

Referenced Individual/Business

Address

EXCHANGE BUILDING, SUITE 212
245 S.E. 1ST ST.

Company: ADMINSTRATIVE MANAGEMENT SERVICES, LTD., INC. MIAMI FL

1325015-000-12258

File Cabinet#: 03 Drawer#: [redacted] Folder#: 389 Type: DOC. To/Fr[redacted] Date:

Referenced Individual/Business	Address
	3830 WEST FLAGLER ST.
Company: A.I.B. SYNDICATE, INC.	CORAL GABLES FL

File Cabinet#: 03 Drawer#: 1 Folder#: 393 Type: LETTER To/From: TO Date: 05/06/86

Referenced Individual/Business	Address
	P.O. BOX 7001
Company: ALLIED FIDELITY INSURANCE CO.	INDIANAPOLIS IN

File Cabinet#: 03 Drawer#: 1 Folder#: 395 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	EXCHANGE BUILDING 245 S.E. 1ST ST.,
Company: AMERICAN ROYAL EXCHANGE, INC.	MIAMI FL

File Cabinet#: 03 Drawer#: 1 Folder#: 401 Type: LETTER To/From: TO Date: 07/22/86

Referenced Individual/Business	Address
	3830 WEST FLAGLER ST.
Company: ASSOCIATED INSURANCE BROKERS, INC.	CORAL GABLES FL

File Cabinet#: 03 Drawer#: 1 Folder#: 403 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	8600 N.W. SOUTH RIVER DRIVE
Company: B.G. H. SYNDICATE, INC.	MIAMI FL

File Cabinet#: 03 Drawer#: 1 Folder#: 404 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	1393 S.W. 1ST ST., SUITE 200
Company: BARLOW MEDINA INTERNATIONAL LTD., CORP.	MIAMI FL

1325015-000-12259

File Cabinet#: 03 Drawer#: [redacted] Folder#: 419 Type: DOC. To/Fr[redacted] Date:

Referenced Individual/Business	Address	
	8010 N. UNIVERSITY DR.	
Company: CAPACITY REINSURANCE, INC.	TAMARAC	FL

File Cabinet#: 03 Drawer#: 1 Folder#: 419A Type: DOC. To/From: Date:

Referenced Individual/Business	Address	
	2200 S. LOOMIS ST.	
Company: CARMICHAEL LEASING COMPANY, INC.	CHICAGO	IL

File Cabinet#: 03 Drawer#: 1 Folder#: 441 Type: DOC. To/From: Date:

Referenced Individual/Business	Address	
	6855 MIRAMIR PARKWAY	
Company: EQUINE RE, INC.	MIRAMIR	FL

File Cabinet#: 03 Drawer#: 2 Folder#: 482 Type: LETTER To/From: FR Date: 04/23/86

Referenced Individual/Business	Address	
	KENNEDY HOLLAND BUILDING 1306 REGENCY PARKWAY DR.	
Company: KENNEDY, HOLLAND, DELACY, AND SVOBODA	OMAHA	NB

File Cabinet#: 03 Drawer#: 2 Folder#: 504 Type: DOC. To/From: Date:

Referenced Individual/Business	Address	
	2600 S.W. 3RD AVE.	
Company: MIAMI SAVINGS INSURANCE SYDICATE, INC.	MIAMI	FL

File Cabinet#: 03 Drawer#: 3 Folder#: 505 Type: DOC. To/From: Date:

Referenced Individual/Business	Address	
	245 S.E. 1ST ST., SUITE 403	
Company: NATIONAL ASSURANCE CORPORATION	MIAMI	FL

1325015-000-12260

File Cabinet#: 03 Drawer#: 3 Folder#: 506 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	59 JOHN ST.
Company: NEW YORK INSURANCE EXCHANGE	NEW YORK NY

File Cabinet#: 03 Drawer#: 3 Folder#: 514 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	EXCHANGE BUILDING 245 S.E. 1ST ST.
Company: NORTH AMERICAN RISK SYNDICATE, INC.	MIAMI FL

File Cabinet#: 03 Drawer#: 3 Folder#: 536 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	1310 E. 104TH ST., SUITE 300
Company: ROYAL AMERICAN MANAGERS, INC.	KANSAS CITY MO

File Cabinet#: 03 Drawer#: 3 Folder#: 538 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	P.O. 40157
Company: SCAFFOLD GROUP	FORT WORTH TX

File Cabinet#: 03 Drawer#: 3 Folder#: 539 Type: DOC. To/From: Date:

Referenced Individual/Business	Address
	12 BONNERSFIELD LANE, HARROW
Company: SCALADE, LTD.	MIDDX

1325015-000-12261

IEA TASK FORCE FILE INDEX

7-17-89

D.O.I (COLOR CODE: GREEN)
(FILE CABINET #2, DRAWER #1, NO. 209-243)

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GENERAL COUNSEL
INSURANCE EXCHANGE FEASIBILITY STUDY-PROPOSALS & AGREEMENTS
INSURANCE EXCHANGE FEASIBILITY STUDY
INSURANCE EXCHANGE FEASIBILITY STUDY-CORRESPONDENCE
I.E.A. OPERATIONAL PROCEDURES DEVELOPMENT
I.E.A. PORGRESS REPORTS
INSURANCE EXCHANGE STATUTES
INSURANCE EXCHANGE TAX ISSUES
INTER-OFFICE MEMOS - 1979 thru 1987
LEGISLATION PRETAINING TO INSURANCE EXCHANGE
LLOYD'S SAMPLE APPLICATION & AGREEMENTS
MISCELLANEOUS CORRESPONDENCE
NEWSPAPER ARTICLES & OTHER PUBLICATIONS
PRESS RELEASES
PUBLIC RELATIONS CORRESPONDENCE
SPEECHES
SUB CHAPTER "S" REVISION ACT
SUB COMMITTEES
PRICE WATERHOUSE REVIEW & EVALUATION OF I.E.A.
SYNDICATE FINANCIAL INFORMATION FROM EXAMINERS
SYNDICATE REHABILITATION INTER-OFFICE MEMOS
SYNDICATE & UNDERWRITING MEMBER APPLICATION FOR LICENSE
UNIDENTIFIED NOTES

Note: There is no index to the contents of each file.

1325015-000-12262

I.E.A. (COLOR CODE: BLUE)
(FILE CABINET #2, DRAWER #2, NO. 244-281)

ACTION PLAN
ADMITTED ASSETS QUESTION
ADVISORY LETTERS
ANNUAL REPORTS
APPLICATION & FORMS PROCEDURES
APPLICATION COMMITTEE GUIDELINES
APPROVED STATES
ARTICLES OF INCORPORATION
ASSET DIVERSIFICATION
BINDING AUTHORITY CONTRACT
BOARD OF GOVERNORS - 1979 - 1987 MEETINGS & MINUTES
BOARD OF GOVERNORS - MEMBER LISTINGS & PROFILE
BOARD OF GOVERNORS - MEMORANDUMS TO MEMBERS
BOARD OF GOVERNORS - PRESENTATIONS BY PRESIDENT & CEO
BOAED OF GOVERNORS - RESOLUTIONS
BOARD LETTERS
BOARD NEWS
BROKER MEMBERS
BUDGET COMMITTEE
CAPACITY WORK PLAN
CAPITAL TRUST AGREEMENT
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COMMITTEES
COMPLIANCE COMMITTEE
COMPLIANCE REPORTS
CONFERENCES
CONSENT AGREEMENTS/WITHDRAWALS
CONSTITUTION & BY-LAWS - MISC. ITEMS & CORRESPONDENCE
CONSTITUTION & BY-LAWS - DRAFT

(FILE CABINET #2, DRAWER #3 NO. 284-305)

CONSTITUTION & BY-LAWS - MAY 8, 1980 PUBICATION
CONSTITUTION & BY-LAWS - MARCH 1986 REVISION
CONSTITUTION & BY-LAWS - BY-LAWS (EXHIBIT B)
CONSTITUTION & BY-LAWS - AMENDMENTS PROPOSED, 1980-1984
DATA PROCESSING SYSTEM
DIRECT BUSINESS ACCOUNTS
DOCUMENTS BUSINESS ACCOUNTS
DOCUMENTS MANUAL (SEE COPY OUT OF FILE)
EXCHANGE AVIATION UNDERWRITING GROUP
EXECUTIVE COMMITTEE MEETINGS & MINUTES - 1980-1984
FACULATIVE REINSURANCE CERTIFICATE
FINANCIAL STATEMENTS
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GENERAL MEMBERSHIP MEETINGS (in Drawer #4)
GUARANTY FUND (in Drawer #4)

1325015-000-12263

I.E.A. (COLOR CODE: BLUE)
(FILE CABINET #2, DRAWER #4 NO. 306-366a)

HMO STOP LOSS & INSOLVENCY
I.E.A. BROKERS ASSOCIATION
I.E.A. SECURITY FUND, INC.
INSURANCE EXCHANGE STATUTE AMENDMENTS
INTERNAL ACCOUNTING CONTROL SYSTEMS REPORTS
INTERNAL OPERATING SYSTEMS STATUS REPORT
INTERNATIONAL INSURANCE ASSEMBLY
INVESTIGATION COMMITTEE
LEGAL EXPENSES
LEGISLATION COMMITTEE
LETTER OF CREDIT
LINE OF CREDIT
MANAGEMENT AGENCIES
MANAGEMENT AGREEMENT
MEMBER LETTERS & BULLETINS
MEMBERSHIP I.D. NUMBERS
MEMBERSHIP KIT
MISCELLANEOUS CORRESPONDENCE & OTHER
NEWSPAPER ARTICLES & OTHER PUBLICATIONS
OMAHA AFFAIRS COMMITTEE
OVERDUE SLIPS
POOLED UNDERWRITING MEMBERS
PREMIUM FINANCE SUB COMMITTEE
PRESS RELEASES
PROCEDURE MANUAL
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REORGANIZATION COMMITTEE
RESERVE ADEQUACY STUDY
RESUMES
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REVOLVING CREDIT AGREEMENT
RULES
SECURITY FUND, INC.
SEMINARS
SITE SELECTION COMMITTEE
SOLVENCY STANDARDS
SUB CHAPTER "S" CORPORATIONS
SUDDEN DEATH CLAUSE

1325015-000-12264

I.E.A. (COLOR CODE: BLUE)

SURPLUS LINES COMMITTEE
SYNDICATE APPLICATION FOR LICENSE WITH D.O.I.
SYNDICATE APPLICATION FOR MEMBERSHIP
SYNDICATE FINANCIAL RECAP
SYNDICATE GENERAL CORRESPONDENCE
SYNDICATE LOSS RESERVE DEVELOPMENT
SYNDICATE MEMBERSHIP LISTING
SYNDICATE REHABILITATION
SYNDICATE REINSURANCE
SYNDICATE STATUS REPORTS (in Drawer #4)

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SYNDICATE NOTICE OF SUSPENSION (in Drawer #4)
SYNDICATE TRUST PROVISIONS (in Drawer #4)
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TECHNICAL PROCEDURES COMMITTEE MEETING & MINUTES
THIRD PARTY CLAIMS
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[redacted]
TORT REFORM & INSURANCE LAW
TREATY COMMUTATION PROGRAM
TRUST ACCOUNTS
TRUST AGREEMENTS
TRUST PROVISIONS
UNDERWRITITNG CHAMBER PROCEDURES COMMITTEE
UNITARY TAX LAW
U.S. TAX CONSIDERATION

SUBJECT FILE (COLOR CODE: RED)
(FILE CABINET #3, DRAWER #1 NO. 385-456)

AA MUTUAL INSURANCE ASSOCIATION
ADMINISTRATIVE MANAGEMENT SERVICES, INC.
ADMINISTRATIVE MANAGEMENT SERVICES SYNDICATE, LTD.
A.E.G.I.S. (IEA #119)
A.I.B. SYNDICATE, INC.
AIR ONE ASOCIATES, INC.
AKERMAN, SENTERFITT & EDISON
ALC BROKERS, INC.
ALLIED FIDELITY INSURANCE COMPANY
AMERICAN & BRITISH INCORPORATED
AMERICAN ROYAL EXCHANGE, INC.
AMERICAN ROYAL SYNDICATE, INC.
AM/EX BROKERS, INC.
ANGELINA CASUALTY COMPANY
ARMCO SYNDICATE
ASHFORD RE
ASSOCIATED INSURANCE BROKERS
ASSOCIATED INSURANCE SYNDICATE, INC.
B.G.H. SYNDICATE, INC.
BARLOW MEDINA INTERNATIONAL
BARNHART MARINE INSURANCE, INC.
BELTRAN/ALEXANDER & ALEXANDER, INC.
BENITEZ, CARLOS M., INC.
BISCAYNE INSURANCE SYNDICATE
BOCA POINTE, P.U.D., TRACT I
BRITISH MANAGERS, INC.
BRYANT, DEREK & ASSOCIATES
[redacted] b6 b7C
BURNS & WILCOX
BURT, SCHELD SPECIALTY UNDERWRITERS, INC.
BURT SYNDICATE, INC.
[redacted]
C. MANAGEMENT SERVICES, INC.
CADILLAC INSURANCE COMPANY
CAPACITY REINSURANCE, INC.
CITADEL MANAGEMENT CORPORATION
CLASSIC SYNDICATE
[redacted]
COLE ASSOCIATES SYNDICATE, INC.
B.D. COLE, INC.
COLONIAL ASSURANCE COMPANY
COLONY INSURANCE COMPANY
COMMERCIAL INSURANCE REINSURANCE MANAGEMENT
CONSOLIDATED LIMITED REINSURANCE, INC.
CREDIT GENERAL INSURANCE COMPANY
CROSS, N.L.S.
CRUM & FORESTER CORPORATION
DANCO CORPORATION
DAUM MANAGEMENT COMPANY

SUBJECT FILE (COLOR CODE: RED)

DEALERS INSURANCE COMPANY
DEPENDABLE INSURANCE COMPANY
DEREK BRYANT & ASSOCIATES
E & S AGENCIES
EAST-WEST BROKERS
[redacted] b6 b7C
EQUINE RE, INC.
FEICO SYNDICATE, INC.
FIELDING REINSURANCE, LTD.
FIRST INSURANCE INVESTORS GROUP
FIRST INTER-CONTINENT INSURANCE SYNDICATE, INC.
FLORIDA PLACEMENT SERVICE
FLORIDA POWER & LIGHT CO.
FLORIDA RISK MANAGERS
FOREIGN INSURANCE EXCHANGES
FORTUNE INSURANCE COMPANY
FORUM INSURANCE COMPANY
FRASER & COMPANY INSURANCE, INC.
GENERAL INSURANCE BROKERAGE, INC.
GLOBAL UNDERWRITING MANAGEMENT, INC.
GREAT REPUBLIC INSURANCE COMPANY
GREAT ATLANTIC INSURANCE COMPANY

(FILE CABINET #3, DRAWER #2 NO. 457-504)

[redacted] b6 b7C
HARDCASTLE POINTE, INC.
[redacted]
HISPANO-AMERICAN INSURANCE SYNDICATE, LTD.
HISPANO-AMERICAN REINSURANCE BROKERS, INC.
HMO STOP LOSS & INSOLVENCY
HORIZON FINANCIAL, F.A.
HUDIG-LANGEVELDT REINSURANCE
HULL & COMPANY, INC.
HUNT INSURANCE GROUP, INC.
I.E.A. BROKERS ASSOCIATION, INC.
ILLINOIS INSURANCE EXCHANGE
INDIAN LIFE INSURANCE COMPANY
INSURANCE ASSOCIATION OF THE CARIBBEAN
INSURANCE EXCHANGE SYNDICATE, INC.
INSURANCE INNOVATORS, INC.
INSURANCE SYNDICATE OF THE AMERICAS, INC.
INTER-AMERICAN SYNDICATE, INC.
INTERBROKER OVERSEAS, INC.
INTERMEDIARIES OF AMERICA, INC.
INTERNATIONAL UNDERWRITERS/BROKERS, INC.
FRED S. JAMES & CO. OF FLORIDA, INC.
JOHNSON & HIGGING OF FLORIDA, INC.
[redacted]
KENNEDY, HOLLAND, DELACY & SVOBODA
KENSINGTON (USA) REINSURANCE CORPORATION
KENSU HOLDING

SUBJECT FILE (COLOR CODE: RED)

KOPPEN, WATKINS, PARTNERS & ASSOCIATES [redacted] b6 b7C
LAHUS I, II, III, INC.
LAHUS I., INC.
LAHUS II, INC.
LAHUS III, INC.
LAHUS IV, INC.
LAHUS V, INC.
LATIN AMERICAN INSURANCE COMPANY
LINCOLN UNDERWRITING MANAGEMENT
[redacted]
LIQUOR LIABILITY
LODDERHOSE, INC.
LON WORTH CROW INSURANCE AGENCY
MACDUFF AMERICA, INC.
MACDUFF EXCHANGE, INC.
MACDUFF UNDERWRITERS, INC.
MAYFAIR MARKETING INTERNATIONAL
[redacted]
MIAMI BROKERS, INC.
MIAMI SAVINGS INSURANCE SYNDICATE, INC.

(FILE CABINET #3, DRAWER #2, NO. 505-541)

NATIONAL ASSURANCE CORPORATION
NEW YORK INSURANCE EXCHANGE - MISC. CORRESPONDENCE & OTHER
NEW YORK INSURANCE EXCHANGE - STATE OF NY INSURANCE EXCHANGE LAW
NEW YORK INSURANCE EXCHANGE - CONSTITUTION & BY-LAWS
NEW YORK INSURANCE EXCHANGE - FREE TRADE ZONE BILL
NEW YORK INSURANCE EXCHANGE - ANNUAL REPORTS & QUARTERLY STATEMENTS
NEW YORK INSURANCE EXCHANGE - STATE OF NY SENATE ASSEMBLY
NEW YORK INSURANCE EXCHANGE - EDUCATIONAL SEMINARS
NEW YORK INSURANCE EXCHANGE - NEWSPAPER & OTHER ARTICLES
NORTH AMERICAN RISK SYNDICATE
OMAHA INDEMNITY COMPANY
ORMOND RE INSURANCE GROUP, INC.
PALACIO & WEINRAUB
PALM BEACH COUNTY BOARD OF COUNTY COMMISSIONERS
PAN AMERICAN UNDERWRITIERS SYNDICATE
PATREX, INC.
[redacted] b6 b7C
PEARSON & GEORGI INTERNATIONAL
PHELAN, FLETCHER
POE & ASSOCIATES, INC.
POE MANAGEMENT COMPANY
W.F. POE SYNDICATE INC.
PRESQU'ILE AMERICAN SYNDICATE, INC.
PRICE WATERHOUSE
PROTECTIVE CASUALTY INSURANCE COMPANY
PUBLIC ENTITIES - LIABILITY INSURANCE
QUALITY INSURANCE COMPANY
RAM SYNDICATE, INC.

RBI BROKERAGE OF FLORIDA, INC.
REGENCY E. & S UNDERWRITERS, INC.
ROYAL AMERICAN MANAGERS, INC.
SAGETTARIUS INTERMEDIARIES, INC.
SCOFFOLD GROUP
SCALADE, LTD.
SELF FUNDING MANAGEMENT, INC.
SHEREBROOK UNDERWRITING AGENCIES, INC.

(FILE CABINET #3, DRAWER #4, NO. 542-564)

STANDARD UNDERWRITERS M.G.A., INC.
STEEL, HECTOR & DAVIS
STEMBLER, ADAMS & SWEET
STERLING OFFICES OF CANADA, LTD.
SUNSHINE INSURANCE COMPANY
SYMONS UNDERWRITING MANAGERS
SYNDICATE ONE, INC.
SYNDICATE TWO, INC.
SYNDICATE THREE, INC.
SYNDICATE FOUR, INC.
SYNVEX CORP.
TEXAS FIRE & CASUALTY
TITAN HOLDINGS, INC.
TRANSWORLD ASSURANCE SYNDICATE
TRINITY MANAGEMENT
TRIPLE CROWN INSURERS
TRITON INSURANCE BROKERS, LTD.
UNITED FIRE INSURANCE COMPANY
UNITED MANAGEMENT SERVICES, INC.
UNIVERSAL SECURITY INSURANCE COMPANY
USHER SYNDICATE, LTD.
VONA FLEET
ZINOPA CORPORATION

I.E.A. CONTRACTS (COLOR CODE: YELLOW)
MASTER AGENT/BROKER LIST
(FILE CABINET #4, DRAWER #1 NO. 569 a-c - 580)

AGENT NAME	BROKER NAME
[redacted]	ALC Brokers
	Anton Aviation
	Florida Risk Managers
	Great Southern Underwriters
	Florida Risk Managers
	Beltran - A & A
	Program Und./Capacity Reins.

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(FILE CABINET #4, DRAWER #2 NO. 581-598)

[redacted]	Program Und./Capacity Reins.
	Sagettarius Intermediaries
	[redacted]
	Carrier Service
	American & British
	Citadel/Flamer, etc.
	United Management Services
	Republic Hogg Robinson
	[redacted]
	L.F. Everett Co./Bernhardt Marine
	American Insurance Risks
	Florida Placement Services
	Florida Placement Services

(FILE CABINET #4, DRAWER #3 NO. 599-611)

[redacted]	Fraser & Co. Insurance
	Gallagher - Cole
	Associated Ins. Brokers/Public Inc. Agency

(FILE CABINET #4, DRAWER #4 NO. 612-620)

[redacted]	Associated Ins. Brokers/Public Inc. Agency

(FILE CABINET #4, DRAWER #5 NO. 621-630)

File 621 Missing

[redacted]	Associated Ins. Brokers/Public Inc. Agency

(FILE CABINET #5, DRAWER #1 NO. 631-639)

[redacted]	Associated Ins. Brokers/Public Inc. Agency

(FILE CABINET #5, DRAWER #2 NO. 640-652

[redacted]

Associated Ins. Brokers/Public Inc. Agency
[redacted]
Republic Nogg Robinson
Hull & Company

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(FILE CABINET #5, DRAWER #3 NO. 653-665)

[redacted]

Hull & Company
Hunt Insurance Group

(FILE CABINET #5, DRAWER #4 NO. 666-680)

[redacted]

Kalmanson E & S
General Ins. Brokers
Lyon Underwriters
Aviation Ins. Agency
Gordon B. Phillips & Co.
Premier Ins. & Re Ins.
Lyons Int'l, Inc.
Dana Roehrig & Assoc.
Burt & Scheld Specialty
Underwriters, Inc.

(FILE CABINET #5, DRAWER #5 NO. 681-697)

[redacted]

H.S. Nat'l Underwriters
Johnson & Higgins
American Ins. Risks
Symons Underwriting Mgrs.
MacDuff America
Symons Underwriting Mgrs.
Miami Brokers, Inc.
[redacted]
Capacity Reinsurance

(FILE CABINET #6, DRAWER #1 NO. 698-705)

[redacted]

[redacted]
Burns & Wilcox
Associated Underwriters

* Based only on filings received in Surplus Lines Section.

TASK FORCE FILE REFERENCE

Drawer #2 706-711
Manuals from [redacted] Office

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Drawer #3 712-720
Omaha Indemnity Index ~~(CONFIDENTIAL)~~

Drawer #4-5 Empty

File Cabinet #7 Empty

1325015-000-12272

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #8, DRAWER #1- NO. 721-735)

AGGREGATE WRITE-INS FOR OTHER THAN INVESTED ASSETS
-B.G.H. SYND., INC.
-FIRST INVESTORS SYND., INC.
-FIRST INTER-CONTINENT INS. SYND., INC.
-PACIFIC INSURANCE SYND., INC.
-USHER SYND., INC.
AMERICAN ROYAL SYND.
-(bonds, stocks, short term investments)
AMERICAN ROYAL SYND., INC.
B.G.H. SYND., INC
-(bonds, stocks, short term investments)
FIRST INSURANCE INVESTORS GROUP, INC.
FIRST INTER-CONTINENT INSURANCE SYND., INC.
FIRST INTER-CONTINENT INSURANCE SYND., INC.
-(bonds, stocks, short term investments)
FIRST INVESTORS SYND., INC.
-(bonds, stocks, short term investments)
MIAMI SAVINGS INS. SYND., INC.
PACIFIC INSURANCE SYND., INC. (Miami Savings)
-(bonds, stocks, short term investments)
PREMIUMS AND AGENTS BALANCES IN COURSES OF COLLECTION
-Royal American Synd., Inc.
-First Investors Synd., Inc.
-B.G.H. Synd., Inc.
USHER SYND., LTD.
USNER SYND., LTD.
-(bonds, stocks, short term investments)

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #8, Drawer #2 - NO. 736-758)

AIB SYNDICATE, INC.
BISCAYNE INSURANCE SYND., INC.
CORRESPONDENCE FILE
FEICO SYND., INC.
HISPANO AMERICAN INSURANCE SYND., LTD., INC.
INDIAN LIFE INSURANCE COMPANY
LAHUS II
LAHUS III
LAHUS IV
LAHUS V
MINUTES/BOARD OF GOVERNORS' MEETING
PREMIUMS AND AGENTS' BALANCES IN COURSE OF COLLECTION
-First Inter-Continent, Inc.
PREMIUMS AND AGENTS' BALANCES IN COURSE OF COLLECTION
-Pacific Insurance Synd., Inc.
PREMIUMS AND AGENTS' BALANCES IN COURSE OF COLLECTION
-Usher Synd., Ltd.

ROYAL AMERICAN MANAGEMENT SYND., INC. (RAM Synd., Inc.)
STATIONARY FILE
SUMMARY OF CONTRACTS
SUNDICATE ONE, INC.
SYNDICATE TWO, INC.
SYNDICATE THREE, INC.
SYNDICATE FOUR, INC.
SYNDICATE SUMMARY
W.F. POE SYNDICATE

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #8, DRAWER #3 - NO. 759-769)

AIB SYNDICATE

a) Common Stocks
b) Cash on Hand and Deposit
c) Premiums and Agents' Balances
d) Interest, Dividends, Due and Accrued
e) Receivables From Affiliates
f) Notes Receivable
g) Non-Admitted Assets

CORPORATE FILE/AIB SYND., INC. (FOLDER #2)
a) Working Trial Balance
b) Comparative Expense Analysis
c) Audited Financial Statements
d) Articles of Incorpor. and Amendments
e) Corporate By-Laws
f) Copy of Stock Certificate
g) Organization Chart

LIABILITIES/AIB SYND., INC. (FOLDER L-1)
a) Losses
b) Accrued General Expense
c) Payable to Affiliates

LIABILITIES/AIB SYND., INC. (FOLDER L-2)
a) Unearned Premiums

SURPLUS ACCOUNT/AIB SYND., INC. (FOLDER S-1)
a) Surplus Promissory Note

TABLE OF CONTENTS/AIB SYND., INC. (FOLDER #1)
a) Audit Program
b) Internal Contd. Questionnaire
Per Price Waterhouse (CPA'S)
c) Annual Statement FYE 12-31-84
d) Cross Checking Guide

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Insurance Exchange of the Americas

IEA (FOLDER 1a)

a) Corporate File
b) Engagement Letter
c) Legal and Attorney Fees
d) Compliance Issues
e) Syndicate Diversification
f) 1985 Budget
g) Organizational Chart
h) Committee Structure
i) Correspondence re DOI
j) Board Minutes

EXAMINATION OF IEA'S CORRESPONDENCE (FOLDER #3)
File DOI and IEA examination
EXAMINATION OF IEA'S LOAN AGREEMENT BETWEEN IEA AND THE CITY OF MIAMI EDC (FOLDER 3a)
LOSS RESERVE ANALYSIS 1984 (IEA)
REVIEW OF CENTRAL OFFICE PROCEDURES AND CONTROLS (FOLDER #2a)

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #8, DRAWER #4 - NO. 770-781)

AIB SYNDICATE, INC. AND IEA (FOLDER M-1)
Test of Premiums Per Date Processing
Care of IEA / Written FYE 12-31-84
BILLING BROKERS
BROKER FINANCIAL STATEMENTS
BROKERS SUMMARY FILE
COOPERS AND LYBRAND SYSTEM AUDIT 1985-1986
IEA COLLECTION
IEA COMMUTATION
IEA MARKET CHANGES
LOCATION AND PHONE NUMBERS
MACDUFF AMERICA, INC.
EX 0007
NATIONAL ASSURANCE COPR. AB 1976
SELF FUNDING MANAGEMENT, INC. SF 3162
TRITON INSURANCE BROKERS, LTD.
UNITED MANAGEMENT SERVICES

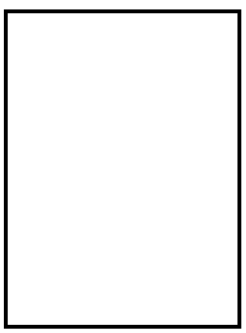
CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #8, DRAWER #5 - NO. 782-791)

AMERICAN INTERMEDIARIES, INC. AI1986
AMERCO BROKERS CORPORATION AM4010
BARNHARDT MARINE BM1986
BGH SYNDICATE, INC.
BROKER FINAL REPORTS
CAPACITY REINSURANCE, INC.
CAPACITY REINSURANCE, INC. FB8010
COMMERCAL MARINE GROUP, INC. CM4040
DEREK BRYANT ASSOCIATES, INC. DB4481
EQUINE RE. INC.
FLAMER AND CO.
GREAT SOUTHERN UNDERWRITERS INTER. INC.
LYONS INTERNATIONAL, INC. LI4411
LUVANG INSURANCE UNDERWRITERS, INC. LU9077
MACDUFF AMERICA, INC. (DAYTONA)

DEPOSITIONS

(FILE CABINET #9, DRAWER #1 - NO. 792-801)



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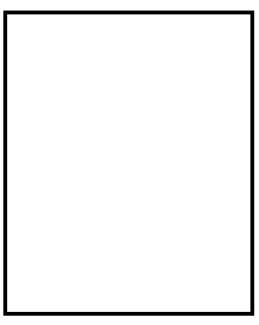
DEPOSITIONS

(FILE CABINET #9, DRAWER #2 - NO. 802-811)



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DEPOSITIONS

(FILE CABINET #9, DRAWER #3 - NO. 812-821)

[redacted] b6 b7C

DEPOSITIONS

(FILE CABINET #9, DRAWER #4 - NO. 822-824)

[redacted]

(FILE CABINET #9, DRAWER #5 - EMPTY)

CHIEF EXAMINER'S OFFICE

(FILE CABINET #10, DRAWER #1 - NO. 825-830)

[redacted]
CONSTITUTION
CONSTITUTION AND LAW
IEA CONSTITUTION AMENDMENT
IEA PROPOSED REGULATION AND PROCEDURES
TABLES AND CODES

Noris Report
OMAHA INDEMNITY COMPANY
ROYAL AMERICAN MANAGERS, INC.

Department of Insurance Material

(FILE CABINET #10, DRAWER #2 - NO. 831-838)

[redacted] b6 b7C
LAND BANK
MISCELLANEOUS
OMAHA INDEMNITY-RAMS-AMS
SADOWSKI CORRESPONDENCE (RE: SYNDICATES)

[redacted]
IEA CORRESPONDENCE
IEA MISCELLANEOUS
LIBERTY FEDERAL SAVINGS (IEA)

Department of Insurance Material

(FILE CABINET #10, DRAWER #3 - NO. 839-852)

[redacted] b6 b7C

BOARD OF GOVERNORS' ADDRESSES
EXCHANGE LEGISLATION
IEA CITADEL MANAGEMENT CORPORATIONS SURPLUS LINES FACILITY
IEA CONSTITUTION CHANGES
IEA CORRESPONDENCE
IEA CPL PROJECT
IEA JUNKBONDS
IEA MEETING 6-17-87
IEA MORATORIUM ON NEW OR RENEWAL AUTO INS. BUSINESS
IEA NEWSPAPER ARTICLES
IEA REFERENCE MATERIALS
IEA REHABILITATION FILE
IEA UPDATES
ORDER OF LIQUIDATION AND INJUNCTION
SYNDICATE MEMBERSHIP

Insurance Exchange Lawsuits

(FILE CABINET #10, DRAWER #4 - NO. 853-866)

ARECES VS. UNION AMERICAN AND IEA
CADILLAC (IEA SUIT)
- a) Amendment Complaint
- b) Complaint
- c) Exhibit A - Constitution of IEA
- d) Exhibits B-H
- e) Exhibit I - Quota Share Reinsurance Agreement
- f) Exhibit J - Excess of Loss Reinsurance Agreement
- g) Exhibit K, L, M
- h) Exhibit N - IEA Guaranty Fund, Inc. By-Laws
- i) IEA Answers and Affirmative Defences
- j) IEA Memo of Law and Opposition of Motion for Leave to Amend
- k) IEA Motion for Attorney's Fees for Memo of Law and Opposition
- l) Motion and memorandum to file amended complaint

LAND BANK
PALM BEACH COUNTY (IEA SUIT)

Insurance Exchange Lawsuits

(FILE CABINET #10, DRAWER #5 - NO. 867-876) ~~(CONFIDENTIAL)~~

ADMINISTRATIVE MANAGEMENT SERVICES VS. OMAHA INDEMNITY
EAKIN VS. ALLIED FIDELITY

ODIORNE/TEXAS FIRE AND CASUALTY VS. CROQUART
SUN LIFE VS. LAND CONCEPTS
TEXAS FIRE AND CASUALTY (Documents obtained from [redacted] - SIU LAW SUIT b6 b7C

I- Allied Fidelity Management Contract for Texas Fire
H- General Correspondence
A- Lawsuit
F- Payment Directions and Authorization
B- [redacted] Audit of Specialty Insurance Underwriters
E- Reconciliation of Account Current Statements
D- [redacted] Response to [redacted]
C- [redacted] Transmittal Letter to [redacted]
G- Specialty Insurance Underwriters Claim Against Texas Fire
J- Texas Fire and Casualty Managing Agency Agreement with Specialty Insurance Underwriters

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #11, DRAWER #1 - NO. 877-878)

BGH SYNDICATE, INC.
FIRST INTER-CONTINENT INSURANCE SYNDICATE, INC.
a) Draft Reports
b) Corporate Records
c) Accounts and Records
d) Annual Statements and Quarterly Statements
PALACIO AND WEINRAUB, INC.
RAM SYNDICATE
USHER SYNDICATE, LTD
a) CPA Audit Report
b) Corporate Records
c) Annual Statements-1984
d) Assets
e) Liabilities

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #11, DRAWER #2 - NO. 879-882)

FEICO
ADMINISTRATIVE MANAGEMENT SERVICES
FIRST INSURANCE INVESTORS GROUP
HISPANO AMERICAN INS. SYND., LTD.
a) Draft Report
b) Accounts and Records 1983 & 1984
c) Annual Statement 1983 & 1984
d) Corporate Records
HISPANO AMERICAN INS. SYND., LTD.
a) Assets-Accounts
b) Liabilities-Accounts
c) Surplus-Accounts

LAHUS I, INC.
LAHUS II, INC.
LAHUS III, INC.
LAHUS V, INC.

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #11, DRAWER #3 - NO. 883-886)

INDIAN LIFE INSURANCE COMPANY
- a) Draft Reports
- b) Corporate Records
- c) Accounts and Records
- d) Correspondence
- e) Quarterly Statements

INSURANCE EXCHANGE OF THE AMERICAS, INC.
LAHUS IV, INC.
- a) Draft Reports
- b) Corporate Records
- c) Accounts and Records
- d) Correspondence
- e) Quarterly Statements and Miscellaneous

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #11, DRAWER #4 - NO. 887)

COMPUTER RUN FOR SYNDICATES

CHIEF EXAMINER'S OFFICE (ARCHIVES)

(FILE CABINET #11, DRAWER #5 - NO. 888-901)

IEA MEMBER SYNDICATE-CORRESPONDENCE (12-31-84)
SYNDICATE ONE, INC.
- a) Articles of Incorporation
- b) By-Laws
- c) Management Agreement
- d) Trust Agreement-Southeast Bank
- e) Trust Agreement-Pan American Bank
- f) Corporate Custody Agreement
- g) Conflict of Interest Statements
- h) Board of Directors
- i) Minutes-Board of Directors and Shareholders
- j) Subsequent Events Correspondence

SYNDICATE ONE, INC.- Accounts/Records/1984 Annual Statement (12-31-84)

SYNDICATE ONE, INC.- Assets (12-31-84)
a) Bonds A-1
b) Cash on Hand and on Deposit A-6.1
c) Agents' Balances or Uncollected Premiums A-8.1
d) Funds Held or Deposited with Reinsured Cos. A-9
e) Interest Dividends, Real Estate, Income Due and Accrued A-14 (12-31-84)

SYNDICATE ONE, INC.- Draft Report (12-31-84)

SYNDICATE ONE, INC. (12-31-84)

Liabilities
a) Losses L-1
b) Other Expenses L-4
c) Federal and Foreign Income Taxes L-6
d) Unearned Premiums L-10

Capital and Surplus
a) Capital Paid Up S-25A
b) Gross Paid-in and Contributed Surplys S-26A

SYNDICATE ONE, INC. - Subsequent Information (12-31-84)
Premiums Written for 1985

SYNDICATE FOUR, INC. - Subsequent Information (12-31-84)
1985 Premiums Written

SYNVEX CORPORATION (12-31-84)
a) Certificate of Incorporation
b) Authorization to Transact Business in Florida
c) By-Laws
d) Instrument of Organization by Incorporator
e) Corporate Certification and Authorization
f) Management Agreement
g) Underwriting Management Agreement
h) Capital Trust Agreement
i) Settler's Deposit Agreement
j) Investment Management Agreement
k) Option Agreement
l) Financing Service Agreement
m) Financing Agreement
n) List of Directors
o) Minutes-Board of Directors and Shareholders
p) Other Correspondence
q) Shareholders
r) Subsequent Events Correspondence

SYNVEX CORPORATION - Accounts and Records (12-31-84)

SYNVEX CORPORATION - Annual Statement (12-31-84)

SYNVEX CORPORATION - Assets (12-31-84)
a) Bonds A-1
b) Common Stocks A-2.2
c) Cash on Hand and Deposit A-6.1
d) Short Term Investments A-6.2
e) Other Invested Assets A-7
f) Premiums and Agent's Balances in Course of Collection A-8.1
g) Funds Held by or Deposited with Reinsured Companies A-9

h) Interest, Dividends, and Real Estate Income Due and Accrued A-14
i) Capital Contributions Receivable A-18
j) Miscellaneous Receivable A-19

SYNVEX CORPORATION - Draft Report and CAP's Statutory Report (12-31-84)

SYNVEX CORPORATION

Liabilities
a) Losses L-1
b) Contingent Commissions and Other Similar Changes L-13
c) Other Expenses L-4
d) Unearned Premiums L-10

Capital and Surplus
a) Capital Paid Up S-25A
b) Gross Paid-in and Contributed Surplys S-26A

Annual Statements - IEA

(FILE CABINET #12, DRAWER #1 - NO. 902-907)

IEA ANNUAL STATEMENTS 1984-1985

Annual Statements - IEA

(FILE CABINET #12, DRAWER #2 - NO. 908-914)

ANNUAL STATEMENTS - SYNDICATES (1983)
a) Administrative Management Services, Ltd.
b) BGH Syndicate
c) FEICO Syndicate, Inc.
d) Hispano American Insurance Syndicate, Ltd.
e) Insurance Syndicate of the Americas, Inc.
f) Interamerican Inc.
g) Synvex Corporation
h) Usher Syndicate, Ltd., Inc.

Annual Statements - IEA

(FILE CABINET #12, DRAWER #3 - NO. 915-934)

ANNUAL STATEMENTS - SYNDICATES (1984)
a) Administrative Management Services, Ltd.
b) AIB Syndicate Inc.
c) AIB Syndicate Inc. (Revised)
d) Insurance Syndicate of the Americas, Inc.
e) Insurance Syndicate of the Americas, Inc. (Amended)
f) FEICO Syndicate, Inc..

g) First Insurance Investors Group Inc.
h) First Inter-Continent Insurance Syndicate, Inc.
i) Hispano American Insurance Syndicate, Ltd.
j) Lahus IV
k) Lahus V
l) Miami Savings Insurance Synd., Inc.
m) RAM, Inc.
n) Syndicate One
o) Syndicate Four
p) Synvex Corporation
q) Usher Syndicate Ltd
r) W.F. Poe Synd.
s) Zinopa

Annual Statements - IEA

(FILE CABINET #12, DRAWER #4 - NO. 935a & 935b-936)

936 missing from Drawer

ANNUAL STATEMENTS - SYNDICATES (1985)
a) Allied Fidelity and Company
b) Administrative Management Service Syndicate, Ltd.
c) AIB Syndicate, Inc.
d) Texas Fire and Casualty Insurance Company

Annual Statements - IEA

(FILE CABINET #12, DRAWER #5 - NO. 937-963)

ANNUAL STATEMENTS - SYNDICATES (1986)
a) Administrative Management Services, Ltd., Inc.
b) American Royal Syndicate, Inc.
c) BGH Syndicate
d) Biscayne Insurance Syndicate, Inc.
e) First Omter-Continent Insurance Syndicate, Inc.
f) First Investors Syndicate, Inc.
g) FEICO Syndicate Inc.
h) Lahus II
i) Lahus III
j) Lahus IV
k) Lahus V
l) Pacific Insurance Syndicate, Inc.
m) Indian Life Insurance Company
n) Omaha Indemnity Company
o) Syndicate One
p) Syndicate Two
q) Syndicate Three
r) Syndicate Four
s) Usher Syndicate
t) W.F. Poe Syndicate

1325015-000-12283

Department of Insurance (Legal)

(FILE CABINET #13, DRAWER #1 - NO. 964-968)

968 missing; goes through 967a

FROM: [redacted] b6 b7C
FROM:
PENDING LITIGATION AND RELATED MATERIALS
[redacted] DOCUMENTS

Department of Insurance (Legal)

(FILE CABINET #13, DRAWER #2 - NO. 969-982)

ANNUAL REPORTS
IEA BOARD OF GOVERNOR/EXECUTIVE COMMITTEE MEETING MINUTES
IEA CORRESPONDENCE
IEA LEGISLATIVE ACTION
IEA NEWSPAPER ARTICLES
PLANS AND RESOLUTIONS

Other Sources
IEA ARTICLES AND CLIPS
IEA CONSTITUTION - MARCH 1986 AND PROPOSED AMENDMENTS
8-24-87
IEA CORPORATE DOCUMENTS
IEA FLORIDA STATUTES INS. EXCHANGE: (629.401)
IEA INCORPORATION OF UNDERWRITING MEMBERS (629.401, F.S.)
IEA LEGAL MISCELLANEOUS
IEA POOLING ARRANGEMENT AMENDMENTS
IEA REHABILITATION MATERIALS
IEA SUBPOENAS
ILLINOIS AND NEW YORK INSURANCE EXCHANGE MATERIALS

Department of Insurance (Legal)

(FILE CABINET #13, DRAWER #3 - NO. 983-1010)

AMS Syndicate
1985 ANNUAL STATEMENT
APPLICATION AND PERSONAL BIOGRAPHICAL QUESTIONNAIRE
ARTICLES OF INCORPORATION
BALANCE SHEET AND FINANCIAL STATEMENT
CORRESPONDENCE
LICENSING AND REGULATION

North American Risk Syndicate
ACTION WITHOUT MEETING BY SHAREHOLDER
AGENT LICENSE INFORMATION
AGREEMENTS

ALLIED FIDELITY LEASE EXECUTED BY [redacted] b6 b7C
BALANCE SHEETS
CERTIFIED APPLICATION FORM & PERSONAL BIOGRAPHICAL QUESTIONNAIRE
CORRESPONDENCE
LEGAL DOCUMENTS AND CORRESPONDENCE
NORTH AMERICAN RISK SYNDICATE AGREEMENTS
RESOLUTIONS OF BOARD OF DIRECTORS

Syndicate Information
1984-1985 ANNUAL STATEMENTS (PORTIONS)
a) Administrative Management Services Synd.
b) Omaha Indemnity
c) RAM Synd.
1985 ANNUAL STATEMENTS
a) Allied Fidelity
b) Texas Fire

Other Information
B.G.H. SYNDICATE (LEGAL FILE)
CADILLAC INSURANCE CO. #1214
CADILLAC INSURANCE CO. #1227
COLONIAL PENN INSURANCE CO. #1635
CORPORATE DOCUMENTS
DEALER INSURANCE CO. #3238
DEPENDABLE INSURANCE CO. #866
FORUM INSURANCE CO. #28
FORUM INSURANCE CO. #2061
GODWIN LETTERS OF 1/20/87 & 2/5/87 RELATED MATERIAL
INA/COLONIAL INSURANCE CO. #201
INTERNATIONAL BANKERS INSURANCE CO. #858
NEWSPAPER ARTICLES
PROTECTIVE INDEMNITY #1203
QUALITY INSURANCE CO. #4037
UNION AMERICAN #3508
[redacted] (LEGAL FILE) b6 b7C

Annual Statements - IEA

(FILE CABINET #13, DRAWER #4 - NO. 1011-1024)

ANNUAL STATEMENTS - SYNDICATES (1987)
a) First Inverstors Syndicate, Inc.
b) Lahus II
c) Lahus III
d) FEICO Syndicate
e) First Inter-Continent Insurance Syndicate, Inc.
f) American Royal Syndicate, Inc.
g) Administrative Management Syndicate Ltd., Inc.
h) Omaha Indemnity Company

(FILE CABINET #13, DRAWER #5 - EMPTY)

CHIEF EXAMINER'S OFFICE

(FILE CABINET #14, DRAWER #1 - NO. 1028-1040)

(Applications, biographicals, correspondence, by-laws, articles of incorporation, certificates of incorporation, officers and directors, trust agreement, and financial data)

a) AIB SYNDICATE, INC.
b) ALPHA SYNDICATE, INC.
c) ARMCO SYNDICATE, INC.
d) BOSTON REINSURERS INC.
e) CD MANAGEMENT SYNDICATE, INC.
f) CHESAPEAKE AMERICAN INDEMNITY, INC.
g) CROWN LIFE INSURANCE CO.
h) FEICO SYNDICATE
i) FIRST INSURANCE INVESTORS GROUP
j) FIRST INTER-CONTINENT INS. SYND., INC.

CHIEF EXAMINER'S OFFICE

(FILE CABINET #14, DRAWER #2 - NO. 1041-1055)

(Applications, biographicals, correspondence, by-laws, articles of incorporation, certificates of incorporation, officers and directors, trust agreement, and financial data)

HILLS RICHARDS AND COMPANIES, INC.
INSURANCE GROUP OF THE AMERICAS, INC.
INTER-AMERICAN INSURANCE SYNDICATE
INTERNATIONAL INSURANCE SERVICE SYND., INC.
MARK SYNDICATE, LTD.
LAHUS IV, INC.
MIAMI SAVINGS INSURANCE SYNDICATE, INC.
ONE GROUP, INC.
PAN AMERICAN UNDERWRITERS, INC.
PRESQU'ILE
SECOND INTER-CONTINENT INS. SYND., INC.

CHIEF EXAMINER'S OFFICE

(FILE CABINET #14, DRAWER #3 - NO. 1056-1067)

(Applications, biographicals, correspondence, by-laws, articles of incorporation, certificates of incorporation, officers and directors, trust agreement, and financial data)

SENTRY
SOUTHERN INTERNATIONAL GROUP, INC.

1325015-000-12286

STAR INSURANCE ASSOCIATES
SYNDICATE ONE, INC.
SYNDICATE FOUR, INC.
W.F. POE SYNDICATES, INC.

CHIEF EXAMINER'S OFFICE

(FILE CABINET #14, DRAWER #4 - NO. 1068-1112)

ADMINISTRATIVE MANAGEMENT SERVICES CORRESPONDENCE
ADMINISTRATIVE MANAGEMENT SERVICES QUARTERLIES
AIB CORRESPONDENCE FILE
AIB QUARTERLIES
AMERICAN ROYAL/ALLIED FIDELITY CORRESPONDENCE
AMERICAN ROYAL/ALLIED FIDELITY QUARTERLIES
AMERICAN ROYAL SYNDICATE CORRESPONDENCE
AMERICAN ROYAL SYNDICATE QUARTERLIES
B.G.H. CORRESPONDENCE
B.G.H QUARTERLIES
BISCAYNE INSURANCE SYNDICATE CORRESPONDENCE
BISCAYNE INSURANCE SYNDICATE QUARTERLIES
FEICO SYNDICATE CORRESPONDENCE
FEICO SYNDICATE QUARTERLIES
FIRST INTER-CONTINENT INS. SYND. CORRESPONDENCE
FIRST INTER-CONTINENT INS. SYND. QUARTERLIES
FIRST INVESTORS SYNDICATE CORRESPONDENCE
FIRST INVESTORS SYNDICATE QUARTERLIES
HISPANO-AMERICAN INS. SYND. CORRESPONDENCE
HISPANO-AMERICAN INS. SYND. QUARTERLIES
INDIAN LIFE INSURANCE CORRESPONDENCE
INDIAN LIFE INSURANCE QUARTERLIES
LAHUS II CORRESPONDENCE
LAHUS II QUARTERLIES
LAHUS III CORRESPONDENCE
LAHUS III QUARTERLIES
LAHUS IV CORRESPONDENCE
LAHUS IV QUARTERLIES
LAHUS V CORRESPONDENCE
LAHUS V QUARTERLIES
MIAMI SAVINGS INSURANCE SYND. CORRESPONDENCE
MIAMI SAVINGS INSURANCE SYND. QUARTERLIES
RAM SYNDICATE CORRESPONDENCE
RAM SYNDICATE QUARTERLIES
SYNDICATE ONE CORRESPONDENCE
SYNDICATE ONE QUARTERLIES
SYNDICATE TWO CORRESPONDENCE
SYNDICATE TWO QUARTERLIES
SYNDICATE THREE CORRESPONDENCE
SYNDICATE THREE QUARTERLIES
SYNDICATE FOUR CORRESPONDENCE
SYNDICATE FOUR QUARTERLIES
USHER SYNDICATE CORRESPONDENCE
USHER SYNDICATE QUARTERLIES

1325015-000-12287

W.F. POE SYNDICATE CORRESPONDENCE
W.F. POE SYNDICATE QUARTERLIES

CHIEF EXAMINER'S OFFICE

(FILE CABINET #14, DRAWER #5 - NO. 1113-1116)

SYNDICATE FOUR, INC.
- a) Draft Reports
- b) Accounts and Records - Annual Statements
- c) Corporate Records
- d) Assets
- e) Liabilities

W.F. POE SYNDICATE
- a) 1983-1984 Annual Statements

W.F. POE SYNDICATE
- a) Draft Reports
- b) Corporate Records
- c) Correspondence File
- d) Accounts and Records
- e) Assets
- f) Liabilities, Surplus, and Other Funds
- g) Quarterly Statements

ZINOPA CORPORATION
- a) Draft Report
- b) Corporate Records
- c) Accounts and Reocords
- d) Annual Statement 1984

CHIEF EXAMINER'S OFFICE

(FILE CABINET #15, DRAWER #1 - NO. 1117-1131)

ALLIED FIDELITY AND OMAHA INDEMNITY
AMERICAN ROYAL SYNDICATE
AMS REPORT OF EXAMINATION/BROKER EXAM REPORT (DRAFT) (CONFIDENTIAL)
AMS SYNDICATE/ARTICLES, BY-LAWS, CONSENT, AND RESOLUTION
AMVEN INSURANCE SUNDICATE, INC.
BGH SYNDICATE
BISCAYNE INSURANCE SYNDICATE, INC.
CHANNEL SYNDICATE, INC.
FIRST INTER-CONTINENT INS., SYND.
GENERAL INSURANCE EXCHANGE SYND. INFORMATION
HISPANO AMERICAN INSURANCE SYND., LTD.
PACIFIC INSURANCE SYNDICATE
POE AND ASSOCIATES
SYNDICATE ONE
SYNDICATE TWO
SYNDICATE THREE

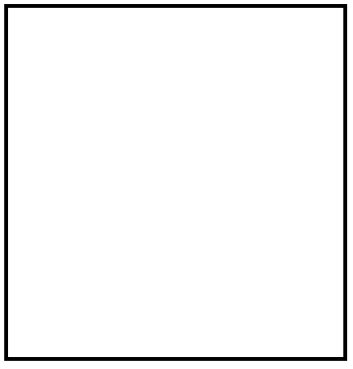
CHIEF EXAMINER'S OFFICE

(FILE CABINET #15, DRAWER #2 - NO. 1132-1148)

APPLICATION FORM FOR UNDERWRITING MEMBERSHIP AS AN INCORPORATED SYNDICATE
CAPACITY RATIOS
COMPANIES ANNUAL REPORTS
EXCHANGE LEGISLATION
IEA BOARD MEETING
IEA CASH RECEIPTS
IEA CONSTITUTION
IEA NEWS ARTICLES
IEA WORKING PAPERS
LIFE INSURANCE ACCOUNTING
PERSONAL BIOGRAPHICAL QUESTIONNAIRE FOR OFFICERS AND DIRECTORS
PROPORTIONAL AND NON-PROPOTIONAL ACCOUNTS
REINSURANCE REQUIREMENTS
REQUEST FOR INSPECTION AND/OR REPRODUCTION OF DOCUMENTS
SCHEDULE F - AGENT BALANCES
STATUS REPORTS AND PROGRESS REPORTS

CHIEF EXAMINER'S OFFICE

(FILE CABINET #15, DRAWER #3 - NO. 1149-1158)



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CHIEF EXAMINER'S OFFICE

(FILE CABINET #15, DRAWER #4 - NO. 1159-1165 a-k)

APPLICATION AND PERSONAL BIOGRAPHICAL QUESTIONNAIRE
EQUIFAX REPORT
FINANCIAL STATEMENTS
THE HARRIS STUDY
IEA BOARD MEETING
IEA BOARD MEMBERS
IEA CONSTITUTION AND BY-LAWS
IEA EXECUTIVE COMMITTEE MINUTES

IEA FLORIDA INTERNATIONAL INSURANCE ASSEMBLY
MARCH 10-13, 1985
IEA FLORIDA INTERNATIONAL SYMPOSIUM
NOVEMBER 29, 1984
IEA GENERAL CORRESPONDENCE
IEA GUARANTY FUND
IEA LEGAL
IEA POLICIES AND PROCEDURES
IEA SYDNICATE INFORMATION
LAHUS II
LAHUS III
LIMITED SYSTEMS REVIEW AND EVALUATION
NEWS ARTICLES
NEW YORK EXCHANGE ANNUAL REPORT
OMAHA INDEMNITY
SUB-CHAPTER S REVISION ACT OF 1982
(IEA TAX MATTER)

Don Hartsfield's Office

(FILE CABINET #15, DRAWER #5 - NO. 1166-1180)

AD HOC COMMITTEE
CODINGS
CONSTITUTION AND LAW
CORRESPONDENCE
FINANCIAL STATEMENT
IEA BOARD MEETINGS
IEA BOARD MEMBERS
IEA EXAMINATION
IEA GUARANTY FUND
IEA PROPOSED REGULATION AND PROCEDURES
LAHUS IV
LEGISLATIVE INFORMATION
MIAMI SAVINGS INSURANCE SYNDICATE
NEWS ARTICLES
NORTH AMERICAN RISK SYNDICATE
PLAN OF REHABILITATION
REINSURANCE CONTRACTS AND AGREEMENTS
SYNDICATE INFORMATION
SYSTEMS REVIEW AND EVALUATION

Line Slips and Documents

(FILE CABINET #16, DRAWER #1 - NO. 1181-1183)

CONTRACT ENTRY AND PROPORTIONAL ACCOUNT
HAKEMIAN DOCUMENTS
IEA DOCUMENTS
IEA LINE SLIPS
NATIONAL CONSULTING SERVICES, INC./REINSURANCE
OMAHA INDEMNITY LINE SLIPS

1325015-000-12290

Technical Procedures and BOG Minutes

(FILE CABINET #16, DRAWER #2 - NO. 1184-1196)

IEA BOG MINUTES 1979-1981
IEA BOG MINUTES 1982
IEA BOG MINUTES 1983
IEA BOG MINUTES 1984
IEA BOG MINUTES 1985
IEA BOG MINUTES 1986-1987
IEA GUARANTY FUND MINUTES 1985
IEA TECHNICAL PROCEDURES (VOLUME I)
IEA TECHNICAL PROCEDURES (VOLUME II)

Documents and BOG Minutes

(FILE CABINET #16, DRAWER #3 - NO. 1197-1199)

IEA BOG MINUTES OF THE EXECUTIVE COMMITTEE 1983
IEA BOG MINUTES OF THE EXECUTIVE COMMITTEE 1984
IEA DOCUMENTS

[redacted] Office and Miscellaneous

(FILE CABINET #16, DRAWER #4 - NO. 1200-1204a)

AKERMAN, SENTERFITT, AND EDISON
ALLIED FIDELITY INSURANCE CO.
AMERICAN INTERMEDIARIES
[redacted] MEMOS
IEA CADILLAC MATERIALS (DUPLICATE)
[redacted] b6
[redacted] IEA BROKER EXAM FILE b7C
DEPOSITION OF [redacted] 01-04-89
DEPOSITION OF [redacted] 01-04-89

(File Cabinet #16, Drawer #5, EMPTY)

Sadowski Files

(FILE CABINET #17, DRAWER #1 - NO. 1205-1214)

A. TORO FILE #1
A. TORO FILE #2
A. TORO FILE #3
AMS, LTD. #1

AMS, LTD. #2
C-MANAGEMENT
RAM SYNDICATE INC. #1
RAM SYNDICATE INC. #2
RAM SYNDICATE INC. #3
UNITED MANAGEMENT SERVICES

[redacted] Files

(FILE CABINET #17, DRAWER #2 - NO. 1215-1231)

AMERICAN ROYAL SYNDICATE, INC. #1
AMERICAN ROYAL SYNDICATE, INC. #2
CLAYSON - OMAHA INDEMNITY 1983, 1984, & 1985
CLAYSON - TREATY CONSULTANT REPORTS, WANKLYN DATA,
[redacted] - OMAHA INDEMNITY
- OMAHA INDEMNITY (CONFIDENTIAL)
- OMAHA INDEMNITY MISCELLANEOUS
IEA COMPLIANCE COMMITTEE
OMAHA INDEMNITY #1
OMAHA INDEMNITY #2
OMAHA INDEMNITY - [redacted]
PLEADINGS #1
PLEADINGS #2

b6
b7C

[redacted] Files

(FILE CABINET #17, DRAWER #3 - NO. 1232-1237)

ASSET/LIABILITY MANAGEMENT - SERVICES PROPOSAL IEA
CLAYSON - FLIE #1 & #2 OMAHA INDEMNITY
CLAYSON - FLIE #1 & #2 ROYAL AMERICA
OMAHA INDEMNITY - [redacted] (DONFIDENTIAL)
OMAHA INDEMNITY - LEGAL FILE
OMAHA INDEMNITY - [redacted]
OMAHA INDEMNITY - [redacted]
RAM MEMO/ IEA BOARD OF GOVERNORS

b6
b7C

(Drawers #4 and #5 - EMPTY)

(FILE CABINET #18, DRAWER #1 - UNNUMBERED DOCUMENTS)
[redacted] Materials

AKERMAN SENTERFITT FILES
ALLIED FIDELITY
AMS
AMS SUSPENSION
ARS
BINDING AUTHORITIES/LINESLIPS

BROKER EXAMINATIONS
BROKER PROFILES
BUSINESS WRITTEN OFF THE IEA
COMPLIANCE REPORTS
C & L REPORTS ON EXAMINATION OF FINANCIAL STATEMENTS
C & L INTERNAL CONTROL REPORTS
C & L REPORTS TO MANAGE - THIRD PARTY REVIEW
CAPITOL INSURANCE COMPANY
CAPTIVE INSURANCE COMPANIES

(FILE CABINET #18, DRAWER #2 - UNNUMBERED DOCUMENTS)

CENTRAL OFFICE SYSTEM
CENTRAL OFFICE TECHNICAL DEPARTMENT
CITADEL
[redacted] b6 b7C
COMMITTEE RESPONSIBILITIES
COMMUTATION OF CONTRACTS
COMPLIANCE
CONSTITUTION (not in Drawer)
CONTINUOUS CONTRACTS
DISCREPANCY BETWEEN BLUESLIP AND COVERNOTE (FORGERY)
EXECUTIVE COMMITTEE
EQUINE RE
FIELDING RE
[redacted]
FINDINGS
[redacted]
GREAT SOUTHERN UNDERWRITERS INTERNATIONAL INC.
IEA
IEA FEES
INTERAMERICAN RE
INTERNAL CONTROL [redacted]
INCESTUOUS RELATIONSHIPS
INVESTIGATION COMMITTEE
JOB DESCRIPTIONS
LEADING UNDERWRITER CONCEPT (in Drawer #3)
LIABILITY OF SYNDICATES WHEN PREMIUMS HAVE NOT BEEN PAID (in Drawer #3)
LODDERHOSE, INC. (in Drawer #3)

(FILE CABINET #18, DRAWER #3 - UNNUMBERED DOCUMENTS)

OMAHA INDEMNITY
OUTCAST REINSURANCE
PALACIO AND WEINRAUB
REFUNDS TO MEMBERS
REVIEW OF BOARD OF GOVERNORS MINUTES
REVIEW OF CORRESPONDENCE FILES
REVIEW OF INTERNAL ACCOUNTING CONTROLS BY PRICE WATERHOUSE

RISK REVIEW COMMITTEE (INCLUDES REGULATIONS & PROCEDURES FOR GRANTING & OPERATION OF LINESLIPS)
REINSURANCE COMMITTEE MINUTES
ROYAL AMERICAN MGRS.

(FILE CABINET #18, DRAWER #4 - UNNUMBERED DOCUMENTS)

SELF REGULATORY OPERATION (SRO)
SINGLETON CONTRACTS
[redacted] b6 b7C
SUDDEN DEATH CLAUSE
TIMELY PAYMENT OF PREMIUMS TO SYNDICATES BY BROKERS
TECHNICAL PROCEDURE COMMITTEE
TRITON INS. BROKERS LTD.
TEXAS FIRE & CASUALTY
UNCONSTITUTIONAL CONTRACTS
UNDERWRITING CAPACITY
WINING
[redacted]
MISC MEMOS

(FILE CABINET #18, DRAWER #5)

IEA, INC. COMPUTER RUNS (PREM. INCOME ANALYSIS)
DEALERS EXAMINERS REPORT

(FILE CABINET #19, DRAWER #1)

EXPENSE ACCOUNTS (DOI EMPLOYEES)

(FILE CABINET #19, DRAWER #2)

ANNUAL STATEMENTS (AMS, ARS, RAM)

(FILE CABINET #19, DRAWER #3)

ANNUAL STATEMENTS

(FILE CABINET #19, DRAWER #4 and #5 - EMPTY)

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 44
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Page 2 ~ b3;
Page 3 ~ b3;
Page 4 ~ b3; b6; b7C;
Page 5 ~ b3; b6; b7C;
Page 6 ~ b3; b6; b7C;
Page 7 ~ b3;
Page 8 ~ b3;
Page 9 ~ b3; b6; b7C;
Page 10 ~ b3; b6; b7C;
Page 11 ~ b3;
Page 12 ~ b3; b6; b7C;
Page 13 ~ b3;
Page 14 ~ b3;
Page 15 ~ b3; b6; b7C;
Page 16 ~ b3; b6; b7C;
Page 17 ~ b3; b6; b7C;
Page 18 ~ b3;
Page 19 ~ b3;
Page 20 ~ b3; b6; b7C;
Page 21 ~ b3; b6; b7C;
Page 22 ~ b3;
Page 23 ~ b3; b6; b7C;
Page 24 ~ b3;
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Page 28 ~ b3; b6; b7C;
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Page 39 ~ b3; b6; b7C;
Page 40 ~ b3;
Page 41 ~ b3;
Page 42 ~ b3; b6; b7C;
Page 43 ~ b3; b6; b7C;
Page 44 ~ b3;

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 8
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
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Page 26 ~ Referral/Consult;
Page 27 ~ Referral/Consult;
Page 28 ~ Referral/Consult;
Page 29 ~ Referral/Consult;
Page 30 ~ Referral/Consult;

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X For this Page X
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[redacted] IS NOT AVAILABLE UNTIL AFTER 8/7/92. FA [redacted] IS AVAILABLE AS OF 7/10/92. b6 b7C

HOUSTON MANAGEMENT CONCURS WITH THEIR REQUESTS TO BE CONSIDERED FOR THIS TDY ASSIGNMENT.

BT

#0037

NNNN

WMFO WAS EXTREMELY USEFUL. LEGAT, MONTEVIDEO APPRECIATES THE EFFORTS EXTENDED BY LEGAT, PARIS, AND BY WMFO.

[redacted] b7D

[redacted] LEGAT, MONTEVIDEO UNDERSTANDS THE RECORDS IN FLORIDA PERTAIN TO THE LATIN AMERICA CREDIT OFFICE (LACRO), AND THE BCCI BRANCH. THE IDENTITY OF RECORDS SEIZED IN NEW YORK IS NOT KNOWN.

WMFO IS REQUESTED TO PROVIDE THE ABOVE INFORMATION BY TELETYPE OR FACSIMILE TO LEGAT, MONTEVIDEO, FOR DISSEMINATION

[redacted] b7D

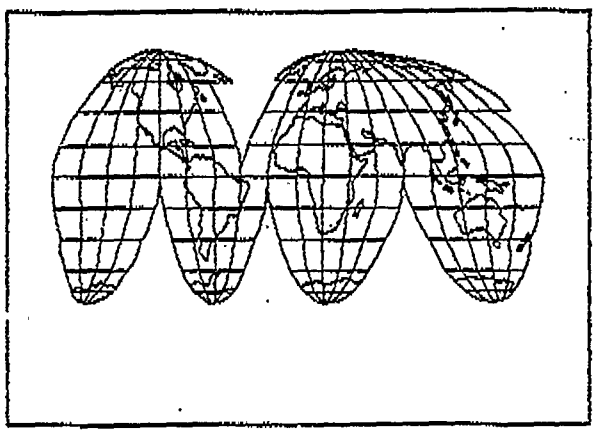
BT

#0005

NNNN

F.B.I.

Washington Metropolitan Field Office
Washington, D.C.



BCCI Squad

Fax : 202/324-9335
Voice: 202/324-9300

Date: 6/15/92 Page 1 of 6

To : FBIHQ (CID, WCCS, FIFU)

Attention : SSA [redacted] 324-5595 b6 b7C

Fax Number: 324-6492

[illegible]-WF-171924-317

From: SA [redacted] Telephone Number: 324-9301 b6 b7C

Special Instructions: Please handcarry to SSA [redacted]

Approved: [signature] 29HQ-116176

[redacted] b6 b7C

152D015-000-13376

TELETYPE SA [redacted] C-5 EXT. 9301 b6 b7C

FM FBI WMFO (29B-WF-171994)(P)

TO DIRECTOR FBI/ROUTINE/

LEGAT PARIS/ROUTINE/

LEGAT MONTEVIDEO/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. OLIA, FLU; CID, WCCS, FIFU, SSA [redacted] b6 b7C

LEGAT PARIS, ALAT [redacted]; LEGAT MONTEVIDEO, ALAT [redacted]

[redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WF TEL TO FBIHQ AND LEGAT PARIS, 4/28/92; LEGAT MONTEVIDEO TEL, 5/22/92.

THE PURPOSES OF THIS COMMUNICATION ARE TO SUMMARIZE THE RESULTS OF THE TRAVEL TO PARIS, FRANCE, BY WMFO SAS [redacted] b6 b7C

[redacted] AND TO COMMEND PARIS ALAT [redacted] FOR HER ASSISTANCE DURING THAT TRIP.

[redacted] b7D

29B-WF-171994-317

[redacted] b7D

[redacted] (WMFO WILL SEEK TO SECURE FBI INTERESTS IN THIS MATTER.)

ON 6/3-6/4/92, THE MAIN OBJECTIVE OF THE TRIP WAS MET--PARTICIPATION IN THE EXECUTION OF SEARCHES OF TWO RESIDENCES AND THE OFFICES OF CONCORDE INTERNATIONAL, INC., ALL BELONGING TO FUGITIVE GHAITH RACHAD PHARAON. THE SEARCHES RESULTED IN THE LOCATION AND SEIZURE [redacted] OF A LARGE AMOUNT OF b7D RELEVANT DOCUMENTS, AS WELL AS FINDING INFORMATION WHICH MAY LEAD TO THE APPREHENSION OF PHARAON. [redacted]

[redacted]

THE PARIS LOCATIONS SEARCHED ON 6/3/92, PURSUANT TO THE U.S.' ROGATORY COMMISSION WERE 1 AVENUE DU MARECHAL MAUNAURY; 61 RUE DE LA BOETIE; AND THE OFFICES OF CONCORDE INTERNATIONAL, 4 PLACE DE LA CONCORDE. THE FIRST LOCATION, 1 AVENUE DU MARECHAL MAUNAURY, WHERE ENTRY WAS MADE WITHOUT INCIDENT AT 7:00 A.M., b6 b7C WAS FOUND TO BE THE RESIDENCE OF [redacted] WHO WAS PRESENT. SOME DOCUMENTS RELATING TO THE NATIONAL BANK OF GEORGIA (NBG) AND INDEPENDENCE BANK (IB), AND BCCI, WERE SEIZED AT THAT LOCATION.

61 RUE DE LA BOETIE, WHICH ALSO WAS ENTERED WITHOUT INCIDENT

AT 7:00 A.M. ON 6/3/92, WAS FOUND TO BE FURNISHED BUT UNOCCUPIED. NOTHING WAS REMOVED FROM THAT LOCATION.

THE OFFICES OF CONCORDE INTERNATIONAL AT 4 PLACE DE LA CONCORDE, WERE ENTERED WITHOUT INCIDENT AT 9:00 A.M. THE ENSUING SEARCH LASTED, WITHOUT INTERRUPTION, UNTIL 2:30 A.M. ON 6/4/92. DOCUMENTS LOCATED AND SEIZED ON BEHALF OF THE U.S. RELATED TO BCCI, NBG AND IB.

IT WAS ALSO DETERMINED DURING THIS TRIP THAT THE REQUESTS CONTAINED IN THE ROGATORY COMMISSION WERE INSUFFICIENT TO COVER SUCH THINGS AS SEARCHES OF AT LEAST TWO OTHER PHARAON RESIDENCES (ONE IN CANNES, FRANCE, THE OTHER A "CASTLE" KNOWN AS MONTEFORT, LOCATED IN SARLAT, FRANCE) AND A YACHT, "LE PHARAON"; OTHER DOCUMENTS RELATING TO KNOWN RELATIONSHIPS BETWEEN BCCI AND PHARAON; OR INTERVIEWS OF PERSONS AT THE VARIOUS LOCATIONS, WHO INCLUDED [redacted] OF CONCORDE INTERNATIONAL) [redacted] [redacted]

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DOCUMENTS SEEN IN CONCORDE INTERNATIONAL'S PREMISES INDICATED THAT IT IS THROUGH THAT COMPANY THAT EXPENSES INCURRED BY THE PHARAON FAMILY ARE PAID, TO INCLUDE MAINTENANCE OF THE VARIOUS RESIDENCES AND THE YACHT, "LE PHARAON." WITH REGARD TO THE "LE PHARAON," RECORDS INDICATED IT IS A 150-PLUS-FOOT, OCEAN-GOING VESSEL WHICH WAS LAUNCHED IN 1990, AND HAS A CREW COMPRISED OF AN AMERICAN CAPTAIN AND AT LEAST THREE PHILIPPINOS. RECENT COMMUNICATIONS TO AND FROM THE YACHT INDICATED THAT IT WAS IN DRY DOCK IN CASABLANCA, MOROCCO; THAT THE PHILIPPINO CREW HAD BEEN SENT HOME IN EARLY-4/92, AND WAS EXPECTED TO RETURN TO CASABLANCA

ON OR ABOUT 6/1/92. MOROCCO IS COVERED BY LEGAT PARIS; ALAT [redacted] WAS REQUESTED TO ASCERTAIN WHETHER THE YACHT IS INDEED THERE. b6 b7C

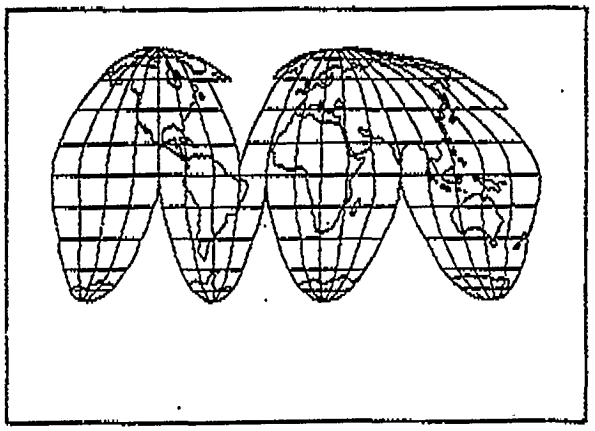
WMFO WISHES TO TAKE THIS OPPORTUNITY TO RECOGNIZE AND THANK PARIS ALAT [redacted] FOR HER OUTSTANDING COOPERATION AND ASSISTANCE IN THIS MATTER. HER FLUENCY IN BOTH FRENCH AND SPANISH WERE INVALUABLE IN DEALING WITH THIS TRULY INTERNATIONAL EFFORT, IN WHICH CONTEMPORANEOUS THREE-LANGUAGE DISCUSSIONS WERE NECESSARY AND FREQUENT. ALTHOUGH SHE HAS BEEN PART OF THE PARIS STAFF FOR ONLY ABOUT A MONTH, ALAT [redacted] ALAT [redacted] ALSO WAS PRESENT DURING THE ENTIRE SEARCH EFFORT, WHICH BEGAN AT 6:30 A.M. AND LASTED THROUGH 2:30 A.M. THE NEXT MORNING. HER PRESENCE AT AND PARTICIPATION IN THE SEARCHES WERE MUCH APPRECIATED AND PROVED TO BE CRITICAL FACTORS IN THEIR SUCCESS. b6 b7C b7D

LEADS: LEGAT PARIS: AT CASABLANCA, MOROCCO: ASCERTAIN PRESENCE AND STATUS OF YACHT "LE PHARAON".

[redacted] b7D

F.B.I.

Washington Metropolitan Field Office
Washington, D.C.



BCCI Squad

Fax : 202/324-9335
Voice: 202/324-9300

Date: 6/15/92 Page 1 of 5

To : FBIHQ (CID, WCCS, FIFU)

Attention : SSA [redacted] 324-5595 b6 b7C

Fax Number: 324-6492

From: SA [redacted] Telephone Number: 324-9301

Special Instructions: Please handcarry to SSA [redacted]

Approved: [redacted] 29HQ-11617

[redacted] b6 b7C

TELETYPE SA [redacted] C-5 EXT. 9301 b6 b7C

FM FBI WMFO (29B-WF-171994)(P)

TO DIRECTOR FBI/ROUTINE/

LEGAT LONDON/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. OLIA, FLU; CID, WCCS, FIFU, SSA [redacted] b6 b7C

LEGAT LONDON, ALAT [redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WF TEL TO FBIHQ AND LEGAT LONDON, 5/22/92.

THE PURPOSE OF THIS COMMUNICATION IS MAINLY TO SUMMARIZE THE RESULTS OF THE TRAVEL TO LONDON BY WMFO SAS [redacted] b6 b7C

AND [redacted]

FOR INFORMATION FBIHQ AND LEGAT LONDON, WMFO SAS, ACCOMPANIED BY DOJ ATTORNEYS (AUSA) [redacted] AND [redacted] b6 b7C

[redacted] AND ASPEN SYSTEMS CORPORATION (ASC) [redacted]

[redacted] MET WITH BCCI/LONDON'S LIQUIDATOR, [redacted] AND

MEMBERS OF HIS STAFF ON 6/5/92, [redacted] b7D

[redacted]

[redacted] THE PURPOSES OF THE MEETING WERE TO SURVEY THE NATURE AND EXTENT OF THE RECORDS WHICH WOULD BE AVAILABLE, AND TO EXPLORE WHAT FACILITIES WOULD BE AVAILABLE FOR REVIEWING AND PROCESSING THOSE RECORDS.

FROM THE PRESENTATION OF [redacted] AND HIS STAFF, IT WAS b6 b7C

DETERMINED THAT THE POPULATION OF RECORDS CONSISTS OF SOME 64,000

29B-WF-171994-36

BOXES OF DOCUMENTS, I.E., ABOUT 150 MILLION PAGES. APPROXIMATELY HALF OF THESE DOCUMENTS ARE LOCATED AT BCCI/LONDON'S HEADQUARTERS (100 LEADENHALL STREET), ALMOST ANOTHER HALF IN AN ARCHIVAL COLLECTION IN A WAREHOUSE, AND THE REMAINDER AT THREE OTHER BRANCHES IN OTHER CITIES. FORTUNATELY, [redacted] AND HIS STAFF HAVE HAD PRIOR EXPERIENCE WITH LARGE LIQUIDATIONS IN WHICH EVIDENTIARY CONCERNS WERE A FACTOR. THEREFORE, CONSIDERABLE AND APPARENTLY VERY EFFECTIVE STEPS HAVE BEEN TAKEN TO BE ABLE TO ACCOUNT FOR WHAT RECORDS ARE AVAILABLE AND THE SOURCE-LOCATIONS OF THOSE RECORDS. THERE IS A COMPUTERIZED INDEX OF ALL BOXES, COMPRISED OF AT LEAST A PARAGRAPH ON THE CONTENTS IF NOT A MORE COMPLETE DESCRIPTION; IN SOME CASES, DOCUMENT BY DOCUMENT. SOME OF THE STATISTICS INCLUDE: 20,000 BOXES WITH DETAILED INDICES; 1,000 BOXES OF "INTERESTING" DOCUMENTS COLLECTED FROM DESKS AND CABINETS CONTROLLED BY BCCI OFFICIALS; AND ABOUT 3,000 "IMPORTANT" DOCUMENTS SO DESIGNATED BY [redacted] STAFF. A LOG OF THE MOVEMENTS OF ALL BOXES AND/OR DOCUMENTS HAS BEEN MAINTAINED. THERE ALSO EXIST ABOUT 12,000 CUSTOMER FILES AT LEADENHALL STREET, AND ANOTHER 25,000 AT THE OTHER LOCATIONS IN THE COUNTRY. MICROFILM RECORDS OF TRANSACTION VOUCHERS ALSO HAVE BEEN FOUND AND CATALOGUED, ALTHOUGH HARD-COPIES OF THOSE VOUCHERS OLDER THAN 1985 APPARENTLY WERE DESTROYED. ALSO, THERE IS A "FALCON" COMPUTER SYSTEM CONTAINING RECORDS OF APPROXIMATELY 144,000 CUSTOMER ACCOUNTS, DATING FROM 1/1/77 TO 7/5/91 (THE LATTER DATE BEING WHEN THE LIQUIDATOR ASSUMED CONTROL OF BCCI).

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PART OF THE LIQUIDATOR'S PRESENTATION WAS A TOUR OF FOUR POTENTIAL OFF-SITE LOCATIONS IN WHICH THE DOCUMENTS COULD BE

REVIEWED AND PROCESSED. ACCORDING TO [redacted] THERE IS NOT SUFFICIENT ROOM IN THE LEADENHALL STREET FACILITY FOR THE MEMBERS OF THE TASK FORCE TO DO THEIR WORK. WMFO BELIEVES THAT, OVER A PERIOD OF 4-TO-6 MONTHS, AND ASSUMING THE APPLICABILITY AND VIABLITY OF THE LIQUIDATOR'S INDICES, A GROUP OF TEN PEOPLE (5 SAS AND 5 FAS), WORKING IN A SPACE OF ABOUT 3,500-TO-4,000 SQUARE FEET, COULD REVIEW THE RECORDS IN THE U.K.. BASED ON WHAT WMFO SAS WERE TOLD, SUCH A SPACE WOULD RENT FOR AT LEAST $50,000 PER QUARTER. THE LIQUIDATOR CAN AND WILL IMMEDIATELY PROVIDE THE FURNISHINGS FOR THE OFF-SITE OUT OF STOCK ALREADY ON HAND.

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WITH REGARD TO PROCESSING THE DOCUMENTS, WMFO BELIEVES THAT, RATHER THAN SELECTING AND THEN PHOTOCOPYING DOCUMENTS TO BE SENT BACK TO THE U.S. FOR ASC PROCESSING, THE MOST DESIRABLE, EFFECTIVE AND EFFICIENT MEANS OF PROCESSING THE RECORDS WOULD BE TO HAVE TWO ASC SCANNERS ON SITE, THEREBY PRODUCING ONLY A FEW HUNDRED COMPUTER DISKS WHICH HAVE TO BE SHIPPED AND STORED, RATHER THAN WHAT COULD EASILY PROVE TO BE BETWEEN 500-AND-1000 BOXES OF PHOTOCOPIES.

ON 6/9/92, DOJ DIRECTED THAT ASC PRESENT A PROPOSAL FOR PROCESSING THE BCCI/LONDON RECORDS. ON 6/10/92, THE PACE ORDER WAS SIGNED. THEREFORE, WMFO ANTICIPATES MAKING A REQUEST IN THE NEAR FUTURE FOR TRAVEL AUTHORIZATION AND POSSIBLY FOR TDY ASSISTANCE. WMFO ESTIMATES THAT SOME COMBINATION OF SAS AND FAS TOTALLING TEN PEOPLE WILL BE REQUIRED FOR THE REVIEW, WHICH WILL TAKE PROBABLY 4-TO-6 MONTHS TO COMPLETE.

BASED ON WMFO'S DISCUSSIONS WITH DOJ AND ASC ABOUT THE UPCOMING LONDON DOCUMENT PROJECT, WMFO LEARNED THAT THE SAME

BUDGETARY PROBLEMS THAT HAVE PLAGUED THIS CASE FOR SOME TIME WILL AGAIN REQUIRE SOME CREATIVE SOLUTION. AS WITH THE TASK FORCE CO-LOCATION EFFORT, DOJ HAS NO FUNDS FOR RENTING SPACE FOR THE LONDON PROJECT, OTHER THAN FUNDS SLATED FOR ASC'S CONTRACT. TO USE THOSE FUNDS TO COVER ALL THE COSTS OF THE LONDON PROJECT WOULD ONLY DIMINISH THE AMOUNT AVAILABLE FOR DOCUMENT PROCESSING. IN WMFO'S OPINION, THE USE OF ASC-DESIGNATED FUNDS FOR OTHER THAN THE EXPENSE OF PROCESSING THE RECORDS IS UNDESIRABLE, PARTICULARLY IN LIGHT OF THE FACT THERE ARE SEVERAL OTHER POPULATIONS OF RECORDS YET TO BE SURVEYED AND HANDLED.

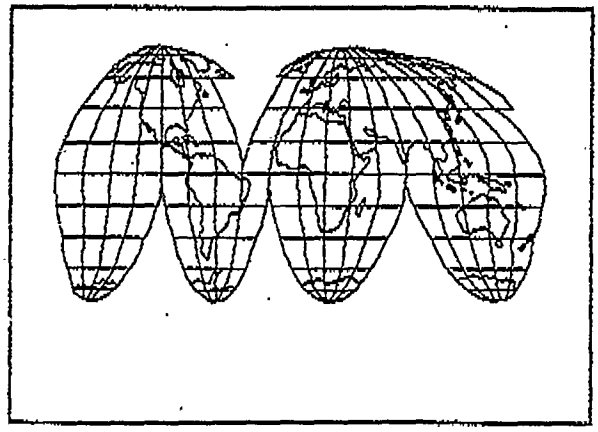
SOME SOLUTION TO THE OFF-SITE SPACE PROBLEM MIGHT BE FOUND IN UTILIZING AVAILABLE SPACE IN SOME U.S. [redacted] b7D GOVERNMENT FACILITY, OR IN SOME DORMANT BCCI BRANCH. WITH REGARD TO THE LATTER, WMFO WILL BROACH THE POSSIBILITY OF USING A BCCI BRANCH TO THE LIQUIDATOR THROUGH DOJ, ALTHOUGH IT SHOULD BE NOTED THAT, IF THE LIQUIDATOR IS ALREADY PAYING RENT ON SUCH SPACE, THE U.S. GOVERNMENT, BY VIRTUE OF THE PLEA AGREEMENT, WOULD HAVE TO REIMBURSE THE LIQUIDATOR FOR THE USE OF IT, UNDER THE RATIONALE OF IT BEING COSTS INCURRED IN RECORD PRODUCTION.

LEADS: LEGAT LONDON: AT LONDON, ENGLAND: WILL ASCERTAIN THE AVAILABILITY OF 3,500-4,000 SQUARE FEET OF OFFICE SPACE (THE NAVAL ANNEX ON GROSVENOR SQUARE WAS MENTIONED AS A POSSIBILITY) THAT WOULD BE AVAILABLE FOR APPROXIMATELY 6 MONTHS, BEGINNING IN MID-JULY, 1992.

JUN 26 '92 11:32

F.B.I.

Washington Metropolitan Field Office
Washington, D.C.



BCCI Squad

Fax : 202/324-9335
Voice: 202/324-9300

Date: 6/16/92 Page 1 of 3

To : FBIHQ (CID, WCCS, FIFU)

Attention : SSA [redacted] 324-5595 b6 b7C

Fax Number: 324-6492

288-WF-171994-319

From: SA [redacted] Telephone Number: 324-9301

Special Instructions: Please handcarry to SSA [redacted]

29HQ 116176

Approved: [redacted] b6 b7C

1-D

TELETYPE SA [redacted] C-5 EXT 9123 b6 b7C

FM FBI WMFO (29B-WF-171994)(P)

TO DIRECTOR FBI/IMMEDIATE/

LEGAT OTTAWA/IMMEDIATE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: OLIA, FLU; CID, WCCS, FIFU, SSA [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS; MC #38; FIF: FAG. OO:WMFO

REFERENCES: WMFO TELETYPE TO DIRECTOR, 6/8/92; OTTAWA TELETYPE TO DIRECTOR, 6/10/92; WMFO TELCALL TO OTTAWA, 6/16/92.

REQUEST OF FBIHQ: TO APPROVE THE OFFICIAL TRAVEL OF WMFO SA [redacted] TO OTTAWA, CANADA ON 6/21/92 FOR A PERIOD OF NOT MORE THAN THREE DAYS, FOR THE PURPOSE OF INTERVIEWING [redacted] OF ICIC (INVESTMENTS) LTD.

ON 2/6/92, US DEPARTMENT OF JUSTICE (DOJ) ASSET FORFEITURE OFFICE NOTIFIED WMFO THAT, UNDER THE PLEA AGREEMENT, THE ASSETS OF BCCI AND ITS SUBSIDIARIES OR AFFILIATES ARE FORFEITABLE. ICIC (O), ICIC INVESTMENT, ICIC HOLDINGS, LTD, ARE ALL RELATED COMPANIES AND WMFO HAS TO DETERMINE THEIR TIES WITH BCCI IN ORDER FOR THEIR ASSETS TO BE FORFEITED. THE US GOVERNMENT CURRENTLY HAS FROZEN $47 MILLION WORTH OF ASSETS, WHICH ARE HELD IN THE US, HOWEVER THE FREEZE ON THE ASSETS EXPIRES 6/30/92.

[redacted] HAS AGREED, WITH SA [redacted] TO BE INTERVIEWED, BY THE FBI, REGARDING HIS EMPLOYMENT AT ICIC AND BCCI. PROPOSED ITINERARY IS FOR SA [redacted] TO TRAVEL TO OTTAWA ON 6/21/92 AND b6 b7C

29B-WF-171994-274

RETURN ON 6/23/92.

ESTIMATED EXPENSES FOR THE TRIP ARE $ 899.39, CALCULATED ON THREE DAYS PER DIEM AT $ 166.00 ($ 99.00 FOR HOTEL AND $ 67.00 FOR MEALS), PLUS $ 320.00 ROUND TRIP AIRFARE.

LEADS. [redacted] SA [redacted]

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247

Memorandum

To : DIRECTOR, FBI Date 6/9/92

From : LEGAT, OTTAWA (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE NUMBER 38;
FIF; FAG;
OO: WMFO

Reference: WMFO teletype dated 6/8/92.

Dissemination, as outlined below, was made on dates indicated.

____ copies of

__X__ Pertinent information from referenced teletype.

Name and Location	Date Furnished
	6/9/92

b7D

29B-WF-171994-3211

(2)-Bureau
1-Ottawa
JJS:js
(3)

1325015-000-13390

Memorandum

To : DIRECTOR, FBI Date 6/9/92

From : LEGAT, OTTAWA (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE NUMBER 38;
FIF; FAG;
OO: WMFO

Reference: WMFO teletype dated 6/8/92.

Dissemination, as outlined below, was made on dates indicated.

____ copies of

__X__ Pertinent information from referenced teletype.

Name and Location	Date Furnished
[redacted]	6/9/92

b7D

2-Bureau
1-Ottawa
JJS:js
(3)

1325015-000-13391

9 Jul 92

0015 MRI 00016

PP RUCNFB

DE FBIME #0001 1910019

ZNY EEEEE

P 090018Z JUL 92

FM FBI MEMPHIS

TO DIRECTOR FBI/PRIORITY/

BT

UNCLAS E F T O

CITE: //3440//

PASS: [redacted] FINANCIAL INSTITUTION FRAUD UNIT. b6 b7C

SUBJECT: HIDDEN INTEREST; MAJOR CASE 38; FINANCIAL ASSISTANCE/FINANCIAL ANALYST (FA); OO: WMFO.

RE BUTEL TO ALL FIELD OFFICES, JULY 7, 1992, AND MEMPHIS TELEPHONE CALL TO [redacted] ON JULY 8, 1992. b6 b7C

FINANCIAL ANALYST [redacted] SOCIAL SECURITY [redacted] CURRENTLY ASSIGNED TO THE MEMPHIS DIVISION IS INTERESTED IN THE 90-DAY TEMPORARY DUTY (TDY) ASSIGNMENT TO WMFO AS DESCRIBED IN REFERENCED BUTEL, AND IS HIGHLY RECOMMENDED BY SAC, MEMPHIS, FOR THIS ASSIGNMENT. FINANCIAL

[redacted] b6 b7C

1325015-000-13392

ANALYST [redacted] HAS AN EOD OF JANUARY 4, 1987. IN ADDITION TO HAVING A B.A. IN ACCOUNTING, FA [redacted] IS A CERTIFIED PUBLIC ACCOUNT. b6 b7C

FA [redacted] HAS BEEN A FINANCIAL ANALYST FOR TWO YEARS AND HAS WORKED SEVERAL COMPLEX FINANCIAL NSTITUTION FRAUD MATTERS. IN ADDITION TO HER EXPERIENCE AS A FINANCIAL ANALYST, FA [redacted] HAS SERVED IN THE FOLLOWING POSITIONS: FILE CLERK, IMPREST FUND CLERK, FIELD SUPPORT ACCOUNT CLERK, AUTOMOTIVE CLERK, AND CONFIDENTIAL INFORMANT CLERK. b6 b7C

FA [redacted] HAS COMPUTER EXPERIENCE IN THE FOLLOWING COMPUTER SYSTEMS: WORD PERFECT, EXCEL, FREELANCE, RBASE, AND RBASE 3.1. b6 b7C

FA [redacted] HAS HANDLED ALL WORK ASSIGNMENTS IN A TIMELY MANNER AND HAS EXHIBITED THE ABILITY TO ANALYZE DATA AND ASSEMBLE IT IN A FASHION PRESENTABLE FOR FURTHER ANALYSIS BY INVESTIGATIVE AGENTS, AND PRESENTATION FOR PROSECUTION. b6 b7C

BT

#0001

NNNN

8 JUL 92 [illegible]

RECEIVED
TELETYPE UNIT

0329 MRI 01359

RR RUCNFB

DE FBINO #0002 1901924

ZNR UUUUU

R 081924Z JUL 92

FM FBI NEW ORLEANS (29A-WF-171994)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //3530:SQUAD 4//

PASS: HQ FOR CID, WCC SECTION, [redacted] FA PROGRAM MANAGER. b6 b7C

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FINANCIAL ASSISTANTS/FINANCIAL ANALYSTS (FA); OO: WMFO.

REFERENCE BUREAU TELETYPE TO ALL OFFICES, JULY 7, 1992.

FINANCIAL ANALYST [redacted] SOCIAL SECURITY ACCOUNT NUMBER [redacted] IS INTERESTED IN THE TDY ASSIGNMENT AT WMFO. b6 b7C

29A-WF-171994-327

BT b6 b7C

#0002

[redacted]

NNNN

Memorandum

Dep. Dir. ____
ADD Adm. ____
ADD Inv. ____
Asst. Dir.:
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Cong. Affs. Off. ____
Off. of EEO ____
Off. Liaison & Int. Affs. ____
Off. of Public Affs. ____
Telephone Rm. ____
Director's Sec'y ____

To [redacted] Date 3/23/92

From : L. A. Potts

Subject : HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

PURPOSE: To recommend that a management official (GM-15 or above) and additional resources be assigned on a TDY basis to the investigation of the Bank of Credit and Commerce International (BCCI) which has escalated to a multi-faceted case, complex and global in scope, and is considered to be the top Financial Institution Fraud (FIF) priority at both FBIHQ and the Department of Justice (DOJ).

RECOMMENDATIONS: 1. That a management official at the GM-15 level or higher be immediately assigned on a TDY basis (for a time frame less than one year) to report directly to SAC, WMFO, with line authority to oversee and prioritize the entire investigation; to have day-to-day liaison with FBIHQ, DOJ, and other local, Federal, and foreign investigative officials; and to respond to various Congressional and Senate inquiries concerning BCCI.

APPROVED: Adm. Servs. ____ Crim. Inv. ____ Director ____ Ident. ____ Dep. Dir. ____ Info. Mgnt. ____ ADD-Adm. ____ Inspection ____ ADD-Inv. ____ Intell. ____ Laboratory ____ Legal Coun. ____ Tech. Servs. ____ Training ____ Cong. Affs. Off. ____ Off. of EEO ____ Off. of Liaison & Int. Affs. ____ Off. of Public Affs. ____

2. That approval be granted to assign the number of additional resources required for this matter on a TDY basis for less than one year, including one Supervisory Special Agent (SSA) who will have responsibility for the overall review of BCCI documents and records.

APPROVED: Adm. Servs. ____ Crim. Inv. ____ Director ____ Ident. ____ Dep. Dir. ____ Info. Mgnt. ____ ADD-Adm. ____ Inspection ____ ADD-Inv. ____ Intell. ____ Laboratory ____ Legal Coun. ____ Tech. Servs. ____ Training ____ Cong. Affs. Off. ____ Off. of EEO ____ Off. of Liaison & Int. Affs. ____ Off. of Public Affs. ____

OO-WF-171994-330X

DETAILS: Captioned investigation is a matter of intense interest to the U.S. government, the national media, Congress, and the general public. This case has escalated to such a magnitude that additional resources must now be dedicated. The Criminal Investigative Division (CID) is recommending that a management

1 - [redacted]
1 - Mr. Potts
1 - [redacted]
1 - [redacted]
DRW:drw/vf (10)

1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - [redacted]

1 - [redacted]

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(Continued-Over)

FBI/DOJ

1325015-000-13400

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official (GM-15 or above) and additional resources be assigned on a TDY basis to this investigation which has escalated to a multi-faceted case, complex and global in scope, and is considered to be the top FIF priority at both FBIHQ and DOJ. It is recommended that this GM-15 level or higher be immediately assigned on a TDY basis (for a time frame less than one year), to report directly to SAC, WMFO; with line authority to oversee and prioritize the entire investigation; to have day-to-day liaison with FBIHQ, DOJ, and other local, Federal, and foreign investigative officials; and to respond to various Congressional and Senate inquiries concerning BCCI. In addition it is recommended that additional Agent and support resources be assigned to this matter on a TDY basis for less than one year, including one SSA who will have responsibility for the overall review of BCCI documents and records. SAC, WMFO concurs with these recommendations.

This matter requires a complete, comprehensive, and immediate law enforcement response. This recommendation is being made to enable the FBI to more effectively coordinate this matter as an equal partner with DOJ and to better manage the world-wide investigation now encompassing at least three different CID program areas and numerous FBI field offices and Legal Attaches (Legats).

The FBI has aggressively pursued this matter since initiation; however, case management and direction has, from the onset, been directed at the highest levels of DOJ. A DOJ individual at the Senior Executive Service (SES) level routinely contacts WMFO management personnel at the supervisory level and/or investigative personnel (GM-14/GS-13), providing instructions as to what is to be done. The daily interfacing necessary by FBI management officials with the DOJ requires that a management official at the GM-15 level or higher supervise this investigation to insure that FBI interests are preserved.

In February 1991, WMFO initiated this investigation based on a criminal referral from the Board of Governors of the Federal Reserve System (BGFRS) alleging that false and fraudulent statements had been made concerning BCCI's ownership and control of Credit and Commerce American Holdings, the parent-holding company of First American Bankshares (FABS), Washington, D.C. Subsequent BGFRS criminal referrals alleged false statements had been made concerning the ownership and control of the National Bank of Georgia (NBG), Atlanta, Georgia, and the Independence Bank (IB), Encino, California. In January 1992, four corporate BCCI entities plead guilty to criminal charges in U.S. District Court, Washington, D.C., and BCCI was ordered to forfeit over $550 million in cash and other assets. In addition, the BCCI plea agreement required that BCCI liquidators provide full cooperation in the ongoing investigation to include access to documents and witnesses. Since initiation, this case has significantly expanded to include numerous criminal allegations in addition to FIF.

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WMFO is coordinating this matter with the DOJ, Fraud Section and U.S. Attorney's Offices in Atlanta, Los Angeles, Miami, Tampa, and Washington, D.C. Currently WMFO has twelve full-time Agents and one Financial Analyst (FA) assigned to this matter. The principal relief supervisor of WMFO's squad C-5 has been tasked with the day-to-day supervision of the BCCI matter. WMFO has submitted a request to FBIHQ to approve the appointment of this individual to a temporary GS-14. In addition, WMFO has recently requested an additional six FAs for pending document review. The Atlanta, Los Angeles, and Miami Offices have two, two, and four Agents assigned respectively to this matter. Seventeen DOJ Trial Attorneys and Assistant U.S. Attorneys from the Washington, D.C. area are assigned to this matter under the direction of the Principal Deputy Chief of the Fraud Section, DOJ.

On 3/13/92, FBIHQ officials met at DOJ with high ranking DOJ officials to include Robert Mueller, Assistant Attorney General, Criminal Division; Larry Urgenson, Deputy Assistant Attorney General, Criminal Division; Thomas R. Reinhardt, Deputy Assistant Attorney General, Office of Legislative Affairs; G. Allen Carver, Principal Deputy Chief, Fraud Section; and [redacted], Trial Attorney, Fraud Section.

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The purpose of this meeting was to discuss the ongoing investigation concerning BCCI. During this meeting, it was noted that this matter is now a global investigation involving numerous countries, FBI Divisions, and Legats. The investigation crosses multiple CID program lines. The world-wide nature of the BCCI investigation presently encompasses the international investigation of various criminal allegations including unlawful acquisitions of U.S. banks and thrifts, fraudulent securities transactions, money-laundering, political payoffs, public corruption, terrorism, and illegal arms transactions. BCCI's alleged criminal conduct, currently being scrutinized by various congressional committees, demands that a thorough, comprehensive investigation be conducted on a timely basis.

AAG Mueller utilized the term "scorched earth" to describe the wide-ranging investigation he envisions as required to adequately pursue the various criminal allegations known to date.

The ongoing investigation focuses on those individuals responsible for BCCI's acquiring secret control over FABS, NBG, and IB, and is international in scope. Interviews have been conducted in Egypt, London, England, and the Cayman Islands. Numerous BCCI documents have been identified throughout the world that will have to be reviewed. WMFO has identified over 28,000 boxes of BCCI documents (of which WMFO estimates 1900 boxes will contain potential evidence) in the United Kingdom; the Cayman Islands; Los Angeles, California; Miami, Florida; and New York, New York. Other locations with populations of BCCI records of unknown volume include France, Jamaica, Mexico, Brazil, Argentina, and Panama.

1325015-000-13402

b6
b7C

The necessity to conduct a significant number of interviews in this ongoing investigation both within the United States and abroad; to locate and review existing BCCI documents world-wide; and to follow-up on the various additional allegations that have not yet been investigated requires that a number of additional Agent and support resources be assigned to this matter on a TDY basis for less than one year, including one SSA who will have responsibility for the overall review of BCCI documents and records. In order to expedite this matter, two distinct areas of the ongoing investigation should each be individually assigned to an SSA. One SSA should be assigned responsibility for investigative teams handling interviews and the ongoing criminal investigation; and one SSA should be assigned responsibility for review teams to locate and review documents.

The WCCS will continue to exercise FBIHQ oversight of this matter. WMFO is Office of Origin and will continue to be responsible for overseeing this matter to a logical conclusion.

1325015-000-13403

FEDERAL BUREAU OF INVESTIGATION

11 Jul 92 05:46Z

RECEIVED TELETYPE UNIT

0012 MRI 00023

RR RUCNFB

DE FBICG #0003 1930013

ZNR UUUUU

R 110012Z JUL 92

FM FBI CHICAGO (298-WF-171994)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //3150:SQUAD 7//

PASS: UNIT CHIEF [redacted] FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION, CRIMINAL INVESTIGATIVE DIVISION.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FINANCIAL ASSISTANTS/ANALYSTS, OO: WMFO.

RE BUREAU TELETYPE TO ALL FIELD OFFICES DATED JULY 7, 1992.

CHICAGO FINANCIAL ANALYST (FA) [redacted] SOCIAL SECURITY NUMBER [redacted] HAS EXPRESSED AN INTEREST IN THE TEMPORARY DUTY (TDY) ASSIGNMENT TO WMFO RE CAPTIONED CASE, AND

[redacted]

ICC.3823

1325015-000-13404

PAGE TWO DE FBICG 0008 UNCLAS

IS WILLING TO VOLUNTEER AND REMAIN IN THE WASHINGTON, D.C. AREA FOR A MINIMUM OF 90 DAYS, WITH NO RETURN TRAVEL TO HER PERMANENT DUTY STATION. IT IS ALSO UNDERSTOOD THAT INTERNATIONAL TRAVEL MAY BE A PART OF THIS ASSIGNMENT.

FA [redacted] HAS A GOVERNMENT CREDIT CARD AND GOVERNMENT DRIVER'S LICENSE, AND WILL BE AVAILABLE TO TRAVEL NO LATER THAN JULY 20, 1992. b6 b7C

FA [redacted] HAS HAD PREVIOUS EXPERIENCE ON THIS INVESTIGATION, WITH TDY ASSIGNMENTS TO MIAMI DURING SEPTEMBER-NOVEMBER, 1991, AND APRIL-MAY, 1992. b6 b7C

CAPTIONED CASE WAS DISCUSSED WITH ASAC [redacted] CHICAGO DIVISION, AND AFTER CONSIDERATION, ASAC [redacted] CONCURS IN THE RELEASE OF FA [redacted] FOR THE TDY ASSIGNMENT. b6 b7C

SAC-CHICAGO CONCURS.

BT

#0008

NNNN

1325015-000-13405

0034 MRI 01703

OO P12

DE FBIHO #0037 1922118

ZNR UUUUU

O 102118Z JUL 92

FM FBI HOUSTON (29B-WF-171994)

TO DIRECTOR FBI/IMMEDIATE/

BT

UNCLAS

CITE: //3290//

PASS: ATTN: FINANCIAL INSTITUTION FRAUD UNIT.

SUBJECT: HIDDEN INTERESTS, MAJOR CASE 38: FINANCIAL ASSISTANTS/FINANCIAL ANALYSTS (FA); OO: WMFO.

RE BUREAU TELETYPE TO ALL OFFICES, 7/7/92; TELCALL BETWEEN SSA [redacted], HOUSTON, AND FA PROGRAM MANAGER [redacted] 7/10/92. b6 b7C

HOUSTON FINANCIAL ANALYST [redacted] GS-9, AND AUDITOR (FORMER FA) [redacted], GS-11, ARE INTERESTED IN CONSIDERATION FOR TDY ASSIGNMENT ON CAPTIONED INVESTIGATION. b6 b7C

DUE TO UPCOMING INSPECTION OF HOUSTON DIVISION, AUDITOR

1325015-000-13406

0556 MRI 01831

RECEIVED
TELETYPE UNIT
19 Jun 92 18 05

PP RUCNFB FBIWMFO PAR FBIMM FBINY

DE MON #0005 1702227

ZNY EEEEE

P 182226Z JUN 92

FM LEGAT MONTEVIDEO (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/ROUTINE/

LEGAT PARIS/ROUTINE/

INFO FBI MIAMI/ROUTINE/

FBI NEW YORK/ROUTINE/

BT

UNCLAS E F T O

CITE: //5750:MON 392//

PASS: FBIHQ FOR OLIA, FLU II; CID, WCCS, FIFU, SSA [redacted]; b6 b7C

AND WF FOR SA [redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WMFO TEL TO DIRECTOR, JUNE 16, 1992.

[redacted] RETURNED FROM PARIS DURING THE b7D

PAST WEEKEND, ADVISING THAT MEETINGS WITH THE FBI TEAM FROM

29B-WF-171994-316

[redacted] b6 b7C

OC-3823
cc: OLIA

1325015-000-13374

[redacted] IT WAS FURTHER b3 Per IRS b7D

DETERMINED THAT REHMAN HAS ALSO TESTIFIED BEFORE THE SENATE SUBCOMMITTEE ON TERRORISM, NARCOTICS AND INTERNATIONAL COMMUNICATION COMMITTEE ON FOREIGN RELATIONS ON 10/24/88.

REHMAN'S TESTIMONY PERTAINED TO BCCI'S INVOLVEMENT IN MONEY LAUNDERING AND THE SHIPMENT OF CASH OUT OF THE UNITED STATES TO BCCI'S OFF-SHORE BANKS.

[redacted] b3 b7C b7D

LEADS

HOUSTON:

AT TEXAS CITY, TEXAS

HOUSTON WILL LOCATE AND INTERVIEW AZIZ REHMAN REGARDING HIS KNOWLEDGE OF BCCI'S ALLEGED INVOLVEMENT IN MONEY LAUNDERING AND DETERMINE IF HE IS ABLE TO PROVIDE ANY ADDITIONAL INFORMATION WHICH IS NOT CONTAINED IN THE TRANSCRIPT OF HIS SENATE SUBCOMMITTEE TESTIMONY. SUTEL RESULTS TO WMFO ASAP.

BT

#0016

NNNN

RECEIVED
TELETYPE UNIT
20 OCT 91 1 PC 42
FEDERAL BUREAU
OF INVESTIGATION

[redacted] b6 Per FBI b7C

0068 MRI 01335

OO P12 FBIHO FBIWMFO

DE FBIMM #0016 2751925

ZNR UUUUU

O 021924Z OCT 91

FM FBI MIAMI (29B-WF-171994) (WCC-1) (P)

[redacted] b6 Per FBI b7C

TO DIRECTOR FBI (29B-WF-171994)/IMMEDIATE/

FBI HOUSTON/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3460//

PASS: FOR FBIHQ FIFU, SSA DENNIS WEAVER, ROOM 3839; FOR WMFO SSA GERRY LANG.

SUBJECT: HIDDEN INTERESTS, MAJOR CASE 38, FIF, OO: WMFO.

RE TELCALLS BETWEEN SSA ROSS M. GAFFNEY AND SSA DENNIS WEAVER, FBIHQ, AND SSA GERRY LANG, WMFO, 10/2/91.

[redacted] b3 Per IRS b7D

29B-WF-171994-315 X1

[redacted] b6 Per FBI b7C

1325015-000-13372

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 28
Page 4 ~ b6; b7C; b7D;
Page 5 ~ b6; b7C; b7D;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 14 ~ Referral/Consult;
Page 15 ~ Referral/Consult;
Page 16 ~ Referral/Consult;
Page 17 ~ Referral/Consult;
Page 18 ~ Referral/Consult;
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Page 22 ~ Referral/Consult;
Page 23 ~ Referral/Consult;
Page 24 ~ Referral/Consult;
Page 25 ~ Referral/Consult;
Page 27 ~ Referral/Consult;
Page 28 ~ Referral/Consult;
Page 29 ~ Referral/Consult;
Page 30 ~ Referral/Consult;
Page 31 ~ Referral/Consult;
Page 32 ~ Referral/Consult;
Page 38 ~ Duplicate;

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X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

235

Office of the Legal Attache
American Embassy
London, England

Secure Fax No.: 71 629 8246
Non-Secure Fax No.: 71 499 7944
Telephone Number: 071-499-9000, ext 2478

Page 1 of 3 pages

Date: May 19,1992

Hidden Info

- O IMMEDIATE
- O PRIORITY
- ● ROUTINE

- OSECURE
- ●NON-SECURE
- ●CLASSIFICATION: UNCLAS

TO: FBI HEADQUARTERS

FILE NO:

FAX NUMBER: (202) 324-4705

ATTN: SSA [redacted]

Sent 12:35 p.m.

b6
b7C

FROM: LEGAL ATTACHE, LONDON

FILE NO: 80-LO-9581 SUB A

ORIGINATOR: ALAT [redacted]

SUBJECT: [redacted]

b7D

29B-WF-171991-290

COMMENTS/MESSAGE: Attached please find [redacted]

b7D

[redacted]

29HQ-116176

[redacted]

b6
b7C

Searched.....
Indexed.....
Serialized.....
Filed.....

Approved [redacted]

80-LO-9581 Sub A

MAY 21 '94 4:22 FROM LEGAT LONDON

1325015-000-13460

Office of the Legal Attache
American Embassy
London, England

Secure Fax No.: 71 629 8246
Non-Secure Fax No.: 71 499 7944
Telephone Number: 071-499-9000, ext 2478

Page 1 of 3 pages

Date: May 19,1992

○ IMMEDIATE
○ PRIORITY
◎ ROUTINE

○SECURE
◎NON-SECURE
◎CLASSIFICATION: UNCLAS

TO: FBI HEADQUARTERS

FILE NO:

FAX NUMBER: (202) 324-4705

ATTN: SSA [redacted]

Sent 12:35 p.m.

b6
b7C

FROM: LEGAL ATTACHE, LONDON

FILE NO: 80-LO-9581 SUB A

ORIGINATOR: ALAT [redacted]

SUBJECT: [redacted]

b7D

COMMENTS/MESSAGE: Attached please find [redacted]

b7D

Searched.....
Indexed.....
Serialized.....
Filed.....

Approved [redacted]

80-LO-9581 Sub A

1325015-000-13463

PAGE.001
FROM LEGAT LONDON 4:22 MAY 21 '94

HQGI02DS PC FULL RESPONSE REC 1 MAX 1 06/24/92

SENSITIVE BUT UNCLASSIFIED

A NAME BCCI
DDN
TRUE BANK OF CREDIT AND COMMERCE INTERNATIONAL

VIOL GEN N 998 R 998 TN 998 TR 998
RESUB SENATE SELECT COMMITTEE ON INTELLIGENCE
VICTIM FO-FILE-NO

SEX X RACE X SUM30DT 00000000 ENTRY 08191991 MODIFIED
ID DOB POB
MISC REQUEST BY SENATE SELECT COMMITTEE ON INTELLIGENCE FOR REVIEW OF ABOVE

ADDRESS-NO STREET
CITY ST/PV COUNTRY ZIP
LOC DC

EVENT-DATE MAIN/REFERENCE M
FILE-NO 062-0123000 SERIAL

SENSITIVE BUT UNCLASSIFIED

ENTER-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10--PF11--PF12--
MORE REDO EXIT ADD-A DEL MOD AIMS MENU

1325015-000-13483

Memorandum

To : DIRECTOR, FBI

Date 6/17/92

From : LEGAT, OTTAWA (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO: WMFO

Reference: WMFO teletype to Director dated 6/16/92.

Dissemination, as outlined below, was made on dates indicated.

copies of

___x___ Pertinent information from referenced teletype.

29B-WF-171994-306

Name and Location	Date Furnished
Mr. Edward Ney U.S. Ambassador Ottawa, Ontario	6/17/92

2-Bureau
1-Ottawa (29B-WF-171994)
JJS/afo
(3)

29-116176

b6
b7C

1325015-000-13490

4/17/92

WORKSHEET Lab 9032703OEVT

Q12, 1 U.S. Customs Service audio cass't, M.I.P. "5/13/89"

_BEG _END _COM _DIST _REV _N/F _S/N _HARM _OFFSP/WOW _BASSY _MUFFLED

1) TRACK CONF. Mono DEV.TP. _____ PK MET. READ. _____

2) CONTENT _____

3) FFT _____

4) LENGTH Approx 30 mins.

5) BACKGR _____

6) INTELLIGIBILITY Tape received in broken condition was broken. About a 1½ minute section of tape was damaged, and about 90% intell., remainder of tape was fully intell. Tone at 87 Hz.

7) ENH. OF Q12(L TK) Mono

PLAYED BACK ON: Tandberg 910, 1⅞ IPS

a. L TK THRU Ithaco 4211, 100/6300 - 100/6300 Hz.

b. ___ THRU

c. THRU

d. THRU

8) 2 ENH. COPY(s) of Q12

a. One on Side A of 1 Maxell C90, FT, M, 1⅞ IPS, RB315, Dolby B

b. " " " " " " " " " " " "

9) PC One on 1-7" Ampex reel, FT, ½ R-R/E, 3¾ IPS, RB77

10) COMMENTS: PK remounted broken section of tape in a C30 ~~shell~~ housing (Side B). Q12 was recorded in two parts with a gap between part 1 and 2.

1325015-000-13497

RECEIVED
TELETYPE UNIT
24 JUN 92 08 19

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Serv.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0020 MRI 00721

OO P12 FBILA FBIWMFO

DE ROM #0002 1760806

ZNY EEEEE

O 240805Z JUN 92

FM LEGAT ROME (29B-WF-171994) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI LOS ANGELES/IMMEDIATE/

FBI WMFO (29B-WF-171994)/IMMEDIATE/

BT

UNCLAS E F T O

CITE: //5350:ROM615.176//

PASS: SSAS [redacted] FIFU, WCC SECTION, b6 b7C

CID; SSA [redacted] FLU #1, OLIA; SA [redacted] LA

DIVISION; SA [redacted], C-5, WMFO.

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

REWMFOTEL DATED 6/22/92 AND ROMTELCALL TO SSAS [redacted] AND b6 b7C

[redacted] ON 6/22/92.

PER RE TEL, LEGAT ROME HAS OBTAINED COUNTRY CLEARANCE FOR

TRAVEL TO ISTANBUL, TURKEY, FOR PERIOD 6/24-29/92, FOR SAS

29B-WF-171994-309

[redacted] b6 b7C

1325015-000-13492

PAGE TWO DE ROM 0002 UNCLAS E F T O

[redacted] (WMFO) AND [redacted] (LA) AS WELL AS FOR AUSA [redacted] AND DOJ ATTORNEY [redacted]. ASSISTANT REGIONAL SECURITY OFFICER (ARSO) [redacted] U.S. EMBASSY, ANKARA, TURKEY, ADVISED THAT COUNTRY CLEARANCE FOR AFOREMENTIONED WAS GRANTED ON 6/22/92, BY ANKARA CHARGE D'AFFAIRES. [redacted] FURTHER NOTED THAT HOTEL ACCOMMODATIONS HAVE BEEN MADE FOR PERIOD 6/25-28/92 (THREE PERSONS FOR THE EVENINGS OF 6/25/ THROUGH 6/28; ONE PERSON FOR THE EVENINGS 6/25 THROUGH 6/27/92). IN ADDITION, A ROOM WILL BE MADE AVAILABLE AT THE U.S. CONSULATE FOR SCHEDULED INTERVIEWS.

b6
b7C

[redacted] ADDED THAT BECAUSE OF SEVERE PERSONNEL SHORTAGES AT THE CONSULATE THEY WOULD BE UNABLE TO MEET AND ASSIST THE FBI/DOJ PARTY UPON THEIR ARRIVAL AT ISTANBUL.

b6
b7C

BT

#0002

NNNN

FD-258 (Rev. 5-5-91)

[redacted] 1 - [redacted]

b6
b7C

REPORT OF THE
TECHNICAL SERVICES DIVISION
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

July 9, 1992

To: SAC, Washington Metropolitan Field (C-5)

FBI File No. 29B-WF-171994 322

Lab No. 20327030 E VT

Reference: Airtel dated March 26, 1992

Your No.

Re: HIDDEN INTERESTS;
MC #38
FIF; FAG

Specimens received: March 27, 1992

Q12 One U.S. Customs Service magnetic tape cassette marked in part "5/13/89"

Result of examination:

The piece of recording tape was remounted in a Maxell C30 housing. Two enhanced monaural copies were made of specimen Q12 on side A of separate Maxell C90 magnetic tape cassettes with Dolby B noise reduction encoding. Each copy was made in two parts.

In order to obtain maximum intelligibility, the enhanced copies should be played back using a high-quality cassette recorder and headphones, using Dolby B noise reduction as indicated on the cassettes.

29B-WF-171994-310

Supervisory Special Agent [redacted] conducted the enhancement examination.

b6
b7C

Page One
DOW/tal (6)

(CONTINUED - OVER)

WAB
JA

MAIL ROOM ☑ This Report Is Furnished For Official Use Only

1325015-000-13494

8-259 (Rev. 5-91)

RECORDED
4/3/92
trl

FEDERAL BUREAU OF INVESTIGATION
UNITED STATES DEPARTMENT OF JUSTICE [redacted] b6 b7C

Work Sheet

To: SAC, Washington Metropolitan Field (C-5)

FBI File No. 29B-WF-171994 -316

Lab No. 20327030 E VT

Reference: Airtel dated March 26, 1992

Your No.

Re: HIDDEN INTERESTS,
MC #38
FIF; FAG

Specimens received: March 27, 1992

Q12 One audio cassette tape

4/10/92 11:29 A [redacted] E & ec. E w seal. b6 b7C
w work, transparent tape (not ET) believe done
by our shop.
4/16/92 8:10 A [redacted] e + found small envelope, already
open containing Q12.

1325015-000-13496

May 28, 1992

[redacted] b6 b7C

Interpol, U.S. National Central Bureau
Washington, D.C.

Attention: SSA [redacted] b6 b7C
FBI Representative - Interpol

RE: GHAITH RASHAD PHARAON

Dear [redacted]: b6 b7C

Enclosed is a request for the issuance of an International Red Notice on captioned subject.

Sincerely yours,

[redacted] b6 b7C
Inspector in Charge

By: [redacted] Unit Chief b6 b7C
Foreign Liaison
Unit II
Office of Liaison and
International Affairs

Enclosure

307

Dep. Dir. ____
ADD Adm. ____
ADD Inv. ____
Asst. Dir.:
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Cong. Affs. Off. ____
Off. of EEO ____
Off. Liaison & Int. Affs. ____
Off. of Public Affs. ____
Telephone Rm. ____
Director's Sec'y ____

MAIL ROOM

I - Interpol
CLZ:lgm (3)

Hand Delivered to Interpol 6/2/92

1325015-000-13491

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/29/95

TO : DIRECTOR, FBI
Attn: Laboratory Division
Language Services

FROM : ADIC, WMFO (29B-WF-171994 SUB GG)
(P)(C-5)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Request of FBIHO: Expeditiously translate enclosed documents [redacted]

Enclosed are eight (8) groups of documents received from [redacted] b3 b7D

The enclosed documents [redacted] The translations are now necessary to aid WMFO and the Department of Justice in reviewing documents and preparing for trial.

2-FBIHQ (Enc. 8)
1-WMFO

JNR:jnr
(3)

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-13498

American Embassy
London

FAX: 71-499-1944

UNCLASSIFIED

[redacted]

[redacted]

b6
b7C

(including [redacted])

29B-WF-171994-244

1 ENCLOSURE

"ENCLOSURE ATTACHED"

29A-116176

1325015-000-13499

244

ENCLOSURE

(Indicate page, name of newspaper, city and state.)

(Mount Clipping in Space Below)

Date: 15 JAN 92
Edition: FINANCIAL TIMES

Title: BCCI

High Court order opens worldwide sale of assets to repay creditors

BCCI liquidation accelerates

THE WORLDWIDE liquidation of Bank of Credit and Commerce International yesterday moved into full swing as the High Court in the UK issued a winding up order against one of the group's two main operating arms.

That allows liquidators to begin the process of selling off the group's assets and repaying creditors some of the $20bn owed.

The court order also triggers the US's largest ever creditor scheme, by which similarly depositors can get up to 75 per cent of their deposits, up to a maximum of $10,000.

A similar winding up order against the other substantial part of the group was expected to be issued later in the day in the Cayman Islands.

It also emerged yesterday that BCCI liquidators hope to conclude a ring-fenced deal with Abu Dhabi, the bank's major shareholder, by the end of [illegible] deal is expected to [illegible] the group's deposits [illegible] Gulf and Saba. In return, the liquidators would [illegible] particular [illegible] parties, including Abu Dhabi itself.

The High Court in London issued the winding up order against BCCI Overseas, the banking arm of the group which controlled the bank's [illegible] in the UK. The order was made on the grounds that the bank was unable to pay its debts and was insolvent.

Earlier applications for a winding up order were [illegible] provisional liquidators from [illegible]

BCCI SA Luxembourg, the holding company of the group, was [illegible] liquidation in Luxembourg [illegible] registered holding company is [illegible]

Hearings in [illegible] said that [illegible]

1325015-000-13501

Memorandum

Dep. Dir. ____
ADD Adm. ____
ADD Inv. ____
Asst. Dir.: ____
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Cong. Affs. Off. ____
Off. of EEO ____
Off. Liaison & Int. Affs. ____
Off. of Public Affs. ____
Telephone Rm. ____
Director's Sec'y ____

To : Mr. Potts

Date 5/6/92

From : F. B. Verinder

Subject : HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO

PURPOSE: To obtain authorization to amend the travel plans of WMFO Special Agent (SA) [redacted] to include travel to London, England, during the period 5/8-14/92. Department of Justice-Fraud Section (DOJ-FS) Trial Attorney [redacted] will accompany SA [redacted] in this travel to conduct interviews and review records in the investigation of the Bank of Credit and Commerce International (BCCI). b6 b7C

RECOMMENDATION: That SA [redacted] official travel plans be amended to include travel to London, England. b6 b7C

APPROVED: Director ____ Dep. Dir. ____ ADD-Adm. ____ ADD-Inv. ____ Adm. Serv. ____ Crim. Inv. ____ Ident. ____ Info. Mgmt. ____ Inspection ____ Intell. ____ Off. of Liaison & Int. Affs. ____ Off. of Public Affs. ____ Off. of EEO ____

DETAILS: Approval for foreign travel of SA [redacted] to Istanbul, Turkey, and Jeddah, Saudi Arabia, was granted in F. B. Verinder to Mr. Potts memorandum dated 4/30/92, and related addendum dated 5/1/92. This approved itinerary had SA [redacted] travelling to Istanbul, Turkey, on 5/4/92, departing from there to Jeddah, Saudi Arabia, on 5/8/92, and then returning to the United States on 5/14/92. b6 b7C

On 5/4/92, DOJ notified WMFO that counsel for individuals to be interviewed in Jeddah, Saudi Arabia (Khalid Bin Mahfouuz [redacted], had informed DOJ that they were unable to arrive in Jeddah in time to prepare their clients for interviews as previously planned and that the earliest time they will be ready was 5/15/92. DOJ had agreed to this change and had requested that WMFO travel plans be changed accordingly. b6 b7C

WMFO teletype dated 5/6/92 to Director, FBI requested approval to amend the travel plans of SA [redacted] to include travel to London, England, during the period 5/8/92 to 5/14/92; depart from London on 5/14/92 enroute to Jeddah, Saudi Arabia, where he will remain through 5/18/92, returning to the United States on b6 b7C

1 - Mr. Potts
1 - Mr. Verinder
1 - [redacted]
1 - [redacted]
1 - Mr. Esposito
1 - [redacted]
1 - [redacted]
1 - Acting UC, FIFU
1 - [redacted]

DRW:drw/vf (10)

(Continued-Over)

1325015-000-13502
FBI/DOJ

5/19/92. DOJ Attorney [redacted] will accompany SA [redacted] to London, England, and Jeddah, Saudi Arabia, [redacted] to conduct interviews of various BCCI officers and auditors in this matter. Interviews to be conducted in London include: Former BCCI [redacted] former [redacted] former [redacted] former [redacted] Ghaith Pharaon's [redacted] b6 b7C b7D

The White-Collar Crimes Section concurs in the need for this travel. SA [redacted] has extensive knowledge of the BCCI investigation making him the logical choice for travel. SAC, WMFO concurs in the need for this travel. b6 b7C

On 5/5/92, ALAT [redacted] Legat Rome, advised that he has obtained appropriate host country clearances for SA [redacted] to travel to Istanbul, Turkey, during the period 5/4/92-5/8/92 and to travel to Jeddah, Saudi Arabia, during the period 5/14-18/92. b6 b7C

On 5/6/92, ALAT [redacted] Legat, London, advised that he has initiated coordination to obtain host country clearance for SA [redacted] to travel to London, England, during the period 5/8-14/92. b6 b7C

On 5/6/92, DOJ-FS Attorney [redacted] advised that she concurs with this travel and that she has coordinated this matter with Linda Candler, DOJ-Office of International Affairs. On 5/6/92, Candler concurred with this travel. b6 b7C

On 5/6/92, SSA [redacted] Domestic Liaison Unit, Office of Liaison and International Affairs, FBIHQ concurred with this travel and advised that he will make the appropriate notifications to Department of State by the attached "DOJ Notification of Foreign Travel" forms following approval. b6 b7C

The estimated additional cost of amended travel for WMFO SA [redacted] is $2,600. b6 b7C

1325015-000-13503

Memorandum from F. B. Verinder to L. A. Potts
RE: Hidden Interests; Major Case 38; OO: WMFO

The White-Collar Crimes Section concurs in the need for this travel. SAs [redacted] have extensive knowledge of the BCCI investigation making them the logical choices for travel. SAC, WMFO concurs in the need for this travel. b6 b7C

On 5/26/92, Assistant Legal Attache (ALAT) [redacted] Legat, London, advised that he would obtain host country clearance for SAs [redacted] for 6/4 - 6/92. b6 b7C

On 5/26/92, DOJ, Fraud Section Attorney [redacted] advised that she concurs with this travel and that she would coordinate this travel with Linda Candler, DOJ, Office of International Affairs. On 5/26/92, Linda Candler concurred with this travel. b6 b7C

On 5/26/92, SSA [redacted] Domestic Liaison Unit, Office of Liaison and International Affairs, FBIHQ concurred with this travel and advised that he will make the appropriate notifications to the Department of State with the attached "DOJ Notification of Foreign Travel" form following approval. b6 b7C

The estimated additional cost for SAs [redacted] travel from Paris to London is $870.10 each. b6 b7C

1325015-000-13511

Buairtel to SACs, WMFO and BA
RE: Hidden Interests; Major Case #38; FIF; FAG; OO: WMFO

Bufile [redacted] Serials [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, the above-mentioned serials were regarding [redacted] receiving access to the J. Edgar Hoover Building. b6 b7C

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, the above-mentioned serial regarded, "Travel of the Legal Advisor and Team members to Israel," which [redacted] was a part of. b3 b6 b7C b7E

Bufile [redacted] reflects a reference to one [redacted] who may possibly be identical to the subjects of your request; enclosed for WMFO is one copy of two communications regarding the above-mentioned subjects with the following caption: b6 b7C

[redacted]
WASHINGTON, D.C.;
[redacted]
DISTRICT OF MARYLAND;
INFORMATION CONCERNING;
(WFO [redacted]

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request; enclosed for WMFO is one copy of a communication regarding the above-mentioned subject with the following caption: b6 b7C

[redacted]
SPECIAL INQUIRY-SENATE COMMITTEE ON
THE JUDICIARY;
BUDED 7/27/73;
(DENVER [redacted]

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that [redacted] was the subject of an investigation which related to [redacted] receiving "DOJ SPECIAL ACCESS CREDENTIALS." b6 b7C

Buairtel to SACs, WMFO and BA
RE: Hidden Interests; Major Case #38; FIF; FAG; OO: WMFO

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding [redacted] accepting an invitation to address an FBI Fraud Against the Government In-Service. b3 b6 b7C b7E

Bufile (77-133274 Serial 13x109) reflects a reference to one Breckenridge Long Willcox, who may possibly be identical to the subject of your request; enclosed for WMFO is one copy of a communication regarding the above-mentioned subject with the following caption: b6 b7C

"BRECKINRIDGE LONG WILLCOX;
DAPLI;
UNITED STATES ATTORNEY,
DISTRICT OF MARYLAND;
(HQ 77-133274) (BA 77B-31083)
(DN 77B-9938) (LA 77B-24864)
(MM 77B-10607) (NF [redacted]
(WFO 77B-102632)"

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding [redacted] attending an Attorney General's Seminar on "Power Negotiations." b6 b7C

Bufile [redacted] Serial [redacted] Enclosure Page 4) reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding [redacted] having Access to the J. Edgar Hoover F.B.I. Building. b6 b7C

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding the thanking of [redacted] for his presentation at an In-service. b3 b6 b7C b7E

Bufile [redacted] Serial [redacted] Enclosure Page 6) reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that b3 b6 b7C b7E

1325015-000-13506

Buairtel to SACs, WMFO and BA
RE: Hidden Interests; Major Case #38; FIF; FAG; OO: WMFO

no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding a Medicare/Medicaid Fraud Seminar [redacted] would be attending. b6 b7C

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request, enclosed for WMFO is one copy of a communication regarding the above-mentioned subject with the following caption:

"UNKNOWN SUBJECT(S);
UNAUTHORIZED DISCLOSURE OF
DEPARTMENT OF JUSTICE INFORMATION;
OOJ;
OO: BA [redacted]"

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request; enclosed for WMFO is one copy of a communication regarding the above-mentioned subject with the following caption: b6 b7C

[redacted]
DISTRICT OF MARYLAND;
OBSTRUCTION OF JUSTICE;
OO: BALTIMORE"

Bufile (62-54364 Serial 157) reflects a reference to one Breckinridge L. Willcox, who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding the Directors request that letters be sent to the United States Attorneys who attended the National Conference of USAs on the FBI's Drug Demand Reduction efforts.

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request; enclosed for WMFO is one copy of a communication regarding the above-mentioned subject with the following caption: b6 b7C

"FRANCIS J. CATANIA,
JUDGE OF COMMON PLEAS COURT
DELAWARE COUNTY, PA;
[redacted]
AR-HOBBS ACT;
OO: PHILADELPHIA [redacted]

Buairtel to SACs, WMFO and BA
RE: Hidden Interests; Major Case #38; FIF; FAG; OO: WMFO

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request; enclosed for WMFO is one copy of a communication regarding the above-mentioned subject with the following caption: b3 b6 b7C b7E

"LT. [redacted], U.S. ARMY;
[redacted]
ACTION;
FRAUD AGAINST THE GOVERNMENT;
DESTRUCTION OF GOVERNMENT RECORDS;
VIOLATION OF CIVIL SERVICE REGULATIONS;
VIOLATION OF EQUAL EMPLOYMENT
OPPORTUNITY REGULATIONS;
[redacted]
(DETROIT [redacted]"

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request; enclosed for WMFO is one copy of a communication labeled "~~SECRET~~" regarding the above-mentioned subject with the following caption: b3 b6 b7C b7E

"[redacted]
[redacted] REQUEST TO CONTACT);
(WMFO [redacted]"

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial titled, "PRESIDENT'S COUNCIL ON PHYSICAL FITNESS AND SPORTS;" "APPOINTMENT OF TWO MEMBERS." [redacted] was one of the two members appointed. b6 b7C

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding the requesting of [redacted] name searched for Presidential appointment as a member of the President's Council on Physical Fitness and Sports. b6 b7C

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request; enclosed for WMFO is one copy of a communication regarding the above-mentioned subject. b6 b7C

1325015-000-13508

Buairtel to SACs, WMFO and BA
RE: Hidden Interests; Major Case #38; FIF; FAG; OO: WMFO

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, and that the subject was mentioned in a serial regarding a Memorandum dated 12/2/86 to [redacted] from the Chief of the Recording Section in the Identification Division; the Memo was regarding "Duncan Ordinance" modified or repealed so that the FBI can be furnished all arrest prints directly by the D.C. Metropolitan Police Departments. b6 b7C

NOTE: The following files were requested on 2/28/92, and was never received. A locate was placed on these files on the same above-mentioned date; as of yet these files have not been located, but as soon as these files are located HQ will provide the information provided in each file. The subjects and the files in which they appear are as follows: [redacted] b6 b7C
[redacted] (WASHINGTON CAPITAL NEWS), [redacted] Serial [redacted] ENCLOSURE PAGE 121: [redacted] Serial [redacted] Serial [redacted] Serial [redacted] Serial [redacted] ENCLOSURE PAGE 7; [redacted] Serial [redacted] Serial [redacted] ENCLOSURE PAGE 2, [redacted] Serial [redacted]

APPROVED:
Director
Dep. Dir.
ADD-Adm.
ADD-Inv.
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Inspection
Intell.
Laboratory
Legal Coun.
Tech. Servs.
Training
Off. of EEO
Off. of Liaison & Int. Affs.
Off. of Public Affs.

1325015-000-13509

Memorandum

Dep. Dir. _____
ADD Adm. _____
ADD Inv. _____
Asst. Dir.:
Adm. Servs. _____
Crim. Inv. _____
Ident. _____
Insp. _____
Intell. _____
Lab. _____
Legal Coun. _____
Rec. Mgnt. _____
Tech. Servs. _____
Training _____
Cong. Affs. Off. _____
Off. of EEO _____
Off. Liaison & Int. Affs. _____
Off. of Public Affs. _____
Telephone Rm. _____
Director's Sec'y _____

To : Mr. Potts

Date 5/27/92

From : F. B. Verinder

Subject : HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO

PURPOSE: To obtain authorization to amend the previously approved travel plans of WMFO Special Agents (SAs) [redacted] to depart Paris, France, on Thursday, 6/4/92, for same day arrival in London, England, and return to the United States on 6/6/92. Assistant United States Attorney (AUSA) [redacted] will meet SAs [redacted] in London, England, on 6/4/92 to participate in meetings with [redacted] representing Bank of Commerce and Credit International (BCCI) liquidators to survey and discuss the future access and review of BCCI bank records in London.

b6
b7C

RECOMMENDATION: That SAs [redacted] travel plans be amended to authorize travel from Paris, France, to London, England, on 6/4/92 and return to the United States on 6/6/92.

b6
b7C

APPROVED:

Director	Adm. Servs.	Laboratory	Off. of Liaison & Int. Affs.
Dep. Dir.	Crim. Inv.	Legal Coun.	
ADD-Adm.	Ident.	Tech. Servs.	Off. of Public Affs.
ADD-Inv.	Info. Mgmt.	Training	
	Inspection	Cong. Affs. Off.	
	Intell.	Off. of EEO	

* Approved for AD Potts

DETAILS: Approval for foreign travel of SAs [redacted] to Paris, France, 5/30 - 6/6/92 was granted on 5/7/92 in F. B. Verinder to Mr. Potts memorandum dated 5/7/92. By teletype dated 5/22/92, SAC, WMFO requested that the approved travel plans of SAs [redacted] be amended to authorize travel from Paris to London on 6/4/92 and return to the United States on 6/6/92.

b6
b7C

On 5/19/92, WMFO was notified by the Department of Justice (DOJ) that [redacted] representative for the BCCI liquidators, would be willing to meet with FBI and DOJ representatives to survey and discuss the future access and review of BCCI bank records currently in the possession of BCCI liquidators in London. A meeting with [redacted] has been scheduled for 6/5/92 and will be attended by AUSA [redacted] and SAs [redacted] According to DOJ, [redacted] access to these BCCI records.

b6
b7C
b7D

1 - Mr. Potts
1 - Mr. Verinder
1 - [redacted]
1 - [redacted]
1 - [redacted]

1 - Mr. Esposito
1 - [redacted]
1 - Acting UC, FIFU
1 - [redacted]

b6
b7C

DRW:drw/amp (10)

(CONTINUED-OVER)

1325015-000-13510

FBI/DOJ

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 05-25-2018 BY: [redacted]

b6
b7C

~~SECRET~~

41

AIRTEL

6/3/92

Director, FBI

SACs, WMFO (29B-WF-171994) (C-5)
Baltimore (Info)

HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference WMFO teletype to the Director, dated 2/13/92.

Based on the request made in referenced communication, a search of FBIHQ indices was conducted. Except for the information set forth below, no records were provided identifiable to your request of corruption investigations relating to the subjects.

Bufile [redacted] Serial [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request and the case involved an Applicant-type investigation in a WFO investigation captioned: b6 b7C

"[redacted] SPECIAL INQUIRY;
SENATE SELECT COMMITTEE ON INTELLIGENCE ACTIVITIES;
(WFO [redacted] (BA [redacted])"

Bufile [redacted] Serials [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, the above-mentioned serials were letters regarding New Agents Training and the Law Enforcement Awards.

MAILED 32
JUN 05 1992
FBI

Bufile [redacted] Serials [redacted] reflects a reference to one [redacted] who may possibly be identical to the subject of your request. WMFO is advised that no corruption matters were found relating to your request, the above-mentioned serials were letters regarding New Agents Training and a Letter of Appreciation. b6 b7C

Enclosures (9) No enclosure being retained at FBIHQ, Enc. 38-41 VRM/amp 6/3/92

SEE NOTE PAGE 6

1 - [redacted] b6 b7C

VRM: amp (5)

"~~SECRET~~ MATERIAL ATTACHED"
"UNCLASSIFIED WHEN SEPARATED FROM CLASSIFIED ENCLOSURES"

Dep. Dir. _____
ADD Adm. _____
ADD Inv. _____
Asst. Dir.:
Adm. Servs. _____
Crim. Inv. _____
Ident. _____
Insp. _____
Intell. _____
Lab. _____
Legal Coun. _____
Rec. Mgmt. _____
Tech. Servs. _____
Training _____
Cong. Affs. Off. _____
Off. of EEO _____
Off. Liaison & Int. Affs. _____
Off. of Public Affs. _____
Telephone Rm. _____
Director's Sec'y _____

MAIL ROOM ☑

~~SECRET~~

1325015-000-13504

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 81
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
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FD-36 (Rev. 8-26-82)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 3/10/92

3/8

TO: DIRECTOR FBI
(ATTN: HQ ATTN SSA [redacted] WMFO FOR
SA [redacted])

b6
b7C

FROM: LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT: CLARK McADAMS CLIFFORD;
[redacted]
BCCI
OO: WMFO

b6
b7C

Enclosed for WMFO are [redacted]

b6
b7C
b7D

The documents are being forwarded in four boxes to WMFO. SA [redacted] is requested to advise DOJ Attorney [redacted], telephone number [redacted] upon receipt.

b6
b7C

3 - Bureau
(1 - Attn SSA [redacted] WCCU)
(1 - Attn SA [redacted] WMFO)
1 - London
EJK/bt
(4)

b6
b7C

29B-WF-171994-229

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

29HQ-116176

1325015-000-13300

8-258 (Rev. 8-5-91)

1 - Mr. [redacted]
1 - Mr.
1 - Mr.

b6
b7C

REPORT OF THE
TECHNICAL SERVICES DIVISION
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

May 5, 1992

To: SAC, Washington Metropolitan Field (C-5)

FBI File No. 29B-WF-171994

Lab No. 20327029 E VT

Reference: Airtel dated March 26, 1992

Your No.

Re: HIDDEN INTERESTS,
MC #38
FIF; FAG

Specimens received: Personally delivered by SA [redacted] on March 27, 1992

b6
b7C

Q9 One Nagra reel of magnetic tape marked in part "3/28/89" and "F"

Q10 One Nagra reel of magnetic tape marked in part "3/28/89" and "H"

Q11 One Nagra reel of magnetic tape marked in part "VEH" and "3/29/89"

FBI MAR 05 1992 MAILED 13

Result of examination: 29B-WF-171994-236

Two enhanced stereo copies were made of each of specimens Q9, Q10 and Q11. In each instance one copy was made on four sides of two Maxell C90 magnetic tape cassettes with Dolby B noise reduction encoding and the second copy was made on two 7-inch reels of magnetic tape at a recording speed of 3 3/4 inches per second in a two-track configuration.

DOW/trl (6)

(CONTINUED - OVER)

MAIL ROOM ☑

This Report Is Furnished For Official Use Only

1325015-000-13301

In order to obtain maximum intelligibility, the enhanced copies should be played back using high-quality stereo recorders and headphones, using Dolby B noise reduction for the cassette copies as indicated on the cassettes.

SSA [redacted] conducted the enhancement examination. b6 b7C

Specimens Q9, Q10, Q11, the enhanced copies of these specimens, and the chain of custody form FD-192, were forwarded to the Washington Metropolitan Field Office via Federal Express on April 6, 1992.

1325015-000-13302

O-4 (Rev. 1-9-90)
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

RECEIVED
MAR 18 2 29 PM '92

DATE: 3/17/92

Re: Hidden Interests

TO: SAC, Atlanta
2635 Century Pkwy, NE Suite 400
Atlanta, GA 30345

ATTN: SA [redacted]

b6
b7C

Invoice of Contents

Description of Contents:

Hardcopy printouts of Q4 and directory listings

FBI File# 29B-WF-171994

Case# 20306026 D RC

Your# [redacted]

b6
b7C

Return t

Shipping#

Room 3223 TL 241

Ext. 4476

SHIPPING METHODS

Air Freight and Express Services

- ☐ Overnight
- ☒ 2-Day Standard Service
- ☐ Saturday Delivery
- ☐ Economy (2-3 Days Service)
- ☐ Deferred (4-5 Days Service)

- ☐ Mail Room: 1B327, TL 152 (registered mail)
- ☐ FMSS - Supply Room, 1B353 (not registered)

Hazardous Materials Only

Weight of Hazardous Materials:

Packaged By _____
Signature

Date _____

All items listed above are contained in this package.

A detailed description items will be found in Bureau communication dated _____.

(SHIPPING HOURS - 9:00 A.M. TO 4:00 P.M.)

WORKSHEET Lab # 9032-7029 EVT

Q 9, 1 Green Mtn reel, M.I.P. "5/28/89" "F"

BEG END COM _DIST _REV _N/F S/N _HARM _OFFSP/WOW BASSY _MUFFLED

1) TRACK CONF. Stereo DEV.TP. _____ PK MET. READ. _____

2) CONTENT Informal Subj.

3) FFT _____

4) LENGTH Approx. 2.5 hrs.

5) BACKGR Car noise

6) INTELLIGIBILITY Bassy, rumble, 95% intell. poor S/N

7) ENH. OF Q9 (L+R) Stereo

PLAYED BACK ON: SNST

a. L+R THRU Fostex 3070, activates 4 dB on high noise

b. L+R THRU Orban 642B/SP, (6) boosts 1 - 4 K Hz

c. L+R THRU Ithaco 4211, 160/8000 - 160/8000 Hz

d. THRU

8) 2 ENH. COPY(s) of Q9

a. One on 4 Sides of 2 Maxell C90s, 2T, S, #1 7/8 IPS, RB315 Dolby B

b. One on 2-7" Ampex reels, 2T, S, 3 3/4 IPS, A807

9) PD " " " " " " " RB77

PE " " " " " " " A807

10) COMMENTS: Adds T/C and lowers rumble, trade offs in removal of rumble (can) needed leave some on — note Q10 rolled off at 100 Hz

1325015-000-13304

WORKSHEET Lab # 20327029 EVT

Q10, 1 Green Mora, M.I.H, 3/29/89"

√BEG END COM _DIST _REV _N/F √S/N _HARM _OFFSP/WOW √BASSY _MUFFLED

1) TRACK CONF. Stereo DEV.TP. _____ PK MET. READ. _____

2) CONTENT Inform. + Subj.

3) FFT _____

4) LENGTH Approx. 2.5 hrs.

5) BACKGR Car noise

6) INTELLIGIBILITY Poor S/N, rumble, bassy, 95% intell.

7) ENH. OF Q10(L+R) Stereo

PLAYED BACK ON: SNST

a. L+R THRU Fostex 3070, activates 4dB on loud noise

b. L+R THRU Orban 672B/SP, (6) boosts 1-4 KHz

c. L+R THRU Ithaco 4211, 100/6300 - 100/6300 Hz

d. THRU

8) 2 ENH. COPY(s) of Q10

a. One on 4 Sides of 2 Maxell C90s, 2T, S, 1 7/8 IPS, RB715, Dolby B

b. One on 2-7" Ampex reels, 2T, S, 3 3/4 IPS, A807

9) PD " " " " " " " RB77

PE " " " " " " " A807

10) COMMENTS: Adds T/C and lowers rumble.

1325015-000-13305

WORKSHEET Lab # 20327029 EVT

Q11, 1 Green Mesa, M.I.P. "VEH #3, 3/29/89"
(VEH #3 on attached page)

BEG END COM DIST REV N/F S/N HARM OFFSP/WOW BASSY MUFFLED

1) TRACK CONF. Stereo DEV.TP. _____ PK MET. READ. _____

2) CONTENT _____

3) FFT _____

4) LENGTH Approx 2.5 hrs.

5) BACKGR _____

6) INTELLIGIBILITY Left track lower level. Fairly good recording that is fully intell. Left track ~~is~~ has worse S/N. Hiss. Left tk has dropouts.

7) ENH. OF Q11 (L+R) Stereo

PLAYED BACK ON: SNST

a. L+R THRU Orban 648-B/SP, amplification only

b. L+R THRU Ithaco 4211, L - 0/5000 - 0/15000 / R 0/6300 - 0/6300 Hz

c. THRU

d. THRU

8) 2 ENH. COPY(s) of Q11

a. One on 4 sides of 2" Maxell C90s, 2T, S, 15/16 IPS RB-NS, Dolby B

b. One on 2-7" Ampex reels, 2T, S, 3 3/4 IPS, A807

9) PD " " " " " " " " RB77

PE " " " " " " " " A807

10) COMMENTS: Lowers some hiss, might be advisable to monitor RT only

1325015-000-13306

OVERNIGHT EXPRESS

O-4 (Rev. 1-9-90)
FEDERAL BUREAU OF INVES[redacted]GTION
WASHINGTON, D. C. 20535

[redacted]ECEIVED
MAR 10 12 39 PM '92

DATE: ~~3/10/92~~ 3/10/92 Re:

TO: SAC, Atlanta
2635 Century Pkwy, NE Suite 400
Atlanta, GA 30345

Attn: SA [redacted] b6 b7C

Invoice of Contents

Description of Contents:

Q7 & Q8 directory listings and ~~a~~ hardcopy printouts.

FBI File# 29BWF-171994

Case# 20306026 D ZC

Your# [redacted] b6 b7C

☒ Return to [redacted]

Room 3223 TL 241

Ext. 4416

Shipping# _____

SHIPPING METHODS

Air Freight and Express Services

☒ Overnight (1 Box)

☐ 2-Day Standard Service

☐ Saturday Delivery

☐ Economy (2-3 Days Service)

☐ Deferred (4-5 Days Service)

☐ Mail Room: 1B327, TL 152

(registered mail)

☐ FMSS - Supply Room, 1B353

(not registered)

Hazardous Materials Only

Weight of Hazardous Materials:

Packaged By _____
Signature

Date _____

All items listed above are contained in this package.

A detailed description items will be found in Bureau communication dated _____.

(SHIPPING HOURS - 9:00 A.M. TO 4:00 P.M.)

1325015-000-13307

8-259 (Rev. 8-5-91)

RECORDED
4/3/92
trl

FEDERAL BUREAU OF INVESTIGATION enhancement
UNITED STATES DEPARTMENT OF JUSTICE [redacted]

b6
b7C

Work Sheet

To: SAC, Washington Metropolitan Field (C-5)

FBI File No. 29B-WF-171994 — 236

Lab No. 20327029 E VT

Reference: Airtel dated March 26, 1992

Your No.

Re: HIDDEN INTERESTS,
MC #38
FIF; FAG

Specimens received: March 27, 1992

Q9-Q11 Three audio cassette tapes

1325015-000-13303

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 29
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
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Page 51 ~ Referral/Consult;

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X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

LAHUS V PARTNERSHIP, [redacted] DOES NOT BELIEVE BCI HOLDING INCORPORATED TO BE IDENTICAL TO THE BANK CREDIT AND COMMERCE INTERNATIONAL (BCCI). [redacted] INDICATED THAT HE RECEIVED THE MAJORITY OF HIS INFORMATION FROM IEA TASK FORCE INVESTIGATORS, [redacted] WHO PROVIDED [redacted] WITH A COPY OF A REPORT GENERATED BY THE TASK FORCE CONCERNING ITS INVESTIGATION OF THE ACTIVITIES OF IEA. [redacted] ADVISED THAT OFFICIALS OF THE INSURANCE COMMISSIONER'S OFFICE FOR THE STATE OF FLORIDA MAY NOT BE AWARE THAT [redacted] POSSESSES THIS REPORT. [redacted] ADVISED THAT HE POSSESSES A SECOND VERSION OF THE REPORT WHICH CONCLUDES THAT ACTIVITIES OF THE IEA CONSTITUTED CRIMINAL CONDUCT. ACCORDING TO [redacted], A FIRST VERSION OF THIS REPORT CONTAINS MORE SPECIFIC CONCLUSIONS INCLUDING ONE THAT IEA WAS POSSIBLY ENGAGED IN MONEY LAUNDERING FROM DRUG TRANSACTIONS. THE FIRST VERSION OF THE REPORT WAS REVISED AFTER REVIEW BY OFFICIALS OF THE INSURANCE COMMISSIONER'S OFFICE. [redacted] ADVISED THAT HE REMAINS AVAILABLE TO ASSIST WITH ANY INFORMATION IN HIS POSSESSION IN FBI'S REVIEW OF IEA RECORDS AT TALLAHASSEE.

b6
b7C

BT

#0020

NNNN

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

^PAGE 2 UNCLAS

[redacted] TO TRAVEL TO LONDON, ENGLAND, DURING THE TIME PERIOD 3/14 - 25/92 WAS APPROVED BY THE ASSISTANT DIRECTOR, CRIMINAL INVESTIGATIVE DIVISION.

b6
b7C

BT

////

0-93B (Rev. 01/25/91)

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

ADMINISTRATIVE NOTE/TICKLER COUNT:

Approval for foreign travel was granted in an F. B. Verinder to Mr. Potts memorandum dated 3/9/92.

Drafted By: DRW:amp Room/TL #: 3839/231 Phone No: 5595

COPY DESIGNATIONS:

1 - Mr. [redacted]

b6
b7C

American Embassy
London

FAX: 71-499-0744

CLASSIFIED

Hidden Interests

TO: [redacted] ASSISTANT LEGAL ATTACHE

SSA [redacted] WCCS

FROM: BCCI

NO. OF PGS. 2 (including cover sheet)

SENT BY: BI DATE: FEBRUARY 6, [illegible]

RECD BY: DATE:

COMMENTS:

b6
b7C

29B-WF-171994-218

29B-WF-171994

RSB

1325015-000-12740

PW gives account of BCCI fraud

BY NEIL BENNETT, BANKING CORRESPONDENT

PRICE Waterhouse, the Bank of Credit and Commerce International's auditor, has broken its silence about the investigation and the discovery of the $10 billion fraud that led to the bank's closure in July.

As part of an inquiry into the BCCI affair, the Treasury and Civil Service select committee has published a series of written answers that PW made in response to the committee's questions. This is the first time the firm has commented in the events leading to the bank's closure.

PW has had to remain silent about its activities under the terms of the banking act. It has been criticised in London over its failure to detect the fraud earlier.

The accountancy firm says in its defence: "Even the best planned and executed audit is not necessarily designed to discover a ... fraud, especially ... where there is collusion at the highest level of management. Under such circumstances, it is reasonable to expect that it may take a ... of audited ... before accounting ... lead to the ... fraud."

... memorandum ... was told that the Abu ... government, BCCI's ... shareholder, had ... about the bank's ... deposits, ... and hidden investments ... April 1990."

... was appointed BCCI's ... auditor in 1987. From ... the firm carried out ... reports into BCCI's ... for the Bank of England, ... the Sandstorm report last June that ... evidence of widespread and massive fraud ... to the loss ...

... says it ... BCCI's fraud ... in the early Seven... brought in fic...

... read ... Alliance ... Nanson will have ICI ... Wednesday ... with ... Lloyd's ... Lloyd's ... to be ... by ... The ... will ... Chief ... Lloyd's ... Lloyd's ... Lloyd's

American Embassy
London

FAX: 71-499-7944

U~~N~~ CLASSIFIED

FROM: [redacted] ASSISTANT LEGAL ATTACHE

TO: SSA [redacted] WCCS

SUBJECT: BCCI

NO. OF PGS. 2 (including cover and last page)

SENDER: BT DATE: FEBRUARY 6, 1992

RECD BY: DATE:

COMMENTS:

b6
b7C

1325015-000-12742

FEB 7 '94 0:11 FROM LEGAT LONDON

** TOTAL PAGE.002 **

PW gives account of BCCI fraud

BY NEIL BENNETT, BANKING CORRESPONDENT

PRICE Waterhouse, the Bank of Credit and Commerce International's auditor, has broken its silence about the investigation and the discovery of the $10 billion fraud that led to the bank's closure last July.

As part of an enquiry into the BCCI affair, the Treasury and Civil Service select committee has published a series of written answers that PW made in response to the committee's questions. This, for the first time, details its activities in the events leading to the bank's closure.

PW has had to remain silent about its activities under the terms of the Banking Act, and has been subjected to criticism over its failure to detect the fraud earlier.

The accountancy firm says in its defence: "Even the best planned and executed audit will not necessarily discover a sophisticated fraud, especially one where there is collusion at the highest level of management. Under such circumstances, it is reasonable to expect that it may take a number of audits before accumulating concerns lead to the identification of fraud."

The PW memorandum says it was told that the Abu Dhabi government, BCCI's controlling shareholder, had known about the bank's concealed deposits, fictitious loans and hidden investments since April 1990.

PW was appointed BCCI's sole auditor in 1987. From 1988, the firm carried out nine reports into BCCI's finances for the Bank of England, including the Sandstorm report last June that showed evidence of widespread and massive fraud and led to the closure.

PW says that BCCI's fraud originated in the early Seventies when it "brought in fictitious profits and inflated its capital" to support its rapid growth. The accountant only became suspicious of the bank almost 15 years later, when it discovered, by accident, that two small bank loans had been used to service another bad debt. The PW report in April 1990 highlighted transactions in the Cayman Islands that were "false or deceitful". A further report in October said that previous management had colluded with major customers to misstate or disguise the purpose of transactions.

This report led to the resignations of Agha Hasan Abedi and Swaleh Naqvi, respectively BCCI's founder and chief executive. Only then was PW told that there was a separate set of bank files that it had never seen. "We were shocked to find that Naqvi was holding around 6,000 files," it says. In yesterday's Treasury select committee hearing, Brian Quinn, a Bank of England director, defended the current bank regulatory legislation and the failure of the Bank to close BCCI after the earlier reports. "There was a threat to the bank, but it was being met by a shareholder [the Abu Dhabi government] which was coming forward with substantial support," he said.

Mr Quinn was unable to say why Ernst & Whinney had threatened to resign as BCCI's auditor in 1986.

Meanwhile, 30 of the local authorities that lost money in the BCCI collapse, have submitted evidence to Lord Justice Bingham's enquiry.

☐ The Serious Fraud Office has issued a warrant for the arrest of Basheer Chowdry, the former head of BCCI's British operations, who is out of the country. A statement from the SFO said it would take all necessary steps to try him in England.

Mohammed Abdul Baqi, former managing director of Attock Oil, appeared in court yesterday. He was remanded in custody for seven days. He faces a charge alleging that between 1987 and 1990 he conspired with Mr Chowdry to show PW that Attock owed the bank $76.5 million.

its table

road network. Along with the Namsco will buy ICI's Weston plant at Runcorn, which refines alt for Britain's tables, as well as sal feed, water softening and the al industry.

lies of brine for this plant, how- ill continue to be delivered by e from ICI. The company is quit- e general salt market but will its other Cheshire salt mines, employ the Frash technique of

PROGRESSIVE PEP

Many investors would be well-advised to take maximum advantage of the tax benefits currently offered by Personal Equity Plans while they still can.

However, with current political and economic uncertainties, you may be reluctant to commit capital to equity investment all at once.

With the Mercury Phased Investment PEP you may open a Plan for the full £6,000 now, but equity investment is made within the PEP in twelve monthly instalments. You also have the advantage of being able to transfer any remaining uninvested balance into equities at any time.

For further information, contact your financial adviser or call us free on 0800 244400.

1325015-000-12743

MERCURY

Memorandum

Dep. Dir. _____
ADD Adm. _____
ADD Inv. _____
Asst. Dir.:
Adm. Servs. _____
Crim. Inv. _____
Ident. _____
Insp. _____
Intell. _____
Lab. _____
Legal Coun. _____
Rec. Mgnt. _____
Tech. Servs. _____
Training _____
Cong. Affs. Off. _____
Off. of EEO _____
Off. Liaison & Int. Affs. _____
Off. of Public Affs. _____
Telephone Rm. _____
Director's Sec'y _____

To : Mr. Potts

Date 3/20/92

From : F. B. Verinder

Subject : HIDDEN INTERESTS;
Major Case #38;
OO: WMFO

PURPOSE: To obtain authorization for WMFO Financial Analyst (FA) [redacted] to travel to Georgetown, Grand Cayman, to review and copy documents in the investigation of the Bank of Credit and Commerce International (BCCI). The anticipated dates of travel are 3/24 - 4/4/92. b6 b7C

RECOMMENDATION: That FA [redacted] be authorized to travel to Georgetown, Grand Cayman. b6 b7C

APPROVED: Adm. Servs. _____ Laboratory _____ Off. of Liaison & Int. Affs. _____
Crim. Inv. _____ Legal Coun. _____
Director _____ Ident. _____ Tech. Servs. _____ Off. of Public Affs. _____
Exec. Asst. Dir. _____ Insp. _____ Training _____
Asst. Dir.: _____ Intell. _____ Cong. Affs. Off. _____
ADD-Inv. _____ Int'l. _____ Off. of EEO _____

DETAILS: The WMFO is conducting investigation of captioned matter with the Department of Justice, Fraud Section (DOJ, FS) concerning BCCI. The DOJ has successfully negotiated with the government of the Cayman Islands and with the court-appointed liquidators of BCCI to allow review and copying of a large number of BCCI documents housed in three locations in Georgetown, Grand Cayman. WMFO Agents have been assisting DOJ Attorneys in reviewing documents to determine which documents are of evidentiary value and which should be copied. DOJ clerical personnel have been on site to assist in the review/copying project.

On 3/16/92, DOJ, FS, Principal Deputy Chief [redacted] requested FBI clerical assistance in the BCCI copying project currently underway with DOJ Attorneys and DOJ clerical personnel. [redacted] requested one person for the period 3/24/92-4/4/92. b6 b7C

WMFO has designated FA [redacted] to travel to Georgetown to assist in the BCCI document review/copying project. FA [redacted] will be in Georgetown with WMFO Special Agents [redacted] and [redacted] whose travel has been previously approved in DAD Verinder to AD Potts Memo dated 2/27/92. b6 b7C

29B-WF-171[illegible]-219

The White-Collar Crimes Section concurs in the need for this travel. SAC, WMFO also concurs in the need for this travel.

1 - Mr. Potts
1 - Mr. Verinder
1 - Mr. [redacted]
DRW:drw/amp (10)

1 - Mr. [redacted]
1 - Mr.
1 - Mr.

1 - Mr. [redacted]
1 - Mr.
1 - Mr. b6 b7C

(Continued-Over)

FBI/DOJ

1325015-000-12744

Memorandum from F. B. Verinder to Mr. Potts
RE: Hidden Interests; Major Case #38

Miami SSA [redacted] (Northern Caribbean Liaison Officer) has been involved in the BCCI investigation from inception and has been coordinating this travel. On 3/19/92, SSA [redacted] advised that he has contacted appropriate authorities and will obtain host country clearance. b6 b7C

On 3/18/92, DOJ-[redacted] advised that she concurs with this travel and that she has coordinated this matter with [redacted] DOJ-Office of International Affairs (OIA), to obtain the necessary Grand Cayman Court order granting [redacted] access to the BCCI documents. On 3/19/92, [redacted] DOJ-OIA concurred with this travel and advised that she will obtain necessary court orders for [redacted] to review the BCCI documents. b6 b7C

On 3/19/92, SSA [redacted] Domestic Liaison Unit, Office of Liaison and International Affairs, FBIHQ concurred with this travel and advised that he will make the appropriate notifications to [redacted] Chief of Overseas Investigations, Diplomatic Security, Department of State. b6 b7C

The anticipated cost of travel would be $3,218.00.

1325015-000-12745

American Embassy
London

308

RECEIVED
I.
COMMUNICATIONS

DEC 3 12 13 PM '91 FAX: 71-499-7944

UNCLASSIFIED

FROM: [redacted] ASSISTANT LEGAL ATTACHE

TO: SSA [redacted] EXT 5594, ROOM 3839, TL 231

SUBJECT: BCCI "Hidden Interests

NO. OF PGS. 2 (including cover and last page)

SENDER: BT DATE: DECEMBER 3, 1991

RECD BY: _____ DATE: _____

COMMENTS: _____

b6
b7C

29B-WF-171994-223X

ENCLOSURE

1325015-000-12746

DEC 4 '92 0:00 FROM LEGAT LONDON PAGE 001

Financial Times 12/3/91

BCCI liquidators win time to seek Abu Dhabi aid

By Richard Donkin

THE provisional liquidators of Bank of Credit and Commerce International have run up $200m (£113m) of overheads and expenses since taking over the bank in July, a report disclosed yesterday.

The report by joint provisional liquidators Touche Ross was produced yesterday at the High Court, which granted a further adjournment of winding-up proceedings.

The adjournment, which was unopposed by the Bank of England and creditors, was agreed to give provisional liquidators more time to negotiate a deal with Abu Dhabi, said Mr Smouha, which we expected" when the behalf of creditors.

appointed in July, without action agreed with the Abu majority shareholder, pects of achieving a worthwhile dividend for depositors had been remote and it might not have been paid until the end of the century.

Sir Donald Nicholls, the vice-chancellor, said as he granted the adjournment until January 14 that the affairs of BCCI and BCCI Overseas had been inextricably intermingled. Worldwide co-operation was essential to realise assets to the best advantage of creditors and to avoid prolonged litigation.

He said that the BCCI group owed money to 800,000 depositors with 1.2m accounts in more than 70 countries.

The Touche Ross report before the court gave a precise figure for the first time of the estimated realisable assets, which came to £1,180m, against total liabilities of £10,650m. The figures, which the report stressed were still uncertain, were understood to involve at the 10 per cent payout before taking into account the deal with Abu Dhabi.

The report showed that in addition to the $200m overheads and expenses already run up by liquidators worldwide, a further $33m of liquidation expenses would be incurred before all the bank's assets were realised. Liquidators' fees alone were estimated at $20m, while BCCI shareholders' fees and legal fees were $7.5m.

Dr Afifi Elias, chairman of the BCCI Depositors' Protection Association criticised the fees and called the BCCI liquidation a "very substantial business indeed".

Mirror

dators win time to seek Abu Dhabi aid

adjournment, which was by the Bank of England ors, has agreed to give liquidators more time to deal with Abu Dhabi on creditors.

Smouha, provisional liquidator of the Luxembourg holding of BCCI, said after the hearing that creditors of BCCI Overseas and BCCI SA, the two main ..., might expect to see 10 ... of a negotiated payout ... of 1992, with pros-

pects of receiving 10 per cent to 40 per cent in the longer term.

Mr Smouha said the bank had been in an "even worse condition than we expected" when the provisional liquidators were appointed in July, without a plan of action agreed with the Abu Dhabi majority shareholder, and the prospects of achieving a worthwhile dividend for depositors had been remote and it might not have been paid until the end of the century.

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Dr Afifi Elias, chairman of the BCCI Depositors' Protection Association criticised the fees and called the BCCI liquidation a "very substantial business indeed".

DEC 4 '92 0:00 FROM LEGAL LONDON PAGE 002

EXHIBIT 23 ENCLOSURE

1325015-000-12747

American Embassy
London

RECEIVED
COMMUNICATIONS
Dec 3 12 13 PM '91

FAX: 71-499-7944

UNCLASSIFIED

FROM: [redacted] ASSISTANT LEGAL ATTACHE

TO: SSA [redacted], EXT 5594, ROOM 3839, TL 231

SUBJECT: BCCI

NO. OF PGS. 2 (including cover and last page)

SENDER: BT DATE: DECEMBER 3, 1991

RECD BY: _____ DATE: _____

COMMENTS: _____

b6
b7C

[redacted]

2940-11.6176

1325015-000-12748

DEC 4 '92 0:00 FROM LEGAT LONDON PAGE.001

Financial Times 12/3/91

BCCI liquidators win time to seek A

By Richard Donkin

THE provisional liquidators of Bank of Credit and Commerce International have run up $200m (£113m) of overheads and expenses since taking over the bank in July, a report disclosed yesterday.

The report by joint provisional liquidators Touche Ross was produced yesterday at the High Court, which granted a further adjournment of winding-up proceedings.

The adjournment, which was unopposed by the Bank of England and creditors, was agreed to give provisional liquidators more time to negotiate a deal with Abu Dhabi on behalf of creditors.

Mr Brian Smouha, provisional liquidator for the Luxembourg holding company of BCCI, said after the hearing that creditors of BCCI Overseas and BCCI SA, the two main BCCI banks, might expect to see 10 per cent of a negotiated payout towards the end of 1992, with prospects of receiving 30 per cent to 40 per cent in the longer term.

Mr Smouha said the bank had been in an "even worse condition than we expected" when he was appointed in July. Without a plan of action agreed with the Abu Dhabi majority shareholders, he said, prospects of achieving a worthwhile dividend for depositors had been remote and it might not have been paid until the end of the century.

Sir Donald Nicholls, the vice-chancellor, said as he granted the adjournment until January 14 that the affairs of BCCI and BCCI Overseas had been inextricably intermingled. Worldwide co-operation was essential to realise assets to the best advantage of creditors and to avoid prolonged litigation.

He said that the BCCI group owed money to 800,000 depositors with 1.2m accounts in more than 70 countries.

The Touche Ross report before the court gave a precise figure for the first time of the estimated realisable assets, which came to $1,159bn against total liabilities of $10,641bn. The figures, which the report warned were still uncertain, were used to arrive at the 10 per cent estimated payout before taking into account a deal with Abu Dhabi.

The report gave no estimate of what might be realisable in claims against First American Bancshares, the Washington-based bank that the US Federal Reserve Board says was secretly owned by BCCI.

A breakdown of closure costs in the report showed that in addition to the $200m overheads and expenses already run up by liquidators worldwide, a further $23m of liquidation expenses would be incurred before all the bank's assets were realised. Liquidators' fees alone came to $4m since the BCCI closedown on July 5 and legal fees were $7.8m.

Dr Adil Elias, chairman of the BCCI Depositors' Protection Association criticised the fees and called the BCCI liquidation a "very substantial business indeed".

Mirror

dators win time to seek Abu Dhabi aid

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Dr Adil Elias, chairman of the BCCI Depositors' Protection Association criticised the fees and called the BCCI liquidation a "very substantial business indeed".

DEC 4 '92 8:00 FROM LEGHT LONDON PAGE.002

1325015-000-12749

COMMUNICATIONS
SEP 13 8 52 AM '91

American Embassy
London

Info OGA

FAX: 71-499-7944

UNCLASSIFIED

3:1

BCCI

FROM: ALAT [redacted] b6 b7C

TO: [redacted] FBIHQ (EXT. 5594; ROOM 3839; TL#231)

SUBJECT: BCCI

NO. OF PGS. 7 (including cover and last page)

SENDER: [redacted] DATE: Sept 13, 1991

RECD BY: _____ DATE: _____

COMMENTS: newspaper article

1 - ENCLOSURE

29-HQ-116176

29B-WF-171944-223X1

B C I

SEP 13 '92 18:55 FROM LEGAT LONDON PAGE.001

1325015-000-12750

Hurd gives green light to plans for bank

THE Government will not stand in the way of any plans to relaunch the collapsed Bank of Credit and Commerce International, Douglas Hurd, the Foreign Secretary, said yesterday, *writes Nick Fielding.*

He told a delegation of 10 BCCI employees led by Keith Vaz, the Leicester East MP, who met him for 45 minutes at the Foreign Office yesterday, that the negotiations provided a "window of opportunity" to enable the Bank of England to put together plans.

Mr Hurd, who said he recognised the difficulties created for depositors and staff by the collapse, told the delegation that information was being passed from the Bank to ministers and that the Prime Minister and the Chancellor were being kept fully informed of the negotiations.

The Foreign Secretary will be meeting his United Arab Emirates counterpart at the United Nations at the end of September, where BCCI will be discussed. The delegation impressed upon Mr Hurd the importance of sending a minister to Abu Dhabi to discuss the restructuring plans.

In Abu Dhabi yesterday, the police completed their round-up of top BCCI officials, following more than 30 arrests at the bank's headquarters throughout Sunday. Mr Ajaz Afridi, for example, was arrested at 1am on Monday. A call to the private office of chief executive Zafar Iqbal, who was among those arrested on Sunday, was answered by an official who said "the bank was inoperative at present".

According to sources in London, no one from the Serious Fraud Office was involved in the arrests. A team led by Jerry Ohlson, who is leading the police inquiry into BCCI, left yesterday for the Cayman Islands.

The four-strong team will meet a team from the US Justice Department and the FBI. They will be planning their approach to the Caymans government and hoping to gain access to documents under the control of the liquidators Deloitte Ros Tohmatsu. These are believed to concern BCCI Overseas and International Credit and Investment Co, a BCCI-linked firm.

Fed feels

Nick Fielding reports on how the continuing fallout from the scandal could change the way in which the US banking system is regulated

DURING the past year, as banking regulators in the UK pondered over whether to intervene in the growing turmoil enveloping the now collapsed Bank of Credit and Commerce International, the US Federal Reserve Board played a major, but largely unreported, role in uncovering the full extent of the fraud. It appears, indeed, that American action was instrumental in forcing the Bank of England to consider taking serious action against the rogue bank.

Nevertheless, the Fed is under fire. Although it has been aggressive in comparison with the Bank of England, US legislators feel it should have acted earlier. The impact of the scandal on American banking regulation is likely to be long-term and lead to substantial changes in the way the banking system is structured.

Last week's report by Charles Schumer's House of Representatives Judiciary Committee on federal law enforcement handling of the scandal makes devastating criticisms of the Fed, saying it delayed for two years before acting on strong evidence obtained by an undercover agent. But action in America against BCCI — in the past year at least — has far outstripped that taken in the UK.

In July the Fed announced it had started formal enforcement proceedings against BCCI Holdings (Luxembourg), its two subsidiaries and against nine individuals associated with BCCI, for their part in violating US banking law.

Its 110-page indictment included a $200m (£120m) fine against BCCI and related banks and companies and the permanent barring from any involvement with US banking organisations of nine individuals, who include Agha Hassan Abedi, BCCI's founder, Swaleh Naqvi, former chief executive, and a number of prominent Saudi and Gulf Arab investors in BCCI.

A whole battery of hearings is under way in America, including four grand juries, a Justice Department investigation into the collapsed savings and loan company Centrust (which appears to have been indirectly owned by BCCI), investigations by the superintendents of banks in New York and California, and the Operation C-Chase inquiry involving officers from the US Treasury, the Internal Revenue Service, Customs and the Drug Enforcement Administration. There are also continuing Senate hearings into drug money laundering.

Robert Morgenthau has been tenacious in following the story

In addition, in Miami the government of Panama has filed a suit against BCCI alleging that the bank laundered money stolen by the former dictator Manuel Noriega.

The most dramatic of the Senate hearings to date was that of the subcommittee of the Senate Foreign Relations Committee on terrorism, narcotics and international operations held in Washington on 8 August. BCCI's former chief finance officer, Masihur Rahman, testified in great detail about the bank's crooked operations and about threats to his personal safety by bank staff.

All this activity is taking place in a country in which BCCI hardly had an official presence. Contrast this to the single UK inquiry, headed by Lord Justice Bingham, which is being held in private. The non-statutory inquiry, due to start shortly, will have no powers to compel witnesses to appear nor to subpoena documents and, cloaked in secrecy, is unlikely to produce the kind of revelations that are shaking the American banking world.

At the Rahman hearings, on the other hand, Senator John Kerry, the chief inquisitor, made avail-

SEP 13 '92 13:55 FROM LEGAL LONDON PAGE.002

ENCLOSURE

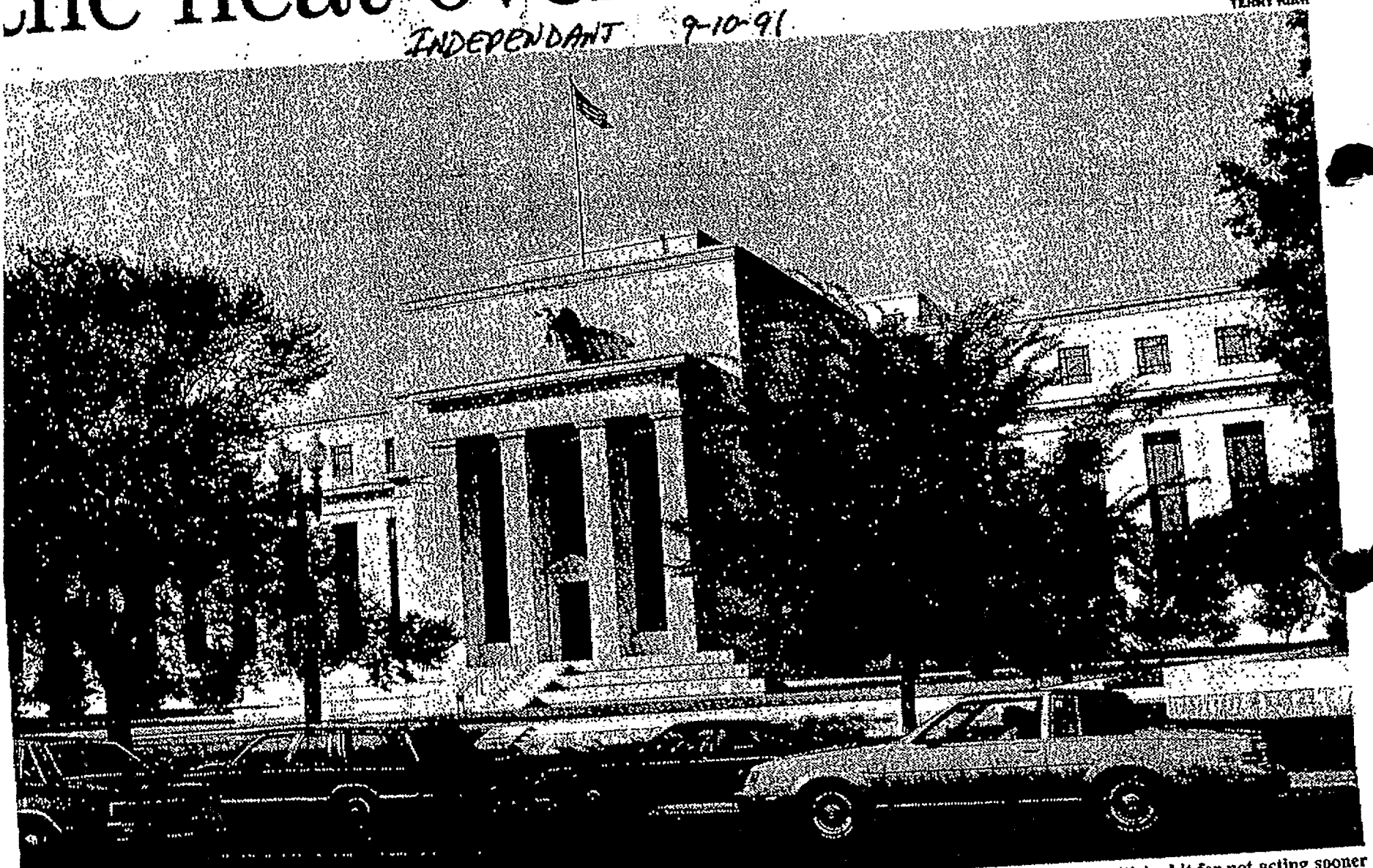
1325015-000-12751

PAGE.003
SEP 13 '92 16:57 FROM LEGAT LONDON

The heat over BCCI saga

INDEPENDANT 9-10-91

TERRY KIRK



Although the Federal Reserve Board was much more aggressive than the Bank of England in pursuing BCCI, American legislators have criticised it for not acting sooner

1325015-000-12752

ble to anyone who wanted them opies of hitherto secret Price Waterhouse reports on BCCI.

American interest in BCCI took off after the successful Operation C-Chase aimed at halting the huge drug money laundering operation organised from the bank's Florida branch. Operation C-Chase led to the first cycle of Senate subcommittee hearings under the Senate investigator Jack Blum.

He was said to have been appalled at a plea bargaining agreement that allowed the bank to avoid further charges in exchange for a $15m fine. Early in 1990 Mr Blum passed on information to the Manhattan district attorney, Robert Morgenthau, who, in June 1990, convened a grand jury and began his own investigation into banking irregularities in New York State. Mr Morgenthau has proved to be extremely tenacious in following the BCCI story.

Despite inaction from the Justice Department, following information from "foreign authorities" (probably the government of Abu Dhabi), the Fed also began its own inquiry. Its top lawyer, Virgil Mattingly, has called it "the most extensive formal investigation in my experience".

It appears the Fed, working closely with Mr Morgenthau, knew from late 1990 of the extent of the fraud within BCCI and from December 1990 knew of the whereabouts and contents of the Naqvi files in Abu Dhabi. On 4 January this year the Fed started its formal investigation into BCCI's activity in the US.

The Fed and Morgenthau's interest in BCCI focused on the true ownership of First American Bank, National Bank of Georgia and Independence Bank of Encino, California – all of them, it now transpires, owned through nominees by BCCI.

On 4 March – the same day as the Bank of England instructed Price Waterhouse to begin its section 41 inquiry into BCCI's affairs

Eddie George and the Fed agreed on document secrecy

– the Fed issued an order requiring BCCI to divest itself of the shares of Credit and Commerce American Holdings NV, the holding company of First American Bank, and to cease all banking operations in America.

While it appears that British and American authorities have at long last worked out a *modus operandi*, it has taken a long time and generated much friction.

The Bank of England argued that UK banking secrecy laws prevented it handing over all the material it had to the Americans. Under an agreement between Eddie George, deputy Bank of England governor, and the Fed, Bank records and internal memoranda and minutes of BCCI's "college of regulators", although now in the possession of the Americans, will not be made public. Only if they are absolutely necessary will they be produced.

The fallout from the First American saga – quite apart from any criminal proceedings – is likely to be significant. Already the House Banking Committee is concerned about the "the apparent lack of oversight" by the Fed. Henry Gonzalez, Texan Democratic chairman of the committee, has accused it of a "hear no evil, see no evil" approach to regulation. He was referring to the BCCI scandal and to the $3bn illicit loans to Iraq from the Atlanta branch of the Banca Nazionale de Lavoro.

One possible consequence could be to make the Office of Comptroller of the Currency the dominant bank regulator in the US. At present it has priority only for banks operating throughout the entire United States. "This would mean a clear separation between the Federal Deposit Insurance Corporation as the main bank insurer, the Fed becoming responsible for monetary policy and the Office of Comptroller of Currency becoming the main regulatory body," says Ellen Stockdale, director for communications at the OCC.

These issues have been discussed for the past 10 years, but the BCCI saga is bound to add impetus. Banking in America is unlikely to evet be the same again.

SEP 13 '92 16:59 FROM LEGAT LONDON

1325015-000-12753

MEETING WITH VAZ

Hurd signals willingness to heal any rift with Abu Dhabi

By Ralph Atkins

MR DOUGLAS Hurd, foreign secretary, yesterday signalled the government's willingness to heal any rift with Abu Dhabi over the Bank of Credit and Commerce International affair, and promised it would not block viable plans for a restructuring of the bank.

A visit by Mr Douglas Hogg, Foreign Office minister, to the United Arab Emirates is expected to follow a meeting this month between Mr Hurd and Mr Rashid Abdullah, UAE foreign minister, in New York.

Mr Hurd's comments came at a private meeting with Mr Keith Vaz, Labour MP for Leicester East, who is lobbying on behalf of BCCI depositors for a restructuring.

Mr Vaz said the foreign secretary had accepted that the closure of BCCI in July had come as a shock to the Abu Dhabi authorities and he was now anxious to minimise the harm to relations with Britain.

The Foreign Office interpretation of the meeting, however, put the emphasis on ensuring that good relations continued, rather than admitting that damage had been caused.

On a possible restructuring, Mr Vaz said Mr Hurd had said the adjournment of winding-up proceedings against BCCI had provided a "window of opportunity".

He interpreted this as a shift in the government's line, citing a letter Mr John Major sent him in July that talked only of a restructuring taking place after liquidation.

"To me it represents the government saying as much as it possibly can say that, if a proposal comes up and it's viable, they will not stand in its way," Mr Vaz said.

Labour and the Liberal Democrats also supported a restructuring, Mr Vaz said. "We have to take this broad political support — because there is broad political support for restructuring — and put it to the Bank of England."

The Foreign Office stressed, however, that the government continued to regard the a possible restructuring as a matter for the Bank of England. There was no question of ministers leaning on Mr Robin Leigh-Pemberton, the Bank governor.

SEP 13 '92 17:00 FROM LEGAT LONDON

1325015-000-12754

ARRESTS

Bank officials kept incommunicado

By Richard Waters and Richard Tomkins

MOST of the top management of BCCI was held at a secret location in Abu Dhabi last night amid continuing mystery surrounding the reason for their detention.

The arrest of about 30 BCCI officers took investigators, regulators and diplomats in other countries completely by surprise.

The arrests were made without the co-operation of authorities in other countries which have been investigating events surrounding the BCCI collapse.

The emirate's authorities released no information yesterday about the whereabouts of those detained, or whether they had been charged. A relative of one of those arrested said no information had been given and no contact had been allowed with those held.

UK Foreign Office officials confirmed that the Serious Fraud Office had no role in detaining BCCI executives in Abu Dhabi. They said, however, that the British embassy was seeking access to Britons who had been arrested.

Among those understood to have been detained are Mr Swaleh Naqvi, BCCI's former chief executive, and Mr Zafar Iqbal, the man who replaced him last year. Mr Iqbal was himself an Abu Dhabi appointment, after Mr Naqvi had admitted his part in illicit activities at the bank and offered to help the emirate to establish the bank's full position.

Neither Mr Naqvi's lawyer in Washington nor his family in Abu Dhabi appeared to know where Mr Naqvi was or to have had any contact with him.

It emerged that between 12 and 15 of those detained were UK citizens. Their names and passport numbers were supplied to the British consulate in Abu Dhabi, but these were being withheld last night.

The Foreign and Commonwealth Office said that it was taking steps to find out where the British citizens, believed to be of Pakistani origin, were being held and to make sure they were being well treated.

News of the arrests prompted concern that a restructuring of BCCI now looked less likely.

One source close to the restructuring discussions said: "You couldn't relaunch this in a million years, after mass arrests like this."

The sudden arrests on Sunday, which according to one report were followed up by others yesterday, marked a sudden reversal in the public attitude of the Abu Dhabi authorities.

Normally highly secretive, Abu Dhabi took the unusual step soon after the BCCI closure in July of placing full-page newspaper advertisements attacking the decision of foreign regulators to close the bank.

The comprehensive rounding up of top BCCI management suggests now, however, that it places some credence in the regulators' claim that the bank's senior staff colluded in fraud over a prolonged period.

WORLD ROUND-UP

Tokyo envoys call for aid

JAPAN: Foreign embassies affected by the closure of BCCI's Tokyo branch have appealed to the Japanese government for aid, a Foreign Ministry official said. Five embassies have appealed for compensation after their deposits were frozen two months ago, he said.

But the Japanese government has no plans to respond to the appeals, he added. "The identities of the embassies must remain confidential," the official said. "In most cases, though, the missions have opened new accounts in Tokyo and are now receiving money [from their home countries] to meet their costs."

BCCI's Tokyo branch, which ceased operations on July 8, had Y53.7bn from 250 depositors, the majority of them corporations, in March this year.

PERU: A judge has opened court proceedings against former officials of Peru's central bank in connection with BCCI, the government-owned newspaper El Peruano said on Saturday.

It quoted Judge Felipe Villavicencio as saying he had ordered the arrest of Mr Leonel Figueroa, former president of the Central Reserve Bank of Peru, Mr Hector Neyra, former bank general manager and Ms Ana Maria Tenenbaum, former manager of the international operations department.

He said he had also ordered the judicial police to embargo personal assets up to $3m (£1.7m), the amount Mr Robert Morgenthau, Manhattan District Attorney, alleged Mr Figueroa and Mr Neyra had accepted from BCCI in return for depositing up to $270m of Peru's reserves.

Ms Nelly Malarin, a special prosecutor, announced charges against Mr Figueroa and Mr Neyra last Thursday. They became the first officials or former officials to be charged in the worldwide BCCI scandal. She did not mention Ms Tenenbaum.

Ms Tenenbaum's mother said that her daughter was attending a meeting of an Andean Pact economic group in Quito, Ecuador and was due back on Sunday night.

She said that her daughter had been cited to appear at the attorney general's office on Thursday but that her office had sent a letter saying that she was out of the country.

Ms Tenenbaum's department had approved depositing up to $100m in BCCI in 1986 and 1987. The board later approved depositing up to $270m in the bank.

American Embassy
London

FAX: 71-499-7344

UNCLASSIFIED

304

BCCI

b6
b7C

SA [redacted] FBIHQ

NO. OF PGS. 2 (including cover page)

ST DATE: MARCH 1

REF: DATE:

b6
b7C

29B-WF-179961 2307

[redacted]

29HQ 116176

1325015-000-12767

ENCLOSURE

Ex-DTI Inspector Becomes Head of Stockbroker

1325015-000-12768

American Embassy
London

FAX: 71-499-7944

UNCLASSIFIED

FROM: [redacted] ASSISTANT LEGAL ATTACHE

TO: SA [redacted] FBIHQ

SUBJECT: [redacted]

NO. OF PGS. 2 (including cover and last page)

SENDER: BT DATE: MARCH 12, 1992

RECD BY: DATE:

COMMENTS:

b6
b7C

1325015-000-12769

...police after what he described as an "incident" in London.

...be able to select a candidate by the weekend if the prime minister this week calls a general election for April 9.

...have been angered by the Maxwells' refusal, saying it has prevented a complete dissection of how the brothers' father, the late Robert Max-

...suggestions for a successor committee to pursue.

On Monday, in response to the Maxwell affair, the committee recommended sweeping reform of the UK pension

...Group pensioners' problems was "all too clear".

"There appears to have been a massive fraud perpetrated under the very eyes of the trustees," he said.

...for next year and giving ... proportionately more to the Lecs. ... plants including ... will receive £5.2m. ... gets £68.1m. Other Lecs ... ing Ayrshire, Dunbar ... and Forth Valley also ... increases. ...

Ex-DTI inspector becomes head of Serious Fraud Office

...[illegible] just 10 months at the ... [illegible] ... Mr William Park, a senior partner at law firm Linklaters & Paines, said Mr Staple had long experience of company and commercial practice, including civil fraud litigation.

His City perspective was probably better than that of his two predecessors at the SFO, Mr Park said. Coming from a different culture, he might well have a greater awareness of the real evils in City fraud and its effects on the public.

Mr John Clitheroe of Kingsley Napley, a leading defence solicitor, said it was a very imaginative ... He pointed to Mr Staple's experience as a Department of Trade and Industry inspector in the Consolidated Gold Fields inquiry in 1986 and the 1988 inquiry into Aldermanbury Trust, and hoped he could "work towards an examination of the DTI and SFO investigations".

Although Mr Staple has spent most of his time at Clifford Chance doing commercial litigation since he qualified as a solicitor in 1964, Mr Nigel Fox Bassett, the firm's senior partner, said he had considerable experience of fraud and white-collar crime in the ... and about to take a period in ... Hong Kong office. Mr Staple is chairman of the authorisation and disciplinary appeal tribunal of the Securities and Futures Association and acts as a legal assessor on the disciplinary committee of ... Exchange.

Mr Gareth Williams QC, chairman of the Bar, welcomed his appointment and said the Bar was not disappointed that a solicitor rather than a barrister had been selected.

Mr Rodger Pannone, whose firm defended Mr Ernest Saunders, the former Guinness chairman, and will be ... acting for Mr Asil Nadir, former chairman of Polly Peck International who faces criminal charges, described the choice of Mr Staple, a colleague on the Law Society council, as "inspired".

"He is a man of great ability, legal knowledge and breadth of vision, with tremendous experience of commercial litigation at the highest level," Mr Pannone said. "He's also an extremely likeable individual."

Mr Staple has been on the society's governing council since 1988 and its treasurer for the past three years. He is married with four children.

George Staple: mix o... and practical experie...

** TOTAL PAGE.002 **

1325015-000-12770

FD-36 (Rev. 8-29-85)

163

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
X ☐ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 2/24/92

TO : DIRECTOR, FBI
ATTN: AUTOMOTIVE MANAGEMENT UNIT
ROOM 6863, SSA [redacted]

b6
b7C

FROM : SAC, Washington Field Office (29B-WF-171994) (P)

SUBJECT : AUTOMOTIVE MATTERS
"HIDDEN INTERESTS";
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

RE airtel from WMFO to The Director dated 10/12/91.

On 2/12/92, BUCAR # 99-6564, identified as a 1992 White Dodge Spirit bearing VA Tag RVA-975 was returned to Thrifty Car Rental, Alexandria, VA. This vehicle was replaced with Thrifty Unit # 320403, a 1992 Burgundy Mitsubishi Galant bearing VA Tag RTF-462, and will now be identified as BUCAR # 99-6564.

Serial 1-171[illegible] - 228

On 2/20/92, BUCAR # 99-6560, identified as a 1992 Blue Dodge Dynasty bearing VA Tag RVB-995 was also returned to Thrifty Car Rental. This vehicle was replaced with Thrifty Unit # 820271. a 1992 Champagne Chrysler 5th Avenue bearing VA Tag RVK-323, and will now be identified as BUCAR # 99-6560.

1-D
2 - Bureau
2 - 29B-WF-171994
MTU:mtu

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-12771

TELETYPE

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5 SEP 91 21 56Z

FBI BUREAU OF INVESTIGATION

PP RUCNFB FBIJK FBIMM

DE FBIAT #0019 2481936

ZNR UUUUU

P 051740Z SEP 91

FM FBI ATLANTA (29B-WF-171994) (P)

[redacted] b6 b7C

TO DIRECTOR FBI/PRIORITY/

FBI JACKSONVILLE/PRIORITY/

FBI MIAMI/PRIORITY/

BT

UNCLAS

SECTION ONE OF TWO SECTIONS

CITE: //3040:SQ 5//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION, WMFO FILE (29B-WF-171994).

29-WF-171994-228X1

SUBJECT: (1) HIDDEN INTERESTS, MAJOR CASE 39; OO: WMFO.

RE JACKSONVILLE TELETYPE TO FBIHQ DATED 8/20/91.

THE FOLLOWING INFORMATION WAS OBTAINED FROM [redacted] b6 b7C

CRIMINAL INVESTIGATOR FOR THE RESOLUTION TRUST CORPORATION (RTC), ATLANTA, GA., TELEPHONE NUMBER [redacted]

[redacted] b6 b7C

CT

29-116176

On 9/6/91 Contacted Atlanta And Requested That copy Be Transmitted to OO WMFO.

copy faxed to WMFO 9/9/91

1325015-000-12772

CONCERNING RECORDS OF THE INSURANCE EXCHANGE OF THE AMERICAS (IEA) AND THEIR RELATION TO [redacted] GHAITH PHARAON, AND AMERICAN SOUTHERN INSURANCE COMPANY. b6 b7C

[redacted] IS CURRENTLY CONDUCTING AN INVESTIGATION CONCERNING THE FAILURE OF CENTRUST SAVINGS AND LOAN, MIAMI, IN THE SUMMER OF 1991, [redacted] CONTACTED OFFICIALS OF THE INSURANCE COMMISSIONER'S OFFICE FOR THE STATED OF FLORIDA AFTER LEARNING THAT SOUTHEASTERN INSURANCE COMPANY HAD BEEN SEIZED BY THE STATE OF FLORIDA FOR REASONS OF INSOLVENCY. b6 b7C

[redacted] MET WITH OFFICIALS OF THE INSURANCE COMMISSIONER'S OFFICE IN TALLAHASSEE, INCLUDING INVESTIGATORS ASSIGNED TO THE IEA TASK FORCE. THEREAFTER, [redacted] WAS ABLE TO CONDUCT A SHORT REVIEW OF IEA RECORDS SEIZED BY THE INSURANCE COMMISSIONER'S OFFICE WHEN IEA CLOSED APPROXIMATELY 1988. THIS REVIEW DID NOT INCLUDE ALL IEA RECORDS, AND RTC CONTEMPLATES FURTHER REVIEW.

THIS REVIEW, PLUS CONVERSATIONS WITH INVESTIGATORS ASSIGNED TO THE IEA TASK FORCE REVEALED THAT IEA WAS [redacted] IN MIAMI BY [redacted] AND WAS COMPOSED OF APPROXIMATELY 36 SYNDICATES OR PARTNERSHIPS WHICH REPRESENTED THEMSELVES AS INSURANCE COMPANIES. AMONG THE SYNDICATES WERE INDIAN LIFE, b6 b7C

WHOSE [redacted], LAHUS VI, WHOSE PARTNERS WERE [redacted] AND LAHUS V, WHOSE PARTNERS WERE [redacted] (A PARTNER OF [redacted], AND [redacted] PERSONAL ATTORNEY). ACCORDING TO [redacted], THESE SYNDICATES WROTE LITTLE INSURANCE, HOWEVER, ACTIVELY TRADED SECURITIES RELATED TO TAKEOVER DEALS AND LEVERAGED BYOUTS ISSUED THROUGH DREXEL BURNHAM LAMBERT. THE SECURITIES IN THE PORTFOLIO OF THE SYNDICATES WERE HELD FOR SHORT PERIODS OF TIME GENERALLY, AND WERE NOT LONG TERM INVESTMENTS. [redacted] BELIEVES THAT MANY OF THE TRADES CONDUCTED BY THOSE SYNDICATES ARE IN SECURITIES ISSUED THROUGH [redacted] AND DREXEL BURNHAM LAMBERT, AND THE TRADES ARE BASED ON INSIDER INFORMATION CONCERNING TAKEOVERS OR LEVERAGED BYOUTS ISSUED BY DREXEL BURNHAM LAMBERT. FURTHER, IEA RECORDS SHOWED THAT SYNDICATES SUCH AS INDIAN LIFE AND LAHUS V SENT MILLIONS OF DOLLARS TO FIRMS IN BERMUDA AND ARE SHOWING THESE FUNDS TO BE PAYMENTS FOR PREMIUMS FOR REINSURANCE. [redacted] BELIEVES THE REINSURANCE PREMIUMS REPRESENT A TECHNIQUE FOR MOVING PROFITS FROM THE TRADES CONDUCTED WITHIN THE SYNDICATES OUTSIDE THE UNITED STATES.

b6
b7C

[redacted] DID NOT REVIEW RECORDS OF ALL SYNDICATES WITHIN IEA AND IS NOT AWARE OF THE EXTENT THAT OTHERS SYNDICATES ARE ENGAGING IN THIS ACTIVITY. b6 b7C

[redacted] BELIEVES THAT [redacted] OF IEA HAS DEVELOPED PAYMENTS OF REINSURANCE PREMIUMS TO COUNTRIES OUTSIDE THE UNITED STATES AS A TECHNIQUE TO MOVE FUNDS EASILY IN AND OUT OF THE UNITED STATES, MAKING IT DIFFICULT TO TRACE OWNERSHIP OR THE SOURCE OF THE FUNDS AND ALSO ALLOWING THE SYNDICATES TO CLAIM THE FUNDS ARE ALLEGEDLY REPRESENTING REINSURANCE PREMIUMS AS A BUSINESS EXPENSE FOR THE SYNDICATE. A REVIEW OF [redacted] SHOWED INSTANCES WHEREIN THE AMOUNT OF REINSURANCE PREMIUMS BEING PAID EXCEEDED THE AMOUNT OF INSURANCE POLICIES BEING WRITTEN BY THE SYNDICATES, WHICH WERE REPRESENTING THEMSELVES AS INSURANCE COMPANIES. [redacted] HAS LEARNED THAT FOLLOWING THE CLOSING OF IEA, [redacted] OPERATED ANOTHER INSURANCE COMPANY NAMED VICTORIA INSURANCE COMPANY IN GEORGIA, WHICH, ACCORDING TO THE GEORGIA DEPARTMENT OF INSURANCE, MOVED APPROXIMATELY $50 MILLION DOLLARS OUT OF THE U.S. DURING THE FIRST QUARTER OF 1990 IN THE FORM OF REINSURANCE PREMIUMS. [redacted] IS ALSO KNOWN TO HAVE REPRESENTED A COMPANY NAMED TRANSIT WITHDRAWN, [redacted] BELIEVES THAT PHARAON AND [redacted] THEN b6 b7C

SEARCHED FOR ANOTHER WAY TO COMPLETE THIS TRANSACTION, AND SOMETIME LATER A DRAMATIC INCREASE IN THE INSURANCE PREMIUMS BEING GENERATED BY AMERICAN SOUTHERN PAYING DIVIDENDS OF APPROXIMATELY $11 MILLION BACK TO INTER-REDEC AND GHAITH PHARAON. [redacted] SUSPECTS THAT CENTRUST IN SOME MANNER MAY BE RESPONSIBLE FOR THE INCREASE IN INSURANCE PREMIUMS. HOWEVER, TO DATE HE HAS BEEN UNABLE TO SHOW A CONNECTION BETWEEN CENTRUST AND THE INCREASE IN PREMIUMS. b6 b7C

[redacted] HAS OBSERVED A PATTERN OF INSIDER TRADING BY [redacted] OF CENTRUST INVOLVING A STOCK NAMED [redacted] WHICH STOCK WAS A TAKEOVER TARGET. RTC IS MAKING A CRIMINAL REFERRAL TO THE DEPARTMENT OF JUSTICE CONCERNING THE INSIDER TRADING ACTIVITY BY [redacted] HAS ADVISED THAT HE OBSERVED RECORDS INDICATING TRADING OF THE LAHUS V SYNDICATE WITHIN IEA IN THE [redacted] STOCK AT THE SAME TIME AS TRADES TRANSACTED BY [redacted] FURTHER, [redacted] HAS LEARNED OF AN UNSUCCESSFUL ATTEMPT BY PHARAON AND [redacted] TO TAKE OVER A CHEMICAL COMPANY NAMED HERCULES. [redacted] HAS OBSERVED THAT HERCULES STOCK IS OWNED BY NATIONAL REINSURANCE, A COMPANY WHICH PROVIDES SUBSTANTIAL AMOUNTS OF REINSURANCE TO AMERICAN b6 b7C

SOUTHERN INSURANCE COMPANY.

AT CENTRUST, [redacted] HAS DISCOVERED EVIDENCE OF [redacted] b6 b7C AND/OR CENTRUST ENGAGING IN INSIDER TRADING TRANSACTIONS INVOLVING JUNK BONDS ISSUED THROUGH DREXEL BURNHAM LAMBERT SUCH AS BONDS BY INTEGRATED RESOURCES. IN ONE INSTANCE, [redacted] DISCOVERED A COMMUNICATION BETWEEN [redacted] IN WHICH [redacted] IS ASKING [redacted] WHY HE [redacted] IS BUYING A SPECIFIC SECURITY, INDICATING THAT [redacted] IS MAKING INVESTMENT DECISIONS FOR [redacted] AND CENTRUST. FURTHER, TWO SYNDICATES WITHIN IEA TRADED IN CENTRUST STOCK, AND SUBSTANTIAL TRADING HAS BEEN OBSERVED BOTH AT CENTRUST AND WITHIN THE IEA SYNDICATES IN SIMILAR DREXAL TAKEOVER ISSUES.

[redacted] INDICATED THAT [redacted] SERVED AS A [redacted] b6 b7C [redacted] OF THE BOARD OF CENTRUST, WHERE SHE WAS RESPONSIBLE FOR DELIVERING CENTRUST CHECKS TO VARIOUS POSSESSION OF ONE CHECK IN THE AMOUNT OF $5,000 REPRESENTING A CENTRUST CONTRIBUTION TO THE CAMPAIGN OF FORMER FLORIDA [redacted] FOR THE U.S. SENATE. PRIOR TO

BT

#0019

NNNN

0215 MRI 01366

PP RUCNFB FBIJK FBIMM

DE FBIAT #0020 2481936

ZNR UUUUU

P 051740Z SEP 91

FM FBI ATLANTA (29B-WF-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI JACKSONVILLE/PRIORITY/

FBI MIAMI/PRIORITY/

BT

UNCLAS

SECTION TWO OF TWO SECTIONS

CITE: //3040:SQ 5//

PASS: FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIME SECTION, WMFO FILE (29B-WF-171994).

SUBJECT: HIDDEN INTERESTS, MAJOR CASE 39; OO: WMFO.

TEXT CONTINUES:

WORKING AT CENTRUST, [redacted] WORKED ON THE BOARD OF DIRECTORS FOR THE IEA. PRIOR TO SERVING AT IEA, [redacted] WAS NAMED IN A SUCCESSFUL LAW SUIT FILED AGAINST HER EMPLOYER,

b6
b7C

BROWARD SAVINGS AND LOAN, CHARGING BROWARD SAVINGS AND LOAN WITH DEFRAUDING INVESTORS.

[redacted] ADVISED THAT [redacted] OF IEA GOT IN TROUBLE WITH REGULATORS FOR HIS REPRESENTATION OF OLD AMERICAN INSURANCE COMPANY WITHOUT THE PROPER LICENSE. OLD AMERICAN INSURANCE COMPANY IS OWNED BY CENTRUST. [redacted] INDICATED THAT THE RELATIONSHIP BETWEEN [redacted] AN BCCI IS DEMONSTRATED BY THE FACT THAT [redacted] AND BCCI BOTH SERVED AS [redacted] FOR THE FLORIDA COUNCIL FOR INTERNATIONAL DEVELOPMENT (FCID), AN AGENCY DESIGNED TO PROMOTE INTERNATIONAL COMMERCE. ACCORDING TO [redacted], CENTRUST BANK WAS THE ONLY BANK WHO REFUSED TO PARTICIPATE IN FCID.

b6
b7C

[redacted] ADVISED THAT ONE OF THE FIRMS IN BERMUDA ACCEPTING REINSURANCE PREMIUMS WAS CLARENDON INSURANCE COMPANY WHICH WROTE VERY LITTLE INSURANCE. THIS FIRM WAS [redacted] IN 1981 BY A MEXICAN NAMED [redacted] FOR $400 MILLION, AND SHORTLY THEREAFTER BEGAN ACCEPTING REINSURANCE PREMIUMS SUCH AS THOSE RECEIVED FROM SYNDICATES OPERATING WITHIN THE IEA. [redacted] IS KNOWN TO BE AN INVESTOR IN ONE OF THE LAHUS PARTNERSHIPS WITHIN IEA.

b6
b7C

CONCERNING BONDS OF BCI HOLDING INCORPORATED OWNED BY

0-93 (Rev. 01/25/91)

653

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
COMMUNICATION MESSAGE FORM

TRANSMIT VIA:
☒ Teletype

PRECEDENCE:
☐ Immediate
☒ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

DATE: 3/9/92

^PAGE 1 OF 2

FM DIRECTOR FBI (29B-WF-171994)

TO FBI LOS ANGELES/PRIORITY/

FBI WMFO/PRIORITY/

LEGAT LONDON/PRIORITY/

BT

UNCLAS

CITE: //0624//

PASS: SA [redacted], LOS ANGELES; ALAT [redacted], LEGAT, LONDON; SA [redacted] WMFO. b6 b7C

SUBJECT: D HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO.

RE LOS ANGELES TELETYPE TO DIRECTOR, FBI, 2/12/92 AND WMFO TELETYPE TO DIRECTOR, FBI, 2/27/92.

ON 3/9/92, FOREIGN TRAVEL AS REQUESTED IN REFERENCED COMMUNICATIONS FOR LOS ANGELES SA'S [redacted] AND b6 b7C

29B-WF-171994-217

****** FOR COMM CENTER USE ONLY ******

NOTE: Copy Designations Are On The Last Page Of This Teletype!!!

Approved By LAP/DRW

MRI/JUL 1398 1069 ISN 132

Transmitted MAR 10 1992 0857

1325015-000-12737

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 09-14-2018

2-2

b6 Per FBI
b7C

1 - Mr. [redacted]
1 - Mr.
1 - Mr.

~~SECRET~~

April 8, 1992

BY LIAISON

(C) Hidden Interests

To: Director
National Security Agency
Fort George G. Meade, Maryland

From: Larry A. Potts
Assistant Director
Criminal Investigative Division

Subject: REQUEST FOR IDENTITY AND DISSEMINATION AUTHORIZATION
RE: 3/00/45890-91

This communication is classified ~~"Secret"~~ in its entirety.

You are requested to provide the identity of the United States (U. S.) person referred to in the above report, and any additional information available. The identity is necessary to understand foreign intelligence information or assess its importance (USSID 18, 8.2.C.).

Additionally, you are requested to authorize dissemination of the report, including the identity of U. S. person, to our Washington Metropolitan Field Office which is coordinating an investigation being conducted in connection with this matter.

Please direct any inquiries to SSA [redacted] NSA Liaison or SSA [redacted] CID, FBIHQ, telephone number (202) 324-5595.

b6 Per FBI
b7C

NOTE: This requests NSA provide identity of the U. S. person in NSA serial 3/00/45890-91, and to authorize dissemination to WMFO.

TJW:prh (5)

Classified by 8947
Declassify on: OADR
~~SECRET~~

b6 Per FBI
b7C

[redacted]

Exec AD Adm. ____
Exec AD Inv. ____
Exec AD LES ____
Asst. Dir.:
Adm. Servs. ____
Crim. Inv. ____
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Legal Coun. ____
Off. Cong. & Public Affs. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Off. Liaison & Int. Affs. ____
Telephone Rm. ____
Director's Sec'y ____

MAIL ROOM

LAP/FBI

via Liaison 4/8/92

29HQ-116176
1325015-000-12757

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 34
Page 35 ~ Referral/Consult;
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[redacted] b3 b7E

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[redacted] b6 b7C b7D

[redacted] b7D

[redacted] will coordinate the BCCI investigation on a full time basis, as long as the need remains; b6 b7C

TDY Agent, preferably a GS13 or 14 experienced WCC investigator, will be assigned to London to pick up ALAT [redacted] WCC case load (which is significant and focuses, to a large measure, [redacted] b6 b7C b7D

[redacted] b7D

On August 18, 1991, Legat, London, discussed with Deputy Chief of Mission RON WOODS, Legat's proposal for addressing the BCCI case through the full time assignment of an ALAT to the case, backed up by a long-term TDY Agent to pick up existing WCC work load. Mr. WOODS fully supports that proposal.

1325015-000-12142

FBI investigation at Houston indicates that Senator Hatch may have had some contact at BCCI. Although neither WMFO nor Houston consider Senator Hatch as a subject of this investigation, WMFO considers that an interview of Senator Hatch would be appropriate based on these news articles and investigation to date at Houston. The White-Collar Crimes Section, Criminal Investigative Division, has reviewed this matter and concurs with SAC, WMFO that Senator Hatch be interviewed concerning his knowledge of BCCI.

I have approved the interview of Senator Hatch and arrangements are being made to interview Senator Hatch as soon as possible with a DOJ Attorney.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

DRW
ADRW BEH

L. A. Potts

12/6

1325015-000-12073

335

10/10/91

Director Sessions:

RE: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

In attached note dated 9/25/91, you inquired as to how many total boxes of documents we now have for review in this matter.

Not all documents pertinent to captioned matter have been identified; however, WMFO to date has identified a total of 327 boxes of documents that will have to be reviewed. Of these 327 boxes of documents, 200 boxes are located at WMFO, 67 boxes are located at the Miami Division, and the remaining 60 boxes are located in the Los Angeles Division. WMFO is coordinating the ongoing review of these documents with the Los Angeles and Miami Divisions.

During the period 9/10-12/91, representatives from DOJ and FBI, WMFO surveyed documents from the Bank of Credit and Commerce International (BCCI) in the Cayman Islands and coordination is ongoing to obtain copies of these documents. This survey estimated that there are approximately one million documents that must be reviewed to determine their pertinence to this matter.

In addition, the Tampa Division has recently identified approximately 5,400 boxes of documents from the BCCI representative bank in Florida that may be pertinent to the investigation concerning subject Ghaith Pharaon. These records are in the custody of the Federal Reserve, Miami, Florida, and a review of computerized indices will be utilized to determine whether any of these documents will have to be reviewed to determine their relevance to captioned matter.

Through coordination with the Department of Justice Fraud Section and the U.S. Attorney's Office, District of Columbia, Washington, D.C., WMFO is identifying documents that are relevant to captioned matter. As additional pertinent documents are identified, WMFO will coordinate the review of these documents as necessary. 29B-WF-171994-183

You will be kept advised of all future developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

W. M. Baker

Enclosure
1 - [redacted]
1 - [redacted]
1 - Mr. Baker
1 - Mr. Potts
1 - Acting DAD, Rm. 3012
1 - [redacted]
1 - Special Assistants, CID
1 - [redacted]
1 - [redacted]

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DRW:vf (13)

1325015-000-12074

353

9/25/91

Director Sessions:

(1)

RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

You requested that the FBI establish coordination with the [redacted] the U.S. Customs Service (USCS), and the Drug Enforcement Administration (DEA) concerning the investigation of the Bank of Credit and Commerce International (BCCI). On 9/23/91, representatives from the White-Collar Crimes Section and Drug Section, Criminal Investigative Division (CID), Congressional Affairs Office (CAO), and the Washington Metropolitan Field Office (WMFO) met in a conference with representatives of the [redacted] the USCS, DEA, and the Financial Crimes Enforcement Network (FINCEN) and established coordination and information sharing relevant to the BCCI investigation. The information exchange and coordination between agencies was positive and cooperative. Each agency provided contacts for additional future coordination which will be followed up by WMFO. b7E

On 9/17/91, representatives from the FBI, [redacted] DOJ-Office of International Affairs (DOJ-OIA), DOJ-Fraud Section, and U.S. Attorney's offices from Washington, D.C.(USAOWDC), Tampa and Miami met at the U.S.Attorney's Office, District of Columbia, Washington, D.C. and reviewed a list of individuals who have been detained by the government of Abu Dhabi and established the priority of individuals to be interviewed if the government of Abu Dhabi permitted these individuals to be interviewed. b7E

On 9/18/91, representatives of the DOJ-Fraud Section, contacted the White-Collar Crimes Section and advised that officials of the government of Jamaica had requested that a DOJ Attorney meet with them regarding information that they had discovered concerning BCCI-Jamaica. On 9/19-20/91, a representative from the FBI's Legal Attache Office for Jamaica, the Northern Caribbean Liaison Office, Miami Division, travelled to Jamaica with a DOJ Fraud Section Attorney and an Attorney from the DOJ-OIA and met with [redacted] Prime Minister of Jamaica and various officials of the Jamaican government. These officials provided information concerning b6 b7C

1 - [redacted]
1 - [redacted]
1 - Mr. Baker
1 - Mr. Potts
1 - Acting DAD, Room 3012

DRW:amp (11)

DRW AMP

P

1 - [redacted]
1 - [redacted]
1 - Special Assistants, CID
1 - [redacted] b6 b7C
1 - [redacted]

288-WF-171994-184

RC

possible money laundering by BCCI-Jamaica and indicated that they would make documents available for review as necessary in the BCCI investigation.

On 9/20/91 [redacted] b6 b7C b7D

[redacted]

WMFO continues to coordinate ongoing witness interviews and document review in this document intensive investigation with the Atlanta, Los Angeles, Miami, and Tampa Divisions. The Miami Division has recently identified 67 boxes of documents obtained from the investigation of Centrust Savings that are pertinent to the BCCI investigation. The Tampa Division has identified 4,400 boxes of documents from the BCCI representative bank in Florida that may be pertinent to the investigation concerning subject Ghaith Pharaon. These documents are presently in the custody of the Federal Reserve, Miami, Florida. In addition, representatives from DOJ and FBI, WMFO recently surveyed BCCI documents in the Cayman Islands and coordination is ongoing to obtain copies of those documents. On 9/23/91, [redacted] advised that b7E there are 65 boxes of documents that had been seized by USCS in the "C Chase" investigation in 1988 that are pertinent to this investigation and should be reviewed by WMFO.

WMFO is continuing to investigate this matter in conjunction with attorneys from the DOJ Fraud Section and the USAOWDC.

You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

b6 b7C [redacted]

W. M. Baker

PRW

1325015-000-12076

RECEIVED
F.B.I.
COMMUNICATIONS
SEP 13 6 52 AM '91

American Embassy
London

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FAX: 71-499-7944

UNCLASSIFIED

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ADD Adm.
ADD Inv.
Asst. Dir.
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Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.

b6
b7C

3839
TL 231

Hidden Interests

FROM: ALAT b6 b7C

TO: BIHQ (EXT. 5594; ROOM 3839; TL 231)

SUBJECT: BCCI

NO. OF PGS. (including cover and last page)

SENDER: DATE: Sept 13, 1991

RECD BY: DATE:

COMMENTS: Newspaper article

29B-WF-171994-184X
29-HQ-116176

M b6 b7C
By Time 9:20 AM

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FBI 7446

CC

PAGE.001 FROM LEGAT LONDON 1325015000 1201

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Hurd gives green light to plans for bank

THE Government will not stand in the way of any plans to relaunch the collapsed Bank of Credit and Commerce International, Douglas Hurd, the Foreign Secretary, said yesterday, *writes Nick Fielding.*

He told a delegation of 10 BCCI employees led by Keith Vaz, the Leicester East MP, who met him for 45 minutes at the Foreign Office yesterday, that the negotiations provided a "window of opportunity" to enable the Bank of England to put together plans.

Mr Hurd, who said he recognised the difficulties created for depositors and staff by the collapse, told the delegation that information was being passed from the Bank to ministers and that the Prime Minister and the Chancellor were being kept fully informed of the negotiations.

The Foreign Secretary will be meeting his United Arab Emirates counterpart at the United Nations at the end of September, where BCCI will be discussed. The delegation impressed upon Mr Hurd the importance of sending a minister to Abu Dhabi to discuss the restructuring plans.

In Abu Dhabi yesterday, the police completed their round-up of top BCCI officials, following more than 30 arrests at the bank's headquarters throughout Sunday. Mr Ajaz Afridi, for example, was arrested at 1am on Monday. A call to the private office of chief executive Zafar Iqbal, who was among those arrested on Sunday, was answered by an official who said "the bank was inoperative at present".

According to sources in London, no one from the Serious Fraud Office was involved in the arrests. A team led by Jerry Ohlson, who is leading the police inquiry into BCCI, left yesterday for the Cayman Islands.

The four-strong team will meet a team from the US Justice Department and the FBI. They will be planning their approach to the Caymans government and hoping to gain access to documents under the control of the liquidators Deloitte Ros Tohmatsu. These are believed to concern BCCI Overseas and International Credit and Investment Co, a BCCI-linked firm.

Fed feels

Nick Fielding reports on how the continuing fallout from the scandal could change the way in which the US banking system is regulated

DURING the past year, as banking regulators in the UK pondered over whether to intervene in the growing turmoil enveloping the now collapsed Bank of Credit and Commerce International, the US Federal Reserve Board played a major, but largely unreported, role in uncovering the full extent of the fraud. It appears, indeed, that American action was instrumental in forcing the Bank of England to consider taking serious action against the rogue bank.

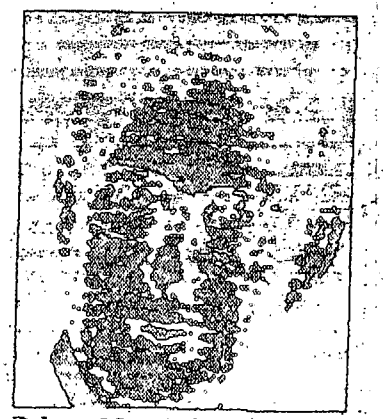
Nevertheless, the Fed is under fire. Although it has been aggressive in comparison with the Bank of England, US legislators feel it should have acted earlier. The impact of the scandal on American banking regulation is likely to be long-term and lead to substantial changes in the way the banking system is structured.

Last week's report by Charles Schumer's House of Representatives Judiciary Committee on federal law enforcement handling of the scandal makes devastating criticisms of the Fed, saying it delayed for two years before acting on strong evidence obtained by an undercover agent. But action in America against BCCI – in the past year at least – has far outstripped that taken in the UK.

In July the Fed announced it had started formal enforcement proceedings against BCCI Holdings (Luxembourg), its two subsidiaries and against nine individuals associated with BCCI, for their part in violating US banking law.

Its 110-page indictment included a $200m (£120m) fine against BCCI and related banks and companies and the permanent barring from any involvement with US banking organisations of nine individuals, who include Agha Hassan Abedi, BCCI's founder, Swaleh Naqvi, former chief executive, and a number of prominent Saudi and Gulf Arab investors in BCCI.

A whole battery of hearings is under way in America, including four grand juries, a Justice Department investigation into the collapsed savings and loan company Centrust (which appears to have been indirectly owned by BCCI), investigations by the superintendents of banks in New York and California, and the Operation C-Chase inquiry involving officers from the US Treasury, the Internal Revenue Service, Customs and the Drug Enforcement Administration. There are also continuing Senate hearings into drug money laundering.



Robert Morgenthau has been tenacious in following the story

In addition, in Miami the government of Panama has filed a suit against BCCI alleging that the bank laundered money stolen by the former dictator Manuel Noriega.

The most dramatic of the Senate hearings to date was that of the subcommittee of the Senate Foreign Relations Committee on terrorism, narcotics and international operations held in Washington on 8 August. BCCI's former chief finance officer, Masihur Rahman, testified in great detail about the bank's crooked operations and about threats to his personal safety by bank staff.

All this activity is taking place in a country in which BCCI hardly had an official presence. Contrast this to the single UK inquiry, headed by Lord Justice Bingham, which is being held in private. The non-statutory inquiry, due to start shortly, will have no powers to compel witnesses to appear nor to subpoena documents and, cloaked in secrecy, is unlikely to produce the kind of revelations that are shaking the American banking world.

At the Rahman hearings, on the other hand, Senator John Kerry, the chief inquisitor, ma...

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SEP 13 '92 16:56 FROM LEGAT LONDON PAGE.002

The heat over BCCI saga

INDEPENDENT 9-10-91

Although the Federal Reserve Board was much more aggressive than the Bank of England in pursuing BCCI, American legislators have criticised it for not acting sooner

SEP 13 '92 16:57 FROM LEGAT LONDON

1325015-000-12079

SEP. 13 '92 16:59 FROM LEGAT LONDON PAGE.004

ble to anyone who wanted them opies of hitherto secret Price Waterhouse reports on BCCI.

American interest in BCCI took off after the successful Operation C-Chase aimed at halting the huge drug money laundering operation organised from the bank's Florida branch. Operation C-Chase led to the first cycle of Senate subcommittee hearings under the Senate investigator Jack Blum.

He was said to have been appalled at a plea bargaining agreement that allowed the bank to avoid further charges in exchange for a $15m fine. Early in 1990 Mr Blum passed on information to the Manhattan district attorney, Robert Morgenthau, who, in June 1990, convened a grand jury and began his own investigation into banking irregularities in New York State. Mr Morgenthau has proved to be extremely tenacious in following the BCCI story.

Despite inaction from the Justice Department, following information from "foreign authorities" (probably the government of Abu Dhabi), the Fed also began its own inquiry. Its top lawyer, Virgil Mattingly, has called it "the most extensive formal investigation in my experience".

It appears the Fed, working closely with Mr Morgenthau, knew from late 1990 of the extent of the fraud within BCCI and from December 1990 knew of the whereabouts and contents of the Naqvi files in Abu Dhabi. On 4 January this year the Fed started its formal investigation into BCCI's activity in the US.

The Fed and Morgenthau's interest in BCCI focused on the true ownership of First American Bank, National Bank of Georgia and Independence Bank of Encino, California – all of them, it now transpires, owned through nominees by BCCI.

On 4 March – the same day as the Bank of England instructed Price Waterhouse to begin its section 41 inquiry into BCCI's affairs – the Fed issued an order requiring BCCI to divest itself of the shares of Credit and Commerce American Holdings NV, the holding company of First American Bank, and to cease all banking operations in America.

Eddie George and the Fed agreed on document secrecy

While it appears that British and American authorities have at long last worked out a *modus operandi*, it has taken a long time and generated much friction.

The Bank of England argued that UK banking secrecy laws prevented it handing over all the material it had to the Americans. Under an agreement between Eddie George, deputy Bank of England governor, and the Fed, Bank records and internal memoranda and minutes of BCCI's "college of regulators", although now in the possession of the Americans, will not be made public. Only if they are absolutely necessary will they be produced.

The fallout from the First American saga – quite apart from any criminal proceedings – is likely to be significant. Already the House Banking Committee is concerned about the "the apparent lack of oversight" by the Fed. Henry Gonzalez, Texan Democratic chairman of the committee, has accused it of a "hear no evil, se no evil" approach to regulation. He was referring to the BCCI scandal and to the $3bn illicit loans to Iraq from the Atlanta branch of the Banca Nazionale de Lavoro.

One possible consequence could be to make the Office of Comptroller of the Currency the dominant bank regulator in the US. At present it has priority only for banks operating throughout the entire United States. "This would mean a clear separation between the Federal Deposit Insurance Corporation as the main bank insurer, the Fed becoming responsible for monetary policy and the Office of Comptroller of Currency becoming the main regulatory body," says Ellen Stockdale, director for communications at the OCC.

These issues have been discussed for the past 10 years, but the BCCI saga is bound to add impetus. Banking in America is unlikely to ever be the same again.

1325015-000-12080

PAGE.005
SEP.19.'92 17:00 FROM LEGAT LONDON

MEETING WITH VAZ

Hurd signals willingness to heal any rift with Abu Dhabi

By Ralph Atkins

MR DOUGLAS Hurd, foreign secretary, yesterday signalled the government's willingness to heal any rift with Abu Dhabi over the Bank of Credit and Commerce International affair, and promised it would not block viable plans for a restructuring of the bank.

A visit by Mr Douglas Hogg, Foreign Office minister, to the United Arab Emirates is expected to follow a meeting this month between Mr Hurd and Mr Rashid Abdulleh, UAE foreign minister, in New York.

Mr Hurd's comments came at a private meeting with Mr Keith Vaz, Labour MP for Leicester East, who is lobbying on behalf of BCCI depositors for a restructuring.

Mr Vaz said the foreign secretary had accepted that the closure of BCCI in July had come as a shock to the Abu Dhabi authorities and he was now anxious to minimise the harm to relations with Britain.

The Foreign Office interpretation of the meeting, however, put the emphasis on ensuring that good relations continued, rather than admitting that damage had been caused.

On a possible restructuring, Mr Vaz said Mr Hurd had said the adjournment of winding-up proceedings against BCCI had provided a "window of opportunity".

He interpreted this as a shift in the government's line, citing a letter Mr John Major sent him in July that talked only of a restructuring taking place after liquidation.

"To me it represents the government saying as much as it possibly can say that, if a proposal comes up and it's viable, they will not stand in its way," Mr Vaz said.

Labour and the Liberal Democrats also supported a restructuring, Mr Vaz said. "We have to take this broad political support — because there is broad political support for restructuring — and put it to the Bank of England."

The Foreign Office stressed, however, that the government continued to regard the a possible restructuring as a matter for the Bank of England. There was no question of ministers leaning on Mr Robin Leigh-Pemberton, the Bank governor.

1325015-000-12081

PAGE.006
SEP 13 '92 17:00 FROM LEGAT LONDON

ARRESTS

Bank officials kept incommunicado

By Richard Waters and Richard Tomkins

MOST of the top management of BCCI was held at a secret location in Abu Dhabi last night amid continuing mystery surrounding the reason for their detention.

The arrest of about 30 BCCI officers took investigators, regulators and diplomats in other countries completely by surprise.

The arrests were made without the co-operation of authorities in other countries which have been investigating events surrounding the BCCI collapse.

The emirate's authorities released no information yesterday about the whereabouts of those detained, or whether they had been charged. A relative of one of those arrested said no information had been given and no contact had been allowed with those held.

UK Foreign Office officials confirmed that the Serious Fraud Office had no role in detaining BCCI executives in Abu Dhabi. They said, however, that the British embassy was seeking access to Britons who had been arrested.

Among those understood to have been detained are Mr Swaleh Naqvi, BCCI's former chief executive, and Mr Zafar Iqbal, the man who replaced him last year. Mr Iqbal was himself an Abu Dhabi appointment, after Mr Naqvi had admitted his part in illicit activities at the bank and offered to help the emirate to establish the bank's full position.

Neither Mr Naqvi's lawyer in Washington nor his family in Abu Dhabi appeared to know where Mr Naqvi was or to have had any contact with him.

It emerged that between 12 and 15 of those detained were UK citizens. Their names and passport numbers were supplied to the British consulate in Abu Dhabi, but these were being withheld last night.

The Foreign and Commonwealth Office said that it was taking steps to find out where the British citizens, believed to be of Pakistani origin, were being held and to make sure they were being well treated.

News of the arrests prompted concern that a restructuring of BCCI now looked less likely.

One source close to the restructuring discussions said: "You couldn't relaunch this in a million years, after mass arrests like this."

The sudden arrests on Sunday, which according to one report were followed up by others yesterday, marked a sudden reversal in the public attitude of the Abu Dhabi authorities.

Normally highly secretive, Abu Dhabi took the unusual step soon after the BCCI closure in July of placing full-page newspaper advertisements attacking the decision of foreign regulators to close the bank.

The comprehensive rounding up of top BCCI management suggests now, however, that it places some credence in the regulators' claim that the bank's senior staff colluded in fraud over a prolonged period.

1325015-000-12082

WORLD ROUND-UP

Tokyo envoys call for aid

JAPAN: Foreign embassies affected by the closure of BCCI's Tokyo branch have appealed to the Japanese government for aid, a Foreign Ministry official said. Five embassies have appealed for compensation after their deposits were frozen two months ago, he said.

But the Japanese government has no plans to respond to the appeals, he added. "The identities of the embassies must remain confidential," the official said. "In most cases, though, the missions have opened new accounts in Tokyo and are now receiving money [from their home countries] to meet their costs."

BCCI's Tokyo branch, which ceased operations on July 8, had Y53.7bn from 250 depositors, the majority of them corporations, in March this year.

PERU: A judge has opened court proceedings against former officials of Peru's central bank in connection with BCCI, the government-owned newspaper El Peruano said on Saturday.

It quoted Judge Felipe Villavicencio as saying he had ordered the arrest of Mr Leonel Figueroa, former president of the Central Reserve Bank of Peru, Mr Hector Neyra, former bank general manager and Ms Ana Maria Tenenbaum, former manager of the international operations department.

He said he had also ordered the judicial police to embargo personal assets up to [illegible] (£1.7m), the amount Mr [illegible] Morgenthau, Manhattan [illegible] attorney, alleged Mr [illegible] eroa and Mr Neyra accepted from BCCI in re[illegible] for depositing up to $270m [illegible] reserves.

Mr Delly Malarin, a special prosecutor, announced charges against Mr Figueroa and Mr Neyra last Thursday. They became the first officials or former officials to be charged in the worldwide BCCI scandal. She did not mention Ms Tenenbaum.

Ms Tenenbaum's mother said that her daughter was attending a meeting of an Andean Pact economic group in Quito, Ecuador and was due back on Sunday night.

She said that her daughter had been cited to appear at the attorney general's office on Thursday but that her office had sent a letter saying that she was out of the country.

Ms Tenenbaum's department had approved depositing up to [illegible]100m in BCCI in 1986 and [illegible]87. The board later approved depositing up to $270m in the bank.

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COMMUNICATIONS
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American Embassy
London

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FROM: ALAT [redacted] b6 b7C

TO: [redacted] FBIHQ (EXT. 5594; ROOM 3839; TL#231)

SUBJECT: BCCI

NO. OF PGS. 7 (including cover and last page)

SENDER: [redacted] DATE: Sept 13, 1991

RECD BY: _____ DATE: _____

COMMENTS: Newspaper article

CALLED: [redacted] b6 b7C

By _____ Time 9:20 am

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SEP 13 '92 16:55 FROM LEGAT LONDON

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Hurd gives green light to plans for bank

THE Government will not stand in the way of any plans to relaunch the collapsed Bank of Credit and Commerce International, Douglas Hurd, the Foreign Secretary, said yesterday, *writes Nick Fielding.*

He told a delegation of 10 BCCI employees led by Keith Vaz, the Leicester East MP, who met him for 45 minutes at the Foreign Office yesterday, that the negotiations provided a "window of opportunity" to enable the Bank of England to put together plans.

Mr Hurd, who said he recognised the difficulties created for depositors and staff by the collapse, told the delegation that information was being passed from the Bank to ministers and that the Prime Minister and the Chancellor were being kept fully informed of the negotiations.

The Foreign Secretary will be meeting his United Arab Emirates counterpart at the United Nations at the end of September, where BCCI will be discussed. The delegation impressed upon Mr Hurd the importance of sending a minister to Abu Dhabi to discuss the restructuring plans.

In Abu Dhabi yesterday, the police completed their round-up of top BCCI officials, following more than 30 arrests at the bank's headquarters throughout Sunday. Mr Ajaz Afridi, for example, was arrested at 1am on Monday. A call to the private office of chief executive Zafar Iqbal, who was among those arrested on Sunday, was answered by an official who said "the bank was inoperative at present".

According to sources in London, no one from the Serious Fraud Office was involved in the arrests. A team led by Jerry Ohlson, who is leading the police inquiry into BCCI, left yesterday for the Cayman Islands.

The four-strong team will meet a team from the US Justice Department and the FBI. They will be planning their approach to the Caymans government and hoping to gain access to documents under the control of the liquidators Deloitte Ros Tohmatsu. These are believed to concern BCCI Overseas and International Credit and Investment Co, a BCCI-linked firm.

Fed feels

Nick Fielding reports on how the continuing fallout from the scandal could change the way in which the US banking system is regulated

DURING the past year, as banking regulators in the UK pondered over whether to intervene in the growing turmoil enveloping the now collapsed Bank of Credit and Commerce International, the US Federal Reserve Board played a major, but largely unreported, role in uncovering the full extent of the fraud. It appears, indeed, that American action was instrumental in forcing the Bank of England to consider taking serious action against the rogue bank.

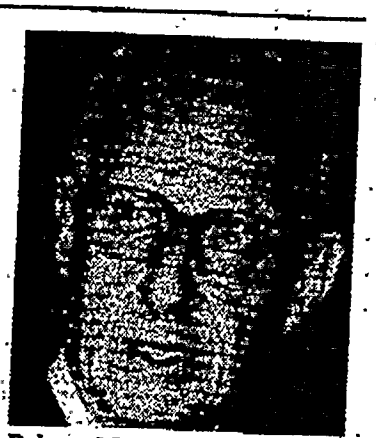
Nevertheless, the Fed is under fire. Although it has been aggressive in comparison with the Bank of England, US legislators feel it should have acted earlier. The impact of the scandal on American banking regulation is likely to be long-term and lead to substantial changes in the way the banking system is structured.

Last week's report by Charles Schumer's House of Representatives Judiciary Committee on federal law enforcement handling of the scandal makes devastating criticisms of the Fed, saying it delayed for two years before acting on strong evidence obtained by an undercover agent. But action in America against BCCI — in the past year at least — has far outstripped that taken in the UK.

In July the Fed announced it had started formal enforcement proceedings against BCCI Holdings (Luxembourg), its two subsidiaries and against nine individuals associated with BCCI, for their part in violating US banking law.

Its 110-page indictment included a $200m (£120m) fine against BCCI and related banks and companies and the permanent barring from any involvement with US banking organisations of nine individuals, who include Agha Hassan Abedi, BCCI's founder, Swaleh Naqvi, former chief executive, and a number of prominent Saudi and Gulf Arab investors in BCCI.

A whole battery of hearings is under way in America, including four grand juries, a Justice Department investigation into the collapsed savings and loan company Centrust (which appears to have been indirectly owned by BCCI), investigations by the superintendents of banks in New York and California, and the Operation C-Chase inquiry involving officers from the US Treasury, the Internal Revenue Service, Customs and the Drug Enforcement Administration. There are also continuing Senate hearings into drug money laundering.



Robert Morgenthau has been tenacious in following the story

In addition, in Miami the government of Panama has filed a suit against BCCI alleging that the bank laundered money stolen by the former dictator Manuel Noriega.

The most dramatic of the Senate hearings to date was that of the subcommittee of the Senate Foreign Relations Committee on terrorism, narcotics and international operations held in Washington on 8 August. BCCI's former chief finance officer, Masihur Rahman, testified in great detail about the bank's crooked operations and about threats to his personal safety by bank staff.

All this activity is taking place in a country in which BCCI hardly had an official presence. Contrast this to the single UK inquiry, headed by Lord Justice Bingham, which is being held in private. The non-statutory inquiry, due to start shortly, will have no powers to compel witnesses to appear nor to subpoena documents and, cloaked in secrecy, is unlikely to produce the kind of revelations that are shaking the American banking world.

At the Rahman hearings, on the other hand, Senator John Kerry, the chief inquisitor, made avail...

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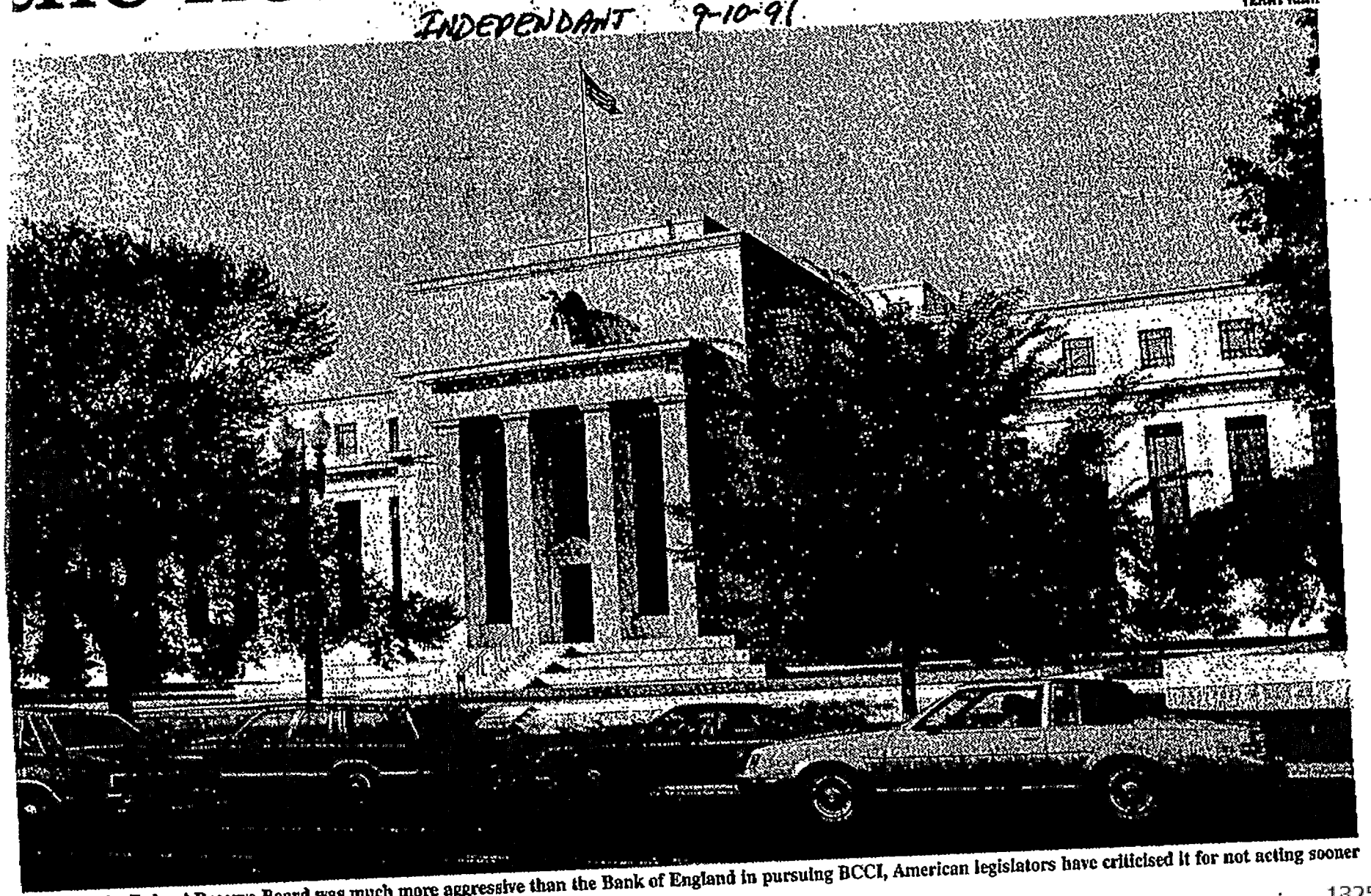
The heat over BCCI saga

INDEPENDANT 9-10-91

TERRY KIRK



Although the Federal Reserve Board was much more aggressive than the Bank of England in pursuing BCCI, American legislators have criticised it for not acting sooner

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nt that allowed the bank to
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r a $15m fine. Early in 1990 Mr
um passed on information to
e Manhattan district attorney,
obert Morgenthau, who, in June
90, convened a grand jury and

began his own investigation into banking irregularities in New York State. Mr Morgenthau has proved to be extremely tenacious in following the BCCI story.

Despite inaction from the Justice Department, following information from "foreign authorities" (probably the government of Abu Dhabi), the Fed also began its own inquiry. Its top lawyer, Virgil Mattingly, has called it "the most extensive formal investigation in my experience".

It appears the Fed, working closely with Mr Morgenthau, knew from late 1990 of the extent of the fraud within BCCI and from December 1990 knew of the whereabouts and contents of the Naqvi files in Abu Dhabi. On 4 January this year the Fed started its formal investigation into BCCI's activity in the US.

The Fed and Morgenthau's interest in BCCI focused on the true ownership of First American Bank, National Bank of Georgia and Independence Bank of Encino, California – all of them, it now transpires, owned through nominees by BCCI.

On 4 March – the same day as the Bank of England instructed Price Waterhouse to begin its section 41 inquiry into BCCI's affairs

Eddie George and the Fed agreed on document secrecy

– the Fed issued an order requiring BCCI to divest itself of the shares of Credit and Commerce American Holdings NV, the holding company of First American Bank, and to cease all banking operations in America.

While it appears that British and American authorities have at long last worked out a *modus operandi*, it has taken a long time and generated much friction.

The Bank of England argued that UK banking secrecy laws prevented it handing over all the material it had to the Americans. Under an agreement between Eddie George, deputy Bank of England governor, and the Fed, Bank records and internal memoranda and minutes of BCCI's "college of regulators", although now in the possession of the Americans, will not be made public. Only if they are absolutely necessary will they be produced.

The fallout from the First American saga – quite apart from any criminal proceedings – is likely to be significant. Already the House Banking Committee is concerned about the "the apparent lack of oversight" by the Fed. Henry Gonzalez, Texan Democratic chairman of the committee, has accused it of a "hear no evil, see no evil" approach to regulation. He was referring to the BCCI scandal and to the $3bn illicit loans to Iraq from the Atlanta branch of the Banca Nazionale de Lavoro.

One possible consequence could be to make the Office of Comptroller of the Currency the dominant bank regulator in the US. At present it has priority only for banks operating throughout the entire United States. This would mean a clear separation between the Federal Deposit Insurance Corporation as the main bank insurer, the Fed becoming responsible for monetary policy and the Office of Comptroller of Currency becoming the main regulatory body," says Ellen Stockdale, director for communications at the OCC.

These issues have been discussed for the past 10 years, but the BCCI saga is bound to add impetus. Banking in America is unlikely to ever be the same again.

1325015-000-12087

EETING WITH VAZ

Hurd signals willingness to heal

By Ralph Atkins

MR DOUGLAS Hurd, foreign secretary, yesterday signalled the government's willingness to heal any rift with Abu Dhabi over the Bank of Credit and Commerce International affair, and promised it would not block viable plans for a restructuring of the bank.

A visit by Mr Douglas Hogg, Foreign Office minister, to the United Arab Emirates is expected to follow a meeting this month between Mr Hurd and Mr Rashid Abdullah, UAE foreign minister, in New York.

Mr Hurd's comments came at a private meeting with Mr Keith Vaz, Labour MP for Leicester East, who is lobbying on behalf of BCCI depositors for a restructuring.

Mr Vaz said the foreign secretary had accepted that the closure of BCCI in July had come as a shock to the Abu Dhabi authorities and he was now anxious to minimise the harm to relations with Britain.

The Foreign Office interpretation of the meeting, however, put the emphasis on ensuring that good relations continued, rather than admitting that damage had been caused.

any rift with Abu Dhabi

On a possible restructuring, Mr Vaz said Mr Hurd had said the adjournment of winding-up proceedings against BCCI had provided a "window of opportunity".

He interpreted this as a shift in the government's line, citing a letter Mr John Major sent him in July that talked only of a restructuring taking place after liquidation.

"To me it represents the government saying as much as it possibly can say that, if a proposal comes up and it's viable, they will not stand in its way," Mr Vaz said.

Labour and the Liberal Democrats also supported a restructuring, Mr Vaz said. "We have to take this broad political support — because there is broad political support for restructuring — and put it to the Bank of England."

The Foreign Office stressed, however, that the government continued to regard the a possible restructuring as a matter for the Bank of England. There was no question of ministers leaning on Mr Robin Leigh-Pemberton, the Bank governor.

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ARRESTS

Bank officials kept incommunicado

By Richard Waters and Richard Tomkins

MOST of the top management of BCCI was held at a secret location in Abu Dhabi last night amid continuing mystery surrounding the reason for their detention.

The arrest of about 30 BCCI officers took investigators, regulators and diplomats in other countries completely by surprise.

The arrests were made without the co-operation of authorities in other countries which have been investigating events surrounding the BCCI collapse.

The emirate's authorities released no information yesterday about the whereabouts of those detained, or whether they had been charged. A relative of one of those arrested said no information had been given and no contact had been allowed with those held.

UK Foreign Office officials confirmed that the Serious Fraud Office had no role in detaining BCCI executives in Abu Dhabi. They said, however, that the British embassy was seeking access to Britons who had been arrested.

Among those understood to have been detained are Mr Swaleh Naqvi, BCCI's former chief executive, and Mr Zafar Iqbal, the man who replaced him last year. Mr Iqbal was himself an Abu Dhabi appointment, after Mr Naqvi had admitted his part in illicit activities at the bank and offered to help the emirate to establish the bank's full position.

Neither Mr Naqvi's lawyer in Washington nor his family in Abu Dhabi appeared to know where Mr Naqvi was or to have had any contact with him.

It emerged that between 12 and 15 of those detained were UK citizens. Their names and passport numbers were supplied to the British consulate in Abu Dhabi, but these were being withheld last night.

The Foreign and Commonwealth Office said that it was taking steps to find out where the British citizens, believed to be of Pakistani origin, were being held and to make sure they were being well treated.

News of the arrests prompted concern that a restructuring of BCCI now looked less likely.

One source close to the restructuring discussions said: "You couldn't relaunch this in a million years, after mass arrests like this."

The sudden arrests on Sunday, which according to one report were followed up by others yesterday, marked a sudden reversal in the public attitude of the Abu Dhabi authorities.

Normally highly secretive, Abu Dhabi took the unusual step soon after the BCCI closure in July of placing full-page newspaper advertisements attacking the decision of foreign regulators to close the bank.

The comprehensive rounding up of top BCCI management suggests now, however, that it places some credence in the regulators' claim that the bank's senior staff colluded in fraud over a prolonged period.

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WORLD ROUND-UP

Tokyo envoys call for aid

JAPAN: Foreign embassies affected by the closure of BCCI's Tokyo branch have appealed to the Japanese government for aid, a Foreign Ministry official said. Five embassies have appealed for compensation after their deposits were frozen two months ago, he said.

But the Japanese government has no plans to respond to the appeals, he added. "The identities of the embassies must remain confidential," the official said. "In most cases, though, the missions have opened new accounts in Tokyo and are now receiving money [from their home countries] to meet their costs."

BCCI's Tokyo branch, which ceased operations on July 8, had Y53.7bn from 250 depositors, the majority of them corporations, in March this year.

PERU: A judge has opened court proceedings against former officials of Peru's central bank in connection with BCCI, the government-owned newspaper El Peruano said on Saturday.

It quoted Judge Felipe Villavicencio as saying he had ordered the arrest of Mr Leonel Figueroa, former president of the Central Reserve Bank of Peru, Mr Hector Neyra, former bank general manager and Ms Ana Maria Tenenbaum, former manager of the international operations department.

He said he had also ordered the judicial police to embargo personal assets up to $3m (£1.7m), the amount Mr Robert Morgenthau, Manhattan District Attorney, alleged Mr Figueroa and Mr Neyra had accepted from BCCI in return for depositing up to $270m of Peru's reserves.

Ms Nelly Malarin, a special prosecutor, announced charges against Mr Figueroa and Mr Neyra last Thursday. They became the first officials or former officials to be charged in the worldwide BCCI scandal. She did not mention Ms Tenenbaum.

Ms Tenenbaum's mother said that her daughter was attending a meeting of an Andean Pact economic group in Quito, Ecuador and was due back on Sunday night.

She said that her daughter had been cited to appear at the attorney general's office on Thursday but that her office had sent a letter saying that she was out of the country.

Ms Tenenbaum's department had approved depositing up to $100m in BCCI in 1986 and 1987. The board later approved depositing up to $270m in the bank.

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American Embassy
London

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Hidden Interests

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To record these Articles
9/18/91

BCCI executives to be charged

By Richard Donkin in Abu Dhabi and Alan Friedman in Washington

CRIMINAL charges are expected to be brought within days by the Abu Dhabi government against some of the most senior bankers in the Bank of Credit and Commerce International.

The decision by the emirate, BCCI's majority shareholder, to press charges emerged as eight more of the 32 remaining BCCI executives detained since last Sunday in the Abu Dhabi Police Officers' Club were released.

The move to charge BCCI top managers may effectively quash efforts by the US Justice Department and the office of Mr Robert Morgenthau, the Manhattan district attorney, to have Mr Swalen Naqvi, the former chief executive officer of BCCI, handed over to them.

The US officials made a joint approach to Abu Dhabi on Tuesday through diplomatic channels after hearing of the police action.

The charges are expected to emerge at a time when a team of consultants and accounts working for the Abu Dhabi government finalise an outline of fresh restructuring proposals for the bank.

The outline proposal would provide a working draft for a final plan to be announced in time for the December 2 deadline for restructuring proposals imposed by the High Court in London.

None of those released in the early hours of yesterday morning was said to have been closely questioned. All but one of those allowed to go free since the detentions took place are from the second tier of BCCI management or personal assistants to executives. The only senior executive among those held to be released to date is Mr Mazhar Abbas, head of personnel at BCCI.

In Washington, it emerged that the committee of central bank supervisors chaired by Mr Gerald Corrigan, president of the Federal Reserve Bank of New York, is planning to tighten international bank regulation in the wake of the BCCI scandal.

Mr Corrigan, who came under sharp criticism yesterday for having moved too slowly on the BCCI affair, said during an appearance before the House of Representatives Banking Committee that BCCI was discussed last week by members of the Basle Supervisors Committee.

He hoped recommendations on how to tighten international bank supervision would be made by the committee's December meeting.

Sept 14, 1991
"Financial Times"

Garcia agrees to face questions

PERU'S ex-president Alan Garcia has agreed to answer questions from a Peruvian congressional panel examining his alleged enrichment in office. Yesterday he walked out of the congressional investigation and his agreement to testify came as panel members met to determine if he had broken the law by quitting the hearing.

"My lawyer and I have showed up at the usual hour of the meeting of the commission . . . to continue testifying or answering questions by its members," Mr Garcia said in a chamber of congress where he presented his testimony for 10 hours over three days earlier this week.

"My presence here proves my willingness to continue participating, clarifying, explaining how the country is being ridiculed by these issues of BCCI and Mirage jet deals without specifying what crimes have been committed."

He was referring to allegations that he was linked to the case of three former officials of his government who have been charged with bribe-taking from BCCI and reports that the bank brokered the sale to third countries of French-made Mirage jets.

Mr Garcia, who was president from 1985 to 1990, walked out of the panel on Wednesday saying it had already found him guilty and would not allow his lawyer to speak.

He said the constitution guaranteed the right to defence by a lawyer, but the panel said the president was not on trial.

SEP-18-1991 06:25 FROM-LEGAL LONDON 1 P.04
SEP 18 '91 16:48 FROM LEGAL LONDON 202 324 4705 PAGE.004
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SEP-18-1991 08:25 FROM FBIHQ 9HED 1 TO P.03
SEP. 18 '92 16:48 FROM LEGAT LONDON TO 2023243105 PAGE.003
SEP. 18 '92 16:18 PAGE.003

"Financial Times" September 14, 1991

PANAMA

Probe into dealings is ordered

PANAMA'S Congress, hoping to uncover more about the activities of BCCI, will form a commission to probe the bank's dealings in the country.

Lawmakers overwhelmingly backed a proposal to probe BCCI's two Panamanian branches. Legislators, suspecting BCCI of shady practices in Panama, say there must be more information than has so far been revealed by the banking commission and the attorney-general's office.

"It's necessary . . . to investigate the real causes of the closure of BCCI in Panama and its involvement in the different criminal investigations cited worldwide," legislator Mr Miguel Bush said in his proposal to set up the commission.

The congressional probe into BCCI came in a week of heightened attention to the bank's dealings in Panama.

Mr Rogelio Cruz, the attorney-general, whose office has said little about the bank scandal, announced on Thursday that seven questionable BCCI loans amounting to more than $20m were under investigation.

Mr Cruz, who would not give any further details about the loans, made the announcement after giving a Peruvian delegation permission to review accounts deposited by BCCI in the Panama City branch of Swiss Bank, where bribe money was allegedly paid to Peruvian central bank officials.

Former Peruvian central bank officials implicated in the dealings have denied any wrongdoing.

FBI/DOJ
1325015-000-1004

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Date: 14 SEPT 92
Edition:
FINANCIAL TIMES
Title:
BCCI
Character
or
Classification:
Submitting Office:

Indexing:

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SEP 18 '92 16:47 LEGAT LONDON

US HOUSE BANKING COMMITTEE HEARINGS

Eight inquiries failed to see First American owner shi

[illegible] Federal Reserve [illegible] aware of the Fed's concerns about [illegible] Bank of Richmond – BCCI's involvement with the Middle [illegible] uncover Eastern investors who bought the [illegible] Credit and Williamsburg bank in 1985.

[illegible] During this period, the Reserve [illegible] inspections found compliance [illegible] with the conditions and commitments [illegible] the original application and no problems [illegible] Mr Black said.

[illegible] Robert Black, Richmond Fed president, [illegible] reports of our first [illegible] examinations nor any of the [illegible] examination prepared by [illegible] other federal and state regulators sent [illegible] to the House Banking Committee [illegible] criticisms regarding [illegible] the examinations were well [illegible]

[illegible] this common ownership," while [illegible] significant, did not provide grounds [illegible] for any action on the part of the Richmond Reserve Bank or any reason [illegible] mendation, or its forwarding by the [illegible] board, he said.

[illegible] the Fed discovered that BCCI had [illegible] and the First American purchase [illegible] in late 1990 from a BCCI audit report. [illegible] Federal Reserve has charged [illegible] with secretly owning more than [illegible] of the shares in First American's parent Credit and Commerce American Holdings.

It said the [illegible] acted on [illegible] for BCCI, which [illegible] buy the shares [illegible] the under- [illegible] ling that [illegible] would [illegible] repeat. Mr Black said that [illegible] discovery. The Richmond Fed [illegible] examined First American and [illegible] has not discovered any abuses [illegible] American bank or irregularities [illegible] practices.

"[illegible] connection [illegible] the bank's [illegible] practices [illegible] membership [illegible] by [illegible] been uncovered," he said.

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Date: 16 SEPT 91
Edition: FINANCIAL TIMES

Title: BCCI

Character or Classification:
Submitting Office:

Indexing:

b3
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Nigeria hit by $200m fraud at BCCI arm

By William Keegan

The Bank of Credit and Commerce International defrauded Nigeria of up to $200m (£110m) during 1989 and 1990, officials and backers of the bank have told the Financial Times.

Executives in BCCI Limited (Nigeria) operated a variety of scams with the connivance of colleagues in BCCI Nigeria, which is 60 per cent owned by the Nigerian government.

A London-based commodity trader who found his account with BCCI was paid Dfl 1m to refinish his fitness after incurring losses – the result of fraud, according to a BCCI official.

The commodity trader, who has asked not to be named, confirmed that a payment was made to him by BCCI (N).

BCCI officials say the profit from the fraud, which was particularly complicated, was divided between the bank and the employees involved. One senior executive, according to a BCCI official, received $1m. All are now pensioners and millionaires. No other bank can claim to many millionaires under one roof.

BCCI officials estimate the bank made an illegal profit of $150m-$200m between 1988 and 1990 but that the frauds were probably in operation from 1982. The Central Bank of Nigeria told the central auditor it was aware of the losses but would be looking into its books for "final evidence".

According to the commodity trader, whose company was [illegible] in many business deals with Nigerians in London, he was approached by BCCI (N) in early 1989. The export to Nigeria of vehicles spare parts.

The Central Bank of Nigeria could take up to six months to process letters of credit and make available foreign exchange for the payment of the parts. BCCI would tell both the Nigerian importer and the foreign exporter, without the knowledge of the other, for funds to cover interest payments on the money set aside [illegible]

Geller's hearing starts today

Mr Theodore Geller, chairman of Bank of Credit and Commerce International (Overseas), the Cayman Islands subsidiary of the troubled international bank, is to appear before the Cayman Islands Monetary Authority today for a hearing into the bank's affairs.

Mr Geller, who is also chairman of BCCI (Overseas), has been asked to appear before the authority to explain why it should not revoke the bank's licence to operate in the Cayman Islands. The hearing is expected to last two days.

Mr Geller has been chairman of BCCI (Overseas) since it was established in 1984. It has assets of $1.2bn and 11 branches.

ment, which had a virtual monopoly over foreign exchange as a result of the country's lucrative oil earnings, authorised all exchange transactions. BCCI would then approach the central bank with a request to remit to BCCI in London foreign exchange to cover the letter of credit. On the latter payment cleared to the importer. The central bank would not be told that the document had also been cleared [illegible] on the letter of credit. BCCI now has outstanding interest rates over all the commissions of credit.

In a more serious and complex fraud, BCCI officials have confirmed that a secret account was operated within BCCI-N under the exclusive control of the expatriate management and cleared by two executives in London without [illegible] officials in the central bank.

The Nigerian central bank [illegible] exchange [illegible] customers to export the money to London for their own benefit without the knowledge of account holders. In addition, the central bank would be told [illegible] funds by BCCI-N when applying the difference between the official and the black market exchange rate for the funds. At periods during the mid, the [illegible] black market exchange rate of the Nigerian currency was over two times [illegible] official rate. The bank [illegible] to do this

Continued on Page 7

Nigeria hit

Continued from Page 1

transfer illegally to personal funds to London, above the knowledge of the Nigerian authorities. Trade officials were told by expatriate executives that the transfer would be possible, but only at the black market rate.

In a typical deal, the client would, say, pay BCCI-N naira 1.6m and receive in his London account $1m. BCCI-N executives would keep the naira 1.6m in their secret account and then conduct a fraud through which they would receive permission from the central bank to transfer the money to London at the official exchange rate. This would give them $100, twice the sum they had initially paid the BCCI-N client. BCCI and their officials would pocket the difference.

The Nigerian central bank would make foreign exchange available for the scheme after BCCI-N executives claimed the sums involved were client interest payments on letters of credit. The central bank would ask for only an oral assurance from the expatriate executives that the claims were genuine, the BCCI officials say.

According to BCCI officials, the Nigerian shareholders became increasingly disenchanted with the foreign management, resulting in the cancellation of the management contract at the end of last year.

BCCI-N, which was owned 60 per cent by Nigerian shareholders and 40 per cent by BCCI, changed its name in July to African Bank International. BCCI retains its shareholding but ABI plans either to find a new foreign partner or arrange the sale of the shares on the foreign market.

FBI/DOJ

American Embassy
London

FAX: 71-499-7944

UNCLASSIFIED

FROM: ALAT [redacted]

TO: [redacted] FBIHQ (EXT. 5594; ROOM 3839; TL#231)

SUBJECT: BCCI

NO. OF PGS. SIX (including cover and last page)

SENDER: [redacted] DATE: September 18, 1991

RECD BY: _____ DATE: _____

COMMENTS: Newspaper articles re subject matter.

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Requested: LegAT London

BCCI

1325015-000-12097

Indexing:

BCCI executives to be charged

By Richard Donkin in Abu Dhabi and Alan Friedman in Washington

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None of those released in the early hours of yesterday morning was said to have been closely questioned. All but one of those allowed to go free since the detentions took place are from the second tier of BCCI management or personal assistants to executives. The only senior executive among those held to be released to date is Mr Mazhar Abbas, head of personnel at BCCI.

In Washington, it emerged that the committee of central bank supervisors chaired by Mr Gerald Corrigan, president of the Federal Reserve Bank of New York, is planning to tighten international bank regulation in the wake of the BCCI scandal.

Mr Corrigan, who came under sharp criticism yesterday for having moved too slowly on the BCCI affair, said during an appearance before the House of Representatives Banking Committee that BCCI was discussed last week by members of the Basle Supervisors Committee.

He hoped recommendations on how to tighten international bank supervision would be made by the committees December meeting.

The flow host the Shs (£5. tion

SEP-18-1991 06:26 FROM FBI HQ SWED 1 TO P.05
SEP 18 92 18:43 FROM LEGAL LONDON
PAGE.005
1325015-000-12098

P.04

Sept 14, 1991
"Financial Times"

Garcia agrees to face questions

PERU'S ex-president Alan Garcia has agreed to answer questions from a Peruvian congressional panel examining his alleged enrichment in office. Yesterday he walked out of the congressional investigation and his agreement to testify came as panel members met to determine if he had broken the law by quitting the hearing.

"My lawyer and I have showed up at the usual hour of the meeting of the commission . . . to continue testifying or answering questions by its members," Mr Garcia said in a chamber of congress where he presented his testimony for 10 hours over three days earlier this week.

"My presence here proves my willingness to continue participating, clarifying, explaining how the country is being ridiculed by these issues of BCCI and Mirage jet deals without specifying what crimes have been committed."

He was referring to allegations that he was linked to the case of three former officials of his government who have been charged with bribe-taking from BCCI and reports that the bank brokered the sale to third countries of French-made Mirage jets.

Mr Garcia, who was president from 1985 to 1990, walked out of the panel on Wednesday saying it had already found him guilty and would not allow his lawyer to speak.

He said the constitution guaranteed the right to defence by a lawyer, but the panel said the president was not on trial.

SEP-18-1991 06:25 FR FBIHQ SWBD 1 TO

1325015-000-12099

SEP 18 16:48 FROM LEGAT LONDON PAGE.003
SEP. 18 '92 16:48 FROM LEGAT LONDON PAGE.003

"Financial Times"
September 14, 1991

PANAMA

Probe into dealings is ordered

PANAMA'S Congress, hoping to uncover more about the activities of BCCI, will form a commission to probe the bank's dealings in the country.

Lawmakers overwhelmingly backed a proposal to probe BCCI's two Panamanian branches. Legislators, suspecting BCCI of shady practices in Panama, say there must be more information than has so far been revealed by the banking commission and the attorney-general's office.

"It's necessary . . . to investigate the real causes of the closure of BCCI in Panama and its involvement in the different criminal investigations cited worldwide," legislator Mr Miguel Bush said in his proposal to set up the commission.

The congressional probe into BCCI came in a week of heightened attention to the bank's dealings in Panama.

Mr Rogelio Cruz, the attorney-general, whose office has said little about the bank scandal, announced on Thursday that seven questionable BCCI loans amounting to more than $20m were under investigation.

Mr Cruz, who would not give any further details about the loans, made the announcement after giving a Peruvian delegation permission to review accounts deposited by BCCI in the Panama City branch of Swiss Bank, where bribe money was allegedly paid to Peruvian central bank officials.

Former Peruvian central bank officials implicated in the dealings have denied any wrongdoing.

FBI/DOJ

1225015-000-12100

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 05-24-2018 BY [redacted]

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.)

Date: 14 SEPT 91
Edition:
FINANCIAL TIMES

Title:
BCCI

Character or Classification:
Submitting Office:

Indexing:

b6
b7C
b3
b7E

US HOUSE BANKING COMMITTEE HEARINGS

Eight inquiries failed to see First American ownershi

The US Federal Reserve, aware of the Fed's concerns about BCCI's involvement with the Middle Eastern investors who bought the Washington bank in 1982.

During this period, the Reserve Bank's inspections found compliance with the conditions and commitments of the original application and no violations of the law, Mr Black said.

"Neither the reports of our first American inspections nor any of the reports of examination prepared by other federal and state regulators contained comments or criticisms regarding the involvement of individuals or companies in the ownership of First American by or improper payments to BCCI," Mr Black said.

Since 1982, there were no dividend payments to the investors who injected more than $60m into First American, he said.

Mr Black told the committee that although the Middle Eastern investors who bought First American in 1982 also owned stock in BCCI, US law does not prohibit common ownership of banks and non-banks by individuals as it does for companies.

"This common ownership," while significant, did not provide grounds for any action on the part of the Richmond Reserve Bank or any recommendation by us for action by the board," he said.

The Fed discovered that BCCI had financed the First American purchase in late 1980 from a BCCI audit report.

The Federal Reserve has charged BCCI with secretly owning more than 60 per cent of the shares in First American's parent, Credit and Commerce American Holdings.

It said the investors acted as a for BCCI, which lent the m buy the shares with the unde ing that the loans would r repaid. Mr Black said that sin discovery, the Richmond Fe examined First American and has not discovered any abuse American bank or irregular practices.

"Simply put, no connection b the banks' lending practices a unauthorised ownership by B been uncovered," he said.

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ALL INFORMATION CONTAINED
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DATE 05-24-2018 BY [redacted]

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Nigeria hit by $200m fraud at BCCI arm

By William Keeling

THE Bank of Credit and Commerce International defrauded Nigeria of up to $200m (£118m) between 1985 and 1987, clients and officials of the bank have said.

Executives in BCCI's London office co-ordinated a variety of frauds with the connivance of colleagues in BCCI-Nigeria working for the affiliate under a management contract.

A London-based commodity trader who traded with Nigeria and who held his account with BCCI was paid $6m to maintain his silence after incurring losses as a result of fraud, according to a BCCI official.

The commodity trader, who has asked not to be named, confirmed that a payment was made to him by BCCI.

BCCI officials say the profit from the frauds, which were particularly complicated, was divided between the bank and the employees involved. One senior executive, according to a BCCI official, boasted: "All our star performers are millionaires. No other bank can claim so many millionaires under one roof."

BCCI officials estimate the bank made an illegal profit of $150m-$200m between 1985 and 1987 but add that the frauds were probably in operation from 1982. The Central Bank of Nigeria said the central authorities were not aware of the issue but would be looking into its books for fraud evidence.

According to the commodity trader, whose company was registered in Jersey before it went into liquidation in 1988, this is how one fraud worked:

BCCI would issue a letter of credit for, say, the export to Nigeria of vehicle spare parts.

The Central Bank of Nigeria could take up to six months to process letters of credit and make available foreign exchange for the payments of the parts. BCCI would ask both the Nigeria importer and the foreign exporter, without the knowledge of the other, for funds to cover interest payment, which has a virtual monopoly over foreign exchange as a result of the country's lucrative oil earnings, authorised all exchange transactions. BCCI would then approach the central bank with a request to release to BCCI in London foreign exchange to cover the letter of credit and the interest payment charged to the importer. The central bank would not be told that the exporter had also been charged interest on the letter of credit. BCCI were thus earning interest twice over on the same letter of credit.

In a more serious and complex fraud, BCCI officials have confirmed that a secret account was operated within BCCI-N under the exclusive control of the expatriate management and directed by top executives in London without the knowledge, the officials insist, of local Nigerian staff.

Expatriate managers fed a substantial portion of local currency profits made by BCCI-N into this secret account and then used customer accounts to divert the money to London for their own benefit without the knowledge of account holders. In addition, the secret account was used to hold funds made by BCCI-N when exploiting the difference between the official and the black market exchange rate for the naira. At periods during the 1980s, the black market exchange rate for the Nigerian currency was [illegible] the official rate

Gates's hearing starts today

Mr Robert Gates, President Bush's choice as the next director of the Central Intelligence Agency, will today seek to persuade senators he is the right man to be America's spymaster. He will be questioned about several big scandals of the 1980s, including the BCCI affair. Page 4

Date: 16 SEPT 91
Edition: FINANCIAL TIMES
Title: BCCI
Character or Classification:
Submitting Office:
Indexing:

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Nigeria hit

Continued from Page 1

wanted illegally to repatriate personal funds to London, without the knowledge of the Nigerian authorities. These clients were told by expatriate executives that the transfer would be possible, but only at the black market rate.

In a typical deal, the client would, say, pay BCCI-N naira 1,000 and receive in his London account $500. BCCI-N executives would keep the naira 1,000 in their secret account and then conduct a fraud through which they would receive permission from the central bank to transfer the money to London at the official exchange rate. This would give them $1000, twice the sum they had initially paid the BCCI-N client. BCCI and their officials would pocket the difference.

The Nigerian central bank would make foreign exchange available for the transfer after BCCI-N executives claimed the sums involved were client interest payments on letters of credit. The central bank would ask for only an oral assurance from the expatriate executives that the claims were genuine, the BCCI officials say.

According to BCCI officials, the Nigerian shareholders became increasingly disenchanted with the foreign management, resulting in the cancellation of the management contract at the end of last year.

BCCI-N, which was owned 60 per cent by Nigerian shareholders and 40 per cent by BCCI, changed its name in July to African Bank International. BCCI retains its shareholding but ABI plans either to find a new foreign partner or arrange the sale of the shares on the foreign market.

FBI/DOJ

1325015-000-12102

11/15/91

163-91
418

Director Sessions:

RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

As you are aware, on 2/7/91, WMFO initiated a financial institution fraud investigation based on a criminal referral from the Board of Governors of the Federal Reserve System (BGFRS) alleging that false and fraudulent statements had been made concerning the Bank of Credit and Commerce International's (BCCI) ownership and control of Credit and Commerce American Holdings (CCAH), the parent-holding company of First American Bank Shares (FABS). FABS is the largest bank-holding company in the Washington, D.C. area, with $11.5 billion in assets, and controls banks in five other states.

On 5/21/91, WMFO received three additional criminal referrals from the BGFRS concerning BCCI's use of Saudi Arabian businessman Ghaith Pharaon as a nominee in the purchases of the National Bank of Georgia, Atlanta, Georgia, and the Independence Bank of Encino, California, and alleged false statements made to the BGFRS concerning the ownership and control of these two banks. Additionally, investigation at Miami, Florida, indicated that Pharaon was involved in fraudulent securities transactions at Centrust Savings Bank, Miami, Florida.

WMFO has been investigating this matter in conjunction with criminal and civil Attorneys from the U.S. Attorney's Office for the District of Columbia, Washington, D.C. (DOCWDC), and the Fraud Section, Department of Justice. During the week of 11/11/91 - 11/15/91, evidence was presented to a Federal grand jury, DOCWDC, and a three-count indictment is scheduled to be returned on 11/15/91.

The indictment charges BCCI Holdings (Luxembourg), S.A.; Bank of Credit and Commerce International S.A.; Bank of Credit and Commerce International (Overseas) Limited; International Credit and Investment Company (Overseas) Limited; Agha Hasan Abedi; Swaleh Naqvi; and Ghaith Pharaon with violation of Title 18 USC Section 371 (Conspiracy), 1343 (Wire Fraud), and 1962(d) (Racketeering Conspiracy). Abedi was the founder of BCCI and Naqvi was the number two man at BCCI and took over control after Abedi's illness in 1983.

296-WF-171999-187

The indictment alleges that the defendants conspired to defraud the United States, in particular the BGFRS, the Federal Deposit Insurance Corporation (FDIC), the Federal Home Loan Bank Board and the Federal Savings and Loan Insurance Corporation by obstructing the ability of these Agencies to conduct their regulatory functions in regulating and supervising activities of

1 - [redacted]
1 - [redacted]
1 - Mr. Baker
1 - Mr. Potts
DRW:drw/vf (12)

1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - Special Assistants, CID

1 - [redacted]
1 - [redacted]

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1325015-000-12112

the various BCCI entities and their United States branches and/or agencies. The indictment further charges that the defendants devised a scheme to defraud and to obtain insurance protection by the FDIC concerning Independence Bank, Encino, California, as well as a scheme to defraud purchasers of subordinated debentures issued by Centrust Savings Bank, Miami, Florida. Additionally, the indictment charges that the defendants acted as part of a racketeering enterprise involving the unlawful control, operation, and manipulation of United States financial institutions and fraud against the United States Federal bank regulatory agencies.

The indictment incorporates forfeiture provisions concerning the proceeds which the defendants obtained directly or indirectly from their racketeering activity.

The Department of Justice will be holding a press conference at 2:30 p.m. today to announce this indictment. The FBI will be represented by DAD Larry A. Potts.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

W. M. Baker

11/15

1325015-000-12113

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DATE 06-04-2018 BY [redacted]

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CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 8/19/91

TO: DIRECTOR, FBI
(ATTN: OLIA; CID, WHITE COLLAR CRIME SECTION
ATTENTION ASSISTANT SECTION CHIEF [redacted]

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FROM: LEGAT, LONDON [redacted]

SUBJECT: BANK OF CREDIT & COMMERCE (BCCI);
FPC - GCM
OO: FBIHQ

REQUEST OF THE BUREAU

FBIHQ is requested to approve a long-term TDY Special Agent to London on the basis of facts set forth in this airtel. U. S. Embassy, London, supports Legat's recommendation.

BRIEF CHRONOLOGY OF EVENTS IN LONDON CONCERNING BCCI INVESTIGATION

On July 5, 1991, the Bank of England closed down the headquarters and offices of the Bank of Credit & Commerce. BCCI was operating in 72 countries with its financial headquarters located in London on Leadenhall Street.

296-WF-171944-187X2

Unrelated but coincidental to the July 5, 1991 closure, Special Agents from Washington Metropolitan Field Office (WMFO), accompanied by a DOJ Fraud Attorney and an Assistant United States Attorney (AUSA) out of the United States District Court (USDC), Washington, D.C., were in London July 8, 1991, to interview witnesses consisting of numerous BCCI executives concerning their knowledge of CLARK CLIFFORD [redacted] and BCCI's involvement with First American Bank and other matters.

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(4) - Bureau (TRANSMITTED BY FACSIMILE)
(1 - OLIA)
(2 - CID, WCCS, ATTN: ASC [redacted]
1 - London
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(5)

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SEP 6 1991

Approved: _____ Transmitted _____ Per _____
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29-HQ-116176

Read 9/9/91 DR

1325015-000-12139

[redacted] b3 b7E

[redacted] b7D

[redacted] b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

On August 12 - 13, 1991, meetings were held in Washington, D.C., with the strong recommendation and support of Legat, London, and with all the FBI investigative divisions and Headquarters' personnel having any involvement with BCCI. It was quickly recognized that a myriad of problems existed and that a full-time FBIHQ Supervisory Special Agent (SSA) would be required to coordinate the U.S. aspects of this investigation from a Headquarters perspective.

1325015-000-12140

[redacted] b3 b7E

Meetings were also held with DOJ personnel who at present are formulating a prosecutive plan for the U.S. investigations that will stress DOJ and USA coordination on all levels and with all Federal criminal investigative entities.

[redacted] b6 b7C b7D

[redacted] b7D

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[redacted] b6 b7C b7D

1325015-000-12141

12/5/91

Director Sessions:

RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

Attached article from The Wall Street Journal dated 11/27/91, alleged "Sen. Hatch Apparently Had Links to BCCI in Late 1980s." A subsequent article from The New York Times dated 11/28/91 (attached) provided further clarification of Senator Hatch's alleged BCCI ties.

The Wall Street Journal article noted that Monzer Hourani, allegedly a friend of Hatch's, had said in an interview televised on NBC Nightly News on 11/26/91, that Senator Hatch had told him in 1989 that he knew people at the Bank of Credit and Commerce International (BCCI) and that he might be able to put in a good word with them for Mr. Hourani. The article also noted that Senator Hatch had several meetings with Mohammed Hammoud, "an alleged front man for BCCI Holdings." According to this article, Hourani's statement differs from prior statements allegedly made by Senator Hatch concerning his prior relationship with persons connected to BCCI.

On 12/2/91, the Fraud Section, Department of Justice (DOJ), requested that a WMFO Agent and a DOJ Attorney interview Senator Hatch concerning the information contained in these news articles.

[redacted] has previously provided information to FBI, Houston concerning captioned matter. On 11/27/91, [redacted] was interviewed by FBI, Houston re [redacted]

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[redacted]

2 - Enclosures (2)
1 - [redacted]
1 - [redacted]
1 - Acting AD, Rm. 5012
1 - Mr. Potts
1 - [redacted]

1 - [redacted]
1 - [redacted]
1 - Special Assistants, CID
1 - [redacted]
1 - [redacted]

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DRW:drw/vf (12)
DRW

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FOI/PA
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Civil Action# 15-cv-01303-LL

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Memorandum

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ADD Inv. _____
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Insp. _____
Intell. _____
Lab. _____ b6
Legal Coun. _____ b7C
Rec. Mgnt. _____
Tech. Servs. _____
Training _____
Cong. Affs. Off. _____
Off. of EEO _____
Off. Liaison & Int. Affs. _____
Off. of Public Affs. _____
Telephone Rm. _____
Director's Sec'y _____

To : Mr. [redacted] Date 2/27/92

From : [redacted]

Subject : REQUEST FOR FOREIGN TRAVEL,
(Hidden Interest)

PURPOSE: To request authorization for the following Special Agents (SAs) to travel to Georgetown, Grand Cayman, in the West Indies, to review and analyze documents in a financial institution fraud (FIF) matter:

Agent	Field Office	Dates of Travel
[redacted]	Atlanta	3/4 - 13/92
	WMFO	3/8 - 21/92
	WMFO	3/8 - 21/92
	WMFO	3/22 - 4/3/92
	WMFO	3/22 - 4/3/92

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b7C

RECOMMENDATION: That the above-named SAs be authorized to travel to Georgetown, Grand Cayman.

APPROVED:

Director _____	Adm. Servs. _____	Laboratory _____	Off. of Liaison & Int. Affs. _____
Exec. Dir. _____	Crim. Inv. _____	Legal Coun. _____	Off. of Public Affs. _____
ADD-Adm. _____	Ident. _____	Tech. Servs. _____	
ADD-Inv. _____	Info. Mgmt. _____	Training _____	
	Inspection _____	Cong. Affs. Off. _____	
	Intell. _____	Off. of EEO _____	

DETAILS: The WMFO, in conjunction with, among others, the Atlanta Division, is involved in the investigation of Major Case #38, "Hidden Interests," regarding the international scandal of the Bank of Credit and Commerce International (BCCI).

Department of Justice (DOJ) attorneys have successfully negotiated with the government of the Cayman Islands and with the court-appointed liquidators of BCCI to allow copying of a large mass of BCCI documents housed in three locations in Georgetown, Grand Cayman. FBI Agents are needed to assist DOJ attorneys and other DOJ personnel in determining which documents are of evidentiary value. The documents are housed at two office locations and a warehouse. DOJ intends to maintain a presence there until the task is done. 29B-WF-171794-200

SACs, WMFO and Atlanta, and DOJ Fraud Section, concur with this travel.

1 - Mr. [redacted]
1 - Mr.
1 - Mr.
1 - Mr.

1 - Mr. [redacted]
1 - Mr.
1 - Mr.
1 - Mr.

1 - Mr. [redacted]

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LRS:vf (10)

(Continued-Over)

29-HQ-116176

1325015-000-12781
FBI/DOJ

Memorandum from [redacted] to Mr. [redacted] b6 b7C
RE: Request for Foreign Travel

[redacted] DOJ, Office of International Affairs, and [redacted] Department of State, Citizens Consular Services, concur with this travel. b6 b7C

SSA [redacted] Miami Division, handles foreign liaison with the West Indies, and he has obtained host country clearance through [redacted] of the British Embassy in Washington, D.C. This travel is being coordinated with the Office of the Governor of the Cayman Islands. b6 b7C

The total cost of travel for these Agents is approximately $20,000.

1325015-000-12782

[redacted] b7D

ON JANUARY 30, 1992, DOJ ATTORNEY [redacted] CALLED b6 b7C
ASSISTANT LEGAL ATTACHE (ALAT) [redacted], AND IN DISCUSSING
THE ABOVE TRAVEL INDICATED THAT HE MAY HAVE TO POSTPONE HIS
TRAVEL UNTIL MARCH BECAUSE OF FAMILY REASONS AND WOULD LIKE TO
TRAVEL WITH SA [redacted] OF LA ON THE INDEPENDENCE BANK
INVESTIGATION. LEGAT, LONDON, HAS NO OBJECTION IF [redacted]
DELAYS HIS TRAVEL UNTIL MARCH, AS NUMEROUS INTERVIEWS HAVE BEEN
REQUESTED BY WMFO AND DOJ ATTORNEY [redacted], SEVERAL OF THE
INTERVIEWEES ARE OF INTEREST TO BOTH THE WMFO AND LA
INVESTIGATIONS, HOWEVER, THE MAJORITY OF THE INTERVIEWEES RELATE
ONLY TO ONE INVESTIGATION. BECAUSE OF THE DIFFICULTY IN TRYING
TO COORDINATE LARGE NUMBERS OF INTERVIEWS, PARTICULARLY DUE TO
THE SPACE CONSTRAINTS AT THE EMBASSY, ANY EFFORT TO REDUCE THE
NUMBER OF SPECIAL AGENTS AND ATTORNEYS IN LONDON AT THE SAME TIME
WOULD BE WELCOMED.

BT

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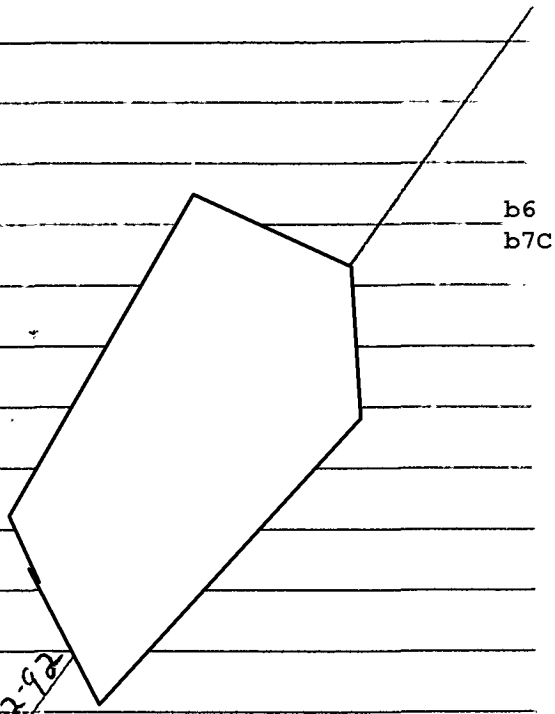

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Unofficial record 20-2-92

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Crim. Inv.
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Director's Office

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FM LEGAT LONDON (29B-WF-171994) (P)

TO DIRECTOR FBI/ROUTINE/

FBI LOS ANGELES/ROUTINE/

BT

UNCLAS

CITE: //5200:LON164.029 30 JAN 1992//

PASS: HQ ATTN SSA [redacted]; OLIA, FLU; CID; WCCS, FIFU; LOS ANGELES ATTN SA [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS MAJOR CASE #38; FIF; FAG; OO: WMFO.

REWFTEL DATED JANUARY 29, 1992.

HOST COUNTRY CLEARANCE HAS BEEN OBTAINED FOR WMFO SPECIAL AGENTS TRAVEL TO LONDON TO CONDUCT BCCI INTERVIEWS. [redacted] b7D

[redacted]

29B-WF-171994-214

[redacted] b6 b7C

copy faxed to atm 2/6/92

1325015-000-12790

FD-36 (Rev. 8-26-82)

CJ 307

FBI

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PRECEDENCE:
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☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 2/24/92

TO: DIRECTOR FBI
(ATTN: HQ ATTN SSA [redacted] WMFO FOR SA [redacted]
[redacted]

FROM: LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT: CLARK McADAMS CLIFFORD;
[redacted]
BCCI;
OO: WMFO

Enclosed for WMFO are two receipts for documents received from the [redacted]

The documents are being forwarded in 11 boxes to WMFO. SA [redacted] is requested to advise DOJ Attorney [redacted] telephone [redacted] upon receipt.

3 - Bureau
(1 - Attn SSA [redacted] WCCU)
(1 - Attn SA [redacted] WMFO)
1 - London
EJK/bt
(4)

29B-WF-171994-212

[redacted]

3841

Approved: _____ Transmitted _____ Per _____
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1 AT cc Retained at Room 3841

29HQ-116176

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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Department of Justice

FOR IMMEDIATE RELEASE
FRIDAY, NOVEMBER 15, 1991

CRM
202-514-2007
(TDD) 202-514-1888

Federal Grand Jury Indicts BCCI and Three Banking Officials on Racketeering Conspiracy Charge

WASHINGTON, D.C.--The Department of Justice announced today that a federal grand jury has charged the Bank of Credit and Commerce International (BCCI) and three banking officials with racketeering conspiracy for secretly taking over a California bank and for fraudulently dealing in the stock of a Florida bank.

The indictment said the conspiracy was conducted by arms of the world-wide BCCI network and these international bankers: Agha Hasan Abedi, 68, of Karachi, Pakistan, founder and president of the BCCI group; Swaleh Naqvi, 57, now believed to be in Abu Dhabi, Acting President of the BCCI group; and Ghaith Pharaon, 50, a Saudi national with long ties to BCCI.

Acting Attorney General William P. Barr said "The indictment is one more important step in the aggressive federal prosecution of BCCI. It is the third time that the Department of Justice has indicted BCCI or its officials in major cases.

"Our priority investigation of BCCI is continuing in a number of states and overseas. These are complex cases that take time to develop. The Department of Justice is pursuing all aspects of the cases relentlessly," Barr said.

The indictment today is the result of work by a Justice

11/15/91

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Department Task Force. Participants in the Task Force include: prosecutors from the Criminal Division of the Department of Justice and from the office of Jay Stephens, United States Attorney for the District of Columbia, and agents from the Federal Bureau of Investigation.

"The Federal Bureau of Investigation made an exceptionally important contribution to the development of today's indictment," Mueller said. "The Justice Department also is grateful to the Federal Reserve Board and the Office of the District Attorney of New York County for their assistance," Mueller said.

The three-count indictment, returned in U.S. District Court in Washington, D.C., said the defendants, as part of the long-term conspiracy, illegally gained control of the Independence Bank of Encino, California.

Pharaon masqueraded as the sole purchaser of Independence Bank in 1985 but in fact he owned only 15 percent of the bank and BCCI was the covert financier of the acquisition and owned the controlling 85 per cent of Independence, the indictment said.

As a result, false statements were made to federal bank regulatory agencies, a scheme was executed to defraud a federally-insured financial institution, and a plan was devised to obtain by fraud the federal insurance protection for Independence Bank, the indictment said.

All of this was done "through deceptive stock purchases by way of hidden stock pledges, nominee agreements, nonrecourse loans, loan releases, beneficial interest agreements, and

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AIRTEL

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Director, FBI

SAC, Los Angeles (29B-LA-126283) (P)

HIDDEN INTERESTS
MAJOR CASE 38
OO: WMFO

BANK OF CREDIT AND COMMERCE INTERNATIONAL;
INDEPENDENCE BANK
ET AL
FIF
OO: LOS ANGELES

Re Los Angeles teletype to FBIHQ and WMFO, dated 12/13/91.

By above-referenced teletype you requested authorization for two Financial Analyst (FA) overhires and identified additional equipment needs. This airtel will address your overhire request. Your equipment requests will be addressed by another entity at FBIHQ.

The Criminal Investigative Division (CID) concurs with your request for two overhires to your FA complement. You are, therefore, authorized to add two additional FAs to your on-board complement of 21 either from within your existing on-board employees, outside hires, or posting fieldwide. Please keep in mind these are overhires and will not increase your authorized FA target staffing level of 21.

MAILED
JAN 28 1992
FBI

29B-WF-171994-159

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Asst. Dir.:
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Crim. Inv. 1 –
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Off. Liaison & Int. Affs. ____
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Telephone Rm. ____
Director's Sec'y ____

[redacted]

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KD:dmb (6)

APPROVED: Adm. Servs. WLK/DRZ Laboratory ____ Off. of Liaison & Int. Affs. ____
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Ident. ____
Inspection ____
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Off. of EEO ____

MAIL ROOM WLK/DRZ

1325015-000-12058

companies, a $500,000 fine.

o Title 18, U.S. Code, Section 1343; wire fraud; for individuals, five years and $250,000 fine; for companies, a $500,000 fine.

o Title 18, U.S. Code, Sections 1962(d), 1963; racketeering conspiracy; for individuals, 20 years, $250,000 fine, and asset forfeiture; for companies, a $500,000 fine.

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91-452

1325015-000-12050

FD-36 (Rev. 11-17-88)

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FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
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Date 11/19/91

TO : DIRECTOR, FBI (29B-WF-171994)

FROM : SAC, ANCHORAGE (29B-WF-171994) (RUC)

SUBJECT : HIDDEN INTEREST;
MAJOR CASE 38
OO: WMFO

Re telcall between SA [redacted] SSA [redacted] on 11/14/91; Anchorage telefax transmission to WMFO on 11/14/91; and Anchorage teletype to FBIHQ, dated 8/21/91, for 62-HQ-123000.

Enclosed for WMFO is one copy of an Anchorage, Alaska, real property tax file in addition to one newspaper article from the Anchorage Daily News.

For information of WMFO, the Anchorage Field Division received information from a confidential source on 10/31/91, that an individual identified as [redacted]

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29B-WF-171994-194

1-9

(2) - Bureau
2 - WMFO (29B-WF-171994) (Encs.)
(Attention: SSA [redacted]
1 - Anchorage
NED/lbm
(5)

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[redacted]

Approved: JRS/NED Transmitted _____ Per _____
(Number) (Time)

29HQ116176

1325015-000-12056

On 11/14/91, SA [redacted] of the Anchorage Field Division contacted SSA [redacted] WMFO, who advised that the BANK OF CREDIT AND COMMERCE HONG KONG LIMITED was an affiliated institution to the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). SSA [redacted] advised that he would request the Anchorage Field Division to conduct a real property asset search in order to determine if [redacted] purchased and/or owns real property in the Anchorage area. b6 b7C

On 11/15/91, a search of the Anchorage real property tax file indicates that [redacted] owns real estate in excess of $6,434,000 in accessed value in Anchorage, Alaska. The attached Anchorage real estate property tax file identifies each property and it's accessed value. b6 b7C

The Confidential Source (CS) in Anchorage advised [redacted] b6 b7C b7D

outright falsehoods, fabrications, and omissions in applications and reports filed with state and federal regulatory agencies," the indictment said.

The indictment said the stock fraud involved the CenTrust Savings Bank in Miami.

Pharaon owned about 25 percent of CenTrust's stock, the indictment said, and under the scheme he would "arrange for a branch of the BCCI Group to purchase approximately $25 million of the total $150 million CenTrust subordinated debentures in order to mislead and deceive regulators and investors as to the true market for the CenTrust subordinated debentures."

The indictment said Pharaon, as part of the conspiracy, "would cause CenTrust Trust to repurchase said subordinated debentures from BCCI (Overseas) Paris, after approximately six weeks, thus making the BCCI defendants whole and completing the deception of other investors as to the true market for the CenTrust subordinated debentures."

Both the purchase and sale of the debentures were carried out, the indictment said.

Mueller said the three individual defendants are believed to be in other countries. "We will make every effort to have them brought to the United States to stand trial," he said.

Here are the charges and the maximum penalties upon conviction:

o Title 18, U.S. Code, Section 371; conspiracy; for individuals, five years in prison and a $250,000 fine; for

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

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Page 15 ~ b6; b7C; b7D;
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FD-36 (Rev. 8-26-82)

FBI

TRANSMIT VIA:
- ☐ Teletype
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PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 10/16/91

TO: DIRECTOR FBI
(ATTN: SSA [redacted] ROOM 3839) b6 b7C

FROM: LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE 38
OO: WMFO

Enclosed for FBIHQ is a package containing numerous press clippings [redacted] b7D newspaper articles relating to the BCCI investigation.

29B-WF-171994-135

3 - Bureau
1 - London
EJK/bt
(4)

25 ENCLOSURE

1*

OCT 30 1991

[redacted] b6 b7C

Approved: _____ Transmitted _____ (Number) (Time)

1 cc AT w/copy of enclosures to WMFO
1 cc AT w/copy of enclosures retained 3839 10/31/91 DR

29-HQ-116176

1325015-000-10999

Captioned case is to be moved to an off-site location and will be staffed by a minimum of eleven SAs as well as several investigative assistants and other support staff. The term of this Bureau Special is expected to be a minimum of one year.

The terms of the current THRIFTY contract call for a monthly lease fee of $599 per vehicle. SSA [redacted], FBIHQ Automotive Management Unit, advises that comparable vehicles are likely to be available through an existing GSA contract at a monthly fee of approximately $300 per vehicle. GSA requires a twelve month minimum lease term and 60-90 days lead time to obtain vehicles. b6 b7C

Over a period of twelve months, assuming the continued rental of nine vehicles from THRIFTY, WMFO will incur an expense of $32,400 whereas a similar GSA contract is estimated to cost $16,200 resulting in a net savings of $16,200 or 50%

In the unlikely event that captioned investigation is discontinued prior to the expiration of the GSA contract, these vehicles will be used to supplement other Bureau Specials within the administrative management of WMFO.

1325015-000-10956

Airtel from SAC, WMFO to Director FBI dated 11/18/91
RE: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO: WMFO

ADDENDUM: CRIMINAL INVESTIGATIVE DIVISION (CID); WHITE-COLLAR CRIMES SECTION (WCCS); DRW:drw/vf; 11/21/91

By airtel dated 11/18/91, SAC, WMFO requests FBIHQ (1) to authorize $16,200 for the continued rental of nine vehicles from Thrifty Car Rental for a period of 90 days, and (2) to authorize $32,400 to lease nine vehicles from General Service Administration (GSA) for a 12-month period upon the expiration of the Thrifty contract.

By teletype dated 8/6/91, SAC, WMFO advised the Financial Institution Fraud Unit (FIFU), WCCS of the formation of a special squad (which would consist of one Supervisory Special Agent (SSA), eight Special Agents (SA), two Investigative Assistants, two Financial Analysts (FA), one Secretary, and one Rotor Clerk) to conduct the investigation of the Bank of Credit and Commerce International (BCCI) matter. In addition, SAC, WMFO requested authorization (which was approved by FBIHQ) for four SAs and two FAs on a Temporary Duty basis. As of 11/20/91, WMFO had 1 SSA, 11 SAs, and 2 FAs assigned to captioned matter.

On 2/7/91, WMFO initiated a financial institution fraud (FIF) investigation based on a criminal referral from the Board of Governors of the Federal Reserve System (BGFRS) alleging that false and fraudulent statements had been made concerning BCCI's ownership and control of Credit and Commerce American Holdings (CCAH), the parent-holding company of First American Bank Shares (FABS) which owns First American Bank, Washington, D.C.

On 5/21/91, WMFO received three additional criminal referrals from the BGFRS concerning BCCI's use of a nominee in the purchase of a bank in Georgia and a bank in California.

On 7/5/91, as a result of alleged fraudulent conduct by BCCI, bank regulators in Britain, Luxembourg, the United States, Switzerland, Spain, France, and the Cayman Islands closed branches of BCCI within their respective jurisdictions. Subsequently, numerous other countries closed BCCI branches within their jurisdictions.

Extensive media coverage, actions by the Federal Reserve Board and New York officials, and charges in Senate hearings have alleged an extraordinary range of worldwide criminal violations by BCCI and its affiliates. This investigation has been designated as major case number 38 and is being closely coordinated with the Department of Justice. Administrative Services Division (ASD) has obtained an off-site facility for the future co-location of FBI/DOJ personnel. The

1325015-000-10957

Assistant Director, Deputy Assistant Director, and the WCCS Chief, Criminal Investigative Division have been in almost daily contact with Assistant Attorney General Robert Mueller or his representatives on this matter.

WMFO airtel dated 10/12/91 to FBIHQ Automotive Management Unit requested rental of nine vehicles and this request was approved through 11/30/91. The terms of WMFO's current Thrifty Car Rental contract calls for a monthly lease of $599 per vehicle. FBIHQ Automotive Management Unit has noted that comparable vehicles will be available through an existing GSA contract at a monthly fee of approximately $300 per vehicle, however, GSA requires a 12-month minimum lease term and 60-90 days lead time to obtain vehicles. Over a period of 12 months, the continued rental of nine vehicles from Thrifty will cost $64,692, whereas a similar GSA contract is estimated to cost $32,400 resulting in a net savings of $32,292 or approximately 50% (it is noted that calculations for this comparison contained in WMFO airtel dated 11/18/91 were incorrect). In order to provide GSA required lead time, WMFO requests FBIHQ to authorize $16,200 for the continued rental of nine vehicles from Thrifty Car Rental for a period of 90 days (11/30/91 - 2/29/92) and to authorize $32,400 to lease nine vehicles from GSA for a 12-month period (2/29/92 - 2/28/93).

The captioned matter is a manpower intensive, complex FIF investigation characterized by complicated transactions requiring extensive witness interview, document collection, retention, and review. The requested rental vehicles are required to address the matter.

The FIFU, WCCS concurs with this request and requests that this matter be handled as expeditiously as possible.

1325015-000-10958

DEC 3 '91 12:04 PAGE.001

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FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- ☐ Immediate
- ☒ Priority
- ☐ Routine

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☒ Unclassified

Time Transmitted: _____

Sender's Initials: [illegible]

Number of Pages: 3

To: WCC Section FIF Unit [redacted] Date: 12/2/91
(Name of Office)

Facsimile number: 324-6492

Attn: [redacted] Rm 3839 X 5595
(Name) (Room) (Telephone No.)

From: Houston
(Name of Office)

Subject: (1) Hidden Interest [redacted] (6)
NC 38

Special Handling Instructions: Hand Carry to SSA [redacted] upon Receipt

Originator's Name: [redacted] Telephone: 868-2266 X 3571

Originator's Facsimile Number:

Approved: [redacted]

29E-WF-171994-126
FBI/DOJ

29HQ-116126

Received
1:30 pm
12/2/91
DRW

1325015-000-10959

FD-36 (Rev. 8-29-85)

FBI

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- ☐ Teletype
- ☐ Facsimile
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PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 11/20/91

TO : SAC, WMFO (29E-WF-171994)

FROM : SAC, HOUSTON (29E-171994)(P)

SUBJECT : HIDDEN INTEREST;
MAJOR CASE 38
FIF;
OO: WMFO

Re HO teletype to the Bureau and WMFO, 11/15/91.

Enclosed for information of WMFO are:

(1) two copies each of FD-302's reflecting interview of [redacted] on [redacted] and [redacted] (2) two copies each of investigative insert with attachments provided by [redacted] regarding [redacted]

[redacted]

As Houston has previously advised, [redacted] (Protect Identity) can provide extensive information regarding [redacted]

[redacted] Houston contact agents for [redacted] are SAs [redacted] and [redacted]

Further interview of [redacted] and related investigation will be conducted at direction of OO.

2-WMFO (Encs. 4)
2-Houston
LEV/ly
(4)

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Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

FD-302 (REV. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 6/13/90

[redacted] (Protect Identity), was contacted at telephone number [redacted]

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Investigation on 6/1/90 at Houston, Texas File # TP 245B-273

by [redacted] am Date dictated 6/2/90

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FD-302 (REV. 3-10-82)

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 5/18/90

[redacted] (Protect Identity) advised as follows: b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

Investigation on 5/16/90 at Houston, Texas File # 245B-TP-273-?

by SA [redacted] SA [redacted] llm Date dictated 5/17/90 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Continuation of Page 1

All the king's men . . .

Saudi Arabian giant NCB leaves some crucial questions unanswered in its accounts, says STEPHEN TIMEWELL

Jeddah's The National Commercial Bank (NCB) has long been an enigma to all but a few intimates. But its inherent secrecy and mysterious ways have not stopped the joint-liability partnership from becoming the largest bank in Saudi Arabia and the Gulf, as well as the world's largest partnership bank. Despite the recession in the region, family-owned NCB has continued to grow but, while the other major institutions in Saudi Arabia appear to have weathered the storm and have begun to show improved results, NCB's performance seems to be getting worse.

The reasons why the country's oldest and largest bank is running counter to its smaller competitors may not be easy to analyse. But its latest results provide a great deal of curious information upon which to speculate.

In July NCB released its full results for the financial year ended 24 August 1987. Besides issuing its balance-sheet over 10 months after the end of year — when most other banks were publishing their half-year results for 1988 — NCB posted a zero net profit following another year of significant increases in provisions for bad and doubtful debts.

The bank's loan-loss provision of SR922.3 million ($246 million) was a 10.8% increase on the previous year and, in comparative terms, well in excess of the combined provisions of the 10 other banks. In relation to loans, the provisions represented 3.6% of the total loan portfolio (3.4% in 1986 and 3.3% in 1985) which was again well in excess of the ratios shown in 1987 by the larger banks in the kingdom. In fact, the ratios for NCB's four main competitors were all reduced significantly.

Why NCB is the odd man out on loan-loss provisions is of key interest both in analysing Saudi bank results and in seeing what is happening in the banking sector. The zero net profit (down from SR80 million the previous year), however, was not the only surprise for those who follow the banking sector (in particular NCB) and see its performance as a useful indication of the health of the economy. Many observers were shocked to see that the bank's results had been qualified by its Saudi auditors and that NCB had taken the unusual step of publishing both the auditor's qualified report and the accompanying notes with the balance sheet in the daily *Financial Times* on 15 July.

Unlike most bank results, NCB's latest balance-sheet is of great importance. Not only does it contain a rare public glimpse inside a closely guarded institution but also the information contained is surprising and raises far more questions than it answers.

First, banks' accounts are rarely qualified in the kingdom and a qualification for merely technical reasons by local auditors appears almost unthinkable. Many analysts argue that the standard of auditing in the region needs improvement but at present qualifications are generally avoided, even by the big international firms. So to have the country's biggest bank qualified by Saudi auditors is an extremely unusual event.

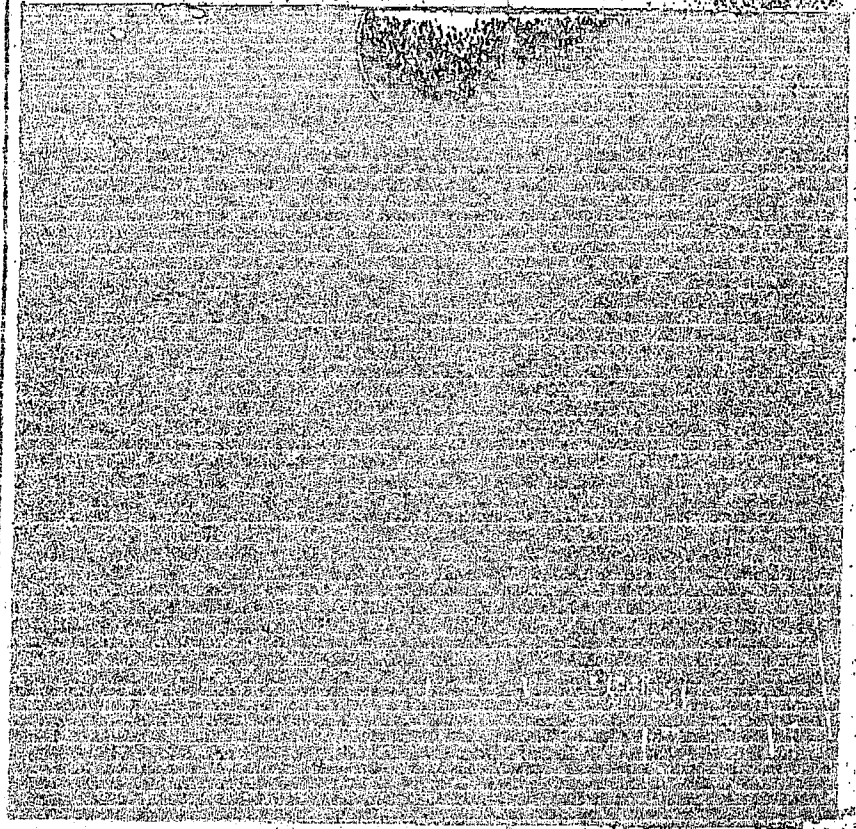
The content of the auditors' comments are disturbing. Issa El Ayouty & Company and Ismail El Habbab state in Note 7: "There are certain loans and advances granted to clients, partners, parties related to partners and directors which constitute a contravention of Articles 6 and 9 of Banking Control Law. The management of the bank elaborates to coincide these accounts with the provisions of the above-mentioned law."

In a country where there is too little rather than too much banking legislation, such contraventions are disturbing. Article 6 prohibits banks granting facilities to a client in excess of 25% of capital and reserves. Thus, the auditors are saying that NCB has an outstanding loan or loans to at least one single borrower in excess of a quarter of its SR3,900 million in capital and reserves. Such heavy exposure to individual risks must be of grave concern to management.

Problems

Article 9 concerns prohibitions against granting certain classes of credit facilities without security. So the only reasonable inference to be drawn from the auditors' qualifications are that NCB has problems in relation to large unsecured loans and was, at the time of the report, in breach of the banking code. Furthermore, if the trend towards increasing loan-loss provisions at the bank is linked to the above, these large unsecured loans are presumably not being serviced. In that case a considerable portion of the loan portfolio must be deemed non-performing.

This hypothesis appears to be strengthened by some unusual comments in the notes attached to the accounts. In most cases, these notes tend to make precise statements about accounting policies and procedures and leave any discussion of the bank's financial



Mysterious portals

1325015-000-10984

THE REPORT

The notes to the financial statements regarding the valuation of loans and advances granted to clients, related parties to partners and directors, provision for the effect of matters referred to in note 5 to the financial statements regarding the provision for loan losses in our opinion, the Balance Sheet, the Profit and Loss Account, and the notes thereon present fairly the state of the Bank's affairs as at 30th Rabi Thani, 1412H (4 August, 1991) and the results of its operations for the year ended on the date in accordance with generally accepted accounting principles and as shown by the records of the Bank."

THE NOTES

1. Investments include amounts of SR1,171.8m of investments for which the titles have yet to be transferred to the name of the bank.

5. Provision for Loan Losses: The management has carried out this year an overall valuation of the loans and advances, in the light of the substantial decline which occurred in the value of the assets held by the bank as security against loans and advances granted to clients. Consequently, it was decided to transfer the available profit for the year to the provision for loan losses in the same way in the following years.

7. There are certain loans and advances granted to clients, parties related to partners and directors which constitute a contravention of articles 9 and 6 of Banking Control Law. The management of the bank endeavours to conclude these contracts with the provisions of the above-mentioned law.

strategy to management reports. However, Note 5 refers to the substantial decline in the value of the security backing for the bank's loans, and states clearly that it intends to further increase provisions in the future: "The management decided to transfer the available profit for the year to the provision for loan-losses and to continue in strengthening the provision in the same way in the following years."

> How can the kingdom's largest bank produce a qualified result over 10 months after the end of year and appear to remain impervious to criticism?

On the face of it, this appears to be a clear statement that the situation is sufficiently disturbing to NCB's management for them to have ruled out the prospect of any net profits in the coming years, or until the loan problems are resolved.

The notes contain other intriguing items. Note 1 states: "Investments include amounts of SR1,171.8 million of investments for which the titles have yet to be transferred to the name of the bank." This one-line note could readily have been passed over if it were not for the fact that SR1,171.8 million is not a small investment and could easily correspond to the chunk of the Luxembourg-based BCC Group purchased recently by NCB's largest shareholder, the Bin-Mahfouz family.

Note 6 represents an assignment and sale of shares following the death of one of the founding partners. These complex arrangements among an increasing number of heirs and beneficiaries within the founding families, highlight the problematic nature of the bank's partnership structure. The increasingly diverse ownership added to the growing conflict of interests between shareholders and management have forced observers to question both the durability and the desirability of a partnership structure for the bank.

Some bankers have also asked why the government has not sought to broaden the ownership structure of the country's largest and most prestigious financial institution. Would a privatisation scheme not help strengthen the growth of the share market, the private sector and perhaps provide the institution with a useful capital injection?

The role of the government, in relation to NCB, is puzzling. How can the kingdom's largest bank produce a qualified result over 10 months after the end of year and appear to remain impervious to criticism? How does Saudi Arabian Monetary Agency (SAMA) monitor NCB when the agency has introduced a variety of regulatory measures but appears to ignore basic functions at the bank? If NCB has contravened the banking law, as the auditors say, what is being done about it? SAMA remains publicly silent on these issues but must be fully aware of the items in the balance-sheet and in constant touch with NCB management.

So what is going on? The regulatory agency appears to be turning a blind eye to loan problems at the bank and NCB seems happy to advertise its infringements and qualified results as well as state that loan-loss provisions will be further increased in years to come. It is useful to remember, in trying to make sense of this bizarre situation, that NCB is not just any bank: as its deposits show, the bank's reputation in the kingdom is second to none.

One possible, but unlikely, explanation is that the management at both institutions have lost their way. But a more plausible analysis is that they are both grappling with issues beyond their immediate control. This would mean that the bank is tired of carrying a load of large unsecured loans that have not been serviced for years and has resorted to this form of public outcry as a means of prompting some repayments.

Ready for battle?

Another note in the accounts may suggest that the bank was preparing for a battle. Last December NCB prepaid (two years early) a $200 million issue of floating-rate notes. This redemption is mentioned in Note 9, and bankers say NCB preferred to prepay the issue rather than see the bank's single foreign borrowing get battered in the secondary market as a result of the institution's poor performance.

No firm conclusions can be drawn from NCB's results — they just leave many crucial questions unanswered. Why the loan issue has taken a different course at the Jeddah bank than at the other banks is a complex issue which must be assumed to relate to the size of the problem and the type of borrowers involved. In the same way, any solution to the bank's loan problems is likely to be even more complicated. Perhaps it is better to see the results more as a political statement than as a balance-sheet. □

Stephen Timewell is editor of Arab Banker, published by the London-based Arab Bankers Association.

1325015-000-10985

BUSINESS

The Arabs Bank on America

The negotiations for the prime Manhattan office space were almost complete. The landlord had only one question: would the prospective tenants—employees of a wealthy Arab bank—be arriving at work each day wearing burnooses, the traditional Arab hooded cloaks? "No," laughed the bank's American negotiator. "Burnooses and camels you can forget. In fact, you'll have trouble finding any of them in a suit with just two pieces. They're bankers. They'll all be wearing three."

Their roots are deep in the Middle East—but Arab banks are trying to find a vest-pocket home in the United States. Nearly a score of Arab banks have opened up shop in the United States since the mid-1970s, and at least four have arrived in the past year alone, says MidEast Report editor David Mizrahi. The banks will have to shed many of their native customs to compete successfully, but the vast American market remains an irresistible mecca. "More and more you'll find Arab banks coming to the U.S.," says Fakhruddin Khalil, senior executive vice president of the UBAF Arab American Bank.

The newcomers differ from earlier Arab immigrants to the financial community—most of whom were private investors whose purchases of U.S. banks created a paranoid stir. Eyebrows rose when Saudi Arabian billionaire Ghaith Pharaon bought the National Bank of Georgia—once headed by former budget director Bert Lance—and a group of investors headed by a Saudi government adviser obtained control of Washington's Financial General Bankshares last year only after a bitter four-year fight. But the latest crop of Arab bankers seem quietly respectable. This week the venerable $11 billion Arab Bank Ltd. of Jordan will open its 100th office in a new Manhattan skyscraper, and the National Commercial Bank, Saudi Arabia's largest, hopes to set up a New York branch this year. Even many younger arrivals have well-heeled backers: the two-year-old Arab Banking Corp., now operating on Park Avenue, is jointly owned by government agencies of Libya, Kuwait and Abu Dhabi.

The most important goal of the new banks is to establish themselves as "the major financial link between U.S. companies" and the Middle East, says Ahmed Bangja, head of National Commercial Bank's U.S. operations and a former aide to Saudi oil minister Ahmad Zaki Yamani. In part they hope to help their wealthy Arab depositors by scouting investments in American real estate and corporations. Some even plan to make that a full-time occupation: Investcorp, a new firm headed by former Chase Manhattan Bank vice president Nemir Kirdar, hopes to become a full-fledged investment bank seeking out deals for its 350 Arab shareholders and other investors. The Arabs are also interested in helping medium-size U.S. companies finance exports to the Mideast, arguing that their expertise will help Americans land contracts in the unfamiliar Arab world. "We're particularly looking at construction, energy and utility companies," says Samir Kaldawy, general manager of ABC's New York branch, "but if someone else walks in and says, 'Here's a good deal,' we'll listen."

Still, some U.S. bankers wonder whether

The sales pitch: A bridge to the Mideast?

the Arabs have enough experience and marketing expertise to compete with American banks on their own turf. "Can you see these guys going out to some middle-market company in the Midwest?" asks an executive at a large New York bank. "They may get in the door, but six months later they'll probably be thrown out." The Arabs concede that they may have trouble. UBAF Arab American Bank, for example, has had trouble building a large portfolio of American loans. One reason is that federal law prohibited it from lending more than 10 percent of its $75 million in capital to individual borrowers in 1981—too small a sum to interest major firms. As a result, the bank's growth "hasn't come up to my expectations yet," acknowledges UBAF Group chairman Mohamed Abushadi. UBAF shareholders have now increased the bank's capital to $100 million.

In their eagerness to capture a piece of the U.S. market, Arabs are becoming more aggressive lenders. In 1981 the $4.5 billion, Bahrain-based Gulf International Bank led a group of Arab banks in packaging a $25 million revolving credit for Portland General Electric, a less-than-top-rated borrower. And to their current dismay, many of the large Arab banks have sizable loans outstanding to Mexico, Brazil and other troubled South American nations. As they venture into riskier areas, says Morgan Guaranty Trust Co. senior vice president Amos T. Beeson, "they're going to have to recruit good people to make careful credit decisions—and I think they will."

Independence On some occasions the Arabs' push to book new business has led them to dispense with deeply rooted ideology. When Israel's Bank Leumi joined a large syndicated loan to Texas-based Gulf States Utilities Co. last year, most of the Arab bankers who had contemplated participating in the loan pulled out. The $6 billion Arab Banking Corp. decided to stay in—though it quietly arranged for its name to be left off The Wall Street Journal tombstone that announced the deal. That episode highlighted what officials close to Arab banks describe as their growing independence from their OPEC shareholders. ABC's Libyan shareholder is the agency that supervises that country's overseas investments, and chief executive Abdulla Saudi is a former aide to Col. Muammar Kaddafi, the Libyan leader, who is a bitter enemy of Israel. But "Kaddafi is smart enough not to muck up the business," says an American close to the bank. "Politically they are left alone."

For their part, the Arabs are heartened by growing acceptance of Arab investment in the United States. Fears that the Arabs' massive U.S. dollar holdings could someday be used to blackmail the American government have died down, and if anything, the banks note, their presence here is a sign of good faith in friendly U.S.-Arab relations. Two years ago the freeze on Iranian assets in U.S. banks during the hostage crisis prompted some Arab banks to think twice about their American investments. Coming to the United States now "is an expression of confidence that [the power to seize assets] won't be used against them," says one Arab bank aide. But as at least one bank has already learned, becoming American may require some compromises. When Iran chose to retaliate for the American assets freeze by halting loan repayments, it forwarded one interest payment to UBAF Arab American on the assumption that the New York state-chartered institution was an Arab bank. Then, abruptly, the payments ceased. To their astonishment, says UBAF's Khalil, the Iranians had discovered "that we were an American bank after all."

SUSAN DENTZER in New York

1325015-000-10986

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FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE
- ☐ Immediate
- ☐ Priority
- ☒ Routine

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☐ Unclassified

Time Transmitted: _____
Sender's Initials: _____
Number of Pages: _____

To: FBIHQ - WCC/FIF Date: 12/4/91
(Name of Office)

Facsimile number: 324-6492

Attn: [redacted] Y3594 b6 b7C
(Name) (Room) (Telephone No.)

From: [redacted] Houston b6 b7C
(Name of Office)

Subject: (4) Hidden Interest
MC 38

Special Handling Instructions: Please Advise re [redacted] b6 b7C
Note: t/t to follow on 12/4/91

Originator's Name: [redacted] Telephone: 868-2262

Originator's Facsimile Number: 29B-WF-171994-129

Approved: [redacted]

FBI/DOJ

29HQ-116176

PAGE 002

BUSINESS DAY C

State sought criminal S&L probe

Sen. Orrin Hatch tied to BCCI call

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BY KATE THOMAS AND JOHN MECKLIN
OF THE HOUSTON POST STAFF

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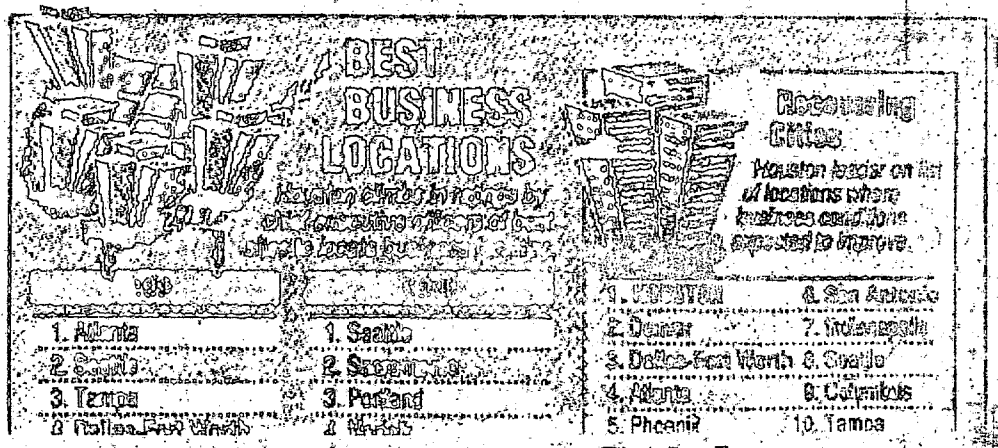
POST NEWS SERVICES

Atlanta has been voted the top business location in the country in an annual ranking of the nation's best business locations [illegible]



Delta retreat threatens end for Pan Am

1325015-000-10993

Carrier works into night trying to avoid shutdown

DEC 4 '91 15:39 PAGE.003

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PROBE: State requested criminal investigation of Houston S&L

From C-1

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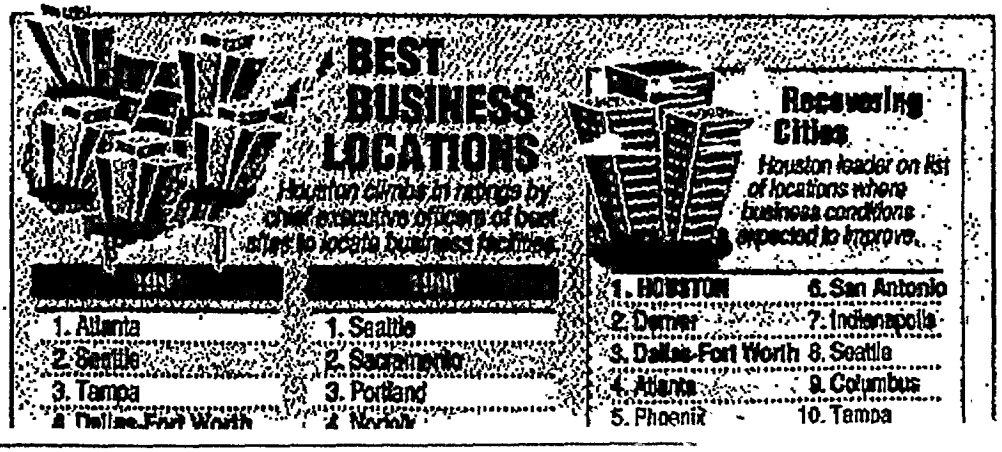

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PAN AM: Delta financial pullout leaves carrier fighting for life

1325015-000-10996

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Memorandum

To : DIRECTOR, FBI Date 12/19/91

From : LEGAT, OTTAWA (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS;
MAJOR CASE NUMBER 38;
FIF; FAG;
OO: WMFO

Reference Butel dated 12/17/91.

Dissemination, as outlined below, was made on dates indicated.

_____ copies of referenced

___X___ Pertinent information from referenced teletype.

Name and Location	Date Furnished
[redacted]	12/19/91

b7D

29B-WF-171994-132

[redacted]

b6
b7C

1-D
(2) - Bureau
1 - Ottawa
JJS/krp
(3)

29HQ-116176

5161

1325015-000-10997

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To : DIRECTOR, FBI Date 12/19/91

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2 - Bureau
1 - Ottawa
JJS/krp
(3)

1325015-000-10998

FD-36 (Rev. 8-29-85)

b6
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FBI

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☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 11/18/91

TO : DIRECTOR, FBI

ATTN: AUTOMOTIVE MANAGEMENT UNIT
ROOM 6863, SSA [redacted]

b6
b7C

ATTN: SSA [redacted] WCCS, FIFU

FROM : SAC, Washington Field Office (29B-WF-171994) (P)

SUBJECT : "HIDDEN INTERESTS"
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

RE WMFO teletype to Director, FBI, dated 8/6/91 and WMFO airtel to FBIHQ Automotive Management Unit dated 10/12/91.

Enclosed for the Auto Management Unit is an FD-369 Purchase Requisition dated 11/18/91.

The Bureau is requested to authorize $16,200 for the continued rental of nine vehicles from THRIFTY CAR RENTAL for a period of ninety days. Current authorization expires 11/30/91.

29B-WF-171994-124

The Bureau is also requested to authorize $32,400 to lease nine vehicles from GSA for a twelve month period upon the expiration of the THRIFTY contract which, if authorized, would be 2/29/91.

4 - BUREAU
2 - WMFO (29B-WF-171994)
MTU:mtu

29HQ-116176

SEE WCCS, CID ADDENDUM PAGES 3 & 4

Approved: _____ Transmitted _____ (Number) (Time) Per [redacted]

b6
b7C

1 cc returned to Room 6863 OR

1325015-000-10955

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 29
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
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ADD Adm.
ADD Inv.
Asst. Dir.
Off. of Public Aff.
Telephone Rm.
Director's Office

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FM FBI LAS VEGAS (29-0)

TO DIRECTOR FBI/ROUTINE/

BT

UNCLAS

CITE: //3380:SQ4//

PASS: ATTENTION WCCS, FIF, WMFO.

SUBJECT: CLARK MC ADAMS CLIFFORD; ET AL; FIF; FAG; OO: WMFO.

RE DIRECTOR TELETYPE TO ALL FBI FIELD OFFICES, 7/26/91.

LAS VEGAS CONDUCTED INDICES SEARCHES FOR COMPANIES AND INDIVIDUALS LISTED IN THE TITLE AND IN THE BODY OF THE COMMUNICATION WITH NEGATIVE RESULTS.

BT

#0002

29B-WF-171994-118X6

[redacted] b6 b7C

NNNN

29HQ-116176

1325015-000-13685

INDIVIDUAL CLAIMS THAT [redacted] b6 b7C b7D

[redacted] AND THAT HE/SHE WAS WITHHOLDING HIS/HER

IDENTITY BASED ON FEAR OF REPRISAL. CLAIMS THAT [redacted]

[redacted] b6 b7C b7D HAS PROVIDED FOLLOWING INFORMATION. [redacted]

[redacted] b6 b7C b7D

SOURCE IDENTIFIED [redacted] b6 b7C b7D

[redacted]

b6
b7C
b7D

ET

#0004

NNNN

10/29/91

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MAJOR CASE #38;
OO: WMFO

The FBI has established and is maintaining coordination with the [redacted], the U.S. Customs Service (USCS), and the Drug Enforcement Administration (DEA) concerning the investigation of the Bank of Credit and Commerce International (BCCI). On 9/23/91, representatives from the White-Collar Crimes Section and Drug Section, Criminal Investigative Division (CID), Congressional Affairs Office, and the Washington Metropolitan Field Office (WMFO) met in a conference with representatives of the [redacted] USCS, DEA, and the Financial Crimes Enforcement Network (FINCEN) and established coordination and information sharing relevant to the BCCI investigation. During this meeting, representatives of the FBI requested that any cases requiring investigation by the FBI or any information pertinent to the FBI's ongoing investigation of BCCI be referred to the FBI on a timely basis. b7E

On 10/22/91, [redacted], DEA, advised that DEA is preparing an intelligence report concerning BCCI and a copy will be provided upon completion to the FBI. On 10/25/91, [redacted] USCS provided information concerning documents relating to Clark Clifford and [redacted] that will be followed up by WMFO. [redacted] also noted that the FBI, [redacted], DEA, and USCS continue to work jointly in the OCDETF case code-named "C CHASE II" (C CHASE II; OCDETF; OO: TAMPA) (Drug Section). On 8/23/91, a Federal grand jury, Middle District of Florida, had returned a three-count sealed indictment charging 11 subjects with violating Racketeering Influenced and Corrupt Organizations, Money Laundering, and Conspiracy statutes. BCCI was named in this indictment as the racketeering enterprise and six of these indicted individuals were officers or former officers in BCCI. Simonsen noted that with the exception of the C CHASE investigation, the USCS has no ongoing investigations targeting BCCI. On 10/25/91, [redacted] did not have any cases concerning BCCI to be referred to the FBI. b6 b7C b7E

29B-WF-171-FF-91

WMFO is continuing to investigate this matter in conjunction with attorneys from the Department of Justice, Fraud Section and the U.S. Attorney's Office, Washington, D.C.

You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

1 - [redacted]
1 - [redacted]
1 - Mr. Baker
1 - Mr. Potts

DRW:vf (14)

1 - [redacted]

W. M. Baker
1 - Special Assistants, CID
1 - [redacted]

b6 b7C

1325015-000-13606

9/25/91

Director Sessions:

RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

You requested that the FBI establish coordination with the [redacted] the U.S. Customs Service (USCS), and the Drug Enforcement Administration (DEA) concerning the investigation of the Bank of Credit and Commerce International (BCCI). On 9/23/91, representatives from the White-Collar Crimes Section and Drug Section, Criminal Investigative Division (CID), Congressional Affairs Office (CAO), and the Washington Metropolitan Field Office (WMFO) met in a conference with representatives of the [redacted] the USCS, DEA, and the Financial Crimes Enforcement Network (FINCEN) and established coordination and information sharing relevant to the BCCI investigation. The information exchange and coordination between agencies was positive and cooperative. Each agency provided contacts for additional future coordination which will be followed up by WMFO. b7E

On 9/17/91, representatives from the FBI, [redacted] DOJ-Office of International Affairs (DOJ-OIA), DOJ-Fraud Section, and U.S. Attorney's offices from Washington, D.C.(USAOWDC), Tampa and Miami met at the U.S.Attorney's Office, District of Columbia, Washington, D.C. and reviewed a list of individuals who have been detained by the government of Abu Dhabi and established the priority of individuals to be interviewed if the government of Abu Dhabi permitted these individuals to be interviewed. b7E

On 9/18/91, representatives of the DOJ-Fraud Section, contacted the White-Collar Crimes Section and advised that officials of the government of Jamaica had requested that a DOJ Attorney meet with them regarding information that they had discovered concerning BCCI-Jamaica. On 9/19-20/91, a representative from the FBI's Legal Attache Office for Jamaica, the Northern Caribbean Liaison Office, Miami Division, travelled to Jamaica with a DOJ Fraud Section Attorney and an Attorney from the DOJ-OIA and met with [redacted] Prime Minister of Jamaica and various officials of the Jamaican government. These officials provided information concerning b6 b7C

1 - [redacted]
1 - [redacted]
1 - Mr. Baker
1 - Mr. Potts
1 - Acting DAD, Room 3012

DRW:amp (11)

1 - [redacted]
1 - [redacted]
1 - Special Assistants, CID
1 - [redacted]
1 - [redacted]
1 - [redacted]

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Orig to Director 9/26

1325015-000-13607

possible money laundering by BCCI-Jamaica and indicated that they would make documents available for review as necessary in the BCCI investigation.

On 9/20/91 [redacted] b6 b7C b7D

[redacted]

WMFO continues to coordinate ongoing witness interviews and document review in this document intensive investigation with the Atlanta, Los Angeles, Miami, and Tampa Divisions. The Miami Division has recently identified 67 boxes of documents obtained from the investigation of Centrust Savings that are pertinent to the BCCI investigation. The Tampa Division has identified 4,400 boxes of documents from the BCCI representative bank in Florida that may be pertinent to the investigation concerning subject Ghaith Pharaon. These documents are presently in the custody of the Federal Reserve, Miami, Florida. In addition, representatives from DOJ and FBI, WMFO recently surveyed BCCI documents in the Cayman Islands and coordination is ongoing to obtain copies of those documents. On 9/23/91, [redacted] advised that b7E there are 65 boxes of documents that had been seized by USCS in the "C Chase" investigation in 1988 that are pertinent to this investigation and should be reviewed by WMFO.

WMFO is continuing to investigate this matter in conjunction with attorneys from the DOJ Fraud Section and the USAOWDC.

You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

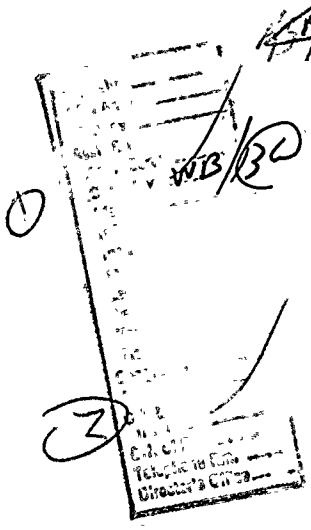
W. M. Baker

1325015-000-13608

UNIT

15 Nov 91 11 28

FEDERAL BUREAU OF INVESTIGATION



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[redacted] b6 b7C

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS E F T O

CITE: //5220:BL083.319 15 NOV 91//

PASS: WHITE COLLAR CRIME SECTION, FINANCIAL INSTITUTION FRAUD, CID; AND OLIA, FLU.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] b6 b7C

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS ANTILLES; AGHA HASAN ABEDI: [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN,

298-WF-171994 -

C- OLIA

SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE INTERNATIONAL;
GAITH PHARAON; FIF; FAG; (OO: WMFO).

RE BL AIRTEL DATED 8/14/91.

[redacted] b7D

[redacted] b7D

AS FBIHQ WILL RECALL THERE ARE TWO BCCI ENTITIES IN LUXEMBOURG; THE BCCI HOLDING COMPANY AND THE LUXEMBOURG BRANCH BANK OF BCCI KNOWN AS BCCI S.A.

THESE INTERVIEWS REFLECT THAT CLARK CLIFFRD HAD BEEN

RECEIVING "ADVISORY FEES" FROM BCCI S.A., ON THE INSTRUCTION OF BCCI, LONDON, SINCE 1984 AND THAT CLIFFORD WAS ON THE PHONE (CLIFFORD HIMSELF CALLING) BCCI S.A. DIRECTORS TWICE A YEAR SINCE THAT TIME.

[redacted] b7D

[redacted] b7D

LEGAT FOLLOWING.

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12/19/91

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Director Sessions:

RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

On 12/17/91, I attended a meeting with White-Collar Crimes Section Chief [redacted] in the office of Assistant Attorney General (AAG) Robert Mueller regarding the investigation of the Bank of Credit and Commerce International (BCCI). AAG Mueller chaired this meeting which was attended by the United States Attorneys from Atlanta, Georgia; Miami, Florida; Tampa, Florida; and the District of Columbia, Washington, D.C. b6 b7C

Participants at this meeting discussed the status of their various aspects of the BCCI investigation.

AAG Mueller advised that at approximately 11:00 a.m. Thursday, 12/19/91, Attorney General (AG) Barr plans to make a press release announcing that BCCI entered into a plea agreement. This plea agreement is the result of negotiations between Attorneys at the Department of Justice (DOJ) and Attorneys and Liquidators for all of BCCI. The results of this agreement will be filed in court in Luxembourg and in the United States. After AG Barr's announcement, Deputy Attorney General (DAG) Terwilliger will answer questions concerning the plea agreement.

The DOJ will utilize the agreement in Luxembourg in the United States as an admission of fraud by BCCI. The Luxembourg plea agreement will be used to facilitate the seizure of BCCI assets currently located in the United States valued at approximately $500 million.

On Friday, 12/20/91, it is anticipated that [redacted] District Attorney, New York County, will announce the plea of several individuals in the New York County indictment against BCCI previously returned on 7/29/91. b6 b7C

Another coordinating meeting to discuss the BCCI investigation is scheduled for the second week of January, 1992. Two Assistant U.S. Attorneys from each of the U.S. Attorney's offices involved in this investigation and two FBI Special Agents from each office involved in this investigation will attend this meeting.

You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

L. A. Potts

29B-WF-171994

1 - [redacted]
1 - [redacted]
1 - Acting AD, Rm. 5012
1 - Mr. Potts
1 - [redacted]

1 - Acting DAD, Rm. 5012
1 - [redacted]
1 - Special Assistants, CID
1 - [redacted]
1 - [redacted]

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DRW:drw/vf (12)

12/19

1325015-000-13612

(Rev. 12/16/91)

CRIMINAL INVESTIGA[redacted] DIVISION

12/24

TO	TL#	ROOM	NAME/TITLE
___	214	7176	THE DIRECTOR
___	235	7142	MR. CLARKE
___	235	7116	MR. GOW
___	235	7110	MR. GREENLEAF
___	213	7159	MR. BAYSE
___	211	5829	MR. CHRISTENSEN
___	152	ACADEMY	MR. DANIELS
___	245	7427	MR. DAVIS
___	232	4012	MR. GILBERT
___	241	3090	MR. HICKS
___	234	6012	MR. KENNEDY
___	233	5012	MR. POTTS
___	213	7125	MR. TOOHEY
___	341	11255	MR. YORK
___	245	7240	MR. COLLINGWOOD
___	245	7443	MR. GUIDO
___	245	7222	MR. JONES

TO	TL#	ROOM	NAME/TITLE
___	233	5012	MR. COULSON
___	231	3012	MR. VERINDER
___	231	7012	MR. WILSON
___	233	5155	MR. BREKKE
___	231	3823	MR. ESPOSITO
___	243	5222	MR. GALLAGHER
___	231	3028	MR. JOHNSON
___	233	5030	MR. KILEY
___	231	3149	MR. KOLETAR
___	231	3042	MR. MOODY
___	233	5078	MR. HUNTLEY
___	233	5012	MS. SOUTHERS
___	231	3012	MS. KOTLOWSKI
___	233	5012	MS. COSTELLO
___	231	3012	MS. MOJADDIDI
___	235	7150	CAREER BOARD
___	152	1B327	MAIL ROOM
___	244	6248	READING ROOM
___	244	6247	TELETYPE UNIT
___	233	5129	ADMIN. UNIT
___	233	5129	BUDGET UNIT
___	233	5015	SIOC

___Call Me
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___Approp. Action
___Initial
___Per Inquiry

___ For Your Info.
___ Prepare Response
___ Prepare Addendum
___ For Your Approval
___ Status/Facts

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[redacted]

LARRY A. POTTS
Acting Assistant Director
Room 5012, Ext. 4-4260

29 HQ-116176

1325015-000-13613

DO-8 (Rev. 10-24-90)

Department of Justice
Federal Bureau of Investigation
Internal Routing/Action Slip

To	Name/Title	TI#	Room
☐	Dep. Dir.	235	7142
☐	ADD-Adm.	235	7110
☐	ADD-Inv.	235	7116
	Assistant Director:		
☐	Administrative Services	234	6012
☑	Criminal Investigative	233	5012
☐	Identification	342	11255
☐	Inspection	213	7125
☐	Intelligence	232	4026
☐	Laboratory	241	3090
☐	Legal Counsel	245	7427
☐	Information Management	211	5829
☐	Technical Services	213	7159
☐	Training	152	QT
☐	Miss Adams		
☐	Mrs. Butler		
☐	Mrs. Fitzsimmons		
☐	Mr. Chase		
☐	Mr. Hartingh		
☐	Mr. Hogan		
☐	Mrs. Munford		

To	Name/Title	TI#	Room
☐	Cong. Affairs Office	245	7240
☐	Correspondence Unit	244	6226
☐	Media Services	213	7659
☐	Public Affairs Office	245	7222
☐	Reading Room	244	6248
☐	Speech Unit	245	7262
☐	Tour Unit	154	M956
☐	Office of EEO	213	7901
☐	Office of Lia. & Int. Affairs	245	7446
☐	SIOC	233	5045
☐	Info. Desk/Telephone Cntr.	244	6437
☐	Mail Rm./Courier Service	152	1B327
☐	Personnel Records	135	6912
☐	Routing Unit	151	1B309B
	☐ Expedite Processing		
	☐ Place on Record & Return		
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☐ Call Me ☐ For Your Information
☐ See Me ☐ Note & Return
☐ Appropriate Action ☐ Record & Return
☐ Initial ☐ See Reverse Side
☐ Per Inquiry ☐ For Your Approval

Remarks:

From: Office of the Director
Room 7162, TI# 214

Phone:

Date: 12/23/91

FBI/DOJ

1325015-000-13614

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 06-06-2018 BY: [redacted]

~~SECRET~~

12/23/91

394

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Director Sessions

RE: (1) HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

By routing slip dated 12/13/91 (attached), you inquired concerning an article from The Wall Street Journal dated 12/13/91, captioned "Did the Canadian Mounties Pull Their Punches With BCCI?"

A review was conducted by the Drug Section, Counter-terrorism Section, and the White-Collar Crimes Section, Criminal Investigative Division (CID), to identify any FBI investigations pertinent to this article. This review identified two counterterrorism investigations captioned [redacted] which contained information related to the Bank of Credit and Commerce Canada (BCCC). No other cases were identified concerning BCCC.

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[redacted]

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FBI investigation of the [redacted]

[redacted]

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[redacted]

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Enclosure

29B-WF-171994-98

1 - [redacted]
1 - [redacted]
1 - Acting AD, Rm. 5012
1 - [redacted]
1 - [redacted]

DRW:vf (12)

1 - Acting DAD, Rm. 5012
1 - [redacted]
1 - Special Assistants, CID
1 - [redacted]
1 - [redacted]

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Classified By: 8947
Declassify On: OADR

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[redacted]

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As of 12/20/91, FBIHQ indices were negative for BCCC, [redacted], and Project Albus, names specifically referenced in the 12/13/91 article. The Sections' reviews failed to identify any Bureau investigation relative to the 11 U.S. prosecutions in Texas.

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You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

LAP/F

L. A. Potts

DRW/Stf

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Please DO USC in 24

1325015-000-13616

DO-7 (Rev. 6-24-91) Date _____

From: Office of Director, Federal Bu[redacted] of Investigation
To: Official Indicated Below

Mr. Clarke _____ ( )
Mr. Greenleaf _____ ( )
Mr. Gow _____ ( )
Mr. Baker _____ ( )
Mr. Bayse _____ ( )
Mr. Daniels _____ ( )
Mr. Davis _____ ( )
Mr. DuHadway _____ ( )
Mr. Hicks _____ ( )
Mr. Kennedy _____ ( )
Mr. Christensen _____ ( )
Mr. Toohey _____ ( )
Mr. York _____ ( )
Mr. Perez _____ ( )
Mr. Collingwood _____ ( )
Mr. Jones _____ ( )
Mr. Guido _____ ( )
Mr. Chase _____ ( )
Mr. Hartingh _____ ( )
Mr. Hogan _____ ( )
Mrs. Munford _____ ( )
Mrs. Fitzsimmons _____ ( )

WHAT'S TO THIS?

see note 12/3/91

See me _____ ( )
Note and return _____ ( )
Prepare reply and return for my signature _____ ( )
Please handle _____ ( )
Respond over your signature _____ ( )
For information _____ ( )
For your recommendation _____ ( )
What are the facts? _____ ( )
Hold _____ ( )
Remarks: _____

FBI/DOJ

1325015-000-13617

THE WALL STREET JOURNAL.

DATE: 12/13/91

PAGE: A-15

Did the Canadian Mounties Pull Their Punches With BCCI?

The Americas

By Warren Kinsella

OTTAWA—Those who wear the scarlet tunics of the Royal Canadian Mounted Police (RCMP), legend has it, always get their man. But following a special federal inquiry into the case of the collapsed Bank of Credit and Commerce Canada (BCCC), all the "Mounties" "got" was a lot of egg on their collective faces.

The four Canadian branches of BCCC—in Toronto, Montreal, Vancouver and Ottawa—were wholly owned subsidiaries of the infamous Luxembourg-based Bank of Credit and Commerce International throughout its nine-year existence. On July 5, 1991, all four branches were shut down by the Office of the Superintendent of Financial Institutions, on the heels of an unprecedented international crackdown on BCCI's global empire. Following the lead of financial regulators in the U.S., Britain and five other nations, Canadian authorities took control of an estimated $208 million (Canadian) in assets and changed the locks at the four branches.

Alarmed by reports that the bank's officers allegedly were involved in laundering of drug money, arms sales and even the funding of terrorist groups, Canadian members of Parliament decided to launch an inquiry of their own. On July 30, members of the House of Commons Finance Committee voted to examine the activities of BCCC. One of the committee's first tasks was to find out whether BCCC did anything criminal—and, if so, what the Mounties knew about it.

At hearings held from August to November of this year, the stunned parliamentarians discovered that the Canadian subsidiary of the rogue bank had been implicated in no less than three money-laundering conspiracies. In two of the cases, the MPs were told, there had been successful prosecutions of co-conspirators residing in the U.S. But in Canada, there had been no prosecutions, no arrests and not even a single formal investigation of BCCC launched by the RCMP. As Liberal Party finance critic Herb Gray put it: "There is something very puzzling here."

But the case of BCCC grew even more puzzling in October, when members of Parliament were told that the former deputy commissioner of the RCMP—the man who had supervised BCCC-related probes from 1987 to 1989—had gone to work for BCCC as a paid consultant four months after his retirement. Henry Jensen had been the second-most-senior officer on the force. When questioned by the finance committee in October about his BCCC job, Mr. Jensen said he was hired to "protect" the bank from money launderers. His conclusion about BCCC's stated attempts to counter money laundering: "Upon my examination of their procedures and policies, I concluded they were exceedingly severe. In effect, it was driving clients away."

But apparently not all clients were being driven away by BCCC's "severe" anti-money-laundering policies. During the course of the finance committee's hearings, MPs were told about the following cases:

- In July 1988, the Ottawa branch of BCCC was named by the FBI as being at the center of a Libyan government-led money-laundering conspiracy. During the course of the successful U.S. prosecution and deportation of six Libyan co-conspirators (also implicated in a plot to assassinate Oliver North), U.S. authorities discovered that the Libyans had opened well-nourished accounts at BCCC's Ottawa branch in 1987. The money ostensibly had been placed in Canadian banks to evade the 1986 trade embargo against the Moammar Gadhafi regime.

Documents filed in the federal court in Alexandria, Va., as part of a plea-bargain agreement with the Libyans, reveal how the BCCC accounts were used to pass on hundreds of thousands of dollars to neo-Nazi groups, the American Indian Movement and the anti-Semitic Nation of Islam. Representatives of the groups mentioned in the plea bargain have confirmed that Libyan donations in various forms were received. Mr. Jensen had initially assisted the FBI in its case, but concluded there was insufficient evidence to file criminal charges in Canada.

- In 1989, an undercover RCMP investigation tripped across BCCC in a money-laundering investigation dubbed Project Albus. The Mounties' investigation focused primarily on members of the Ismaili Muslim sect who, they suspected, were laundering millions of dollars through banks in Toronto and Vancouver into a Swiss bank account. The suspects were found to have a very large safe-deposit box at the main Toronto branch of BCCC, in which cash and the phone numbers of several BCCC bank managers were found.

While the RCMP's investigations led to no arrests in Canada, a U.S. investigation of the same group led to 11 successful prosecutions in Texas. Asked why the Mounties did not have the same success in prosecuting their side of the investigation, Mr. Jensen said that the RCMP investigation went nowhere because of insufficient "resources."

- In 1989, RCMP undercover agent Paul Vidosa was probing money laundering in relation to Project Albus. When agent Vidosa mentioned to BCCC bank officers his supposed connections with members of the Ismaili sect, the officers allegedly promised an "unlimited" credit line at the Ottawa branch of BCCC. While BCCC managers do admit having met with Mr. Vidosa several times while he was undercover, they deny he was extended any preferential treatment. The former agent—whose Eastern Ontario home was fire-

1325015-000-13618

bombed and burned to the ground in September, shortly before he was to testify before the finance committee's BCCC inquiry—stands by his story.

Other BCCC-related cases discussed at the finance committee have raised more questions than they have answered. One is a drug money-laundering prosecution announced in Vancouver in August, with alleged BCCC involvement; another case questions the decision of BCCC management to pour $27 million (U.S.)—more than 10% of the Canadian subsidiary's entire capital base—into questionable real-estate investments in the Puget Sound area of Washington state.

Unlike authorities in the U.S. and the U.K., Canadian authorities have yet to decide whether BCCC wrongdoing merits criminal charges. And it appears unlikely that they will ever do so—despite the startling testimony heard by the House of Commons Finance Committee. Asked why the Mounties had not been more diligent about the BCCI's Canadian branches, current RCMP Deputy Commissioner Gilles Favreau testified: "To this day, to this day, we do not have grounds in Canada to investigate the BCCC. You just do not start an investigation when you do not have grounds."

Mr. Jensen, meanwhile—whose employment with what remained of BCCC was terminated in September—sees nothing improper in his relationship with the disgraced bank. He said in October: "The bank of Credit and Commerce Canada did not have a public reputation that was detrimental or that one ought to avoid. . . . I'm still unaware of anything where BCC Canada acted inappropriately, let alone criminally."

Mr. Kinsella is an Ottawa author. His book on Libyan terrorism, "Unholy Alliances," is to be published next spring.

1325015-000-13619

441
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November 12, 1991

[redacted]

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Dear [redacted]: Hidden Interests

Your communication to the Department of Justice concerning the request for an investigation of the allegations surrounding the death of Danny Casolaro was referred to the FBI.

Our Pittsburgh Office has advised that the Martinsburg, West Virginia, City Police Department (MCPD) is investigating the death of Danny Casolaro, who was found dead in a room at the Sheraton Inn in Martinsburg, West Virginia, on August 10, 1991, the victim of an apparent suicide. The investigation to date has revealed nothing to indicate a violation of Federal law within the investigative jurisdiction of the FBI. The services of the FBI Laboratory and Identification Divisions have been offered to the MCPD, and any information concerning the death of Danny Casolaro which comes to the attention of the FBI will be immediately disseminated to that Department.

Sincerely yours,

[redacted]

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Larry A. Potts
Deputy Assistant Director
Criminal Investigative Division

29B-WF-171994-101

1 - Pittsburgh - Enclosures (2)
For information.
1 - Mr. Potts (Room 3012, TL 231)
ORJ (1) - [redacted] (Room 3839, TL 231) - Enclosures (2)
1 - RMPU, CID (Room 5129, TL 233)

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NOTE: Correspondent wrote to the Department of Justice and enclosed a newspaper article about the death of reporter DANNY CASOLARO. He believes his death should be fully investigated. On 9/24/91, SSRA [redacted] Martinsburg, West Virginia,

RKK:gar (7)

NOTE CONTINUED ON PAGE TWO

29-HQ-116176

1325015-000-13620

[redacted]

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NOTE CONTINUED: Resident Agency, Pittsburgh Division, advised that the Martinsburg City Police Department (MCPD), Martinsburg, West Virginia, is continuing investigation into the death of DANNY CASOLARO, who was found dead in a room at the Martinsburg Sheraton Inn shortly before 1:00 p.m., August 10, 1991, the victim of an apparent suicide. No evidence or information has been developed to date to indicate anything inconsistent with a preliminary finding of suicide as the cause of CASOLARO's death. Investigation to date by the MCPD has found nothing to indicate the presence of a violation under the investigative jurisdiction of the FBI relative to the death of DANNY CASOLARO. SSRA [redacted] advised that the services of the FBI Laboratory and Identification Divisions were offered to the MCPD, and any information concerning the death of DANNY CASOLARO which comes to the attention of the FBI will be immediately disseminated to the MCPD. A similar response was used in a prior communication which was coordinated with SSA [redacted] Financial Institution Fraud Unit, CID. Based on available data, correspondent is not identifiable in Bufiles.

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1325015-000-13621

[redacted]

Control # 910009396

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Dear Sir: —

As a taxpayer & employer & one who pays & pays & [redacted] salary I demand a full investigation of this crime. Mr. Casolaro was murdered because he was getting information that would lead to indictments of high Gov. officials involving their part & knowledge of Iran Contra & October surprise frauds. It would not be out of line to have Pres. Bush- [redacted] (Justice Dept) & others involved. I insist that a full investigation be launched - Also - why did they embalm Casolaro's body before notifying the family? My guess is to do away with any evidence of murder (drugs etc). This country is absolutely rotten to the core. Gov. officials do NOT CARE what happens to this country as long as

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[redacted]

CRIMINAL INVESTIGATION
AUG 30 PM
FBI - LOS ANGELES

1325015-000-13622

you can keep the taxpayers on line & shelling out money for you & others to perpetuate your crimes. It is all based on greed & money & how much you can stuff away before you get caught. Taxpayers are played - we are not free in this country. We are only a money machine that enables Gov. officials (our supposed employees - HA.) to scheme & plot & deal with our money to their benefit. We need lawyers that will prosecute Gov. employees & put them in prison (not a country club) for the rest of their lives! You are all the biggest & worst type of welfare cheats & hard core criminals in this country - & should be treated as such.

I am thoroughly disgusted with this country & especially the criminals who are running it. You make the Mafia look like Kindergarteners. Disgustedly

[redacted]

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1325015-000-13623

[redacted]

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Re:
Murder of
J. Castaso
BCCI
Iran Contra
Scandal + October Surprise

Justice Dept.
Washington DC
20510

1325015-000-13624

October 9, 1991

Honorable Bernard J. Dwyer
House of Representatives
Washington, D.C. 20515-3006

Dear Congressman Dwyer:

This is in further response to your September 9th communication on behalf of [redacted] b6 b7C wrote to you concerning the need for the FBI to investigate the allegations surrounding the recent death of Danny Casolaro.

Our Pittsburgh Office has advised that the Martinsburg, West Virginia, City Police Department (MCPD) is investigating the death of Danny Casolaro, who was found dead in a room at the Sheraton Inn in Martinsburg, West Virginia, on August 10, 1991, the victim of an apparent suicide. The investigation to date has revealed nothing to indicate a violation of Federal law within the investigative jurisdiction of the FBI. The services of the FBI Laboratory and Identification Divisions have been offered to the MCPD, and any information concerning the death of Danny Casolaro which comes to the attention of the FBI will be immediately disseminated to that Department.

While I am unable to respond to [redacted]'s specific b6 b7C questions, I hope this information will be of assistance to you in replying to her inquiry.

Sincerely yours,

Larry A. Potts
Deputy Assistant Director
Criminal Investigative Division

1 - Pittsburgh - Enclosures (2)
1 - WMFO - Enclosures (2)
1 - Mr. Potts
1 - [redacted] (Room 3841, TL 231) - Enclosures (2) b6
1 - [redacted] (Room 3839, TL 231) - Enclosures (2) b7C
1 - RMPU, CID (Room 5129, TL 233)
1 - [redacted] Enclosures (2)
1 - Congressional Affairs Office

NOTE: Congressman Dwyer wrote on behalf of [redacted] who b6 b7C had read about the death of reporter DANNY CASOLARO and had written to Congressman Dwyer stating that she believed that his death should be investigated by the FBI. On 9/24/91, SSRA [redacted] Martinsburg, West Virginia, Resident Agency, Pittsburgh Division,

JB:bgc (13)

NOTE CONTINUED PAGE TWO

1325015-000-13625

NOTE CONTINUED: advised that the Martinsburg City Police Department (MCPD), Martinsburg, West Virginia, is continuing investigation into the death of DANNY CASOLARO, who was found dead in a room at the Martinsburg Sheraton Inn shortly before 1:00 p.m., August 10, 1991, the victim of an apparent suicide. No evidence or information has been developed to date to indicate anything inconsistent with a preliminary finding of suicide as the cause of CASOLARO's death. Investigation to date by the MCPD has found nothing to indicate the presence of a violation under the investigative jurisdiction of the FBI relative to the death of DANNY CASOLARO. SSRA [redacted] advised that the services of the FBI Laboratory and Identification Divisions were offered to the MCPD, and any information concerning the death of DANNY CASOLARO which comes to the attention of the FBI will be immediately disseminated to the MCPD. This response has been coordinated with SSA [redacted] Financial Institution Fraud Unit, CID, and has been reviewed by Unit Chief [redacted] Based on available data, Bufiles contain no record of [redacted] An interim response was sent to Congressman Dwyer on 9/13/91 by CAO.

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1325015-000-13626

411
104

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- ☒ Immediate
- ☐ Priority
- ☐ Routine

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☑ ~~Sensitive~~
- ☒ Unclassified

Time Transmitted: completed 14:36
Sender's Initials: ORW
Number of Pages: 14

To: Legat, Paris (29B-WF-171994) (P) Date: 11/18/91
(Name of Office)

Facsimile number: 011-331-45-63-79-61

Attn: ALAT [redacted] (011)(33)(1) 4076-0752
(Name) (Room) (Telephone No.)

b6
b7C

From: Director, FBI
(Name of Office)

Subject: HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO

Re FBIHQ telcalls to Legat, Paris 11/18/91.

Special Handling Instructions: Attached are photos of subject Ghaith R. Pharaon, DOB 9/7/41 at Riyadh, Saudi Arabia-believed to reside in France.

Please hand carry to ALAT [redacted] (13 PHOTOS)

b6
b7C

Originator's Name: ~~SSA~~ [redacted] Telephone: ~~324-5595~~

Originator's Facsimile Number:

Approved: WMB/ORW

29B-WF-171994-105
FBI/DOJ

13 ENCLOSURE

"ENCLOSURE ATTACHED"

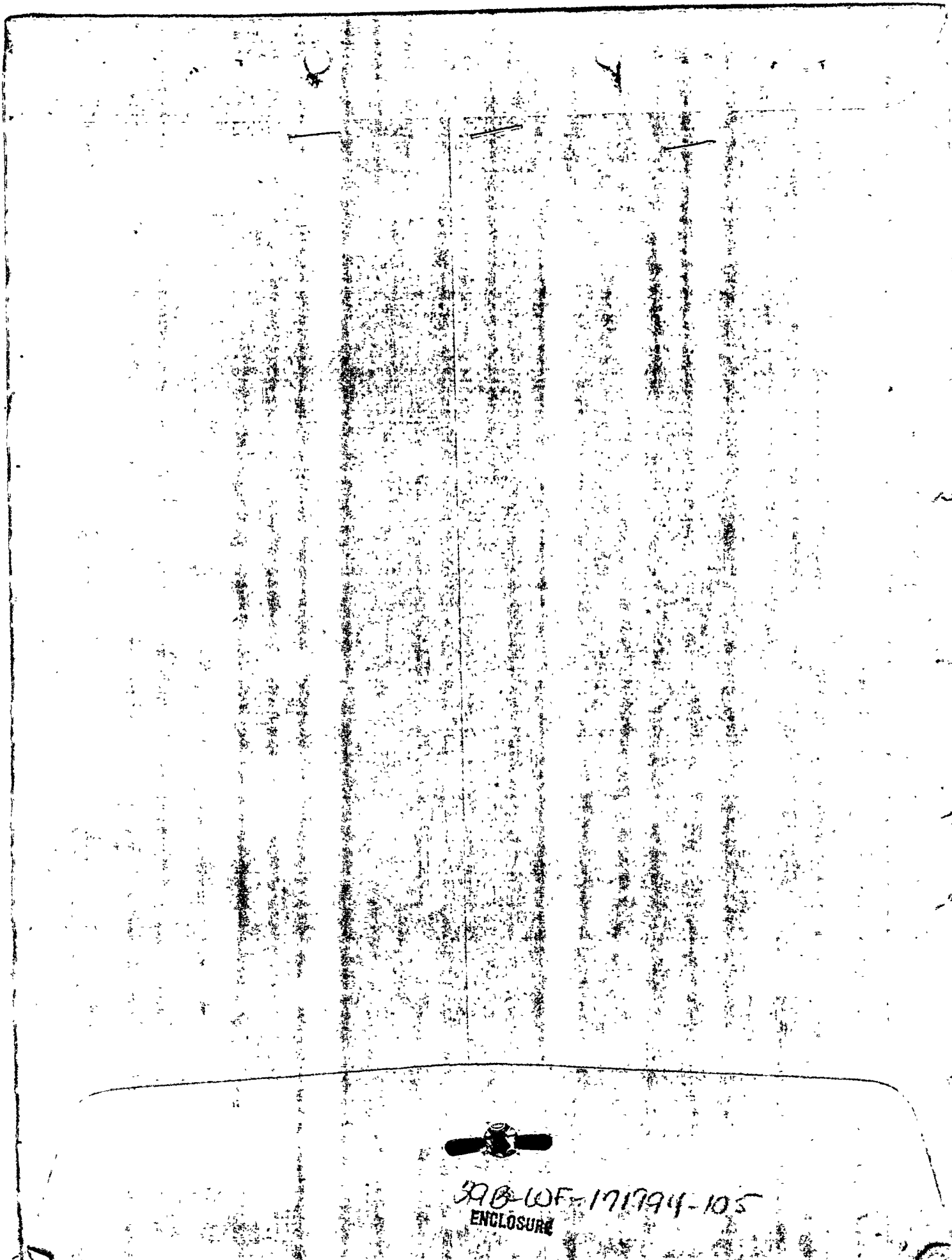
29-HQ-116176

1325015-000-13638

1/01/90 IPSU

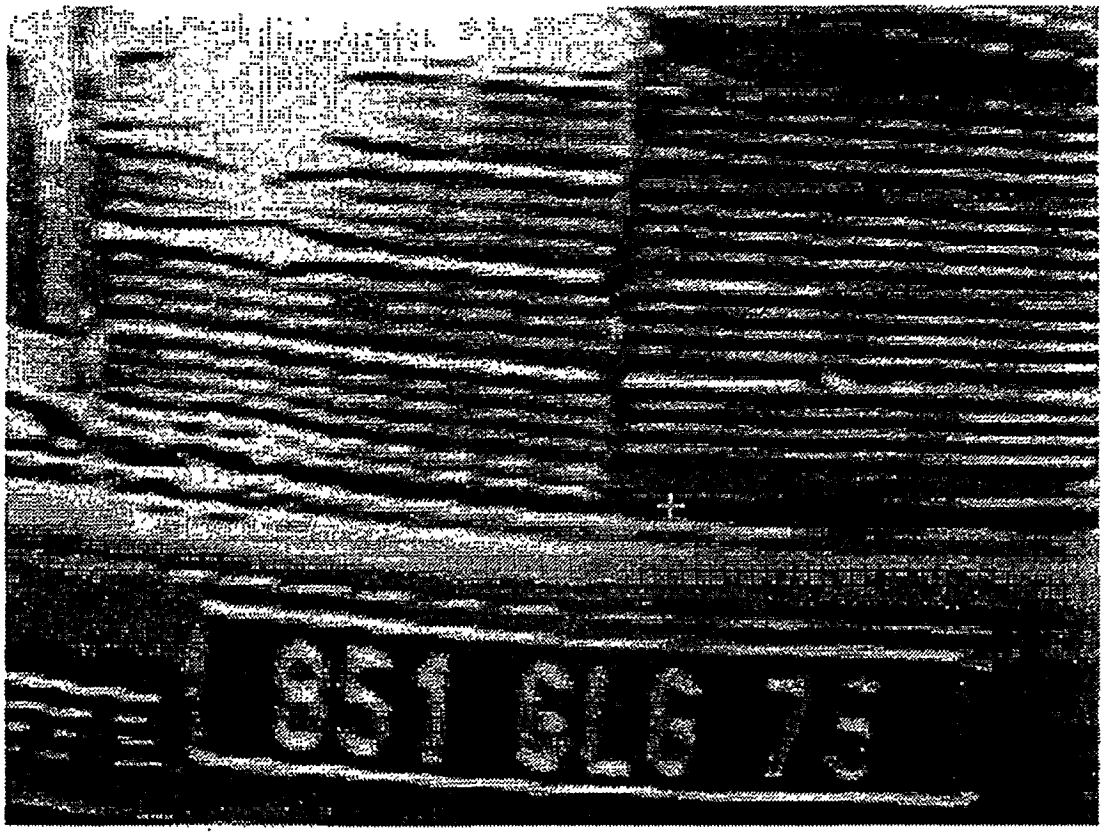
forms 5991

NM 441 TM6



89B-WF-171794-105
ENCLOSURE

1325015-000-13649



379

Memorandum

Dep. Dir. _____
ADD Adm. _____
ADD Inv. _____
Asst. Dir.:
Adm. Servs. _____
Crim. Inv. _____
Ident. _____
Insp. _____
Intell. _____
Lab. _____
Legal Coun. _____
Rec. Mgnt. _____
Tech. Servs. _____
Training _____
Cong. Affs. Off. _____
Off. of EEO _____
Off. Liaison & Int. Affs. _____
Off. of Public Affs. _____
Telephone Rm. _____
Director's Sec'y _____

To Mr. Baker

Date 11/29/91

From : L. A. Potts

Hidden Interests

Subject : REQUEST FOR FOREIGN TRAVEL

PURPOSE: To obtain authorization for WMFO Special Agents (SAs) [redacted] to travel to London, England to conduct interviews of several significant witnesses in the investigation of the Bank of Credit and Commerce International (BCCI) [redacted] The anticipated dates of travel are 11/30/91 to 12/7/91. Traveling with these SAs will be Department of Justice (DOJ) Trial Attorneys (TA) [redacted] and Assistant U.S. Attorneys [redacted] District of Columbia (DOC).

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b7C

RECOMMENDATION: That SAs [redacted] be authorized to travel to London, England.

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APPROVED:

Director _____
Dep. Dir. _____
ADD-Adm. _____
ADD-Inv. _____
Adm. Servs. _____
Crim. Inv. _____
Ident. _____
Info. Mgnt. _____
Inspection _____
Intell. _____
Laboratory _____
Legal Coun. _____
Tech. Servs. _____
Training _____
Cong. Affs. Off. _____
Off. of EEO _____
Off. of Liaison & Int. Affs. _____
Off. of Public Affs. _____

DETAILS: On 11/21/91, WMFO was notified by DOJ Fraud Section TA [redacted] that per instructions of Assistant Attorney General Robert Mueller, arrangements have been made to interview [redacted] in London, England beginning 12/2/91 until 12/6/91. [redacted] is considered to be a vital witness in the BCCI investigation in that he was the personal assistant to [redacted] one of three individuals recently indicted by a Federal grand jury (FGJ) in the DOC on 11/15/91.

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29B-WF-171991-108

Earlier this month, WMFO and DOJ personnel "participated" in "interviews" of [redacted] that were being conducted by the New York County District Attorney's Office. However, these interviews were primarily done to prepare [redacted] for New York grand jury appearances, which occurred during 11/13-15/91. A thorough and complete interview of [redacted] was unobtainable relative to the Federal investigation, which is deemed necessary in light of his anticipated appearance before an FGJ in the DOC.

b6
b7C

1 - Mr. Baker
1 - Mr. Potts
1 - [redacted]
1 - [redacted]
1 - [redacted]

1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - [redacted]

b6
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SKY:amp (10)

(Continued-Over)

29HQ-116176

1325015-000-13654

Memorandum from L. A. Potts to Mr. Baker
RE: Request for Foreign Travel

In addition to [redacted] an interview is anticipated for [redacted] who has come forward offering information he has compiled on BCCI's relationship to First American Bank (FAB). BCCI allegedly secretly owned and controlled FAB, which was never disclosed to Federal regulatory authorities. Interviews will also occur with [redacted] and [redacted] for Price Waterhouse (PW), London, England, and [redacted] of BCCI and BAII Banking Corporation. A third purpose of the travel is to conduct a review of approximately six "trunks" of records [redacted] TA [redacted] has requested a review of these records [redacted] b6 b7C

The White-Collar Crimes Section concurs in the need for this travel. WMFO SAs [redacted] have extensive knowledge of the BCCI investigation, making them logical choices for travel. SAC, WMFO also concurs in the need for this travel. b6 b7C

[redacted] Assistant Legat (ALAT), London has been involved in the BCCI investigation from inception and has been coordinating this travel. ALAT [redacted] has obtained appropriate host country clearance. b6 b7C

On 11/27/91, [redacted] Senior Trial Attorney, DOJ, Office of International Affairs concurred in the travel. [redacted] was acting on behalf of Associate Director Linda Candler, who was unavailable. On the same date, [redacted], Department of State, Counselor Services concurred with the travel. b6 b7C

The total cost of the travel is approximately $4,550.

1325015-000-13655

DATE 11/29/91

TO

FROM
W. M. Baker - Assistant Director
Criminal Investigative Division
Federal Bureau of Investigation

Traveler's Name and Title

Special Agents (SAs) [redacted] b6 b7C

Date(s) of Travel

11/30-12/7/91

Cities/Countries to be Visited

London, England

Purpose

The purpose of travel is to conduct interviews of several significant witnesses, as well as review documents [redacted] b7D

Anticipated Contact with US and Foreign Officials

No

State Department Post Services Requested

No

Part B. Return to Department of Justice

Date _____

TO: Director, Security Staff
Attn: Foreign Travel Unit
Room 6525, Main Building
Department of Justice
Washington, D.C. 20530

_____ This office has no objection to this travel.

_____ Remarks: _____

Signature _____

Organization _____

1325015-000-13656

[redacted]

11/26/91

379

b6
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RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

By routing slip dated 11/18/91 (attached), you inquired concerning an article from the CHICAGO DEFENDER dated 10/24/91 captioned "FBI knew BCCI financed Iran-Contra deal."

On 8/3/91, an analytical review group was formed within Criminal Investigative Division (CID) consisting of analysts from the Counterterrorism, Drug, and White-Collar Crimes Sections (WCCS) and tasked with identifying all references in the central files of the FBI to BCCI and locating and reviewing documents contained in these files at FBIHQ. An extensive search was conducted of FBIHQ files in coordination with the Information Management Division to locate information relating to BCCI retrievable through the various data bases and indices systems. A survey was requested by FBIHQ of all field office files containing references to BCCI. The analytical review group was also tasked with reviewing the responses to this survey. The purpose of this review was to determine what information was in FBIHQ and field files relating to BCCI.

A reference to BCCI was located in 211-HQ-26-1726 (Front Door). This reference is a 7/87 letter from the Office of Independent Counsel to Assistant Director, CID, FBIHQ, requesting the Public Corruption Unit, WCCS conduct indices searches on several companies including BCCI-Monte Carlo. No further reference to BCCI was found in this file.

No reference to the information contained in captioned news article concerning BCCI being involved in the Iran-Contra matter was found in the search of FBI files, however, this information may have come to the attention of the Office of Independent Counsel (OIC) who is investigating the Iran-Contra matter. The OIC maintains its own files and the FBI does not have independent access to these files.

[redacted] was interviewed by WMFO on 7/31/91, 8/14/91, 8/15/91 and he testified before the Federal grand jury, District of Columbia, Washington, D.C. on [redacted] concerning the [redacted] captioned news article.

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29B-WF-177941-109

On 11/20/91, an FBIHQ indices search was negative for [redacted]

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You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

WMB/MP
W. M. Baker

Enclosure

1 - [redacted]
1 - [redacted]
1 - Mr. Baker
DRW:drw/vf (11)

1 - Mr. Potts
1 - [redacted]

1 - [redacted]
1 - Special Assistants, CID
1 - [redacted]

b6
b7C

1325015-000-13657

29 HQ-116176

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
INTERNAL ROUTING/ACTION SLIP

TO	TL #	ROOM	NAME/TITLE	TO	TL #	ROOM	NAME/TITLE
	214	7162	The Director		245	7240	Mr. Collingwood
					245	7222	Mr. Jones
	235	7142	Mr. Clarke		245	7443	Mr. Guido
	235	7116	Mr. Gow		213	7901	Mr. Perez
	235	7110	Mr. Greenleaf				
					235	7150	Career Board
✓	233	5012	Mr. Baker		152	1B327	Mail Room
	213	7159	Mr. Bayse		244	6247	Teletype
	211	5829	Mr. Christensen		244	6248	Reading Room
	Quantico		Mr. Daniels				
	245	7427	Mr. Davis		235	7142	Mrs. Henderson
	232	4026	Mr. DuHadway		235	7142	Miss Lass
	241	3090	Mr. Hicks		235	7142	Ms. Siford
	234	6012	Mr. Kennedy		235	7142	Miss Southers
	213	7125	Mr. Toohey				
	341	11255	Mr. York		235	7142	Mr. Martinolich
					235	7142	Mr. Torrence
	214	7176	Director's Special Assistant				
			(Attn:)				

☐ Call Me
☐ See Me
☐ Approp. Action
☐ Initial
☐ Per Inquiry
☐ For Your Info.
☐ Prepare Response
☐ Prepare Addendum
☑ Status/Facts
☐ For Your Approval

From
Lloyd I. Clarke
Deputy Director

Room	TL #	Phone	Date
7142	235	3315	11/18

FBI/DOJ

1325015-000-13658

(Rev. 5-8-81)

(Mount Clipping in Space Below)

FBI knew BCCI financed Iran-Contra deal

WASHINGTON (UPI) — The scandal-ridden Bank of Credit and Commerce International financed the Reagan administration's secret sale of arms to Iran for a profit but government investigators later covered up the bank's role, a former bank official testified Tuesday.

Abdur Sakhia told a Senate subcommittee that when he was in charge of U.S. operations for BCCI in 1987, FBI investigators asked him for bank records about the arms deal. Upon their delivery, he said, the investigators promised that they would keep the Pakistani-run bank's role "out of the press."

Sakhia said he was shown documents indicating that Reagan administration operatives paid the manager of BCCI's Monte Carlo office a $100,000 bribe to arrange a $10 million loan for the weapon purchases, executed by arms dealer Adnan Khashoggi. Sakhia said BCCI apparently approved the deal because it would not fire or suspend the Monte Carlo manager.

The Reagan administration used profits from the arms sales to secretly aid the Nicaraguan Contra rebels after Congress refused to authorize assistance.

Testimony from the government's subsequent Iran-Contra investigation also alluded to the $10 million loan. That testimony revealed Iran was to pay $11 million for the arms and an undisclosed portion of the $1 million in profit was to go to BCCI.

An FBI spokesman said the agency would have no comment.

BCCI was seized last July by regulators in seven countries after the Bank of England uncovered evidence of fraud, drug trafficking and money laundering. The victims potentially include as many as 1.2 million depositors in the 73 countries where BCCI operated. The accounts of depositors were frozen when the bank was seized.

Sakhia is cooperating with U.S. prosecutors investigating BCCI's secret ownership of the National Bank of Georgia and First American Bankshares in Washington D.C., which, until recently, was chaired by longtime Democratic presidential adviser Clark Clifford.

Testifying before the Senate Subcommittee on Terrorism, Narcotics and International Operations, Sakhia:

—Submitted records indicating that BCCI lent Price Waterhouse's Barbados branch $200,000 even though the office audited some of the bank's books for the firm's United Kingdom branch. Those audits have been severely criticized for not revealing the rogue bank's weak financial conditions and its secret and illegal ownership of U.S. banks.

A Price Waterhouse spokeswoman said there was nothing improper about the loan because it was made a couple of years before the audit and was paid back on normal terms.

—Said BCCI officers were jailed for foreign exchange violations in India, Kenya and Sudan but were then released and never prosecuted. He said the bank had paid off the Indira Gandhi family of India as well as leaders in Pakistan, Bangladesh and a number of African countries, including Kenya, Zimbabwe and Nigeria.

"In some cases, cash was given. In some cases, their relatives were hired....It (the payoff) took many forms," he said, declining to name the recipients.

—Denied assertions by Clifford and First American's former president, Robert Altman, that they were not informed about BCCI's illegal ownership of their bank holding company. He said Altman even advised BCCI on how it could also secretly acquire a Florida bank. To illustrate the banks' close relationship, Sakhia noted that BCCI founder Agha Hassan Abedi decided which office space should be rented for First American's New York office and personally hired its top executive.

—Said former Sen. Paula Hawkins (R-Fla.) informed him in 1984 of reports that his bank was laundering money but Justice Department officials told him the bank was not the subject of an investigation.

FRONT DOOR →

(Indicate page, name of newspaper, city and state.)
PAGE 16
CHICAGO DEFENDER
CHICAGO, ILLINOIS
Date: 10/24/91
Edition:

Title: FBI KNEW BCCI FINANCED IRAN-CONTRA DEAL

Character:
or
Classification:
Submitting Office: CHICAGO

Indexing:

5

FBI/DOJ
1325015-000-13659

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 11/4/91

TO : DIRECTOR, FBI
ATTN: AUTOMOTIVE MANAGEMENT UNIT
ROOM 6863, SSA [redacted]

b6
b7C

FROM : SAC, Washington Field Office (29B-WF-171994) (P)

SUBJECT : AUTOMOTIVE MATTERS
CLARK MCADAMS CLIFFORD;
ET AL;
FIF; FAG;
OO: WMFO

RE airtel from WMFO to The Director dated 10/12/91.

On 10/24/91, BUCAR # 99-6565, identified as a 1992 White Dodge Spirit bearing VA Tag RVA-973 was returned to Thrifty Car Rental, Alexandria, VA. This vehicle was replaced with Thrifty Unit # 320404, a 1992 Red Mitsubishi Galant bearing VA Tag RTC-344, and will now be identified as BUCAR # 99-6565.

29B-WF-171994-110

1-d

2 - Bureau
2 - 29B-WF-171994
MTU:mtu

1863

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

1325015-000-13660

441

418

Director Sessions: 1/13/92

RE: HIDDEN INTERESTS;
MAJOR CASE 98;
OO: WMFO

As you were advised in my previous note of 12/5/91 (attached), the Fraud Section, Department of Justice (DOJ), requested that Senator Orrin Hatch be interviewed concerning information contained in an article from The Wall Street Journal dated 11/27/91, captioned "Sen. Hatch Apparently Had Links to BCCI in Late 1980s."

On 12/11/91, Senator Hatch was interviewed by WMFO with a DOJ Fraud Section Attorney. Hatch advised that he had never had any type of relationship with the Bank of Credit and Commerce International (BCCI), that he had never received loans nor financing from BCCI, and to his knowledge, the only BCCI official he had ever spoke with was [redacted] He had no financial relationship with nor had he received any contributions from [redacted] Clark Clifford, nor the law firm of Clifford [redacted] He had no business dealings with Mohammad Hammoud. b6 b7C

Senator Hatch indicated that his intent was to fully cooperate in this investigation, and to provide any documentation that would assist the current investigation of BCCI. He provided various documents to include a copy of a press release dated 11/27/91, where he responded to an NBC news report that was discussed in the 11/27/91 Wall Street Journal news article. He provided details concerning his knowledge of BCCI to include: his discussions in early 1990 with [redacted] and Attorneys representing BCCI and subsequently with DOJ representatives concerning the BCCI/Tampa money laundering case; a speech he had given in the Senate in February 1990 concerning the BCCI/Tampa money laundering case; and his contacts with Mohammad Hammoud, [redacted] b6 b7C

Senator Hatch had been introduced to Mohammad Hammoud by a constituent from Utah and subsequently had three meetings (occurring in 1981, 1983, and 1988) in his office with Hammoud. These meetings dealt with problems in Lebanon, the hostages, and the Middle East. During these meetings, Hammoud had never mentioned BCCI and at that time, Senator Hatch was not aware of BCCI.

29B-WF-171994-114

Senator Hatch met [redacted] through a mutual friend from Utah. On several occasions, [redacted] had asked Senator Hatch to help him obtain financing for business projects and Senator Hatch had contacted several insurance companies to assist [redacted] had never received any financing from these companies. Senator Hatch was concerned that [redacted] was being discriminated against because he was an Arab. At approximately the time he had given his speech to the Senate b6 b7C

Enclosure
1 - [redacted]
1 - [redacted]
1 - Mr. Potts
1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - Special Assistant, CID
1 - [redacted]
1 - [redacted]

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DRW:drw/vf (12)
DRW VF

1325015-000-13661

in February 1990, Senator Hatch had felt that BCCI would listen to [redacted] because [redacted] was an Arab and BCCI was an Arab bank. Senator Hatch believed that he had called [redacted] and was given [redacted]s name as the top man at BCCI and [redacted]s telephone number. Senator Hatch called [redacted] from his office and had introduced himself as a U.S. Senator. He told [redacted] that he had an Arab friend who he wanted to introduce to [redacted] regarding a financing proposal and he may have given [redacted]'s telephone number to [redacted] This was the sole communication he had with [redacted] b6 b7C

Senator Hatch advised that approximately three months ago he had asked [redacted] if he could obtain a good deal on carpeting for his home. The next day, he had received a carpet from [redacted] valued at approximately $7,000. The carpet was the wrong color and had cost more than he had wanted to pay. He did not want to accept the carpet as a gift, however, he was reluctant to send the carpet back because he did not want to offend his friend. Senator Hatch stated that he was concerned about the adverse media publicity that could arise from this situation. Hatch asked for advice as to how to deal with this situation, and was told that such advice could not be rendered. Hatch stated that he would probably pay the $7,000 for the carpet. b6 b7C

You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

L. A. Potts

1325015-000-13662

Director Sessions:

12/5/91

RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

Attached article from The Wall Street Journal dated 11/27/91, alleged "Sen. Hatch Apparently Had Links to BCCI in Late 1980s." A subsequent article from The New York Times dated 11/28/91 (attached) provided further clarification of Senator Hatch's alleged BCCI ties.

The Wall Street Journal article noted that Monzer Hourani, allegedly a friend of Hatch's, had said in an interview televised on NBC Nightly News on 11/26/91, that Senator Hatch had told him in 1989 that he knew people at the Bank of Credit and Commerce International (BCCI) and that he might be able to put in a good word with them for Mr. Hourani. The article also noted that Senator Hatch had several meetings with Mohammed Hammoud, "an alleged front man for BCCI Holdings." According to this article, Hourani's statement differs from prior statements allegedly made by Senator Hatch concerning his prior relationship with persons connected to BCCI.

On 12/2/91, the Fraud Section, Department of Justice (DOJ), requested that a WMFO Agent and a DOJ Attorney interview Senator Hatch concerning the information contained in these news articles.

[redacted] has previously provided information to FBI, Houston concerning captioned matter. On [redacted] was interviewed by FBI, Houston re [redacted]

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b7D

[redacted]

Enclosures (2)
1 - [redacted]
1 - [redacted]
1 - Acting AD, Rm. 5012
1 - Mr. Potts
1 - [redacted]
1 - [redacted]
1 - [redacted]
1 - Special Assistants, CID
1 - [redacted]
1 - [redacted]

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b7C

DRW:drw/vf (12)

1325015-000-13663

FBI investigation at Houston indicates that Senator Hatch may have had some contact at BCCI. Although neither WMFO nor Houston consider Senator Hatch as a subject of this investigation, WMFO considers that an interview of Senator Hatch would be appropriate based on these news articles and investigation to date at Houston. The White-Collar Crimes Section, Criminal Investigative Division, has reviewed this matter and concurs with SAC, WMFO that Senator Hatch be interviewed concerning his knowledge of BCCI.

I have approved the interview of Senator Hatch and arrangements are being made to interview Senator Hatch as soon as possible with a DOJ Attorney.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

L. A. Potts

1325015-000-13664

0-19 (Rev. 4-26-83)

Exec AD Adm. ____
Exec AD Inv. ____
Exec AD LES ____
Asst. Dir.:
Adm. Servs. ____
Crim. Inv. ____
Ident. ____
Insp. ____
Intell. ____
Lab. ____
Legal Coun. ____
Off. Cong. & Public Affs. ____
Rec. Mgnt. ____
Tech. Servs. ____
Training ____
Telephone Rm. ____
Director's Sec'y ____

Sen. Hatch Apparently Had Links to BCCI in Late 1980s

By a WALL STREET JOURNAL Staff Reporter

WASHINGTON—Sen. Orrin Hatch appears to have had links with BCCI dating at least to the late 1980s.

A friend of the Utah Republican, Mouaz Hourani, said in an interview televised on NBC Nightly News yesterday that Mr. Hatch told him in 1989 that he knew people at Bank of Credit & Commerce International and that he might be able to put in a good word with them for Mr. Hourani, a Houston businessman.

This newspaper had earlier reported that Mr. Hatch had several meetings with Mohammed Hammoud, an alleged front man for BCCI Holdings (Luxembourg) S.A. Mr. Hammoud's death in May 1990 in Geneva remains clouded in mystery. Mr. Hatch's friend, Mr. Hourani, is also said to have known Mr. Hammoud.

The televised comments of Mr. Hourani were at odds with Mr. Hatch's claim to the network that he was unaware of ties between BCCI and Mr. Hammoud until 1990. He told the network he learned of his friend's association only after reading an article in a Washington business monthly.

Previously, a spokesman for Mr. Hatch had told this newspaper that the senator was unaware of Mr. Hammoud's links to BCCI until July 1991.

In an interview with this newspaper last night, Mr. Hourani said he made his acquaintance with Mr. Hatch in 1985. Both of them are Mormons, he explained, and both had an interest in helping to resolve the hostage situation in Lebanon. Mr. Hourani also said he managed $19,000 for Mr. Hatch in a blind trust. Sen. Hatch's 1987 financial disclosure form notes that he received a painting valued at $1,000 from Mr. Hourani.

Mr. Hourani said that he ultimately never had any dealings with BCCI.

The Washington Post ____
The Washington Times ____
Daily News (New York) ____
The New York Times ____
The Wall Street Journal ✓
The Chicago Tribune ____
The Los Angeles Times ____
The Christian Science Monitor ____
USA Today ____

Date 11/27/91

Page ____ 1325015-000-13665 FBI/DOJ

The New York Times

Hatch Gives Details About B.C.C.I. Ties

Bank's Lawyer Helped Senator With a Speech

By MARTIN TOLCHIN

Special to The New York Times

WASHINGTON, Nov. 27 — Senator Orrin G. Hatch today confirmed a report that his defense of the Bank of Credit and Commerce International in a Senate speech last year, as well as of the Justice Department's handling of a money-laundering case against the bank, had been based on information provided by Robert Altman, a friend who was serving as a lawyer for B.C.C.I.

Mr. Altman was also president of First American Bankshares Inc., a Washington bank that Federal prosecutors contend was secretly controlled by B.C.C.I., which was closed last July by regulators in seven countries because of reported widespread money laundering and fraud.

Last week, The Wall Street Journal reported that Senator Hatch had made the speech at Mr. Altman's request. Tuesday night, NBC News reported that Mr. Altman actually drafted the speech, and it said that the Senator's relationship with B.C.C.I. was under investigation.

Not Under Investigation

Mr. Hatch said that William Barr, the Attorney General, told him he was unaware of any investigation but would look into it.

This evening, the Senator received a hand-delivered letter from G. Allen Carver Jr., principal deputy chief of the fraud section of the criminal division of the Justice Department, which said, "This is to inform you that you are not now either a subject or a target of our B.C.C.I.-related investigations."

The letter went on to say that the Justice Department would take advantage of the Senator's offer of cooperation in the investigation and send an agent of the Federal Bureau of Investigation to interview him.

In the speech on Feb. 22, 1990, Mr. Hatch called the B.C.C.I. money-laundering case "a very serious matter," but said that "the charges ought to be viewed in their proper perspective." He added, "The case arose from the conduct of a small number of B.C.C.I.'s more than 14,000 employees."

The Senator said that efforts to make an example of B.C.C.I. "by imposing unprecedented penalties for offenses which other banks have committed could be seen by some as discriminatory."

Talks With Lawyers

In an hourlong interview today, Mr. Hatch, a conservative from Utah and the second-ranking Republican on the Judiciary Committee, said that Mr. Altman and two of the bank's lawyers — Lawrence Barcella and Lawrence Wechsler — "were people of impeccable integrity" who "told me the truth as they knew it."

"They told me that third-tier employees had done this, and that the top management was doing everything they could to resolve this," Mr. Hatch said today.

The Senator added, "Had I known then what I know now, I would not have given the speech with any kind remarks about B.C.C.I.'s management."

Earlier this month, a Federal grand jury indicted two of the bank's top officials and a major shareholder on fraud charges.

In today's interview, Mr. Hatch said that he had met with Mr. Altman and the B.C.C.I. lawyers in his office on two occasions. The first meeting involved a Tampa money-laundering case against the bank. "I encouraged them to settle the case," Mr. Hatch recalled, and indeed, it was settled.

At the second meeting, Mr. Altman and the B.C.C.I. lawyers complained that "the Justice Department and B.C.C.I. were being blasted," Mr. Hatch recalled.

Defending the Justice Department

Of his speech, the Senator said, "I stood up for the Justice Department. I'm on the Judiciary Committee, and I know they do a very good job, and did a very good job in this case." Some senators have criticized the Justice Department for moving too slowly on the case.

He said of Mr. Altman, "We're still friends." The Senator also said that he remained friends with Clark M. Clifford, chairman of First American. He said that he believed both men when they said that they were unaware that their bank had been secretly acquired by B.C.C.I.

In today's interview, Mr. Hatch said that two years ago he had contacted Swaleh Naqvi, then president of B.C.C.I. in the London office, in an unsuccessful attempt to get the bank to finance a company owned by a friend, Munzer Hourani, a Houston businessman of Lebanese ancestry who had joined the Mormon Church.

NBC News reported that Mr. Hourani said that the Senator had offered to help him get money from B.C.C.I., but did not disclose the conversation with Mr. Naqvi, who was indicted by a Federal grand jury earlier this month.

Ties With a Shareholder

Mr. Hatch also discussed his relationship with Mohammed Hammoud, a major B.C.C.I. shareholder. Mr. Hammoud was also the man who bought shares in First American from Mr. Altman and Mr. Clifford in 1988, giving them a profit of nearly $10 million in less than two years. The Federal Reserve reported that Mr. Hammoud was a front man for B.C.C.I., which financed the purchase. The relationship was reported last week in The Wall Street Journal.

In three meetings with Mr. Hammoud, the Senator said, "We talked about Lebanon, the Middle East and the hostages." The Senator said that he was "totally unaware" of Mr. Hammoud's B.C.C.I. connection.

Mr. Hammoud told the Senator of Sheik Shams al-Din, who, he said, knew where the hostages were. The Senator said that he passed this information along to the State Department.

"During none of our meetings did Mr. Hammoud say anything about B.C.C.I.," the Senator said.

Mr. Hatch said that Mr. Hourani had contributed $1,000 each to his last primary and general election campaigns. He said he had given Mr. Hourani $10,000 to invest for him, and that Mr. Hourani had used the money to buy a condominium.

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FD-36 (Rev. 8-26-82)

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FBI

TRANSMIT VIA:
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PRECEDENCE:
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CLASSIFICATION:
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☐ UNCLAS E F T O
☐ UNCLAS

Date 11/1/91

TO: DIRECTOR FBI
(ATTN: SSA [redacted] FINANCIAL INSTITUTION FRAUD UNIT, WCCS, ROOM 3839)

b6
b7C

FROM: LEGAT, LONDON (29B-WF-171994) (P)

SUBJECT: "HIDDEN INTERESTS"
~~MAJOR CASE 38~~
OO: WMFO
(29B-WF-171994)

C CHASE II;
OCDETF CASE
OO: TAMPA
(245B-TP-23845)

ReTPtel to London dated October 2, 1991.

Enclosed for FBIHQ, Tampa, and WMFO are computer printouts of BCCI employee personnel files for [redacted]

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Personnel records could not be located for [redacted]

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[redacted]

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WMFO is requested to provide copies of the enclosed documents to Deputy Chief [redacted] Fraud Section, Department of Justice.

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29B-WF-171994-115

(7) - Bureau (Enc. 4)
(2 - Tampa) (Enc) (ATTN: SA [redacted]
(2 - WMFO) (Enc) (ATTN: SSA [redacted]
1 - London
EJK/bt
(8)

[redacted]

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Approved: _____ Transmitted _____ Per _____
(Number) (Time)

29-HQ-116176

245B-TP-23845-5

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FD-36 (Rev. 8-29-85)

FBI

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☐ Routine

CLASSIFICATION:
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☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 1/8/92

TO : DIRECTOR, FBI
(ATTN: CID, WCCS, FIFU)

FROM : SAC, INDIANAPOLIS (62-HQ-12300) (RUC)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG

OO: WMFO
(29B-WF-171994)

Re WMFO airtel to FBIHQ, 12/12/91, and IP teletype to FBIHQ, 1/7/92, captioned as above.

Enclosed for the Bureau are four copies of the FD-302 containing the 1/6/92, interview of [redacted]
Enclosed for WMFO is the original and one copy of the FD-302 as well as an FD-340 containing the original interview notes.

For the information of the Bureau and WMFO, [redacted] date of birth [redacted] SSAN [redacted] Telephone Number [redacted] was interviewed by the Indianapolis Division at which time he advised that he was a registered stockbroker and previously worked in that capacity from [redacted] for [redacted] which he identified as [redacted] Tampa, Florida. He

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(4) - Bureau (Enc. 4)
(1 - CID)
(1 - WCCS)
(1 - FIFU)
2 - WMFO (29B-WF-171994) (Enc. 3)
1 - Indianapolis
MHM-smp
(7)

29B-WF-171994-117

29HQ-116176

Approved: _____ Transmitted _____ (Number) (Time) Per _____

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1325015-000-13674

was interviewed as a purchaser of the CENTRUST SUBORDINATE DEBENTURES inasmuch as his investment was a personal investment and he did not broker these stocks. In approximately May, 1988, [redacted] was looking for a high yielding security and he made a personal investment decision to purchase CENTRUST SUBORDINATE DEBENTURES. This purchase went through the WILLIAMS SECURITIES GROUP, Tampa, Florida, and was eventually purchased through DREXEL BURNHAM BROKERAGE FIRM. On 6/13/88, [redacted] purchased the CENTRUST SUBORDINATE DEBENTURES and paid between $24,500 and $25,000 total. The SUBORDINATE DEBENTURES had an interest rate of 15.875 percent maturing in the year 2000. [redacted] received interest on this investment for approximately the first year and then it declined in value. [redacted] estimates that he has lost $25,000 in connection with his purchase of the CENTRUST SUBORDINATE DEBENTURES. The full details of [redacted] interview is contained in the enclosed FD-302.

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Since investigation has been concluded by the Indianapolis Division, this matter is being RUC'd.

1325015-000-13675

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/8/92

[redacted] date of birth [redacted] SSAN [redacted], was advised of the identity of SA [redacted] and the nature of the interview. [redacted] advised that he is currently a registered stockbroker, however, he is not licensed in the State of Indiana and is currently doing business as an independent investor. He explained that he and his family moved to Bloomington, Indiana, approximately a year ago from Florida. He advised that he previously was a registered licensed stockbroker in the State of Florida and was in [redacted] known as [redacted] Tampa, Florida. He advised that he did business as a stockbroker in that company from June, 1981 until June, 1990, when he moved to Bloomington, Indiana. b6 b7C

[redacted] advised that with respect to his investment in CENTRUST SUBORDINATE DEBENTURES that he was acting as an independent investor at the time and this was a personal investment. He explained that in connection with his brokerage responsibilities he frequently traveled and in approximately May, 1988, he had been doing business in the Miami, Florida, area and became aware of the CENTRUST SAVINGS BANK of Miami, Florida. He recalled that he heard a speech by [redacted] of the Board of CENTRUST SAVINGS BANK of Miami, Florida, and at the time he was looking for high yielding securities for a personal investment. [redacted] advised that he decided to purchase the CENTRUST SUBORDINATE DEBENTURES. [redacted] directed his company's bond specialist at the brokerage firm of WILLIAMS SECURITIES GROUP, Tampa, Florida, to purchase the CENTRUST SUBORDINATE DEBENTURES. As a result, these SUBORDINATE DEBENTURES were eventually purchased by his company through the DREXEL BURNHAM STOCK BROKERAGE COMPANY. b6 b7C

[redacted] advised that on June 13, 1988, he purchased 25 SUBORDINATE DEBENTURE bonds, which were discounted to him, and he paid between $24,500 and $25,000 total for the bonds. He advised that the SUBORDINATE DEBENTURES were due in the year 2000 and yielded an interest rate of 15.875 percent. He advised that for every $1,000 of securities sold, CENTRUST would received b6 b7C

Investigation on 1/6/92 at Bloomington, Indiana File # 62-HQ-12300 29B-WF-171994

by SA [redacted] -smp Date dictated 1/7/92 b6 b7C

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approximately $946.

[redacted] advised that his decision to purchase the CENTRUST SUBORDINATE DEBENTURES was strictly a personal investment decision. He recalled that he received interest on the investment for approximately a year and then he watched the investment decline in value. At some point, [redacted] found out that CENTRUST had repurchased almost the bulk of the issue and he was never made aware of that information by CENTRUST. Since CENTRUST repurchased a large percentage of the bond issue, [redacted] feels that he was treated unfairly. At some point in time he determined that his investment had become worthless.

[redacted] voluntarily provided answers to specific questions which were as follows:

1. [redacted] was aware that he had purchased CENTRUST SUBORDINATE DEBENTURES inasmuch as he is a registered stockbroker and this was a personal investment.

2. [redacted] purchased the CENTRUST SUBORDINATE DEBENTURES as an investment and this was done by him through an unsolicited order, not through a broker, but was executed by a broker.

3. [redacted] advised that he invested between $24,500 and $25,000 in the June 13, 1988, purchase of the CENTRUST SUBORDINATE DEBENTURES.

4. [redacted] advised that he has lost approximately $25,000 in connection with his investment in the CENTRUST SUBORDINATE DEBENTURES.

5. [redacted] advised that he received an offering document from the DREXEL BURNHAM STOCK BROKERAGE HOUSE regarding the CENTRUST SUBORDINATE DEBENTURES.

6. [redacted] advised that he based his investment decision on the following:

A. The prospects of the CENTRUST SAVINGS BANK, Miami, Florida, as described by [redacted] of the Board.

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B. A review of the prospectus.

C. The premise that people/investors were being treated equitably.

7. [redacted] advised that he invested in the SUBORDINATE DEBENTURES himself and he did receive quarterly statements which were sent by his brokerage firm to him since this was a personal investment.

8. [redacted] advised that had he had knowledge of CENTRUST guaranteeing full payment to another investor, he would not have purchased the CENTRUST SUBORDINATE DEBENTURES.

9. [redacted] indicated that he would invest in a fully subscribed issue.

10. [redacted] advised that he would have to evaluate whether to invest in a non-fully subscribed issue.

11. [redacted] advised that he was under the impression that there was a firm commitment of the offering of the SUBORDINATE DEBENTURES and he assumed that all of the stock had been sold as a practical matter.

12. [redacted] advised that this information very possibly would have made a difference in the way he invested.

[redacted] advised that the only information that he could add to the foregoing was that in January, 1990, he telephonically spoke to [redacted] who was an employee in the [redacted] of the CENTRUST SAVINGS BANK of Miami, Florida. At that time [redacted] advised him that the CENTRUST SAVINGS BANK was current in payments on the DEBENTURES and that the year end financial statement had just been issued and he would be receiving a copy shortly thereafter. At that time, [redacted] was not provided with any additional information and he later determined that information contained in the financial statements that were referred to was not correct.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 1/8/92

[redacted] date of birth [redacted] b6 b7C
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Investigation on 1/6/92 at Bloomington, Indiana File # 62-HQ-12300 29B-WF-171994

by SA [redacted] smp Date dictated 1/7/92 b6 b7C

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FEDERAL BUREAU OF INVESTIGATION

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ADD Inv.
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Ident.
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Insp.
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Legal Coun.
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Off. of Cong. & Public Affs.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

0130 MRI 00279

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P 180203Z DEC 91

FM FBI HOUSTON (298-171994) (P)

TO DIRECTOR FBI/PRIORITY/

FBI WMFO/PRIORITY/

BT

UNCLAS

CITE: //3290//

PASS: FBIHQ FIF UNIT, WCC SECTION.

SUBJECT: HIDDEN INTERESTS MAJOR CASE 38; OO: HO.

RE BUREAU TEL TO HO, 12/3/91.

FOR INFORMATION AND ACTION DEEMED APPROPRIATE BY BUREAU AND WMFO.

RECENT HOUSTON NEWS MEDIA ACCOUNTS REGARDING SEN ORRIN HATCH AND [redacted] PROMPTED ANONYMOUS LETTER RECEIVED AT HOUSTON OFFICE [redacted] FROM AN INDIVIDUAL CLAIMING TO BE [redacted] THIS

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298-WF-171994-88

29HQ-116176

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 27
Page 17 ~ Referral/Consult;
Page 18 ~ Referral/Consult;
Page 19 ~ Referral/Consult;
Page 20 ~ Referral/Consult;
Page 21 ~ Referral/Consult;
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Page 33 ~ Duplicate;
Page 34 ~ Referral/Consult;
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U.S. Department of Justice — Notification of Foreign Travel

DATE 11/8/91

TO

FROM [redacted] Assistant Director
Criminal Investigative Division
Federal Bureau of Investigation

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Traveler's Name and Title

[redacted] Special Agent, [redacted] Special Agent, and [redacted] Supervisory Special Agent

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Date(s) of Travel

11/12-15/91

Cities/Countries to be Visited

Kingston, Jamaica

Purpose

[redacted] Special Agents [redacted] and Supervisory Special Agent [redacted] will travel to Kingston, Jamaica to review documents in conjunction with an ongoing financial institution fraud investigation.

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Anticipated Contact with US and Foreign Officials

Yes

State Department Post Services Requested

No

Part B. Return to Department of Justice

Date _____

TO: Director, Security Staff
Attn: Foreign Travel Unit
Room 6525, Main Building
Department of Justice
Washington, D.C. 20530

_____ This office has no objection to this travel.

_____ Remarks: _____

Signature _____

Organization _____

1325015-000-13371

purchase in May 1988. These transactions are considered a 'Parking scheme' which would cause material misrepresentations and omissions to be made to the other investors.

The Centrust $150,000,000.00 subordinated debentures had an interest rate of 15.875%, maturing in the year 2000. The trade date began on May 18, 1988. The CUSIP Number for this offering was #15640M-AA-3.

Through interviews of the investors and brokers it needs to be established when and how the Centrust Sub Debt offering was presented and sold.

The interviewing agents will ask, but not be limited to, the following specific questions:

Questions to the Investors:

1. Were you aware that you had purchased the Centrust Subordinate debentures?

2. Who purchased (invested in) the Centrust Sub Debt for you?

3. How much did you invest?

4. Did you lose any money in the investment? If so how much?

5. What information did you or your broker receive regarding the Sub Debt offering? From whom?

6. What information did you base your investment on?

7. If you did not invest in the Sub Debt yourself, were you advised of the investment? If so when were you advised, before the investment took place, after the investment took place or after the investment was repurchased by Centrust? Also how were you advised of the investment, did your broker personally contact you (in writing or telephone call) or did you just receive some type of monthly or quarterly statement form the broker?

8. If you had knowledge of Centrust guaranteeing full payment to another investor, how would it affect your investment decision?

9. Would you invest in a 'Fully subscribed issue'?

1325015-000-13310

10. Would you invest in a 'Non-fully subscribed issue'?

11. Were you or your broker advised or led to believe, in any way, that the Sub Debt offer was to be 'fully subscribed'?

12. Would this information have made a difference to the way you invested?

Questions to Brokers

1. For whom did you purchase the Centrust Sub Debt?

2. What information did you receive regarding the Centrust Sub Debt offering? From whom?

3. What information did you base the investment on?

4. What information did you provide your client regarding the Sub Debt offering?

5. Does your client take an active role in investing or does he/she let you do the investing without his/her input or knowledge?

6. Would you invest in a 'Fully subscribed sub debt issue', for this particular client?

7. Would you invest in a 'Non-fully subscribed sub debt issue', for this particular client?

8. Were you advised or led to believe, in any way, that the Sub Debt offer was to be 'fully subscribed'?

9. Would this information (fully subscribed vs non-fully subscribed) have made a difference to the way you invested for this particular client?

10. How much did you invest for your client?

11. Did your client lose any money on this particular investment? If so how much did he/she lose?

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LEADS

All receiving offices will expeditiously conduct interviews for those investors and/or brokers, all of whom are listed below and then are set forth by Division. (Offices will note that the names, set forth by Division, are followed by an identifying number: P# - Purchaser; B# - Broker; I# - Brokers who requested an inquiry in writing.) Interviewing agents will provide WMFO the results of the interviews as soon as possible via teletype with a 302 to follow.

INDIVIDUALS AND COMPANIES CONTACTED

Purchaser

P1. [redacted]

P2. Harbor Trust Co./[redacted]
43 Wapoo Creek Place
Charleston, SC 29412

P3. [redacted]

P4. Preston Mutual Insurance/[redacted]
P.O. Box 288
Preston, IA 52069
319-689-3251

P5. [redacted]

P6. [redacted]

P7. First Investors Fund
[redacted]/Assistant Counsel
10 Woodbridge Center Drive
Woodbridge, NJ 07095-1123
212-858-8123

Broker

B1. [redacted]
Smith Barney
One Federal Street
Boston, MA 02110
617-482-3600

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B2. [redacted]
Smith Barney
One Federal Street
Boston, MA 02110
617-482-3600

B3. [redacted]
Smith Barney
Boca Raton, FL
800-223-7401

B4. [redacted]
Smith & Barney
1200 N. Federal Hwy.
Suite 400
Boca Raton, FL 33432
800-327-5890
305-391-8282

B5. Domenic & Domenic
Hallandale Beach Blvd.
Hallandale, FL
305-458-7788

B6. [redacted]
4510 Inverrary Blvd.
Lauderhill, FL 33319
305-742-5000

B7. [redacted] Drexel
Current employer/address
unknown

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P8.

P9.

P10.

P11.

P12.

P13.

P14.

P15.

B8. [redacted]
Smith Barney
One Federal Street
Boston, MA 02110
617-482-3600

B9. [redacted]
Shearson Lehman
Current employer:
[redacted]
Spartanburg, SC 29302
800-333-3343

B10. [redacted]
813-441-8911

B11. [redacted]
Shearson Lehman Hutton
Current Employer:
Teacher's Pension Fund
813-385-7077

B12. [redacted]
William Security Group/
now [redacted]
Tampa, FL
(Bought at Williams Security Group bond trading desk through Drexel)

B13a [redacted]
Paragon Brokers
Now with Barron Chase Co.
800-678-3022

B13b [redacted]
Shearson Lehman
Miami Beach, FL

B13c. Pacific Brokerage Service
Co. 213-939-1100
(Talked to [redacted] need to write or fax to him and he will give broker's name.
Fax# 213-937-4824)

B14. [redacted]
Shearson Lehman

P16. Prudential Bache/ [redacted] b6 b7C
P.O. Box 1050
S. Plainfield, NJ 07080-1050
212-214-6387
(Did not find any transactions for sub debt)

P17. Merrill Lynch
[redacted]
2 Broadway 21rst St.
New York
212-236-6440

P18. [redacted]
212-713-3836
[redacted] (Division of Paine Webber)
FAO Paine Webber
1285 Ave of the Americas
New York, NY 10019

P19. [redacted]

P20. Triangle Industries/ [redacted]
895 Park Ave.
New York
212-472-9146 x5622

P21. [redacted]

P22. Dean Witter/now Midland Walwyn
[redacted]
416-369-3976

P23. [redacted]

P24. [redacted]

B24. [redacted]
(Possibly [redacted]
Smith Barney

INDIVIDUALS WHO REQUESTED ADDITIONAL INFORMATION BE SENT

I1. [redacted] b6 b7C
212-825-2646
Citibank
20 Exchange Pl Level C
New York, NY 10005
RE: Gerlach & Company

I2. [redacted] b6 b7C
303-773-8200
Liquidation of Blinder Robinson & Co. Inc.
5889 S. Greenwood Plaza Blvd.
Suite 140
Englewood, CO. 80111

I3. [redacted]
212-232-5000
Drexel Lambert
60 Broad Street
New York, NY 10004
RE: [redacted]

I4. [redacted]
617-722-7042
Boston Company
One Boston Place
Boston, MA 02109-2809

I5. [redacted]
212-476-8979
NEUBERGER BERMAN
FAO Liberty Fund
342 Madison Ave
New York, NY 10173

I6. [redacted]
Mercantile Bank of St. Louis
314-425-2789
RE: Cremoco & Co.
Box 349
St. Louis, MO 63166
(Cremco & Co. is the nominee name, did handle securities at one time. Need cancellation date to give more information)

I7. [redacted]
212-909-6269
Prudential Ins. Co. of America
56 NO Livingston, Stop 318
Roseland, NJ 07068
(Bought through Drexel, sold through Bear Stearns Brokerage Firm)

Boston Division:

At Boston, MA:

Brokers: [redacted] (B1), [redacted] (B8); b6 b7C
Purchasers: [redacted] (P8).
In addition to the preceding interviews Boston will interview [redacted] (I4), and conduct any appropriate follow-up leads, to determine what information he can provide regarding the Centrust Sub Debt transactions.

At Newton, MA:

Purchasers: [redacted] (P1). b6 b7C

Columbia Division:

At Charleston, SC:

Purchasers: Harbor Trust Co. [redacted] (P2). b6 b7C

At Spartanburg, SC:

Broker: [redacted] (B9). b6 b7C

Denver Division:

At Englewood, CO:

Denver will interview [redacted] (I2), and conduct b6 b7C
appropriate follow-up leads, to determine what information she can provide regarding the Centrust Sub Debt transactions.

Indianapolis Division:

At Bloomington, IN:

Purchaser: [redacted] (P12). b6 b7C

Los Angeles Division:

At Los Angeles, CA:

Los Angeles will locate [redacted] (B13c) and conduct b6 b7C
appropriate investigation.

1325015-000-13316

Memphis Division:

At Nashville, TN:

Purchaser: [redacted] (P19). b6 b7C

Miami Division:

At Coconut Grove, FL:

Purchaser: [redacted] (P23). At Lauderhill, FL: b6 b7C

At Lauderhill, FL:

Broker: [redacted] (B6); Purchasers: [redacted] b6 b7C
[redacted] (P6).

At Hallandale, FL:

Broker: Domenic & Domenic (B5); Purchasers: [redacted] b6 b7C
(P14). Miami will obtain more information from [redacted]
regarding her broker [redacted] (B14)] and set appropriate
lead.

At North Miami, FL:

Purchasers: [redacted] (P5), [redacted] b6 b7C
(P24). Miami will obtain more pertinent information from
[redacted] regarding his broker [redacted] (B24)] and set
appropriate lead.

At Merritt Island, FL:

Purchasers: [redacted] (P9). b6 b7C

At Lighthouse Point, FL:

Purchaser: [redacted] (P11). b6 b7C

At Bal Harbor, FL:

Purchasers: [redacted] (P15), [redacted] and b6 b7C
[redacted] (P13). Miami will obtain more pertinent
information concerning the [redacted]s brokers (B13a, B13b, &
B13c) and set appropriate leads.

At Boca Raton, FL:

Broker: [redacted] (B3 and possibly B24). b6 b7C

1325015-000-13317

At Miami Beach, FL:

Broker: Miami will locate [redacted] (B13b) and conduct appropriate interview. b6 b7C

Newark Division:

At Woodbridge, NJ:

Purchaser: [redacted] (P7). Newark will obtain additional information concerning [redacted]'s broker, [redacted] (B7) and set appropriate lead. b6 b7C

At South Plainfield, NJ:

Purchaser: [redacted] (P16). b6 b7C

At Roseland, NJ:

Newark will interview [redacted] (I7) to obtain additional information she may have concerning the Centrust Sub Debt transactions. Newark will set or conduct appropriate follow-up leads. b6 b7C

New York Division:

At New York, NY:

Purchasers: [redacted] (P17), [redacted] (P18), [redacted] (P20). In addition to the preceding interviews New York will interview, and conduct appropriate follow-up leads, of the following individuals regarding the Centrust Sub Debt transactions: [redacted] (I1) obtain additional information concerning Gerlach & Company; [redacted] (I3) obtain additional information concerning [redacted] (I5) obtain additional information concerning [redacted] b6 b7C

Omaha Division:

At Preston, IA:

Purchaser: [redacted] (P4). b6 b7C

Tampa Division:

At Palm Harbor, FL:

Purchasers: [redacted] (P10). b6 b7C

1325015-000-13318

At Tampa, FL:

Brokers: Tampa will locate the following brokers and conduct appropriate investigation: [redacted] (B10), [redacted] (B11). Purchaser: [redacted] (P21). b6 b7C

At Winter Park, FL:

Purchasers: [redacted] (P3). b6 b7C

St. Louis Division:

At St Louis, MO:

St Louis will interview [redacted] (I6) to obtain additional information she may have concerning the Centrust Sub Debt transactions. St Louis will conduct or set appropriate follow-up leads. b6 b7C

1325015-000-13319

380

12/5/91

Mr. Potts:

RE: HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO

As you are aware, captioned investigation was initiated by WMFO on 2/7/91, as a result of a criminal referral received from the Board of Governors of the Federal Reserve System (BGFRS) alleging that false and fraudulent statements had been made concerning the Bank of Credit and Commerce International's (BCCI) ownership and control of Credit and Commerce American Holdings (CCAH), the parent-holding company of First American Bankshares (FABS), Washington, D.C.

On 5/21/91, WMFO received additional criminal referrals from the BGFRS concerning BCCI's use of Saudi Arabian businessman Ghaith Pharaon as a nominee in the purchases of the National Bank of Georgia, Atlanta, Georgia, and Independence Bank, Encino, California and alleged false statements made to the BGFRS concerning the ownership and control of these two banks. Additionally, investigation at Miami, Florida, indicated that Pharaon was involved in fraudulent securities transactions at Centrust Savings Bank, Miami, Florida.

On 11/15/91, the Federal grand jury (FGJ), District of Columbia (DOCWDC), returned a three count indictment charging four BCCI corporate entities and three individuals with racketeering conspiracy for secretly taking over Independence Bank, Encino, California, and for securities fraud concerning Centrust Savings Bank, Miami, Florida. The indictment charged Agha Hasan Abedi, [redacted] Ghaith Pharaon, and four BCCI corporate entities with violation of Title 18 USC Section 371 (conspiracy), 1343 (Wire Fraud), and 1962(d) (Racketeering Conspiracy). Abedi, [redacted] and Pharaon are currently fugitives. WMFO teletype 11/20/91, notified All SACs and All Legats concerning the indictment and fugitive status of these individuals. Abedi, the founder of BCCI, is believed to be in Karachi, Pakistan. [redacted] of the BCCI Group, is believed to be in Abu Dhabi. Information has been received variously placing Pharaon in France, Korea, and traveling between Riyadh, Saudi Arabia, Cairo, Egypt, and Morocco. Coordination has been established with Legats London, Paris, Tokyo, Hong Kong, Rome, and DOJ regarding the location and apprehension of these fugitives.

b6
b7C

1 - Mr. Potts
1 - [redacted]
1 -
1 -
DRW:drw/amp (5)

29B-WF-171994-64

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1325015-000-13320

Plea negotiations are ongoing between the DOJ, the District Attorney for New York County (DANY) and provisional Liquidators of BCCI (Liquidators). A plea agreement has been drafted wherein the Liquidators, on behalf of BCCI, will plead guilty to criminal charges in the U.S. District Court for the District of Columbia (the District Court) and the Supreme Court of the County of New York. This plea agreement will not preclude the future criminal or civil prosecution of any culpable BCCI officers, employees, or other individuals and will permit United States federal and state prosecutors to obtain the cooperation and assistance of the Liquidators in obtaining access to documents and witnesses. The plea agreement will permit the DOJ and DANY to concentrate their resources on the prosecution of culpable BCCI officers, employees, or other individual wrongdoers.

The Liquidators will plead guilty to racketeering activity and conspiracy [1962 (c) and (d)] charges in the District Court and to two counts in a New York County indictment returned against BCCI on 7/28/91. As part of this agreement, BCCI will be barred from doing business within the United States, and all BCCI assets located in the United States would be placed into a custodial account to be maintained by the District Court. Subsequently, disbursements will be made from the Custodial Account to a U.S. Disgorgement, Compensation and Penalty Fund maintained by the U.S. Department of the Treasury and a Worldwide Victims Compensation Fund maintained by the Liquidators.

The draft plea agreement was discussed in a meeting in London on 11/25/91, attended by Legal Attache, London, Deputy Attorney General George Terwilliger, Assistant Attorney General Robert Mueller, and representatives from the Fraud Section DOJ, DOJ Office Of International Affairs (DOJOIA), office of the District Attorney of New York, [redacted] b6 b7C b7D

WMFO Agents and DOJ Attorneys travelled to London to conduct interviews and review documents [redacted] during the period 12/2-6/91. [redacted] is being conducted in preparation for [redacted] DOCWDC. b3 b6 b7C b7D

WMFO is continuing to investigate this matter with attorneys from DOJ and the U.S. Attorney's Office, Washington, D.C.

You will be kept advised of all pertinent developments.

NOT APPROPRIATE FOR DISSEMINATION TO THE PUBLIC

B9 [redacted] b6 b7C

DRW

1325015-000-13321

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DATE 06-13-2018 BY [redacted]

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RECEIVED
25 SEP 91
FEDERAL BUREAU OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Servs.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Affs. Off.
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.
Telephone Rm.
Director's Office

b6
b7C

9/26

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [X] ~~Confidential~~
- [ ] Sensitive
- [ ] Unclassified

Time Transmitted: _____
Sender's Initials: _____
Number of Pages: 6

To: FBIHQ (CID, FLU, OLIA) Date: 9-25-91
(Name of Office)

Facsimile number: (202) 324-3147

Attn: [redacted] Room 3839 R-231
(Name) (Room) (Telephone No.)

b6
b7C

From: [redacted] (LIAISON OFFICE)
(Name of Office)

Subject: BANK OF CREDIT AND COMMERCE INTERNATIONAL

29B-WF-171980

Special Handling Instructions: PLEASE HAND CARRY TO [redacted]

b6
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Originator's Name: _____ Telephone: _____

Originator's Facsimile Number: _____

Approved: WAG/WLN

Encl - 1

FBI/DOJ

29-HQ-116176

1325015-000-13322

ALL INFORMATION CONTAINED
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DATE 06-06-2018 BY [redacted]

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FBI/DOJ
OF INVESTIGATION

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.:
Adm. Serv.
Crim. Inv.
Ident.
Info. Mgmt.
Insp.
Intell.
Lab.
Legal Coun.
Tech. Servs.
Training
Cong. Aff. Off.
Off. of EEO
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Director's Office

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FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [X] ~~Confidential~~
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Time Transmitted: _____
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Facsimile number: (202) 324-3147

Attn: [redacted] _____
(Name Room Telephone No.)

b6
b7C

From: [redacted] (LIAISON OFFICE)
(Name of Office)

Subject: BANK OF CREDIT AND COMMERCE INTERNATIONAL

Special Handling Instructions: PLEASE HAND CARRY TO [redacted]

b6
b7C

Originator's Name: _____ Telephone: _____

Originator's Facsimile Number: _____

Approved: INAC/WLN

FBI/DOJ

201

American Embassy
London

OFFICE OF THE LEGAL ATTACHE

UNCLASSIFIED

011-44-71-499-7944 (FROM U.S.)

IMMEDIATE PRIORITY ROUTINE

FROM: LEGAT LONDON (DLAT [redacted]

TO: FBIHQ ATTN: [redacted] ROOM 3839

SUBJECT: BCCI (NEWS ARTICLES)

NO. OF PGS: 12 (including cover and last page)

SENDER: [redacted] DATE: 9/9/91

REC'D BY: _____ DATE: _____

COMMENTS: 29B-WF-171994-68

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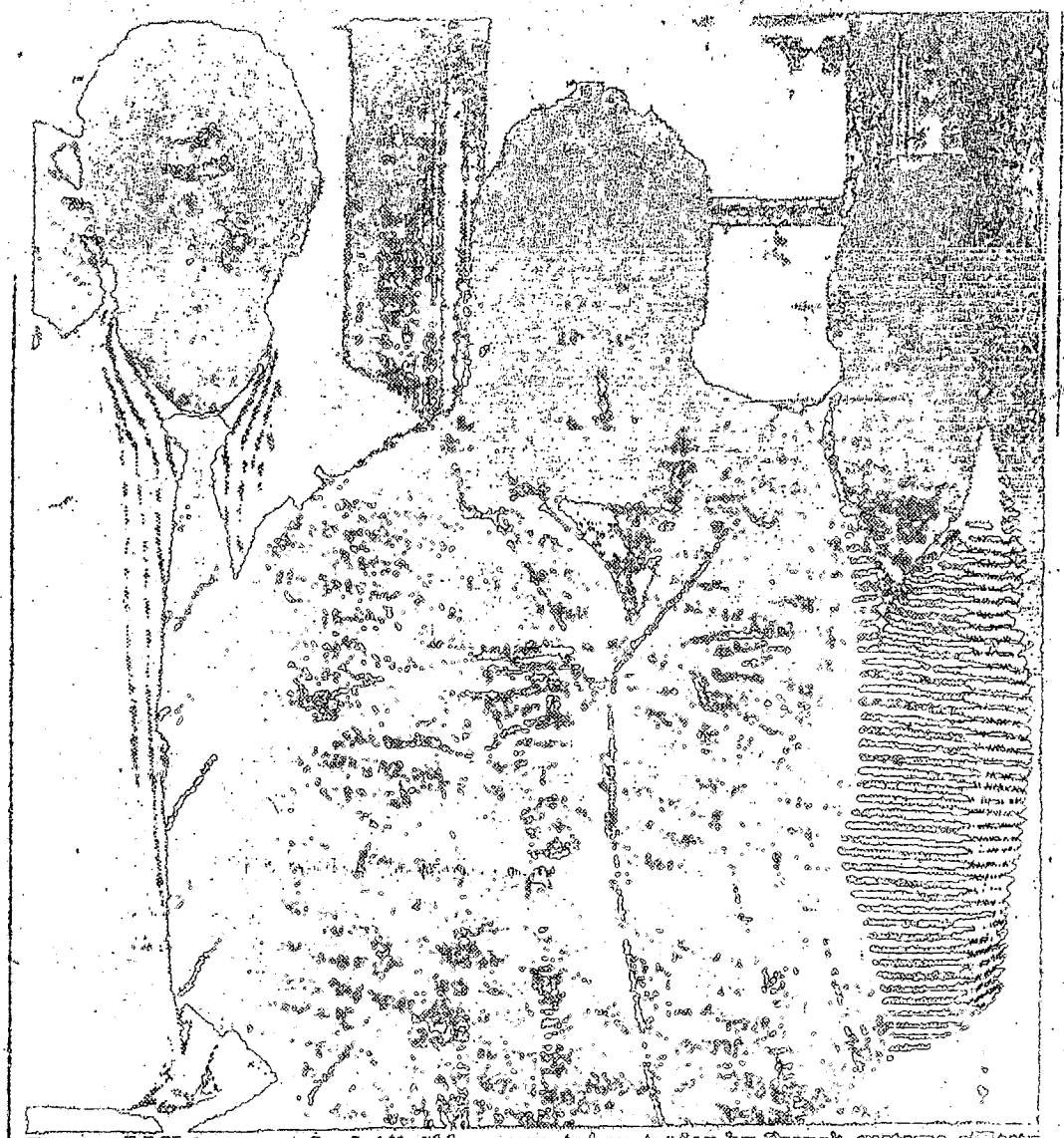

Former BCCI treasurer Syed Ali Akbar, arrested yesterday by French customs officials

US indicts BCCI officials

Continued from Page 1

lay International, a company of which he was a director, had nothing to do with Mr Noriega. Instead, it was money intended for a property development by the Tavoli brothers who run the El Rayan Investment Group in Egypt, he said.

According to yesterday's indictment, Mr Naqvi and Mr Rizvi attended a meeting in London in early 1988 at which "they discussed transferring approximately $23m in deposits at BCCI London, owned by Mr Noriega and family, to BCCI Luxembourg to allay Noriega's fear of asset seizure by US officials". The money was later moved at their direction from Luxembourg to accounts at several other banks, and found its way through Finley International to Capcom, it is claimed.

Yesterday's BCCI indictments, the second set in the US since the bank was shut down on July 5, were unveiled as a Congressional report claimed US federal officials had failed to pursue investigations of BCCI and had missed an opportunity to stop the bank's illegal activities despite having had information of BCCI improprieties as far back as 1988.

Mr Charles Schumer, a Democratic congressman from New York, released a detailed report on BCCI and said that in 1988 "law enforcement . . . had details of BCCI's shenanigans".

SEP 9 '91 8:43 202 824 4705 PAGE.002
SEP 9 92 17:08 FROM LEGAT LONDON PAGE.012
1325015-000-13347

US indicts BCCI officials on drug money charges

By Alan Friedman in Washington and Richard Waters in London

Financial Times 9/9/91

THE US yesterday indicted six officials of the Bank of Credit and Commerce International (BCCI), along with a leader of the Medellín cocaine cartel in Colombia and Capcom Financial Services Ltd of London on charges of racketeering and laundering millions of dollars of drug money through BCCI.

Among those indicted was Mr Syed Ali Akbar, former BCCI treasurer and former head of Capcom, who was arrested by French customs earlier this week as he arrived in Calais. The US Justice Department said it had asked France to extradite Mr Akbar to the US to stand trial.

Mr Swaleh Naqvi, the BCCI president who was first charged in New York last July, was listed as another of the 12 defendants in yesterday's indictments. The Justice Department has not asked Abu Dhabi to extradite Mr Naqvi because of "technicalities".

The charges included the alleged use by Mr Akbar and BCCI of Capcom in the UK to hide and transfer $23m (£13.6m) of funds controlled by Mr Manuel Noriega, the former Panamanian dictator, who went on trial in Miami on drug charges yesterday.

Abu Dhabi names body to consider relaunch.....Page 7

Also indicted in the BCCI case was Mr Gerardo "Don Chepe" Moncada, a leader of the Medellín cocaine cartel, and four of his associates. They are accused of using the bank's network between 1988 and 1989 to launder more than $14m of drug proceeds.

Mr Robert Mueller, assistant attorney general of the US, said the latest BCCI indictments had been delivered by a grand jury in Tampa in sealed form on August 23 and kept secret until yesterday in order to seek the arrests.

Mr Akbar, however, is the only defendant thus far arrested. Mr Mueller said Washington had been working with Scotland Yard and the Serious Fraud Office in London to seek the arrest of Mr Dilder Rizvi, a former BCCI treasurer, also charged yesterday. "We had reason to believe Mr Rizvi was in England, but our efforts to arrest him have been unsuccessful," Mr Mueller said.

In London last night, Mr Michael Barrett, a Capcom director, said: "We were named in the earlier indictment in Tampa, but that was never followed up on." Mr Akbar was sentenced in the UK last October to 18 months imprisonment for drug money laundering. He was released this year on bail, one of the terms being residence at a UK address.

Mr Akbar, in an interview with the Financial Times last month, claimed to have been made the scapegoat for failings at BCCI, and denied involvement in money laundering.

He claimed that the $23m mentioned in yesterday's indictment, and which had been paid into Capcom by Fin-

Continued on Page 16

10.

BCCI Affair Highlights Complex Tangle Of Regulators and Regulated in Washington

By Paula Treadwell
Staff Reporter

WASHINGTON — It was a crucial moment at the U.S. Federal Reserve.

After years of dallying, the Fed had awakened to the secret ownership of Washington's biggest bank holding company, First American Bankshares Inc., by the notorious Bank of Credit & Commerce International. Now — Jan. 30, 1991 — the Fed was preparing to crack down with cease-and-desist orders against both banks.

The matter was before the Fed's Board of Governors for a final vote. Finally, the action was unanimously approved — but with one notable exception. "Abstaining from this action," according to the minutes, was Fed Chairman Alan Greenspan.

Mr. Greenspan explains that he bowed out of the vote — one of the Fed's most important enforcement actions in decades — because he had socialized "on several informal occasions" with Robert Altman, who until last month was president of First American.

Many Links

In the realm of conflicts of interests, Mr. Greenspan's may be small, but it is one of many links involving the Fed, BCCI and First American. Individually, none of the relationships may be all that significant. But taken together they show that the Fed and First American were very much a part of revolving-door Washington in which it's sometimes difficult to distinguish between the regulators and the regulated.

For instance, Michael Bradfield, as a Fed lawyer, played a role in monitoring the takeover of First American by several Arab investors once the transaction had been approved. (Those investors, as it turned out, were actually fronting for BCCI.) After leaving the agency in 1988, Mr. Bradfield became a partner in the Washington office of the law firm Jones Day Reavis & Pogue, where he has done work related to First American and BCCI's share in it. Jones Day also does legal work for First American's oversight committee.

Or consider Robert Mannion, who, as deputy general counsel at the Fed, presided over 1981 hearing at which BCCI was expressly prohibited from playing a direct role in financing, taking over or controlling First American. After leaving the Fed in 1983 he joined the law firm of Arnold & Porter, which has handled important legal work for First American. Mr. Mannion says he personally isn't involved in representing the bank, however.

And there is Baldwin Tuttle, a lawyer who, after leaving the Fed general counsel's office in 1977, played an important role in helping Mr. Altman and his law partner, Clark Clifford, obtain approval for the Arab investors to buy into BCCI. (Messrs. Clifford and Altman, who acted as lawyers for the investors, went on to become chairman and president, respectively, of First American. They now say they had no idea the investors were actually fronting for BCCI.)

Warning Signs

Whether these links played a role, clearly *something* created a regulatory state of mind at the Fed regarding First American and BCCI — something that caused the agency, year after year, to do little more than take note of explicit warning signs in the BCCI-First American relationship.

Among these warning signs:

— In December 1988, David Burris, who was investigating money laundering at BCCI for the Internal Revenue Service, telephoned William Ryback, the Fed's deputy director of banking supervision. Mr. Burris explained that an undercover agent had tape-recorded a BCCI official boasting that the bank secretly controlled First American. But Mr. Ryback "showed little interest," according to a report released Thursday by a House subcommittee. Fed general counsel Virgil Mattingly disputes this account, saying that Mr. Burris was asking what information Mr. Ryback would require to take action against BCCI.

— In June 1989, a federal grand jury in Tampa also investigating BCCI for money laundering subpoenaed the Federal Reserve Bank of Richmond for information on BCCI and "various foreign and U.S. affiliates." Mr. Mattingly instructed the Richmond Fed in writing to comply with the subpoena without ever asking how BCCI, which the Fed had explicitly barred from U.S. banking, could even have "U.S. affiliates." He explains today that the wording of the subpoena reflected only the suspicions of the Tampa investigators, rather than any concrete information of ownership links.

— In October 1989, Luxembourg banking authorities informed the Fed that the owners of record in First American's holding company has been financed by BCCI — a tip-off that, as the Fed later discovered, they were apparently acting as front men for BCCI.

This time, the Fed's Mr. Ryback took action, although not until two months had passed. In a letter, he asked First American's Mr. Altman for an explanation. Two months after that, Mr. Altman replied that he personally had no way of knowing himself how the shareholders were financed. Mr. Altman did, however, attach a letter from a senior BCCI official asserting that the bank had no role in financing First American's shareholders.

The Fed did, of course, eventually take action, not only issuing the cease-and-desist order but also, on July 29, seeking a proposed fine of $200 million against the same bank. BCCI, it alleged, had accumulated a 60 interest in First American acting through its Middle Eastern front men. The Fed also sought to bar several individuals associated with BCCI from U.S. banking.

Hands-Off Attitude

Finally, it appeared, the Fed was getting tough. But in some respects the Fed's hands-off attitude persisted even after it began taking this official action.

The Fed publicly has claimed that it played a vital role in a long-running Herculean struggle that recently forced Mr. Altman to resign as president of First American and his mentor, political power house Clark Clifford, to resign as chairman. But recent correspondence between First American and the Fed makes it plain that the Fed was, in fact, willing to tolerate the executives' continued involvement with the bank.

On July 18, Mr. Mattingly, the Fed general counsel, wrote a file memo referring to an arrangement under which the Fed would have allowed the two men to remain directors of at least one of First American's main holding company boards. William Taylor, the Fed's director of banking supervision, even commended Messrs. Clifford and Altman for being "quite forthcoming" in discussions of the plan, according to Mr. Mattingly's memo.

By July 27, Mr. Taylor has a change of heart. At a meeting of Fed officials it is asserted that the "continued presence of Clifford and Altman would be damaging to the banks," according to a further file memo from Mr. Mattingly.

In dealings outside the Fed, however, Mr. Taylor seems to have been less explicit. On Aug. 2, Charles Mathias, a former U.S. Senator who serves as First American's senior outside director, demanded to know exactly where the Fed stood. "During the past week," he said in a letter, "there has been confusion with respect to your position on the question of Messrs. Clifford and Altman remaining as officers and directors of First American."

'Worrisome Outflow'

That very day, Mr. Mathias also wrote a letter to his good friend, Clark Clifford, urging him to quit the bank.

"In recent weeks," he said, "there has been a worrisome outflow of deposits (from First American) which continues each day." In the public eye, he added, "you and Bob are perceived as the link between BCCI . . . and First American."

He was particularly mindful of the effect of televised congressional hearings at which the men are scheduled to testify next week before the House Banking Committee. "The glare of publicity will be especially intense," he wrote. The two men resigned effective Aug. 12.

New Laundering Indictments Are Returned Against BCCI

W.S.J., Sept. 9, 1991

By Paul M. Barrett
And Peter Truell
Staff Reporters

WASHINGTON — A U.S. grand jury returned more money-laundering indictments involving Bank of Credit & Commerce International even as a congressional report charged that the "government simply overlooked the repeated run-ins it had with BCCI."

A grand jury in Tampa, Florida, indicted six more BCCI officials and a reputed Colombian cocaine trafficker for laundering alleged drug profits through the bank's branches around the world.

Much of the new indictments, however, appears to be based on material available to the government in 1988 and 1989. They also implicate additional people in the same transactions that were the basis of earlier charges against BCCI. Those earlier charges resulted in two BCCI units pleading guilty in January 1990 and forfeiting $15 million.

'Racketeering Enterprise'

BCCI was described in the new indictments as a "racketeering enterprise" that solicited drug traffickers' business, but the bank itself wasn't named as a defendant. As part of the 1990 plea agreement, federal prosecutors in Tampa promised they wouldn't press additional charges against the bank. Reiterating previous allegations, the indictments charged that one of the bank's major drug-related customers was Manuel Noriega, the former Panamanian ruler whose trial in a separate drug case began this week in Miami.

Rep. Charles Schumer, a New York Democrat who is chairman of the House Judiciary Committee's subcommittee on crime and criminal justice, applauded Thursday's indictments saying "finally the government is beginning to act." But he charged the government "had enough information on BCCI to put the bank on its most-wanted list many years back in the mid-1980s."

Mr. Schumer directed his committee staff to prepare the report released Thurs-

Bears Links to U.S. Fed

Ties between BCCI's New American subsidiary and the Federal Reserve Board the newspaper says in Washington, but a rabbi it's counseling couldn't be confirmed. Story on Page A4.

day, which reconstructs how federal law enforcement agencies handled allegations involving BCCI. The 32-page report charged, for instance, that the Internal Revenue Service had 15 separate matters in its files related to BCCI, but no one at the agency appeared to have noticed a pattern. Furthermore, senior IRS officials three times in 1988 refused requests from a South Florida agent for an undercover operation.

'A Step Away'

In addition, in 1988 the U.S. Customs Service was "a step away from discovering that BCCI was involved in a massive coffee-smuggling scheme" out of South Florida, according to the report. The alleged coffee smuggler, Mandur Bilgrami, only recently was indicted and now awaits trial on tax-evasion charges, but the smuggling charges are now mostly past the statute of limitations. Moreover, Customs never expanded its investigation, which "would have uncovered that the bank issued phony letters of credit to finance the smuggling," the report said. Mr. Bilgrami, who is a resident of Jordan, has denied committing tax evasion and and smuggling coffee.

Justice Department officials said that the new indictments demonstrated that U.S. authorities were, in fact, aggressively pursuing cases against BCCI and its officials. They also angrily dismissed criticism from Rep. Schumer that U.S. law enforcement agencies have moved sluggishly. "The congressman's report indicates that which is often found in difficult cases, in which there are a number of law enforcement agencies participating," Assistant Attorney General Robert Mueller said.

"This is a very important stage in a continuing investigation," Mr. Mueller said of the indictments announced Thursday. "There quite probably will be more" charges involving the bank or its employees, he added. Mr. Mueller insisted that the 1990 plea agreement had only prevented prosecutors in Tampa from bringing new charges against the bank; U.S. attorneys elsewhere, he said, have no such constraints.

Officers Named

Also named in the indictments Thursday were Swaleh Naqvi, acting president of BCCI; S.Z.A. Akbar, former BCCI treasurer; Dildar Rizvi, BCCI's current treasurer; and Bashir Sheikh, Wilfredo Chirino and A.W. Bilgrami, all former managers of BCCI operations in Panama.

PAGE.009 SEP 9 '92 17:06 FROM LEGAT LONDON
SEP 9 '91 6:45 202 324 4705 PAGE.001
1325015-000-13350

Top BCCI man held leaving Channel ferry

By Nikki Fielding

ONE OF the key figures at the centre of Bank of Credit and Commerce International's money-laundering operations, Syed Ziauddin Ali Akbar, has been arrested in Calais as he tried to escape the reach of the huge international investigation into the collapsed bank.

Mr Akbar was arrested at 5pm on Tuesday after leaving the Dover-Calais ferry, following a joint operation involving the Serious Fraud Office, the US Department of Justice, the City of London police and French authorities.

The day before, the High Court in London had issued an injunction freezing his assets in a case concerning $23m allegedly stolen by the former Panamanian dictator General Manuel Noriega and laundered through Mr Akbar's BCCI-connected company, Capcom Financial Services. He fled before court papers could be served.

According to UK sources, Mr Akbar was using a fake passport, his own having been impounded by the British courts. He is presently on parole having served six months of an 18-month sentence imposed at the Old Bailey last October after a conviction for conspiracy to launder drug money.

Mr Akbar is now likely to be the subject of extradition proceedings to the United States. Delicate negotiations between British and US regulatory authorities have been going on for several days over who should extradite him. He was yesterday indicted on drug money-laundering charges along with five other former BCCI officials by an American grand jury in Tampa, Florida.

It appears that if Mr Akbar were brought back to the UK for violating his parole conditions that would make it difficult to charge him with other offences. This is likely to be a serious blow to the British police fraud inquiry into both BCCI and Capcom, the futures firm set up by Mr Akbar in the mid-1970s while he was head of the bank's Treasury operation. He was probably the only senior former BCCI official in Britain, the rest having fled to Pakistan or the Gulf.

The High Court hearing on Monday was brought by lawyers representing the government of Panama. It named five defendants including Mr Akbar, Capcom, General Noriega and his wife Felicidad, and Finley International, a company of which Mr Akbar was a director.

Lawyers acting for Panama were back in the High Court yesterday, where they obtained extensions to the freeze orders until the trial and an order against Capcom to disclose its world-wide assets.

US indictments, page 20

1325015-000-13351

'ENDENT

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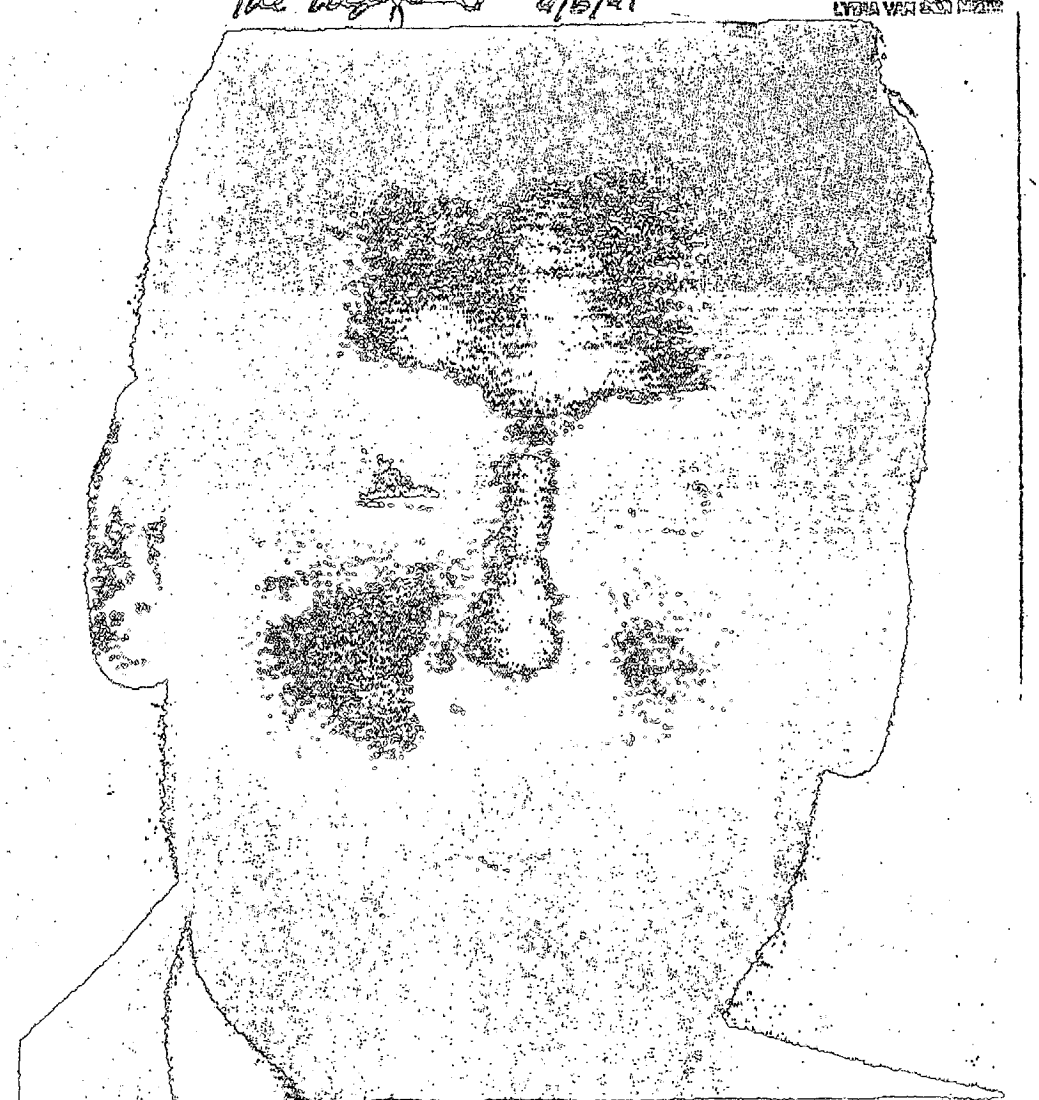
Fri

opher Huhne

The Independent 9/6/91



Syed Zhuddin Ali Akbar, arrested yesterday in France, is among those indicted in the United States

or six former BCCI officers who could testify about BCCI's secret ownership and control of First American Bank in Washington.

The official turned down the offer. Two years later, in January 1991, the Federal Reserve made a criminal referral on these same allegations on its own.

Neil Kinnock yesterday called for a "viable restructuring of BCCI", regardless of any action against those responsible for criminal acts. His call followed a meeting with a BCCI staff group led by the Labour MP Keith Vaz.

The Labour leader also accused John Major of reneging on his promise of a public inquiry into the affair and said the Prime Minister should reverse his decision.

THE INDEP

BUSINES

Edited by Chris

BCCI officials indicted by US grand jury

By Nick Fielding

SIX officials of the Bank of Credit and Commerce International have been indicted by a US grand jury on charges of laundering millions of dollars of drug money through its international banking network.

They include the convicted drug money launderer Syed Ziauddin Ali Akbar, former acting chief executive Swaleh Naqvi and former deputy head of BCCI's American operations Dildar Rizvi.

The indictment, which was made available by the Justice Department in Washington, refers to BCCI as a "racketeering enterprise" but does not formally charge the bank.

As well as naming the senior BCCI officials, it indicts three former members of the bank's Panama staff. It alleges that between 1985 and 1989 they laundered more than $14m (£8.3m) of drug money and engaged in a worldwide conspiracy involving more than 145 acts.

Money was allegedly placed in banks in France, Panama, Uruguay, the Bahamas, Luxembourg, Britain and elsewhere.

Akbar, arrested by French police yesterday, has already been sentenced for his part in conspiring to launder drug money in a court case at the Old Bailey last October. He served six months of an 18-month sentence before his release earlier this year.

Akbar's earlier conviction was part of a wider series of court cases which resulted in five BCCI officials being sentenced to terms ranging up to 12 years for laundering drug money. They included Amjad Awan, who ran the bank's Miami branch.

Their arrests followed a US Customs undercover operation which netted more than 80 narcotics traffickers and money launderers, most of whom were arrested at a fake wedding planned by customs agents.

However, despite the growing pace of court actions in America against BCCI a report published yesterday by a committee of the House of Representatives makes strong criticisms of law enforcement agencies for failing to take action earlier against the bank.

The report from the House Judiciary Committee's sub-committee on crime and criminal justice, chaired by Charles Schumer, says the government "had enough information on BCCI by the mid-1980s to have put BCCI on the most wanted list".

It says that on at least two occasions high-ranking officials quashed actions recommended by rank-and-file investigators that might have led to full-scale investigations of what it refers to as "a criminal enterprise of international proportions".

The report notes that the Internal Revenue Service has so far identified 15 separate matters involving BCCI from 1984 to the present that may involve criminal activities. Of these, 10 were referred to the Justice Department for criminal action, with seven resulting in indictment.

It adds that various federal authorities, such as Customs and the Drug Enforcement Administration, knew of BCCI's involvement in criminal activities from 1983.

Among the failures of American regulators, it mentions that in December 1988 an IRS special agent in Tampa offered to direct a senior official of the Federal Reserve Board in Washington to fin

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BCCI treasury chief held over $1bn loss cover-up

EUROPEAN 9/6-8/9,

Charles McVeigh

FRENCH police have made the first arrest following the collapse of the Bank of Credit and Commerce International.

Syed Valuddin Ali Arbar, head of BCCI's treasury department in London until 1986, was taken into custody in Calais on charges that he laundered drug money and that he covered up losses of $1 billion at the bank.

Arbar, who denies the allegations, was arrested following a joint investigation by the British Serious Fraud Office, the US Department of Justice and the French authorities. He is being held pending extradition to the US. BCCI was closed down on July 5 on suspicion of what investigators believe may have been the biggest fraud in financial history.

Six men were named in a US indictment, which was returned by a grand jury in Florida. The justice department called BCCI a "racketeering exercise" but did not formally charge the bank with any wrongdoing. The six included Arbar, treasurer Dildard Rizzi, acting president Swaleh Naqvi and three former BCCI officials in Panama. The indictment alleges that the six officials laundered drugs cash worth more than $14 million and engaged in a conspiracy involving more than 145 accounts.

Assistant Attorney General Robert Mueller said that the indictment was the first major step in the criminal investigation of BCCI. The money was allegedly placed in bank branches in France, Uruguay, the Bahamas, Luxembourg, Britain and elsewhere. If they are convicted, the BCCI defendants face 25 years in prison.

Former BCCI treasurer held in Calais

By GEORGE SIVELL AND SUSAN ELLICOTT

SYED Ali Akbar, the former treasurer of the collapsed Bank of Credit and Commerce International, has been arrested in Calais, it was disclosed last night. He has been detained in prison pending a decision on extradition which must be made by the French authorities within 40 days.

After the arrest the US Justice Department revealed an indictment against Mr Ali Akbar, five other BCCI officials, and a reputed Colombian drug baron, of laundering drug funds through BCCI's banking network.

The indictment was returned by a grand jury in Tampa, Florida, and made public by the Justice Department in Washington. It described BCCI as a "racketeering enterprise".

The other BCCI officials named in the indictment were Dilderd Rizzi, the treasurer, Swaleh Naqvi, the acting president, and three former BCCI officials in Panama. The alleged drug baron was named as Gerardo Moncada. Only Mr Ali Akbar was in custody, but Mr Naqvi was believed to be in Abu Dhabi and Mr Rizzi in Britain, officials said.

The indictment claimed that the six BCCI officials laundered more than $4 million in drug proceeds from 1983 to 1989 and engaged in a worldwide conspiracy involving more than 145 acts.

Mr Ali Akbar, aged 47, lived in London and has dual British and Pakistani nationalities. In 1990 he was sentenced to 18 months in prison in Florida for laundering drug money. Mr Ali Akbar was released after six months. He was head of treasury services of BCCI in London until 1986.

French border police first took Mr Ali Akbar in for questioning on Monday on suspicion of illegal entry into France. He was detained near a Calais hotel where he had stayed for a week since leaving Britain. Sources said that the police seized letters which he had prepared for his defence, accounting documents and bank statements.

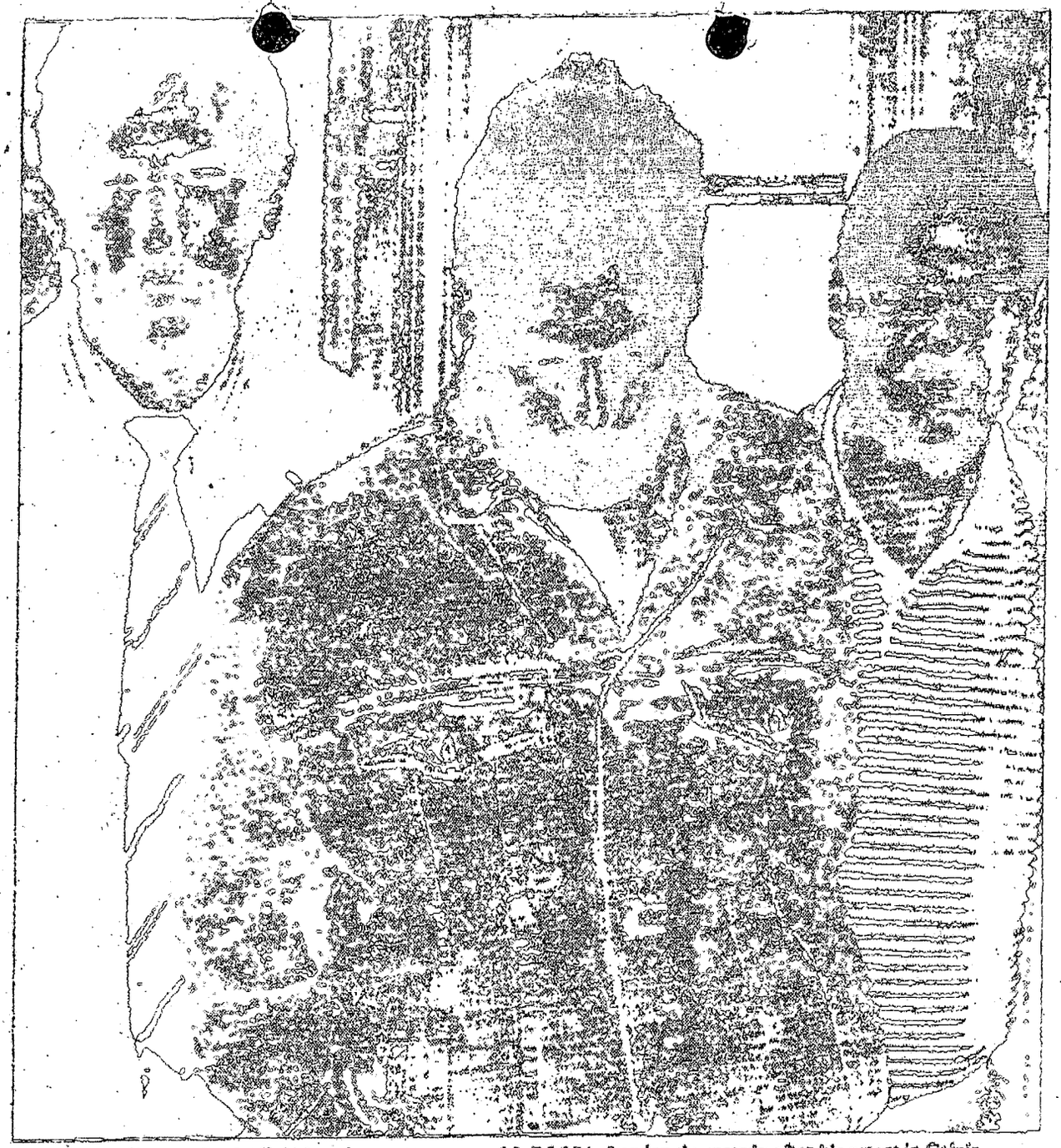
In a recent interview Mr Ali Akbar denied allegations that he concealed losses at the department he headed at BCCI.

BCCI indictment, page 23

Guardian Times 4/6/91

3

1325015-000-13355



Held in France: Syed Ali Akbar, former treasurer with BCCI in London, in custody after his arrest in Cairo

2

1325015-000-13356

BCCI six indicted in Florida

By Susan Elliott in Washington and George Sivell in London

A FLORIDA grand jury has indicted six Bank of Credit and Commerce International executives and the alleged leader of a Colombian cocaine cartel for laundering more than $14 million of drug profits through at least 145 accounts around the world.

The American justice department announcement followed the release of a congressional report accusing federal officials of ignoring evidence of BCCI's misconduct for years, before taking action against the bank this summer.

Robert Mueller, the deputy attorney general, made the charges public after Syed Ali Akbar, former BCCI treasurer, was arrested in Calais, northern France. Ali Akbar, who lives in London and has British and Pakistani nationalities, was detained pending a decision on extradition by a court, which must rule within 40 days.

The justice department said it knew three months ago of the indictments by a grand jury in Tampa investigating the BCCI scandal. But the Bush administration waited before advancing its criminal enquiry until Charles Schumer, the Democratic chairman of a house subcommittee, released a report critical of the government's handling of the affair. The 29-page document said that federal officials "simply overlooked the repeated run-ins" with customers and executives of the Luxembourg-based bank for at least five years. The report also charged unnamed senior Internal Revenue Service staff with refusing, in 1986, to follow up a request from a Florida tax agent to investigate the bank in the light of information he received from ex-BCCI staff.

The indictment against the former BCCI directors coincided with the opening of the trial of General Manuel Noriega in Miami.

He is pleading innocent to charges of drug trafficking, racketeering, money laundering and accepting $4.6 million in bribes from Colombian drug barons.

The High Court in London yesterday renewed asset-freezing injunctions won by the Panamanian government, which is trying to recover £14 million allegedly stolen by the general. The five defendants, include Noriega and his wife, a brokerage firm Capcom Financial Services Ltd, a company linked to the collapse of BCCI, and Ali Akbar, Capcom's former boss and former BCCI treasury chief.

The defendants are prevented, until full hearing of an action over the disputed money, from removing from the English court's jurisdiction, or otherwise dealing in or disposing of, the £14 million in the account. Mr Justice Mummery also gave Panama access to all documents relating to £14 million said into an account of Finley International at the Middle East Bank in the City of London in September 1988.

Calais arrest, page 1

London Times 4/6/92

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b7C

9.6.91
Please FAX
to SSA, WCCS, FBI HQ

1325015-000-13357

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Calais arrest, page 1

London Times 9/6/92.

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b7C

9.6.92
Please FAX
to SSA, WCCS, FBI/HQ

SEP 9 '92 17:00 FROM LEGAT LONDON PAGE.002

Held in France: Syed Ali Akbar, former treasurer with BCCI in London, in custody after his arrest in Calais

1325015-000-13359

SEP 9 '92 17:01 FROM LEGAT LONDON PAGE.003

Former BCCI treasurer held in Calais

By GEORGE SIVELL AND SUSAN ELLICOTT

SYED Ali Akbar, the former treasurer of the collapsed Bank of Credit and Commerce International, has been arrested in Calais, it was disclosed last night. He has been detained in prison pending a decision on extradition which must be made by the French authorities within 40 days.

After the arrest the US Justice Department revealed an indictment against Mr Ali Akbar, five other BCCI officials, and a reputed Colombian drug baron, of laundering drug funds through BCCI's banking network.

The indictment was returned by a grand jury in Tampa, Florida, and made public by the Justice Department in Washington. It described BCCI as a "racketeering enterprise".

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French border police first took Mr Ali Akbar in for questioning on Monday on suspicion of illegal entry into France. He was detained near a Calais hotel where he had stayed for a week since leaving Britain. Sources said that the police seized letters which he had prepared for his defence, accounting documents and bank statements.

In a recent interview Mr Ali Akbar denied allegations that he concealed losses at the department he headed at BCCI.

BCCI indictments, page 23

London Times
4/6/91

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1325015-000-13360
SEP 9 '98 17:08 FROM LEGAT LONDON PAGE.004

BCCI treasury chief held over $1bn loss cover-up

EUROPEAN 4/6-8/91

Charles McVeigh

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1325015-000-13361

THE INDEI
BUSINES
Edited by Chris

BCCI officials indicted by US grand jury

SIX officials of the Bank of Credit and Commerce International have been indicted by a US grand jury on charges of laundering millions of dollars of drug money through its international banking network.

They include the convicted drug money launderer Syed Ziauddin Ali Akbar, former acting chief executive Swaleh Naqvi and former deputy head of BCCI's American operations Dildar Rizvi.

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By Nick Fielding

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Among the failures of American regulators, it mentions that in December 1988 an IRS special agent in Tampa offered to direct a senior official of the Federal Reserve Board in Washington to tip

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1325015-000-13362
SEP 9 '92 17:03 FROM LEGAL LONDON PAGE.006

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The Independent 9/6/91

LYDIA VAN DER MEER

Syed Ziauddin Ali Akbar, arrested yesterday in France, is among those indicted in the United States

or six former BCCI officers who could testify about BCCI's secret ownership and control of First American Bank in Washington.

The official turned down the offer. Two years later, in January 1991, the Federal Reserve made a criminal referral on these same allegations on its own.

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The Labour leader also accused John Major of reneging on his promise of a public inquiry into the affair and said the Prime Minister should reverse his decision.

6a.

1325015-000-13363

SEP 9 '92 17:04 FROM LEGAT LONDON PAGE.007

FD-65 (Rev. 1-13-86)

Federal Bureau of Investigation

AIRTEL

To: Director, FBI
Att: Criminal Investigative Division
Fugitive Unit

Date: 11/19/91

INSTRUCTIONS - Reverse Side

NOTE: Priority "A" and "B" Fugitives - With initial submission, set forth a synopsis of crime on reverse side.

From: SAC, WMFO (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS
MC #38
FIF; FAG
OO:WMFO

- [X] III Inquiry
- [X] Initial Submission
- [ ] Initial Submission - Parental Kidnaping
- [ ] Supplements FD-65 dated _____

Indicate Fugitive Priority

- [ ] A
- [X] B
- [ ] C
- [ ] D (Parental Kidnaping)

FUGITIVE INDEX

Caution MKE	Name NAM	Sex SEX	Race RAC
☐	GHAITH RACHAD PHARAON	M	W

Place of Birth POB	Birth Date DOB	Date of Emancipation DOE	Height HGT	Weight WGT
RIYADH, SAUDI ARABIA (SB)	9/7/41		5'09"	250

Eye Color EYE	Hair Color HAI	FBI No. FBI	Skin Tone SKN
	BLACK		

Scars, Marks, Tattoos, and Other Characteristics SMT

NCIC Fingerprint Classification FPC	Other Identifying Number MNU	Social Security # SOC

Operator's License Number OLN	Operator's License State OLS	Year Expires OLY

Offense Charged RICO; FBW; CONSPIRACY; AIDING & ABETTING OFF

U. S. Code, Title and Section TITLE 18, USC, SECTIONS 1962(d); 1343; 371; 2

Warrant Issued By U.S. DISTRICT COURT, WASHINGTON, DC on 11/18/91 DOW

F.O. File # 29B-WF-171994 OCA

Miscellaneous Including Bond Recommended (MIS)

STOP CARDS AUTOMATED

LICENSE PLATE AND VEHICLE INFORMATION

License Plate Number LIC	State LIS	Year Expires LIY	License Plate Type LIT

Vehicle Identification # VIN	Year VYR	Make VMA	Model VMO	Style VST	Color VCO

Aliases

DR. GHAITH R. PHARAON
GHAITH RASHAD PHARAON

Additional Identifiers

SAUDI CITIZEN

NCIC # NIC

W665764502

1325015-000-13367

2 - FBIHQ (1 - Fugitive Unit)

FBI/DOJ

PRIORITY "A" and "B" FUGITIVES - Synopsis of Crime.

GHAITH RACHAD PHARAON, as shareholder in and nominee for the Bank of Credit and Commerce International, is alleged to have participated in a racketeering conspiracy which secretly acquired a California bank and fraudulently dealt in debentures of a Florida bank.

NOV 25 7 32 AM '91

INSTRUCTIONS

1. **Caution (MKE)** - Insert "C" in block if caution statement indicated. Basis for caution statement must appear in Miscellaneous block, e.g., armed and dangerous.
2. **Name (NAM)** - Place name in this block. Aliases are not to be entered in this block but are to be placed in Aliases block.
3. **Sex (SEX)** - Sex will be designated by one letter, M (male) or F (female).
4. **Race (RAC)** - Race will be described by one letter, A (Asian or Pacific Islander), I (American Indian or Alaskan Native), B (Black), W (White), U (Unknown).
5. **Place of Birth (POB)** - Indicate city and state or, if foreign born, city and country. Where multiple birthplaces are reported, list verified birthplace or that which appears most logical in this block.
6. **Birth Date (DOB)** - Enter as month, day and year. Where multiple birth dates are reported, enter verified birth date or that which appears most logical in this block. Place other dates of birth in Additional Identifiers block.
7. **Date of Emancipation (DOE)** - Must be filled in if individual is a juvenile. Otherwise leave blank.
8. **Height (HGT)** - Express in feet and inches, e.g., 6'0". Round off fractions to nearest inch.
9. **Weight (WGT)** - Express in pounds. Omit fractions.
10. **Eye Color (EYE)** - Use appropriate three-character symbol.
11. **Hair Color (HAI)** - Use appropriate three-character symbol.
12. **Skin Tone (SKN)** - Use appropriate three-character symbol.
13. **Scars, Marks, Tattoos, (SMT), and Other Characteristics** - Place in this block only appropriate NCIC coding for scars, marks, tattoos, birthmarks, deformities, missing body parts and artificial body parts as defined in NCIC Code Manual. If more than one SMT is to be entered, use Additional Identifiers block for additional appropriately coded items. Use Miscellaneous block to describe all scars, marks, tattoos, and other characteristics, which are not defined in the NCIC Code Manual and to more fully describe SMT's which have been entered in SMT block. For example, an appendectomy scar, not being readily visible, would be described in the Miscellaneous block. A tattoo on right arm, shown as TAT R ARM in block, might be further described in Miscellaneous block as a rose tattoo on inside of lower right arm.
14. **NCIC Fingerprint Classification (FPC)** - Enter NCIC fingerprint classification.
15. **Other Identifying Number (MNU)** - Miscellaneous numbers may be entered with appropriate identifiers (prefixes). For first miscellaneous identifying number, use MNU block. When military service number is in fact Social Security Account Number, the number should be entered in both MNU and SOC blocks. Additional identifying numbers are placed in Additional Identifiers block. The identifier (prefix) should precede the number and be separated from the number by use of a hyphen.
16. **Social Security Number (SOC)** - Place subject's Social Security Account Number in this block.
17. **Operator's License Number** - Place subject's operator's license number in OLN block. Also show licensing state (OLS) and year license expires (OLY).
18. **Warrant Issued By-On-(DOW)** - Enter date warrant issued in DOW block. For juvenile offenders, enter the date of violation.
19. **Miscellaneous (MIS)** - Enter additional pertinent information in this block. If caution statement used, basis for statement must be set forth as first item in this block.
20. **License Plate and Vehicle Information** - Place information concerning license plate and/or vehicle known to be in the possession of subject in appropriate blocks under License Plate and Vehicle Information heading.
21. **Additional Identifiers** - Enter information concerning additional license plates (number, state, year expires, and where applicable, type); Social Security Numbers; operator's license number, state and year expires; vehicle information (VIN, VYR, VMA, VMO, VST, VCO); MNU's (see list in item 14 above); visible scars, marks, tattoos, and other characteristics; and dates of birth. Clearly identify what data is being set forth; e.g., Social Security # 423-56-3294; Michigan operator's license 234567, expires 1987; DOB's 4/5/32, 5/3/32; etc.
22. By making an III inquiry, the entering agency may become knowledgeable of additional DOBs, AKAs, and other significant information which may aid in the location and/or apprehension of wanted persons.
23. Changes and deletions should be so indicated in the appropriate blocks.

380

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
X ☐ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 12/12/91

TO : DIRECTOR, FBI
(ATTN: CID, WCCS, FIFU)

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5)

SUBJECT : HIDDEN INTERESTS;
MC #38;
FIF; FAG;
OO:WMFO

For the information of receiving offices, captioned title 'HIDDEN INTERESTS' is a wide ranging investigation into the involvement of the Bank of Credit and Commerce International (BCCI) with the U.S. banking industry. One aspect of the investigation deals with Centrust Savings Bank (Centrust) of Miami, Florida and the 'Parking' of $25 million of Centrust Subordinate Debentures (Sub Debt).

In May 1988, Centrust, through Drexel, Burhnam, Lambert and Merrill Lynch began placing (selling) a $150 million Sub Debt offering to the public. GHAITH R. PHARAON, a major stock holder (24.9%) of Centrust and a major player within BCCI, made arrangements with BCCI to purchase $25 million of the total $150 million Centrust Sub Debt, with the fore-knowledge that Centrust would repurchase the debt within 3 months. On May 18, 1988, PHARAON/BCCI purchased $25 million of Centrust Sub Debt and Centrust subsequently repurchased the same debt in late July, 1988, six (6) weeks after the initial

1D

29B-WF-171994-63

b6
b7C

3-Bureau
3-Boston
3-Columbia
3-Denver
3-Indianapolis
3-Memphis
(37)
RHM:rhm

3-Newark
3-New York
3-Miami
3-Omaha
3-St. Louis
3-Tampa
1-WMFO

Rm 3853
Rm 3841

29HQ-116176

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1cc Retained at FIFU Room 3841.

DR
12/12/91

1325015-000-13309

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 57
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 30 ~ Referral/Consult;
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PRIORITY "A" and "B" FUGITIVES - Synopsis of Crime.

[redacted] of the Bank of Credit and Commerce International, is alleged to have participated in a racketeering conspiracy which secretly acquired a California bank and fraudulently dealt in debentures of a Florida bank.

b6
b7C

NOV 75 7 32 AM '87

INSTRUCTIONS

1. **Caution (MKE) -** Insert "C" in block if caution statement indicated. Basis for caution statement must appear in Miscellaneous block, e.g., armed and dangerous.
2. **Name (NAM) -** Place name in this block. Aliases are not to be entered in this block but are to be placed in Aliases block.
3. **Sex (SEX) -** Sex will be designated by one letter, M (male) or F (female).
4. **Race (RAC) -** Race will be described by one letter, A (Asian or Pacific Islander), I (American Indian or Alaskan Native), B (Black), W (White), U (Unknown).
5. **Place of Birth (POB) -** Indicate city and state or, if foreign born, city and country. Where multiple birthplaces are reported, list verified birthplace or that which appears most logical in this block.
6. **Birth Date (DOB) -** Enter as month, day and year. Where multiple birth dates are reported, enter verified birth date or that which appears most logical in this block. Place other dates of birth in Additional Identifiers block.
7. **Date of Emancipation (DOE) -** Must be filled in if individual is a juvenile. Otherwise leave blank.
8. **Height (HGT) -** Express in feet and inches, e.g., 6'0". Round off fractions to nearest inch.
9. **Weight (WGT) -** Express in pounds. Omit fractions.
10. **Eye Color (EYE) -** Use appropriate three-character symbol.
11. **Hair Color (HAI) -** Use appropriate three-character symbol.
12. **Skin Tone (SKN) -** Use appropriate three-character symbol.
13. **Scars, Marks, Tattoos, (SMT), and Other Characteristics -** Place in this block only appropriate NCIC coding for scars, marks, tattoos, birthmarks, deformities, missing body parts and artificial body parts as defined in NCIC Code Manual. If more than one SMT is to be entered, use Additional Identifiers block for additional appropriately coded items. Use Miscellaneous block to describe all scars, marks, tattoos, and other characteristics, which are not defined in the NCIC Code Manual and to more fully describe SMT's which have been entered in SMT block. For example, an appendectomy scar, not being readily visible, would be described in the Miscellaneous block. A tattoo on right arm, shown as TAT R ARM in block, might be further described in Miscellaneous block as a rose tattoo on inside of lower right arm.
14. **NCIC Fingerprint Classification (FPC) -** Enter NCIC fingerprint classification.
15. **Other Identifying Number (MNU) -** Miscellaneous numbers may be entered with appropriate identifiers (prefixes). For first miscellaneous identifying number, use MNU block. When military service number is in fact Social Security Account Number, the number should be entered in both MNU and SOC blocks. Additional identifying numbers are placed in Additional Identifiers block. The identifier (prefix) should precede the number and be separated from the number by use of a hyphen.
16. **Social Security Number (SOC) -** *Place subject's Social Security Account Number in this block.*
17. **Operator's License Number -** Place subject's operator's license number in OLN block. Also show licensing state (OLS) and year license expires (OLY).
18. **Warrant Issued By-On-(DOW) -** Enter date warrant issued in DOW block. For juvenile offenders, enter the date of violation.
19. **Miscellaneous (MIS) -** Enter additional pertinent information in this block. If caution statement used, basis for statement must be set *forth as first item in this block.*
20. **License Plate and Vehicle Information -** Place information concerning license plate and/or vehicle known to be in the possession of subject in appropriate blocks under License Plate and Vehicle Information heading.
21. **Additional Identifiers -** Enter information concerning additional license plates (number, state, year expires, and where applicable, type); Social Security Numbers; operator's license number, state and year expires; vehicle information (VIN, VYR, VMA, VMO, VST, VCO); MNU's (see list in item 14 above); visible scars, marks, tattoos, and other characteristics; and dates of birth. Clearly identify what data is being set forth; e.g., Social Security # 423-56-3294; Michigan operator's license 234567, expires 1987; DOB's 4/5/32, 5/3/32; etc.
22. By making an III inquiry, the entering agency may become knowledgeable of additional DOBs, AKAs, and other significant information which may aid in the location and/or apprehension of wanted persons.
23. Changes and deletions should be so indicated in the appropriate blocks.

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Department of Justice

Dep. Dir.
ADD Adm.
ADD Inv.
Asst. Dir.
Adm. Serv.
Crim. Inv.
Ident.
Info. Mgt.
Inspection
Intell.
Laboratory
Legal Coun.
Tech. Servs.
Cong. Affairs
Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs
Telephone Rm.
Director's Office

Clark McAdams Clifford

TESTIMONY OF

PAUL L. MALONEY
DEPUTY ASSISTANT ATTORNEY GENERAL
CRIMINAL DIVISION

BEFORE THE

SENATE BANKING COMMITTEE
SUBCOMMITTEE ON CONSUMER AND REGULATORY AFFAIRS

29-WF-171994-40X1

MAY 23, 1991

29-HQ-116176

1325015-000-12802

MR. CHAIRMAN, my name is Paul Maloney. I am a Deputy Assistant Attorney General for the Criminal Division of the Department of Justice. On behalf of the Department, I wish to thank the subcommittee for the opportunity to present the Department's views on the need for legislation concerning the regulation of foreign banks.

Your invitation letter requested testimony in two areas: the BCCI money laundering case, as an example of a recent prosecution of a foreign bank that might serve as a model around which to explore the need for legislation in this area, and S. 1019, legislation recently introduced by Senator Reigle. I am prepared to testify and to answer the subcommittee's questions with respect to both of these matters. I must say at the outset, however, that beyond relating a few of the facts that are already a matter of public record, I will not be able to comment on matters which are presently under review by the Department including relationships between BCCI and First American Bank. That matter is the subject of an ongoing criminal investigation and it would not be appropriate for me to say anything that might jeopardize the outcome of this or any case.

As federal prosecutors, we are governed by very clear rules. In the case of a grand jury investigation, we can neither confirm nor deny that an investigation is taking place. In the case of other investigations, we may only relate the general subject matter of the investigation and indicate that it is continuing or

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that it is concluded. As the members of this subcommittee can appreciate, there are very good reasons for this policy. First and foremost, is the matter of fairness to persons under investigation. We must act responsibly so that citizens are judged on the basis of evidence formally presented, not on rumors and incomplete information.

Moreover, law enforcement suffers when an investigation is conducted in public. Sources dry up, persons who might be inclined to cooperate with the government are less inclined to do so, on-going undercover operations may be compromised, and the targets of the investigation, having been apprised of what the government is after, have an opportunity to fabricate evidence, and coordinate their stories before they are approached by law enforcement agents. For all of these reasons; we cannot discuss the matter of BCCI and First American in any detail today.

The money laundering prosecution against BCCI, of course, is now a matter of public record, and I am happy to discuss the facts of that case with the subcommittee.

CHRONOLOGY OF BCCI INVESTIGATION

The BCCI investigation began in December of 1986 when two undercover Customs agents in Tampa formed a "partnership" with a Colombian money launderer from Medellin. The original object of their investigation was to trace the flow of cocaine proceeds from the United States to South America in order to identify and prosecute major Colombian drug traffickers operating in United States cities. The money launderer would notify the agents by

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telephone when large sums of currency, all proceeds of cocaine sales, were available for a pick-up. The agents would then arrange to collect the currency from the couriers, deposit it in U.S. banks, and within seven to ten days make transfers in "laundered" form to Colombia. The evolution of this investigation into the prosecution of an international bank, BCCI, was only a result of subsequent developments.

The drug money, which amounted to about $33 million by the conclusion of the operation, was initially deposited by undercover Customs agents into accounts at various U.S. banking institutions that were cooperating with the government. Currency Transaction Reports (CTRs) were filled out by each of these cooperating banks, albeit in fictitious "undercover" names. All funds were then channelled by wire transfers between U.S. banks to a single account in the name of Financial Consulting, Inc., that was opened by the principal undercover agent at Florida National Bank, St. Petersburg, Florida. At the behest of the perpetrators, the funds were further transferred to Colombia from the St. Petersburg account by check. The checks were then sold by the Colombian launderer on the "black market" in Medellin.

BCCI was not targeted by the agents in this investigation; it targeted itself. The Colombian money launderer had insisted that the undercover agents establish a bank account in Panama because checks drawn on Panama accounts were more freely marketable and sold at a higher price than checks in the same

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dollar amounts drawn on United States banks. Drug traffickers value Panamanian bank secrecy laws which make it much more difficult to trace their transactions; also, Panama is closer to Colombia than the United States, and Panamanian checks clear more rapidly. We hope that this problem will be effectively addressed by the recently signed Mutual Legal Assistance Treaty (MLAT) with Panama. The undercover agent therefore opened an account in the name of a "shell" corporation at the Bank of Credit and Commerce International (BCCI) in Panama City, Panama. BCCI was chosen essentially because it was the only international bank with branches in Panama that also had an agency in Tampa. The customs agent was able to walk in off the street in Tampa and make arrangements to open up a Panamanian checking account simply by completing the account opening forms. There was no need to leave Tampa. The shelf corporation, IDC International, in whose name the BCCI checking account was opened, was purchased by the undercover agent through the mails from a Panamanian attorney whose services were advertised in the classified section of a magazine freely available in the United States.

During this period (late 1987) BCCI worldwide was involved in a very aggressive deposit drive. Ultimately, an officer of the Panama City branch, Aftab Hussein, having detected apparent laundering activity in the IDC International account, placed a long distance telephone call to the signatory of the account, "Robert Musella," the principal undercover agent. In November of 1987 Hussein suggested to Musella that they get together in Miami

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to discuss how BCCI could help Musella's business. At their first meeting in early December of 1987, Hussein explained that by using checks Musella was making himself more vulnerable to U.S. government investigation. Hussein explained that many accounts at BCCI in Panama had been seized by U.S. drug agents, because the account holders used checks in their operations.

Hussein suggested that Musella stop using a checking account and instead purchase certificates of deposit (CD) with his clients' funds. According to Hussein, a CD purchased at BCCI's branch in Panama with funds wired from the United States, for example, might be used to collateralize a loan in the same amount from BCCI to a shelf corporation in Europe. That corporation, in turn, could use the loan proceeds to wire transfer still another loan to Musella's customers, the drug dealers. In this way, the "clients" would have the value of their illegal proceeds in the form of a loan from an ostensibly legitimate source, Musella could obtain greater security, and Hussein could receive credit for increasing BCCI's deposit base since the original CD would remain indefinitely at the Panama branch. (This type of money laundering scheme is often referred to as a back-to-back loan scheme.)

The undercover agent accepted Hussein's proposals and was soon introduced to a number of other, higher ranking, BCCI officers in Miami, Paris and London. These officers, all having been advised that Musella's funds were generated by cocaine trafficking, eagerly assisted in laundering the money through a

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wire transfer system involving certificates of deposit as collateral for back-to-back loans in like amounts. Many of the transactions were extremely complex. However, they all had certain common characteristics: In every case the transaction was initiated by a collection of cash generated by drug trafficking in some U. S. city. In every case this cash was deposited to an account in a U. S. banking institution that was cooperating with the U. S. Customs Service. In virtually every case, CTRs were filed by the cooperating bank, usually in some fictitious name provided to the bank by the undercover customs agent who brought the cash to the teller. After the initial deposit, the funds were transmitted by wire to the Florida National Bank in St. Petersburg, where the undercover customs agent maintained an account in the name of Financial Consulting, Inc. The next step normally involved a wire transfer of the funds in that account either to BCCI Panama City, or to some other BCCI branch or BCCI affiliate, such as BCP Geneva. Variations were often introduced after this juncture. A certificate of deposit might be purchased and held in another corporate account, say in Panama City. Based on this certificate of deposit in Panama a letter of credit could be issued in favor of a shelf corporation in whose name another account might be opened. Once funds were transferred to this account they might be disbursed by check or wire to accounts in Banco de Occidente or Banco Cafetero, two Colombian banks with branches in Panama that were frequently used by Colombian traffickers.

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Let me digress from the chronology of the BCCI case for the moment to comment on what I understand to be the subcommittee's principal interest in this matter. How might additional regulation of foreign banks such as BCCI by federal regulators have prevented this type of money laundering activity from occurring or made it easier to discover it once it occurred? Unfortunately, while we certainly support the efforts of bank regulators to supervise foreign banks, and while we agree that such supervision could help to detect violations of the money laundering laws in cases such as this, the BCCI case also illustrates the limitations of regulation by United States banking authorities as a law enforcement tool with respect to money laundering. More than anything else, this case focuses our attention on the need for cooperation and the sharing of information concerning banking transactions among foreign governments, and it provides a prime example of the need for sophisticated law enforcement work by well-trained agents who are able to carry on undercover operations.

In the BCCI investigation, the initial "laundering" of drug proceeds occurred in the United States when cash was deposited into American banks that were cooperating with the investigation. BCCI's criminal involvement occurred at the point where, with knowledge that the funds represented drug proceeds, the funds were transferred by wire from Florida to BCCI's Panama City branch and then onward, in the fashion described above. In other words, virtually all of BCCI's criminal activity took place

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outside of the United States. Regulators examining the records of BCCI's operations in Florida might have picked up some unusual activity involving the wire transfers out of the United States; but records of the certificates of deposit and back-to-back loans which underlay the various criminal transactions were all located in Panama, the Bahamas, Switzerland, Luxembourg and France, all countries utilized by BCCI that have bank secrecy laws that would have made it virtually impossible for U.S. regulatory authorities to have obtained the necessary documents.

Indeed, even with the sharing of bank record information between governments, if a government agent had not been an "insider" in these transactions, which permitted him to request, without raising suspicion, copies of records pertaining to his own accounts, it would have been extremely difficult to prove this case. The bank records alone contained no clear evidence of criminality. Successful prosecution was possible not only because the agent was able to request copies of all of his own account records, but because he tape-recorded conversations in which the fact that the money came from cocaine was discussed openly.

In October of 1988 an indictment was returned against the two principal BCCI subsidiaries involved in the money laundering transactions, as well as BCCI Holdings (Luxembourg) S.A., the holding company. In addition, five BCCI officers were arrested and charged with numerous counts of money laundering and conspiracy. In January of 1990, on the eve of the trial, the two

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BCCI subsidiaries, operating companies who had actively participated in the money laundering, entered pleas of guilty pursuant to an agreement with the United States Department of Justice. The bank officers persisted in their pleas of not guilty and were ultimately convicted of virtually all counts after a six-month jury trial in U. S. District Court in Tampa. The BCCI officers were sentenced to terms of imprisonment, without parole, ranging from three to twelve years.

In April of this year the highest ranking officer among the indicted BCCI officers, Nazir Chinoy, was extradited and transported to Tampa by Scotland Yard. Chinoy, who had been BCCI's general manager for France and French-speaking Africa, as well as a member of BCCI's governing central committee, had fought extradition since October of 1988 when he was arrested in London where he had gone to attend a board meeting.

THE PLEA AGREEMENT

Pursuant to their agreement, the two guilty operating entities of BCCI, Bank of Credit and Commerce International, S.A., and Bank of Credit and Commerce (Overseas) Limited, entered guilty pleas to each and every count in the indictment except Count One, which charged a conspiracy to aid and abet the distribution of cocaine. Prior to trial, the trial judge had stated that, absent evidence in addition to money laundering, he did not believe that either the corporations or the individuals were guilty of narcotics conspiracies, even though their

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activities in laundering drug proceeds had knowingly benefitted the narcotics business. In short, the judge indicated his belief that money laundering offenses should be prosecuted under the money laundering statutes, not the drug statutes, and that if the government persisted in pursuing a drug conspiracy theory, he would dismiss that count of the indictment.

For this reason, the government agreed to dismiss the narcotics count as part of the plea agreement with BCCI. The government did go to trial on the narcotics conspiracy theory against the individual defendants, but the trial court dismissed this charge at the close of the government's case in chief.

As part of the plea agreement, BCCI was made to forfeit about $15 million, a sum equal to the total of the drug funds that had passed through the bank during the undercover investigation, plus interest. (Although about $33 million in drug proceeds was collected in cash in various American cities, only about half that total was laundered through the BCCI system.) The $15 million collected from BCCI under the plea agreement was characterized as a criminal forfeiture, rather than a fine. As a result of this characterization, the funds were specifically earmarked for law enforcement purposes. Had the United States Attorney's Office in Tampa not negotiated with BCCI, and forced the bank to trial, the outstanding result obtained might very well not have been achieved. While the maximum fine to which BCCI would have been exposed upon conviction after trial would have been $28 million, the consensus

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of all involved was that the trial court would limit any fine to approximately $2 - 5 million. Courts tend to be guided by precedent in sentencing decisions. Prior to the BCCI plea agreement, the largest monetary penalty ever imposed on any banking institution for a money laundering offense was $5 million levied by the Atlanta federal court against a Colombian bank with branches in the Republic of Panama which had laundered more than twice as much drug money as BCCI. The $5 million dollar fine in that case, however, was an agreed upon plea. The largest fine ever imposed by a court over the objection of the convicted institution was the $2.5 million fine imposed against Ponce Federal in Puerto Rico in 1989.

In short, it is extremely unlikely a fine in excess of $5 million would have been levied. Nor is it likely that without the plea agreement the government would have obtained any significant amount of money in the criminal prosecution through forfeiture. At the time these money laundering offenses occurred, the forfeiture statute, 18 U.S.C. 982, did not permit the forfeiture of laundered money; it permitted the forfeiture only of the commission paid to the money launderer. That statute has since been amended; but since criminal forfeiture is a form of punishment imposed on a criminal defendant, and since penal statutes do not apply retroactively, the amendment could not have applied to BCCI's activities in this case. Therefore, if the case had gone to trial, it is unlikely that there would have been

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any forfeiture, and punishment would have been limited to the fine imposed by the court.

Thus, the $15 million forfeiture extracted under the plea agreement, three times more than any previous money laundering case was an outstanding disposition of the case against BCCI. Although the bank could avoid damaging adverse publicity by not going to trial, it nevertheless had to face much the same publicity, since its officers were on trial from January through July, 1990.

Following the plea agreement, the Justice Department received criticism for not taking steps to see that BCCI "ceased doing business in the United States." However, under the money laundering statutes as presently written, there is no provision for the court to close down a banking institution, or to expel a foreign institution from the United States upon conviction. In short, this was legally impossible.

Another section of the plea agreement that has been misperceived by some is the provision that operates as a final settlement of all existing criminal charges against the bank known to the prosecuting United States Attorney's Office at the time of signing. Clauses of this nature are standard inclusions in virtually all formal written plea agreements. In the BCCI plea agreements this provision was carefully crafted so that the government, in effect, gave away virtually nothing. Paragraph 1(f) provided that if the plea agreement was accepted by the Court, then the United States Attorney's Office for the Middle

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District of Florida would "not charge BCCI or any of the offices, subsidiaries, affiliates, related or controlled entities thereof, as listed in the BCCI Annual Report and Accounts for 1988 at pages 10 and 11 with committing any other federal criminal offenses under investigation or known to the government at the time of the execution of this agreement. . . ." Thus, the only subsidiaries of BCCI protected from further prosecution were those listed in BCCI's 1988 Annual Report. If there are any other affiliates, "related or controlled entities" not listed in BCCI's 1988 Annual Report, such as, for example, First American Bank, such an entity would not be protected.

Moreover, the agreement binds only the U.S. Attorney's Office for the Middle District of Florida, and no other U.S. Attorney's Office, Justice Department component, or regulatory agency is precluded from taking further action. Finally, the plea agreement did not preclude the government from prosecuting any other individuals and BCCI officers for any federal crime. Contrary to some insinuations in the media, no one in Washington, whether in the Justice Department, on Capitol Hill, or elsewhere, ever pressured the U.S. Attorney's Office regarding the plea agreement.

LEGISLATIVE PROPOSALS

You also have requested comments from the Department with regard to Senate Bill 1019. We appreciate this opportunity and have reviewed the bill for potential impact on the law enforcement initiatives of the Department. While the bill is a

1325015-000-12815

proposal for enhanced regulatory authority, and will not directly effect law enforcement concerns in the banking area, we believe it has the potential to aid indirectly in the prosecution of banking crimes through continued cooperation between the Federal Reserve and the Department.

Of primary concern to the Department is the absence of a criminal provision in the penalties section of the proposal. As the committee is aware, Section 8 of the proposal calls for civil money penalties for violations of the Act. There is a provision for the imposition of increased penalties for knowingly submitting a false report to the appropriate banking agency. The Department believes that a criminal provision is warranted and would be useful in the prosecution of intentional misrepresentations made by foreign banking agencies or their agents. The Bank Holding Company Act has such a provision for knowing violations of the Act and provides a criminal penalty (12 USC §1847a). In this regard, I would like to point out that the Bank Holding Company Act contains a provision that makes foreign banking agencies subject to the provisions of that act (12 USC § 3106a), while conducting business as a bank holding company. If a foreign bank agency were to commit a violation of any other banking law, however, it would not be subject to the criminal provision found in the Bank Holding Company Act. We believe therefore that a criminal provision in the International Bank Act is necessary to fully enforce its provisions.

1325015-000-12816

The Department believes that S.1019 would provide enhanced enforcement of the existing federal law to the extent that it calls for all foreign banking offices to be approved and regulated by the federal banking agencies thereby making them subject to federal prosecution for violations of the act. While we support the goal of enhanced Federal oversight, we would prefer that the responsibility within the Federal Government be assigned consistently with the Administration's approach contained in S. 713.

With respect to the BCCI and Banca Nazionale del Lavoro (BNL) cases, the enhanced approval and examination provisions of the bill could lead to early detection and prevention of the type of abuses found in these cases. As this committee is aware, however, a regulatory system which relies on reporting requirements and representations can be circumvented by misrepresentations and deception. It is the hope of the Department that this legislation will assist in the criminal prosecutions of those cases.

On behalf of the Department, I would like to thank the Committee for this opportunity to testify. I would be pleased to answer any questions the subcommittee may have.

1325015-000-12817

FD-65 (Rev. 1-13-86)

Federal Bureau of Investigation

AIRTEL

To: Director, FBI
Att: Criminal Investigative Division
Fugitive Unit

From: SAC, WMFO (29B-WF-171994) (P)

Subject: HIDDEN INTERESTS
MC #38
FIF; FAG
OO:WMFO

Date: 11/1[illegible]/91

INSTRUCTIONS - Reverse Side

NOTE: Priority "A" and "B" Fugitives - With initial submission, set forth a synopsis of crime on reverse side.

- [X] III Inquiry
- [X] Initial Submission
- [ ] Initial Submission - Parental Kidnaping
- [ ] Supplements FD-65 dated _____

Indicate Fugitive Priority

- [ ] A
- [X] B
- [ ] C
- [ ] D (Parental Kidnaping)

FUGITIVE INDEX

Caution MKE	Name NAM	Sex SEX	Race RAC
☐		M	W

Place of Birth POB	Birth Date DOB	Date of Emancipation DOE	Height HGT	Weight WGT
			5'07"	170

Eye Color EYE	Hair Color HAI	FBI No. FBI	Skin Tone SKN
	BLACK		

Scars, Marks, Tattoos, and Other Characteristics SMT

NCIC Fingerprint Classification FPC	Other Identifying Number MNU	Social Security # SOC

Operator's License Number OLN	Operator's License State OLS	Year Expires OLY

Offense Charged RICO; FBW; CONSPIRACY; AIDING & ABETTING OFF

U. S. Code, Title and Section TITLE 18, USC, SECTIONS 1962(d); 1343; 371; 2

Warrant Issued By U.S. DISTRICT COURT, WASHINGTON, DC on 11/18/91 DOW

F.O. File # 29B-WF-171994 OCA

Miscellaneous Including Bond Recommended (MIS)

3 by CARDS
AUTOMATED

LICENSE PLATE AND VEHICLE INFORMATION

License Plate Number LIC	State LIS	Year Expires LIY	License Plate Type LIT

Vehicle Identification # VIN	Year VYR	Make VMA	Model VMO	Style VST	Color VCO

Aliases

Additional Identifiers
PAKISTANI CITIZEN

NCIC # NIC

1YM 50c 9

2 - FBIHQ (1 - Fugitive Unit)

FBI/DOJ

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FOI/PA
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Civil Action# 15-cv-01303-LL

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(Rev. 5-28-90)

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FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [ ] Unclassified

Time Transmitted: _____

Sender's Initials: _____

Number of Pages: _____

To: FBIHQ (Name of Office) Date: 11/5/91

Facsimile number: 324-6492

Attn: SSA [redacted] (Name)

From: SSA [redacted] WMFO (Name of Office)

b6
b7C

Subject: Ridolan Interstate 29B-WF-179943

MC 38

OO: WMFO

[redacted]

Special Handling Instructions: HAND CARRY TO SSA [redacted]

Originator's Name: [redacted] Telephone: 324-6426

Originator's Facsimile Number: 324-6426

Approved: B/C

29-HQ-116176

542318
5223750+
/23/82 Fri 6:34:19
IRGENT PLEASE DELIVER IMMEDIATELY
'O: [redacted] b6 b7C
:/O Bankhouse
Karachi, Pakistan
Subject: Dr. Ghaith Pharaon - Bank Acquisition Progra
.tlanta, Georgia

(eference above and our telephone conversation this ifternoon. I would like to submit the following .nformation:

[redacted] b6 b7C involved [redacted] holding company [redacted] th Atlanta which is 100% owned by Dr. Ghaith [redacted] on and which will acquire 100% of the voting [redacted] s of National Bank of Georgia, Atlanta, Clayton [redacted] Marietta, Georgia. The purchase prices of the [redacted] are as follows:

1. First Bank & Trust Company - 24 million dollars
2. Clayton County Bank -6 1/4 million dollars
3. First Commercial Bank, Buford, Ga. - 6 1/4 million dolla[illegible]
4. National Bank of Georgia - although Dr. Ghaith Pharaon owns 98.6% of the existing stocks, we shall need to spend an additional $250,000.00 to buy out the remaining minority shareholders in order to acquire 100% control.

The above program involves a financial outlay of U.S. Dollars 36.75 million approximately. This financing is arranged through capitalization of the holding company initially with a sum of U.S. Dollars 10 million in the form of equity and a term loan of U.S. dollars 28 million which has already been negotiated and finalized with First National Bank of Boston. Additional capital of U.S. Dollars 29 million has been provided through contribution of National Bank of Georgia's stock to the holding company. Total capitalization of GRP, Inc. at this point is 39 million dollars worth of equity and 28 million dollars worth of debt. The holding company balance sheet reflects a total acquisition debt amounting to approximately 72% of equity. This level is considered quite high in relation to multi-bank proposals and Federal Reserve Bank standards. The Federal Reserve Bank Guidelines normally require (for multi-bank holding companies of over 150 million dollars U.S. in assets) that debt should not exceed approximately 50% of equity funds. After consulting with the local Federal Reserve officials, and Dr. Ghaith Pharaon and your good self, we made a representation to the Federal Reserve authorities that an additional 10 million dollars in equity funds would be provided to GRP, Inc. to bring this ratio down to approximately 50% of equity funds. While the holding company needed the additional 10 million dollars for

DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
INTERNAL ROUTING/ACTION SLIP

TO	TL #	ROOM	NAME/TITLE	TO	TL #	ROOM	NAME/TITLE
	235	7116	[redacted]		231	3849	PUBLIC CORRUPTION UNIT
	233	5012					[redacted]
	231	3012					
					231	3865	GOVERNMENTAL FRAUD UNIT
(2)	231	3823	[redacted]				[redacted]
(1)							
					233	5161	ECONOMIC CRIMES UNIT
							[redacted]
	231	3835	[redacted]		245	7240	CONGRESSIONAL AFFAIRS OFFICE
					244	6226	CORRESPONDENCE UNIT
					213	7326	LEGAL RESEARCH UNIT, LCD
	231	3841	FINANCIAL INSTITUTION FRAUD UNIT		152	1B-327	MAIL ROOM
(3)			[redacted]		233	5129	RMPU/ATTN:
✓					213	7659	PRESS OFFICE
					244	6248	READING ROOM
					233	5078	SPECIAL ASSISTANTS/CID
							ATTN:
					244	6247	TELETYPE ROOM
					231	3117	USOU
					153	1262	VOUCHER UNIT

REMARKS:

TIME
THIS IS THE FIRST THAT DOJ/FBI HEARD OF THIS REQUEST. I HAVE DISCUSSED THE SITUATION WITH [redacted]

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b7C

See attached copy of the controversial [redacted]

☐ Call Me
☐ See Me
☐ Approp. Action
☐ Initial
☐ Per Inquiry
☐ For Your Info.
☐ Prepare Response
☐ Prepare Addendum
☐ For Your Approval
☐ Status/Facts

FROM
[redacted]
FINANCIAL INSTITUTION FRAUD UNIT
WHITE-COLLAR CRIMES SECTION
CRIMINAL INVESTIGATIVE DIVISION

Room	TL #	Phone	Date
3839/3841	231	[redacted]	9/5/91

FBI/DOJ

192-0015-4000-12038

Bank of Georgia have not as yet participated in the management of First Commercial Bank since it was deemed to be inappropriate to do so prior to the acquisition of said bank unless management of the bank specifically requested our intervention. Management of The National Bank of Georgia has been active in the Clayton County Bank's ongoing affairs at the request specifically of Clayton County Bank's management prior to the actual consummation of the merger. We expect to end up 1982 with approximately total combined banking assets in excess of 1.2 billion dollars which would represent a growth rate from 1981 in banking assets of approximately 100%. As is the case with any growing business, but particularly banking, as you well know, earnings tend to lag asset growth in terms of time. We none-the-less expect that the earnings of the group, before taxes and loan loss provision and interest expense on the holding company debt incurred to acquire the banks, will be in excess of 15 million dollars U.S. in 1982. This would of course increase in the subsequent year. Through the first quarter of 1982, the banking group earned 2.7 million dollars U.S. before loan loss provision and taxes and interest expense. This shows a decline from the first quarter of 1981 of approximately $400,000.00 U.S. The primary reason for this earnings decrease is a result of increased efforts on behalf of management of The National Bank of Georgia to develop manpower to help the group achieve its desired growth objectives in 1982. We have also committed substantial resources and machinery so desperately needed to upgrade the morale and facilities of the banking group in Georgia as a whole. As you are aware, we are in the process of building what we hope to be a first-class, quality infrastructure to support the quality banking organization which we aspire to become in 1982 and 1983. In our forthcoming meeting we will of course be prepared to discuss first quarter results and the overall plans of the group in greater detail with your good self. In closing, I trust that you will find the above information to your satisfaction. This message has been prepared jointly by myself and my colleague [redacted] and has also been discussed and approved by [redacted]

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I am hoping that you will be able to receive this message in Karachi before noon tomorrow and would very kindly convey appropriate instruction to me on telephone tomorrow at my residence telephone number in Atlanta, Georgia which is as follows: Area Code [redacted]

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b7C

Best Regards,

[redacted]

The National Bank of Georgia
Atlanta, Georgia.....

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE
- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [ ] Unclassified

Time Transmitted: 9:39
Sender's Initials: KDL
Number of Pages:

To: FBIHQ (Name of Office) Date: 11/5/91

Facsimile number: 324-6492

Attn: SSA [redacted] (Name, Room, Telephone No.)

From: SSA [redacted] WMFO (Name of Office)

Subject: Ridolan Encinte
MC 38
OO: WMFO

Special Handling Instructions: HAND CARRY TO SSA [redacted]

Originator's Name: [redacted] Telephone: 324-6404

Originator's Facsimile Number: 324-6426

Approved: [redacted]

29-HQ-116176
FBI/DOJ

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b7C

[redacted]

1325015-000-12036

542318
5223750
/23/82 Fri 6:34:19
URGENT PLEASE DELIVER IMMEDIATELY
O: [redacted] b6 b7C
C/O Bankhouse
erachi, Pakistan
ubject: Dr. Ghaith Pharaon - Bank Acquisition Program
tlanta, Georgia

eference above and our telephone conversation this
fternoon. I would like to submit the following
nformation:

[redacted] b6 b7C involved, [illegible] holding company [redacted] in Atlanta which is 100% owned by Dr. Ghaith [redacted]on and which will acquire 100% of the voting [redacted]s of National Bank of Georgia, Atlanta, Clayton [redacted] Bank, [redacted] Buford, Georgia and First Bank & Trust Company, Marietta, Georgia. The purchase prices of the above [redacted] are as follows:

1. First Bank & Trust Company - 24 million dollars
2. Clayton County Bank -6 1/4 million dollars
3. First Commercial Bank, Buford, Ga. - 6 1/4 million dollars
4. National Bank of Georgia - although Dr. Ghaith Pharaon owns 98.6% of the existing stocks, we shall need to spend an additional $250,000.00 to buy out the remaining minority shareholders in order to acquire 100% control.

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illion which has already been negotiated and finalized
ith First National Bank of Boston. Additional capital
f U.S. Dollars 29 million has been provided through
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olding company. Total capitalization of GRP, In
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roposals and Federal Reserve Bank standards. The
ederal Reserve Bank Guidelines normally require (fo
ulti-bank holding companies of over 150 million
ollars U.S. in assets) that debt would not exceed
pproximately 50% of equity funds. After consulting
ith the local Federal Reserve officials, and Dr.
haith Pharaon and your good selves, we made a
epresentation to the Federal Reserve authorities that
n additional 10 million dollars in equity funds would
e provided to GRP, Inc. bringing this ratio down to
pproximately 50% of equity funds. While the holding
ompany handed the additional 10 million dollars for

accounting equity to solve the Federal Reserve Bank ratios problem, the holding company did not need the use of the 10 million dollars in cash funds to meet its cash flow needs under the repayment schedule of the 28 million dollar debt agreement with First National Bank of Boston. We have previously submitted information to your good self which provide pro-forma cash flows of the group after this acquisition, demonstrating that under various assumptions, both pessimistic and optimistic in nature that the group could very easily handle the amortization of the 28 million dollars in acquisition debt employed in this program without the second 10 million dollars asked for by the Federal Reserve Bank. These pro-formas submitted to your good self indicate that under very conservative growth and profit assumptions for the group through 12/31/91, the initial 39 million dollars in equity provided by Dr. Ghaith Pharaon for the formation of the holding company would increase to 155 million dollars by this date in 1991. This increase is a result of the repayment of the 28 million dollars in debt borrowed from First National Bank of Boston and the increased profits generated and retained by the group during this 10 year period.

As previously mentioned to your good self by telepone, we have already represented to the Federal Reserve that this additional 10 million dollars in equity funds would be forthcoming within five (5) business days of closing on the acquisition of the Clayton County Bank and the First Commercial Bank which is to take place on Friday, April 30, 1982. It is therefore imperative that these funds be wired as instructed to GRP, Inc.'s, First National Bank of Boston account no. 5152431, Main Office in Boston, Massachusetts U.S.A. I would like to reiterate that GRP, Inc. does not need the use of this 10 million dollars inasmuch as it merely needs the 10 million dollars to flow through its balance sheet in the form of accounting equity five (5) business days prior to the acquisition of these banks and to remain for approximately five (5) business days after the acquisition before being returned to GRP, Inc.'s B.C.C.I. account.

As requested by your good self, following is some financial information as of March 31, 1982 regarding the group:

The group's total assets have increased by approximately 175 million dollars since the beginning of the first quarter of 1981. NBG's total assets are up approximately 121 million dollars; First Bank & Trust's total assets have increased by approximately 45 million dollars; Clayton County Bank's assets have increased approximately 10 million dollars and First Commercial Bank of Gwinnett County assets have decreased from the first quarter of last year by approximately 1 million. The slight decrease in assets by the First Commercial Bank of Gwinnett County is due to the fact that members of management of the National

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Grand Jury Sworn in on January 16, 1991

Holding a Criminal Term

UNITED STATES OF AMERICA	:	
	:	
- v -	:	Crim No. 91-
	:	
BCCI HOLDINGS (LUXEMBOURG), S.A.	:	Violations:
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.	:	18 USC §371 (Conspiracy);
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED	:	18 USC §1343 (Wire Fraud);
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED	:	18 USC §1962(d) (Racketeering Conspiracy);
AGHA HASAN ABEDI,	:	
SWALEH NAQVI, and	:	18 USC §2 (Aiding
GHAITH PHARAON	:	and Abetting).
	:	
Defendants.	:	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Introduction

AT ALL TIMES MATERIAL TO THIS INDICTMENT:

1. The Federal Reserve System ("FRS") was an agency of the United States. The Board of Governors of the FRS ("the Board") had primary responsibility for supervising and regulating activities of bank holding companies and had residual responsibility for United States Offices of foreign banks.

2. The Federal Deposit Insurance Corporation ("FDIC") was an agency of the United States. The FDIC supervised FDIC-insured, state-chartered savings banks which were not members of the FRS. The FDIC examined and supervised those banks under its

11/15/91

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INVESTIGATION AT WMFO HAS REVEALED NO TIES BETWEEN BCCI AND LINCOLN SAVINGS AND LOAN EXCEPT FOR THE ARTICLE IN REFERENCED FACSIMILE FROM THE SAN FRANCISCO CHRONICLE ENTITLED [redacted] AND BCCI FIGURE BUILT FIRM, DID BUSINESS". b6 b7C

WMFO INDICES CHECKS ON "TRENDINVEST" WERE NEGATIVE. WMFO INDICES CHECKS ON [redacted] REVEALED A WALL STREET JOURNAL ARTICLE LOCATED ON PAGE A12 OF THE 9/13/91, EDITION ENTITLED, "CLOSE LINKS EXISTED BETWEEN BCCI, BNL". THE ARTICLE DESCRIBES [redacted] OF THE BCCI SWISS UNIT, BANQUE DE COMMERCE ET PLACEMENTS S.A. AS WELL AS [redacted] BANCA NAZIONALE DEL LAVORO'S UNIT IN ZURICH, KNOWN AS LAVORO BANK AG. [redacted] BANK ~~OF~~ NEW YORK-INTER MARITIME BANK IN GENEVA. b6 b7C

IF ADDITIONAL INFORMATION REGARDING A RELATIONSHIP BETWEEN BCCI AND LINCOLN SAVINGS AND LOAN BECOMES AVAILABLE, WMFO WILL ADVISE FBIHQ AND THE LOS ANGELES DIVISION IMMEDIATELY.

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the State of Florida. CenTrust was regulated and supervised by the FHLBB and had deposits insured by the FSLIC until August 9, 1989. CenTrust was also subject to regulation and supervision by the Florida Department of Banking and Finance.

8. As of August 9, 1989, the insurance of the deposits of CenTrust was transferred to the FDIC and the OTS began its role as regulator and supervisor of CenTrust.

9. CenTrust Trust, formerly the Westport Company, was a wholly-owned subsidiary of CenTrust.

10. Defendant BCCI Holdings (Luxembourg), S.A. ("BCCI Holdings") was a foreign bank holding company established under the laws of Luxembourg.

11. Defendant BCCI Holdings owned and controlled Defendant Bank of Credit and Commerce International S.A. ("BCCI S.A."), a foreign bank established under the laws of Luxembourg. BCCI S.A. operated agencies in Los Angeles, California and New York, New York.

12. Defendant BCCI Holdings also owned and controlled Defendant Bank of Credit and Commerce International (Overseas) Limited ("BCCI Overseas"), a foreign bank established under the laws of the Cayman Islands. BCCI Overseas operated agencies in Miami, Tampa and Boca Raton, Florida.

13. The term "BCCI Group," as used in this indictment, means the combination of BCCI Holdings, BCCI S.A. and BCCI Overseas.

14. The term "BCCI Defendants," as used at times in this

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Indictment, means the Defendants BCCI Holdings, BCCI S.A., and BCCI Overseas.

15. Defendant International Credit and Investment Company (Overseas) Limited ("ICIC Overseas") was a foreign bank established under the laws of the Cayman Islands.

16. Defendant AGHA HASAN ABEDI was a principal of BCCI Holdings, BCCI (Overseas), BCCI S.A. and ICIC Overseas.

17. Defendant SWALEH NAQVI was a principal of BCCI Holdings, BCCI (Overseas), BCCI S.A. and ICIC Overseas.

18. Defendant GHAITH PHARAON was a Saudi Arabian businessman and a shareholder in the BCCI Group.

The Conspiracy

19. Beginning in or about January 1984, the exact date being unknown to the Grand Jury, and continuing until in or about December 1989, in the District of Columbia and elsewhere, the Defendants

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL
(OVERSEAS) LIMITED,
INTERNATIONAL CREDIT AND INVESTMENT COMPANY
(OVERSEAS) LIMITED,
AGHA HASAN ABEDI,
SWALEH NAQVI, and
GHAITH PHARAON

knowingly and willfully combined, conspired, confederated, and

1325015-000-11998

agreed together and with each other, and with others, both known and unknown to the Grand Jury,

(a) to defraud the United States, in particular the Board, FDIC, FHLBB, and FSLIC, of and concerning their right to have their business and affairs conducted free from deceit, dishonesty, impairment and obstruction, by impeding, hindering, obstructing and defeating by deceitful and dishonest means the lawful functions and operations of said agencies of the United States in regulating and supervising activities of the BCCI Group and their United States branches or agencies, ICIC Overseas, Independence and CenTrust, and

(b) to commit offenses against the United States, that is:

(1) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, of deposits of Independence, by means of fraudulent and false pretenses, representations and promises, and to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343;

(2) to devise and intend to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the

FDIC, backed by funds and security of the United States, of deposits of Independence, by means of fraudulent and false pretenses, representations and promises, and for the purpose of executing and attempting to execute the scheme and artifice, knowingly to cause to be delivered by the United States Postal Service various mail matter, in violation of Title 18, United States Code, Section 1341;

(3) to knowingly execute and attempt to execute a scheme and artifice to defraud a federally insured financial institution, and by means of fraudulent and false pretenses, representations and promises to obtain moneys, funds and other property owned by or under the control of such a financial institution, in violation of Title 18, United States Code, Section 1344;

(4) to knowingly and willfully make false, fictitious and fraudulent statements to the FHLBB, and to knowingly and willfully make and cause to be made false entries in the books, reports and statements of CenTrust, in violation of Title 18, United States Code, Sections 1001 and 1006;

(5) to knowingly and willfully cause to be made false entries, including material omissions, in the books and records of Independence with the intent to deceive the Board and FDIC, in violation of Title 18, United States Code, Sections 1001 and 1005;

(6) to devise and intend to devise a scheme and artifice to defraud persons and entities throughout the United

States of money and property, namely, funds from purchasers of subordinated debentures issued by CenTrust, by means of false and fraudulent pretenses, representations and promises, and for purposes of executing said scheme, to transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343;

(7) to devise and intend to devise a scheme and artifice to defraud persons and entities throughout the United States of money and property, namely, funds from purchasers of subordinated debentures issued by CenTrust, by means of false and fraudulent pretenses, representations and promises, and for the purpose of executing said scheme, to cause to be placed in an authorized depository for mail matter things and matters to be delivered by the United States Postal Service, in violation of Title 18, United States Code, Section 1341.

The Manners and Means of the Conspiracy

It was a part of the conspiracy that:

20. The Defendants would enrich Defendants AGHA HASAN ABEDI, SWALEH NAQVI, the BCCI Defendants, ICIC Overseas and GHAITH PHARAON and their associates, by taking advantage of opportunities to deceive and exploit United States financial institutions, deceive United States Federal regulatory agencies, and deceive persons and entities throughout the United States.

It was further a part of the conspiracy that:

21. The BCCI Defendants, ICIC Overseas, AGHA HASAN ABEDI and SWALEH NAQVI would acquire and maintain control and influence over Independence with the aid of Defendant GHAITH PHARAON, through deceptive stock purchases by way of hidden stock pledges, nominee agreements, nonrecourse loans, loan releases, beneficial interest agreements and outright falsehoods, fabrications and omissions in applications and reports filed with state and federal regulatory agencies;

22. The Defendants would use Defendant ICIC Overseas to facilitate deception of the Board, FDIC, FSLIC, and FHLBB concerning the involvement of the BCCI Defendants, AGHA HASAN ABEDI, and SWALEH NAQVI with Defendant GHAITH PHARAON;

23. Defendant GHAITH PHARAON, the owner of approximately 25 percent of the stock of CenTrust, would use his relationship with the BCCI Defendants and SWALEH NAQVI to arrange for a branch of the BCCI Group to purchase approximately $25,000,000 of the total $150,000,000 CenTrust subordinated debentures in order to mislead and deceive regulators and investors as to the true market for the CenTrust subordinated debentures;

24. The BCCI Defendants, Defendant GHAITH PHARAON and another would cause material misrepresentations and omissions to be made to investors;

25. The Defendant GHAITH PHARAON and another would promise the BCCI Defendants and SWALEH NAQVI that CenTrust would repurchase any CenTrust subordinated debentures purchased by the BCCI Group;

26. The BCCI Defendants and Defendant SWALEH NAQVI would direct BCCI (Overseas) Paris to purchase approximately $25,000,000 of CenTrust subordinated debentures;

27. Defendant GHAITH PHARAON and another would cause CenTrust Trust to repurchase said subordinated debentures from BCCI (Overseas) Paris, after approximately six weeks, thus making the BCCI Defendants whole and completing the deception of other investors as to the true market for the CenTrust subordinated debentures.

Overt Acts in Furtherance of the Conspiracy

28. In furtherance of the conspiracy, and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed, in the District of Columbia and elsewhere, the following overt acts, among others:

Overt Acts Relating to Independence Bank

1) On or about January 27, 1984, in Los Angeles, California, Defendant AGHA HASAN ABEDI had a conversation with an employee of the BCCI Group working in California, concerning the purchase by the BCCI Group of a bank on the west coast of the United States.

2) On or about August 28, 1984, in California, the employee referred to in Overt Act No. 1 had a conversation with the then-Chairman of Independence, Encino, California concerning the fact that Independence was for sale.

3) On or about November 13, 1984, the employee referred to

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in Overt Act No. 1 wrote letters to Defendants AGHA HASAN ABEDI and SWALEH NAQVI, in each of which he discussed the acquisition by BCCI of Independence.

4) In or about November 1984, Defendant AGHA HASAN ABEDI had a telephone conversation with the employee referred to in Overt Act No. 1 in California, in which it was discussed that Defendant GHAITH PHARAON was interested in purchasing Independence himself.

5) On or about November 30, 1984, the employee of the BCCI Group referred to in Overt Act No. 1 signed a "letter of intent," confirming the willingness of a then-unnamed principal to purchase all of the capital stock of Independence.

6) Between in or about December 1984 and January 1985, Defendant GHAITH PHARAON in his personal capacity and Defendant SWALEH NAQVI on behalf of the BCCI Group signed an Investment Advisory Agreement.

7) Between in or about November of 1984 and April of 1985, representatives, agents and/or employees of the BCCI Group had conversations with the then owners of Independence concerning the purchase of Independence.

8) In or about April 1985, an employee of the BCCI Group had conversations with employees of the First National Bank of Boston ("Bank of Boston") concerning obtaining financing for Defendant GHAITH PHARAON to be used for a portion of the purchase price for Independence Bank.

9) On or about April 30, 1985, Defendant GHAITH PHARAON

signed a stock purchase agreement with the then owners of Independence, pursuant to which Defendant GHAITH PHARAON agreed to purchase all of the capital stock of Independence Bank for $23,000,000.00.

10) On or about May 17, 1985, Defendant GHAITH PHARAON signed a memorandum agreement with Defendant ICIC Overseas, which agreement provided, among other things, that:

i. Pharaon and ICIC have agreed to acquire 100% of Independence from the present shareholders;

ii. all shares would be held in the name of Pharaon but only 15% were to be held by Pharaon as the beneficial owner; and

iii. Pharaon was to hold the remaining 85% of the shares in a fiduciary capacity for ICIC.

11) On or about May 17, 1985, Defendant SWALEH NAQVI signed the memorandum agreement referred to in Overt Act No. 10 on behalf of Defendant ICIC Overseas.

12) On or about June 10, 1985, Defendant GHAITH PHARAON signed a document entitled "Notice of Acquisition of Control" which was filed with the FDIC and the California State Department of Banking, which called for the following information in question number 3:

"Indicate the full name of each acquiring party or transferee, the total number of shares presently held by each, the total number of shares to be purchased or transferred to each and the total number of shares to be held by each following completion of the proposed transaction. Indicate names of beneficial owners if

shares are to be registered in another name."
the response to which disclosed the only purchaser to be Defendant GHAITH PHARAON.

13) On or about June 11, 1985, in Los Angeles, California, Defendant GHAITH PHARAON met with members of the California State Banking Department, in the course of which meeting Defendant GHAITH PHARAON failed to disclose the existence of the agreement between Defendant ICIC Overseas and Defendant GHAITH PHARAON which was executed on or about May 17, 1985 and which is referred to in Overt Act No. 10.

14) On or about August 30, 1985, an employee of the BCCI Group had a conversation with another employee of the BCCI Group in which the first of these employees requested a loan be made by the BCCI Group to Defendant GHAITH PHARAON for purposes of acquiring Independence.

15) On or about August 30, 1985, an employee of the BCCI Group sent a telex which confirmed that the deposit of $8.5 million of Defendant GHAITH PHARAON will be held in an account at Banque Arabe et Internationale D'Investissement (BAII), Paris, France.

16) On or about August 29, 1985, an employee of the BCCI Group sent a telex to BAII which instructed BAII to confirm to the FDIC and the California State Banking Department, care of Defendant GHAITH PHARAON's attorney, that Defendant GHAITH PHARAON had in excess of $8.4 million on deposit with BAII, which funds were to be used by Defendant GHAITH PHARAON towards the

purchase of Independence.

17) On or about September 4, 1985, BAII confirmed by telex to the California State Banking Department, care of Defendant GHAITH PHARAON's attorney, that it held in excess of $8.4 million on deposit for Defendant GHAITH PHARAON, which funds were to be used by Defendant GHAITH PHARAON towards the purchase of Independence.

18) On or about September 5, 1985, Defendant GHAITH PHARAON caused to be delivered to the California State Banking Department a letter. This letter stated that enclosed was a: "Telex dated September 4, 1985 also from BAII confirming that Pharaon has available in excess of $8.4 million on deposit for the portion of the purchase price not being financed."

19) In or about August 1985, employees of the BCCI Group had conversations with representatives of BAII concerning the issuance by BAII of a letter of credit to the Bank of Boston in the amount of $5 million.

20) On or about August 29, 1985, an employee of the BCCI Group sent a telex to BAII instructing BAII to confirm by telex to the FDIC and the California State Banking Department, care of Defendant GHAITH PHARAON's attorney, that BAII had agreed to issue a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston as security for the Bank of Boston's loan to Defendant GHAITH PHARAON to purchase Independence.

21) On or about August 30, 1985, BAII sent a telex to the California State Banking Department and the FDIC, in care of

Defendant GHAITH PHARAON's attorney, concerning the issuance by BAII of a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston as security for the Bank of Boston loan to Defendant GHAITH PHARAON to purchase Independence.

22) On or about September 5, 1985, Defendant GHAITH PHARAON caused his attorney to deliver a letter to the California State Banking Department confirming the availability of the $5 million letter of credit to be issued by BAII.

23) On or about September 30, 1985, Defendant GHAITH PHARAON signed an "Acquisition Promissory Note" for $12.6 million with the Bank of Boston.

24) On or about October 1, 1985, BAII issued a stand-by letter of credit in the amount of $5 million in favor of the Bank of Boston, which letter of credit secured the Bank of Boston loan to Defendant GHAITH PHARAON.

25) On or about October 1, 1985, the BCCI Group issued a $5 million counter-guarantee to BAII.

26) On or about October 1, 1985, agents of the BCCI Group, and Defendant GHAITH PHARAON caused the Bank of Boston to take acts affecting the distribution of funds completing the sale of all the capital stock of Independence Bank to Defendant GHAITH PHARAON.

27) In or about October 1, 1985, Defendant GHAITH PHARAON appointed the first of the employees of the BCCI Group referred to in Overt Act No. 14 as a Director of Independence.

28) From in or about March 1986 to in or about January

1989, Defendants AGHA HASAN ABEDI and SWALEH NAQVI met with and corresponded with the Chief Executive Officer of Independence on numerous occasions regarding personnel and operational matters involving Independence.

29) On or about June 25, 1986, in Paris, France, Defendant GHAITH PHARAON wrote a letter to Defendant SWALEH NAQVI which stated in pertinent part:

> "According to [the Chief Executive Officer of Independence], and even if I established a holding co. for the purpose of sheltering some of the bank's income it is unlikely that under the present capital structure the bank would greatly grow without any additional capital. In the present circumstances, and until I have worked out some kind of re-scheduling with the Redec banks, I may face some difficulties in arranging independent facilities for Independence Bk for additional capital.
>
> "Therefore I would suggest that for the time being the 15/85 arrangement be maintained until we can determine the course we want Independence to take, and the degree of capital that needs to be made available, if we want the bank to grow, as well as the return on this capital, when compared to other investment opportunities.
>
> "If after meeting with [the Chief Executive Officer of Independence] you are convinced that

additional capital is required and the returns on such capital are attractive, I would be prepared to meet with you and modify the 15/85 arrangement in accordance with my earlier discussion with you and Mr. Abedi. Should this be the course to be followed it may also be necessary to have more support from BCCI in terms of management support, and international contacts."

30) On or about July 3, 1986, Defendant SWALEH NAQVI directed agents of the BCCI Group to cause BCCI Overseas (Panama) to make a loan in the amount of $12,631,000 to Defendant GHAITH PHARAON, which proceeds were used to repay the Bank of Boston loan to Defendant GHAITH PHARAON referred to in Overt Act No. 23.

31) In or about July of 1987, in London, England, Defendants AGHA HASAN ABEDI and SWALEH NAQVI met with an individual concerning prospective employment with Independence.

32) On or about December 29, 1987, Defendant SWALEH NAQVI directed an employee of the BCCI Group to cause BCCI Overseas (Grand Cayman) to advance $3,500,000 to Independence.

33) On or about May 17, 1988, an employee of the BCCI Group caused a branch of the BCCI Group in Bahrain to advance $4,000,000 to Defendant GHAITH PHARAON, which proceeds were added to the capital account of Independence.

34) On or about August 7, 1989, an employee of the BCCI Group caused a branch of the BCCI Group in Bahrain to advance $10,000,000 to Defendant GHAITH PHARAON, which proceeds were used to repay a BAII loan dated on or about July 5, 1989, in the

amount of $10,000,000 to Defendant GHAITH PHARAON.

Overt Acts Relating to CenTrust Savings Bank

Application to FHLBB for Sale of Subordinated Debentures

35) On or about April 12, 1988, Defendant GHAITH PHARAON and another person caused to be filed a document titled "Amendment No. 1 To FORM OC" with the FHLBB.

36) Between on or about April 1, 1988, and on or about May 19, 1988, throughout the United States, Defendant GHAITH PHARAON and another person and various other employees and agents of CenTrust, together with underwriters, Merrill Lynch Capital Markets and Drexel Burnham Lambert, distributed a preliminary prospectus and conducted marketing seminars relating to the sale of CenTrust's subordinated debentures.

37) On or about May 16, 1988, Defendant GHAITH PHARAON and another person caused to be filed a document bearing the title "Amendment 3 to FORM OC" with the FHLBB.

38) On or about May 19, 1988, Defendant GHAITH PHARAON and another person caused to be filed with the FHLBB a document bearing the title "Amendment 4 to FORM OC."

39) On or about May 19, 1988, in Washington D.C., Defendant GHAITH PHARAON and another person caused to be filed with the FHLBB a document bearing the title "OFFERING CIRCULAR" relating to subordinated debentures to be issued by CenTrust.

Contacts with United States Regulators

40) On or about May 3, 1988, Defendant GHAITH PHARAON caused a letter to be delivered to the FHLBB in Washington D.C., which stated in pertinent part that the "subordinated debt issue would add $200 million of additional regulatory capital and thus, additional protection for the FSLIC insurance fund."

41) On or about May 3, 1988, Defendant GHAITH PHARAON communicated by telephone from in or near Savannah, Georgia with a FHLBB employee in Washington, D.C., concerning the CenTrust subordinated debt issue.

42) In or about May of 1988, in Washington D.C., Defendant GHAITH PHARAON and another person met with employees of the FHLBB concerning the issuance by CenTrust of subordinated debentures.

Sale of Subordinated Debentures to Institutional Investors

43) On or about May 24, 1988, Defendant GHAITH PHARAON and others caused to be transmitted by wire approximately $2,500,000 from Safeco Insurance Co., Seattle, Washington, to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

44) On or about May 25, 1988, Defendant GHAITH PHARAON and others caused to be transmitted by wire approximately $3,000,000 from Washington Mutual Savings and Loan Association, Seattle, Washington to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

Sale to BCCI and Repurchase of CenTrust Subordinated Debentures

45) On or about May 23, 1988, in Savannah, Georgia Defendant GHAITH PHARAON caused a telex to be sent from Interedec, a company controlled by Defendant GHAITH PHARAON, to London, England, related to the purchase of the CenTrust subordinated debentures in which it was indicated that the beneficiary of the $25 million of the CenTrust subordinated debentures "will be BCC in Paris."

46) On or about May 24, 1988, in New York, New York and Paris, France, Defendants SWALEH NAQVI and GHAITH PHARAON and the BCCI Defendants caused BCCI Overseas (Paris), a branch of the BCCI Group, to purchase approximately $25,000,000 of CenTrust subordinated debentures.

47) On or about June 24, 1988, Defendants GHAITH PHARAON and SWALEH NAQVI caused to be mailed from New York, New York, to London, England, three CenTrust subordinated debenture registered certificates, labelled RU 10, RU 11 and RU 12, in the name of BCCI Paris, totalling $25,000,000.

48) On or about July 15, 1988, Defendant GHAITH PHARAON caused to be mailed a letter from an employee of Interedec, located in Georgia, to an employee of CenTrust in Florida, concerning the purchase by CenTrust of the subordinated debentures previously purchased by BCCI Overseas (Paris), a branch of the BCCI Group, in which it was stated:

"[The Chairman of the Board of CenTrust] had asked me to provide relevant details to you in order for

Centrust to repurchase the USD 25 million Debentures from BCCI Paris on 27th July 1988 together with interest accrued up to 27th July 1988."

49) On or about July 25, 1988, defendant GHAITH PHARAON caused to be delivered a letter from London, England, to Richmond Hill, Georgia, which transferred the CenTrust debentures referred to in Overt Act No. 47.

50) On or about July 27, 1988, the Defendant GHAITH PHARAON and another caused CenTrust to transmit by wire approximately $25,000,000 to Security Pacific International Bank in New York, New York, related to the purchase by CenTrust of the subordinated debentures previously purchased by BCCI Paris.

51) Between on or about July 1, 1988, and March 1, 1989, on several occasions, in Atlanta, Georgia, Defendant GHAITH PHARAON and another caused false and fraudulent statements to be made to federal banking regulators concerning the actual level of regulatory capital of CenTrust.

(Title 18, United States Code, Section 371)

COUNT TWO

1. The allegations contained in paragraphs 3, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 16, 17 and 18 of COUNT ONE of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. From in or about January 1988 to in or about July 1988, Defendants

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED,
AGHA HASAN ABEDI,
SWALEH NAQVI, and
GHAITH PHARAON

devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises;

3. It was part of said scheme that:

a) Defendant GHAITH PHARAON and another would seek to sell CenTrust subordinated debentures to investors;

b) Defendant GHAITH PHARAON, who owned approximately 25 percent of the stock of CenTrust, would use his relationship with the BCCI Defendants and Defendant SWALEH NAQVI to arrange for a branch of the BCCI Group to purchase $25,000,000 of the CenTrust subordinated debentures in order to deceive other investors as to the true market for the CenTrust subordinated debentures;

c) Defendant GHAITH PHARAON and another would agree with the BCCI Defendants and Defendant SWALEH NAQVI that CenTrust would repurchase any CenTrust subordinated debentures purchased by the BCCI Group;

d) Defendant SWALEH NAQVI would direct and approve the purchase by BCCI (Overseas) Paris, of approximately $25,000,000 of CenTrust subordinated debentures;

e) Defendant GHAITH PHARAON and another would cause CenTrust Trust to repurchase said subordinated debentures from BCCI (Overseas) Paris, after approximately eight weeks, thus making the BCCI Defendants whole and completing the deception of other investors as to the true market for the CenTrust subordinated debentures;

f) Defendant GHAITH PHARAON and another would cause material misrepresentations and omissions to be made to investors.

4. On or about May 3, 1988, in the District of the Columbia and elsewhere, the BCCI Defendants, and Defendants GHAITH PHARAON, SWALEH NAQVI, and AGHA HASAN ABEDI, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice and attempting to do so, knowingly and willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds to wit: a communication by telephone between the Defendant GHAITH PHARAON in Savannah, Georgia and an employee of the FHLBB in Washington, D.C.

(Title 18, United States Code, Sections 1343 and 2)

COUNT THREE

Introduction

1. The allegations in Paragraphs 1 through 14 and 16 through 18 of Count One of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein.

The Enterprise

2. At all times material to this Indictment, the BCCI Group, International Credit and Investment Company (Overseas), Limited ("ICIC Overseas"), AGHA HASAN ABEDI, SWALEH NAQVI, GHAITH PHARAON, and others known and unknown to the Grand Jury, constituted an "enterprise" as defined in Title 18, United States Code, Section 1961(4), that is, a group of organizations and individuals associated in fact.

3. At all times material to this Indictment, this enterprise was engaged in, and its activities affected, interstate and foreign commerce.

The Racketeering Conspiracy

4. From in or about January of 1984, to in or about July of 1991, in the District of Columbia and elsewhere, Defendants

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED,
AGHA HASAN ABEDI,
SWALEH NAQVI, and
GHAITH PHARAON

along with others known and unknown to the Grand Jury, being persons employed by and associated with the enterprise described in paragraph two of this Count, which enterprise was engaged in and the activities of which affected interstate and foreign commerce, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other, and with persons known and unknown to the Grand Jury, to commit an offense against the United States, to wit: to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity.

5. It was part of the conspiracy that the Defendants and their co-conspirators would and did commit acts of racketeering activity as set forth below in paragraph 8 of this Count.

6. It was a further part of the conspiracy that each defendant agreed that two or more of the acts of racketeering set forth below in this Count would be committed in the conduct of the affairs of the enterprise.

Manners and Means of the Conspiracy

7. The allegations of Paragraphs 20 through 27 of Count One of this Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

The Pattern of Racketeering Activity

8. It was a part of the conspiracy that the Defendants and their co-conspirators would commit acts of racketeering activity

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consisting of the racketeering acts set forth below, and additional racketeering acts involving the unlawful control, operation, and manipulation of United States financial institutions and fraud against United States Federal bank regulatory agencies, and fraud against the investing public, constituting violations of Title 18, United States Code, Sections 1341, 1343 and 1344.

Racketeering Act One

Wire Fraud Related to Independence Bank

1) Between on or about January 1, 1984, and December of 1989, Defendants AGHA HASAN ABEDI, SWALEH NAQVI, and GHAITH PHARAON, the BCCI Defendants, and ICIC Overseas (not charged in this Count as a Defendant), devised and intended to devise a scheme and artifice to defraud and to obtain money and property, namely, insurance protection and continued insurance protection by the FDIC, backed by funds and security of the United States, for deposits of Independence, by means of fraudulent and false pretenses, representations and promises;

2) It was part of said scheme and artifice that on or about May 17, 1985, Defendant GHAITH PHARAON and Defendant SWALEH NAQVI, acting in the name of Defendant ICIC Overseas, did enter into a secret agreement whereby 85% of the shares of the stock of Independence, with the attendant voting rights, purportedly to be purchased in their entirety by Defendant GHAITH PHARAON, were instead pledged to ICIC Overseas; it was further part of said scheme that Defendant GHAITH PHARAON did conceal and cause to be

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concealed this material fact from the FDIC and other regulators through fraudulent conduct and deceit; it was further part of the scheme that the BCCI Group exercised influence and control over the affairs of Independence Bank;

3) On or about the dates set forth below, the above Defendants transmitted and caused to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343:

Act	Date	From	To	Nature of Wire
a)	8/30/85	Banque Arabe et Internationale d'Investissement ("BAII") Paris, France	Morrison and Foerster Los Angeles, CA	Telex
b)	9/4/85	Banque Arabe et Internationale d'Investissement ("BAII") Paris, France	Morrison and Foerster Los Angeles, CA	Telex
c1)	10/1/85	First National Bank of Boston (herinafter "Bank of Boston") Boston, MA	Citibank New York, NY	Wire Transfer $3,066,228.33
c2)	10/1/85	Bank of Boston Boston, MA	Citibank New York, NY	Wire Transfer $1,113,771.67
c3)	10/1/85	Bank of Boston Boston, MA	First Wisconsin International Bank New York, NY	Wire Transfer $3,840,000.00
c4)	10/1/85	Bank of Boston Boston, MA	Crocker Bank International New York, NY	Wire Transfer $3,840,000

c5)	10/1/85	Bank of Boston Boston, MA	Irving Trust New York, NY	Wire Transfer $535,040.00
c6)	10/1/85	Bank of Boston Boston, MA	Barclays Bank New York, NY	Wire Transfer $4,584,960.00
c7)	10/1/85	Bank of Boston Boston, MA	First American Bank New York, NY	Wire Transfer $478,000.00
c8)	10/1/85	Bank of Boston Boston, MA	First American Bank New York, NY	Wire Transfer $3,022,000.00
d)	10/1/85	BCCI London, England	Amer Lodhi c/o Morrison and Foerster Los Angeles, CA	Telex
e)	10/2/85	Morgan Guaranty New York, NY	Bank of Boston Boston, MA	Wire Transfer $7,900,000
f)	4/2/88	Independence Bank Encino, CA	Ghaith Pharaon Georgia	Telex
g)	5/17/88	BankAmerica International New York, NY	Independence Bank Encino, CA	Wire Transfer $4,000,000

(Title 18, United States Code, Sections 1343 and 2)

RACKETEERING ACTS TWO THROUGH FOUR

Mail Fraud and Wire Fraud in Connection with CenTrust

Racketeering Act Two

1. The allegations contained in paragraphs 1, 2 and 3 of COUNT TWO of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about May 25, 1988, the BCCI Defendants, and Defendants GHAITH PHARAON, AGHA HASAN ABEDI, and SWALEH NAQVI, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, knowingly and

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willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds, namely, a wire transfer of approximately $3,000,000 of funds from Washington Mutual Savings and Loan Association, Seattle, Washington, to a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

(Title 18, United States Code, Sections 1343 and 2)

Racketeering Act Three

1. The allegations contained in paragraphs 1, 2 and 3 of COUNT TWO of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about the dates set forth below, the above Defendants transmitted and caused to be transmitted in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343:

Act	Date	From	To	Nature of Wire
a)	5/3/88	GHAITH PHARAON Georgia	FHLBB Regulator Washington, D.C.	Telephone Call
b)	5/23/88	BCCI Group London, England	Interedec Savannah, GA	Telex
c)	5/24/88	Citibank New York, NY	BCCI Overseas (Paris) Paris, France	Wire Transfer approximately $25,000,000
d)	7/27/88	CenTrust Miami, FL	Security Pacific International Bank New York, NY	Wire Transfer approximately $25,000,000

(Title 18, United States Code, Sections 1343 and 2)

Racketeering Act Four

1. The allegations contained in paragraphs 1, 2 and 3 of COUNT TWO of this Indictment are realleged and incorporated by reference as if fully set forth herein.

2. On or about May 25, 1988, in the District of the District of Columbia and elsewhere, the BCCI Defendants and Defendants GHAITH PHARAON, AGHA HASAN ABEDI, and SWALEH NAQVI, aided and abetted by one another, for the purpose of executing the aforesaid scheme and artifice to defraud and attempting to do so, knowingly and willfully transmitted and caused to be transmitted in interstate commerce by means of wire communications certain writings, signs, signals, pictures and sounds, to wit: wire transfer of approximately $2,500,000 of funds from Safeco Insurance Co., Seattle, Washington, and a firm in New York, New York, for the purchase of CenTrust subordinated debentures.

(Title 18, United States Code, Sections 1343 and 2)

All in violation of Title 18, United States Code, Sections 1962(d) and 1963, and Title 18, United States Code, Section 2.

FORFEITURE

The Grand Jury further charges:

1. The allegations contained in COUNT THREE of this Indictment are hereby realleged and incorporated by reference herein, for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 1963.

2. The Defendants AGHA HASAN ABEDI,

SWALEH NAQVI, and GHAITH PHARAON have property constituting, and derived from, proceeds which they obtained directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, thereby making such property, or an amount of cash equivalent thereto, forfeitable to the United States of America pursuant to Title 18, United States Code, Section 1963(a)(3). Said properties consist of any and all proceeds the Defendants received as a result of the racketeering activity alleged in Racketeering Acts Two through Four of Count Three.

(Title 18, United States Code, Section 1963.)

A TRUE BILL:

FOREPERSON

JAY B. STEPHENS
Attorney for the United States in
and for the District of Columbia

ROBERT S. MUELLER, III
Assistant Attorney General
Criminal Division
United States Department
of Justice

1325015-000-12024

DECLASSIFICATION AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
DATE 05-23-2018 BY [redacted]

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FM FBI SACRAMENTO (29B-WF-R-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

BT

~~S E C R E T~~

CITE: //3720//

PASS: FBIHQ, FINANCIAL INSTITUTION FRAUD UNIT, WHITE COLLAR CRIMES SECTION.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA; [redacted]

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[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; FAITH PHARAON, AKA; FIF; FAG; OO: WMFO.

THIS COMMUNICATION IS CLASSIFIED ~~SECRET~~ WHERE MARKED.

29B-WF-171[illegible]-3
29HQ-116176

[redacted]

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~~SECRET~~

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ON JULY 29, 1991, QUERY OF SACRAMENTO MANUAL INDICES AND FOIMS REVEALED ONE REFERENCE EACH TO [redacted] GAITH PHARAON AND BANK OF CREDIT AND COMMERCE INTERNATIONAL. A SUMMARY OF EACH OF THOSE REFERENCES FOLLOWS: b6 b7C

[redacted] 100A-SC-8101, SERIAL 98, PAGE 149, APRIL 17, 1987. [redacted] NAME AND PHONE NUMBER WERE IN PHONE DIARY PROVIDED BY THE SAN BERNARDINO SHERIFF'S OFFICE ON AUGUST 23, 1988, IN MATTER ENTITLED, "ANIMAL LIBERATION FRONT (ALF); DESTRUCTION OF ANIMAL SCIENCE BUILDING, UNIVERSITY OF CALIFORNIA AT DAVIS CAMPUS, DAVIS, CALIFORNIA, BY ARSON, APRIL 16, 1987; DOMESTIC SECURITY/TERRORISM; OO: SACRAMENTO." IT IS NOT KNOWN HOW THE SAN BERNARDINO SHERIFF'S OFFICE CAME INTO POSSESSION OF THIS PERSONAL TELEPHONE DIRECTORY OR WHAT ITS SOURCE IS. b6 b7C

GAITH PHARAON IS/WAS THE VICTIM IN SAN FRANCISCO CASE [redacted] ENTITLED, "UNSUBS; [redacted] GAITH PARAON - VICTIM; EXTORTION; IT-SAUDI ARABIA; OO: SAN FRANCISCO"; SC FILE [redacted] DECEMBER 21, 1987. ~~(S)~~ (U) b3 b6 b7C b7E

BANK OF CREDIT AND COMMERCE INTERNATIONAL (LEBANON) S.A.L., #1252?? (LAST TWO NUMBERS ARE SMUDGED AND UNREADABLE)

IS REFERENCED IN SC FILE [redacted] NOVEMBER 1980, IN MATTER ENTITLED, [redacted]

[redacted]

[redacted] (X) (U)

FURTHER REVIEW OF SACRAMENTO MANUAL INDICES AND FOIMS WAS NEGATIVE FOR ALL OTHER SUBJECTS AND [redacted]

[redacted]

THERE BEING NO FURTHER LEADS FOR THE SACRAMENTC DIVISION, THIS MATTER IS PLACED IN RUC STATUS.

~~C BY G-3; DECLS:OADR.~~

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Off. of EEO
Off. Liaison & Int. Affs.
Off. of Public Affs.

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FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

FBI LOS ANGELES (29D-LA-102009)/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. CID, WCCS, FIFU, SS [redacted] LOS ANGELES; SARA-2.

SUBJECT: (1) HIDDEN INTERESTS; MAJOR CASE 38; FIF; OO: WMFO.

RE LOS ANGELES TELETYPE TO DIRECTOR, FBI, DATED 10/11/91; AND DIRECTOR, FBI, FACSIMILE TO SAC, WMFO, DATED 10/11/91.

REFERENCED FACSIMILE REQUESTED WMFO INDICES CHECKS ON "TRENDINVEST" AND [redacted] AS WELL AS WMFO'S KNOWLEDGE OF THE EXISTENCE OF ADDITIONAL TIES BETWEEN BCCI AND LINCOLN SAVINGS AND LOAN.

29-WF-171994-24

29 HQ-116176

[redacted]

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PAGE TWO DE FBIWMFO 0014 UNCLAS

INVESTIGATION AT WMFO HAS REVEALED NO TIES BETWEEN BCCI AND LINCOLN SAVINGS AND LOAN EXCEPT FOR THE ARTICLE IN REFERENCED FACSIMILE FROM THE SAN FRANCISCO CHRONICLE ENTITLED [redacted] AND BCCI FIGURE BUILT FIRM, DID BUSINESS". b6 b7C

WMFO INDICES CHECKS ON "TRENDINVEST" WERE NEGATIVE. WMFO INDICES CHECKS ON [redacted] REVEALED A WALL STREET b6 b7C JOURNAL ARTICLE LOCATED ON PAGE A12 OF THE 9/13/91, EDITION ENTITLED, "CLOSE LINKS EXISTED BETWEEN BCCI & BNL". THE ARTICLE DESCRIBES [redacted] OF THE BCCI SWISS UNIT, BANQUE DE COMMERCE ET PLACEMENTS S.A. AS WELL AS [redacted] BANCA NAZIONALE DEL LAVORO'S UNIT IN ZURICH, KNOWN AS LAVORO BANK AG. [redacted] BANK OF NEW YORK-INTER MARITIME BANK IN GENEVA.

IF ADDITIONAL INFORMATION REGARDING A RELATIONSHIP BETWEEN BCCI AND LINCOLN SAVINGS AND LOAN BECOMES AVAILABLE, WMFO WILL ADVISE FBIHQ AND THE LOS ANGELES DIVISION IMMEDIATELY.

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Dep. Dir. ____
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ADD Inv. ____
Asst. Dir. ____
Adm. Serv. ____
Crim. Inv. ____
Ident. ____
Info. Mgmt. ____
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Intell. ____
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FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

FBI LOS ANGELES (29D-LA-102009)/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. CID, WCCS, FIFU, SSA [redacted] LOS ANGELES; SARA-2.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FIF; OO: WMFO.

RE LOS ANGELES TELETYPE TO DIRECTOR, FBI, DATED 10/11/91; AND DIRECTOR, FBI, FACSIMILE TO SAC, WMFO, DATED 10/11/91.

REFERENCED FACSIMILE REQUESTED WMFO INDICES CHECKS ON "TRENDINVEST" AND [redacted] AS WELL AS WMFO'S KNOWLEDGE OF THE EXISTENCE OF ADDITIONAL TIES BETWEEN BCCI AND LINCOLN SAVINGS AND LOAN.

29 HQ-116176

[redacted]

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purview, approved or denied applications for structural or corporate changes, and ruled on applications for insurance. The FDIC insured deposits in amounts up to $100,000 per account in banks which it insured.

3. The Federal Home Loan Bank Board ("FHLBB") was an agency of the United States established to regulate and supervise savings and loan associations and savings banks insured by the Federal Savings and Loan Insurance Corporation ("FSLIC"). As part of its duties, the FHLBB governed the FSLIC. The FHLBB examined insured institutions to ensure they were operated in a safe and sound manner and in conformity with applicable laws and regulations.

4. The FSLIC was an agency of the United States established to protect depositors by insuring deposits in savings and loan associations and in certain savings banks in amounts up to $100,000 per account.

5. As of August 9, 1989, the Office of Thrift Supervision ("OTS") succeeded to the interests of the FHLBB and the FSLIC with respect to the regulation and supervision of savings and loan associations and certain savings banks, and the FDIC succeeded the FSLIC as the insurer.

6. Independence Bank ("Independence"), Encino, California, was chartered, regulated and supervised by the State of California and had deposits insured by the FDIC.

7. CenTrust Savings Bank, a State Savings Bank ("CenTrust"), was located in Miami, Florida, and was chartered by

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 154
Page 74 ~ Duplicate;
Page 76 ~ Duplicate;
Page 77 ~ Duplicate;
Page 78 ~ Duplicate;
Page 80 ~ Duplicate;
Page 81 ~ Duplicate;
Page 82 ~ Duplicate;
Page 83 ~ Duplicate;
Page 104 ~ Duplicate;
Page 105 ~ Duplicate;
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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/03/97

To: ADIC, WFO

From: SA [redacted] C-1 b6 b7C
Contact: DA [redacted] X9072

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC:js

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Synopsis: **CLOSURE OF SEIZURE NUMBER 3920-97-F-0052 U.S. v $650,000 IN U.S. CURRENCY**

Details: The purpose of this memorandum is to request that seizure number 3920-97-F-0052 be closed based on the fact that the $650,000 in U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

MAINTAIN AS TOP SERIAL

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FS-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FS-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FS-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FS-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FS-5	3920-97-F-0028	$60,000,000	US CURRENCY
SUB FS-6	**3920-94-F-0052**	**$650,000**	**US CURRENCY**

1- [redacted] FSPU b6 b7C
1- 29B-WF-171994
1- 3920-97-F-0052

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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1/FAST, NVMRA
Contact: SA [redacted] x9072

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

TOP Serial

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

1- 29B-WF-171994
1- All seizure files

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MAINTAIN AS TOP SERIAL

This matter is commonly referred to as the BCCI investigation.

The following seizures are being processed through the United States Attorneys Office, Washington, D.C., pursuant to a criminal plea agreement (criminal forfeitures):

18.	3920-92-F-0231	BANK ACCOUNT	$ 4,060,293.91	7/92
19.	3920-92-F-0232	BANK ACCOUNT	$ 15,220,667.63	7/92
20.	3920-92-F-0233	BANK ACCOUNT	$ 43,891,523.00	7/92
21.	3920-92-F-0234	BANK ACCOUNT	$ 991,174.19	7/92
22.	3920-92-F-0235	BANK ACCOUNT	$ 4,925,000.00	7/92
23.	3920-92-F-0236	BANK ACCOUNT	$ 68,919.87	7/92
24.	3920-92-F-0237	BANK ACCOUNT	$ 140,478.46	7/92
25.	3920-92-F-0238	BANK ACCOUNT	$ 360,602.60	7/92
26.	3920-92-F-0239	BANK ACCOUNT	$ 20,241,169.59	7/92
27.	3920-92-F-0240	BANK ACCOUNT	$ 257,119.09	7/92
28.	3920-92-F-0241	BANK ACCOUNT	$ 23,329,555.00	7/92
29.	3920-92-F-0242	BANK ACCOUNT	$ 151.39	7/92
30.	3920-92-F-0243	BANK ACCOUNT	$ 1,668.00	7/92

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This matter is commonly referred to as the BCCI Investigation.

The following seizures are being processed through the United States Attorneys Office, Washington, D.C., pursuant to a criminal plea agreement (criminal forfeitures):

1.	3920-92-F-0115	Bank Account	$ 4,024,342	3/92
2.	3920-92-F-0116	Bank Account	$ 1,283.092.84	3/92
3.	3920-92-F-0117	Bank Account	$ 500,308	3/92
4.	3920-92-F-0118	Bank Account	$ 15,789,646.43	3/92
5.	3920-92-F-0119	Bank Account	$ 583,305	3/92
6.	3920-92-F-0120	Bank Account	$ 12,786,950	3/92
7.	3920-92-F-0121	Bank Account	$ 2,922,107.70	3/92
8.	3920-92-F-0122	Bank Account	$ 65,093,027.79	3/92
9.	3920-92-F-0123	Bank Account	$ 40,240	3/92
10.	3920-92-F-0124	Bank Account	$150,111,348.92	3/92
11.	3920-92-F-0125	Bank Account	$ 25,363,313.42	3/92
12.	3920-92-F-0126	Bank Account	$ 2,662,808.53	3/92
13.	3920-92-F-0127	Bank Account	$ 3,727,520.97	3/92
14.	3920-92-F-0128	Bank Account	$ 15,299,703	3/92
15.	3920-92-F-0129	Bank Account	$ 487,448.84	3/92
16.	3920-92-F-0130	Bank Account	$ 46,285,845	3/92
17.	3920-92-F-0131	Bank Account	$ 73,000	3/92

29B-WF-171994 Sub FS

[redacted]

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1325015-000-11004

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

APR 15 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. Thereupon, an Order of Forfeiture was entered. Paragraph 1(e) of that Order of Forfeiture provides that the four corporate defendants named in this action shall forfeit to the United States ownership interests in all property located in the United States, including, without limitation, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined or discovered pursuant to paragraph 10 of the plea agreement, in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf

(N)

1325015-000-11005

of Court Appointed Fiduciaries of BCCI in the course of the management or disbursement of the liquidation estates as described in the plea agreement.

On April 13, 1992, pursuant to 18 U.S.C. § 1963, the plea agreement, and paragraph 1(e) of the January 24, 1992 Order of Forfeiture, counsel for the United States of America filed a motion requesting that the Court order forfeiture of a quantity of personal property of unknown value, including office furniture and equipment, held by The Fortress Corporation, 1630 N.E. 1st Avenue, Miami, Florida, and owned by BCCI (Overseas) Ltd., one of the four named corporate defendants. Attached to the motion as Exhibit B was an inventory list describing with particularity the property held by The Fortress Corporation which the government seeks forfeited.

Without objection by counsel for the corporate defendants, and it appearing that all assets listed in Exhibit B to the United States' Motion to Amend Order of Forfeiture to Include Additional Property are assets of BCCI (Overseas) Ltd. and are located within the United States, it is hereby

ORDERED that the assets held by The Fortress Corporation and listed on the attached page entitled "Exhibit 'B' Crim. No. 91-0655 (JHG)" are declared forfeited and subject to the Court's Order of Forfeiture of January 24, 1992. The United States Marshals Service is directed to seize those assets forthwith.

It is FURTHER ORDERED that upon receipt of notice from the United States Marshals Service that the property has been seized,

1325015-000-11006

it shall be the responsibility of the United States of America to notify all interested parties of their right to file a claim pursuant to 18 U.S.C. § 1963(l) asserting legal right, title or interest in the property.

IT IS SO ORDERED.
April 15, 1992

JOYCE HENS GREEN
United States District Judge

1325015-000-11007

OFFICE EQUIPMENT

1 -- computer printer Exxon 935 serial #2422755

3 -- 3-drawer file cabinets (white/metal)

3 -- 5-drawer file cabinets (metal)

1 -- NEC Letterprinter model 3550

1 -- Racal-Milgo Mark 96

1 -- Bell & Howell microfiche machine MT-603 serial #5210761

1 -- Bell & Howell Microfilm Image-Search serial #2210175

1 -- Bell & Howell microfilm - DSR 2000 serial 5070471

1 -- microfilm stand (metal), 2 drawers

1 -- time clock

2 -- wooden desks (3 drawers) with secretaries

1 -- wooden desk (6 drawers)

2 -- wooden desks (3 drawers)

1 -- wooden desk (2 drawers)

2 -- wooden desks (no drawers)

1 -- glass-top coffee table with white marble stand

1 -- FAX machine EMT 9165 serial #364570

1 -- adding machine

5 -- calculators

1 -- stamp machine - Pitney Bowes

1 -- Bell & Howell Classic Recorder serial #388561

Numerous metal shelving (and hardware)

Exhibit "B"
Crim. No. 91-0655 (JHG)

FILED
APR 15 1992
CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

1325015-000-11008

29B-WF-171994 Sub FS -57

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

JUL 29 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively "BCCI") and the plea agreement between them and the United States of America. Thereupon, an Order of Forfeiture was entered. Paragraph 1(e) of that Order of Forfeiture provides that the four corporate defendants named in this action shall forfeit to the United States ownership interests in all property located in the United States, including, without limitation, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined or discovered in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf of court-appointed fiduciaries of BCCI in

Exhibit D Cr. # 91-0655(JHG)

the course of the management or disbursement of the liquidation estates as described in the plea agreement.

On June 24, 1992, the government filed a Motion to Amend Order of Forfeiture to Include Additional Property, seeking forfeiture of assets in newly discovered bank accounts held in the names of the corporate defendants, proceeds from the sale of a condominium purchased with resources provided by a corporate defendant, money remaining in a "BCCI Legal Fund" established by one of the corporate defendants for the defense of its employees' legal interests, a bankruptcy distribution to one of the corporate defendants, and assets held at various New York financial institutions in the name of ICIC Investments Ltd. ("Investments"), a sibling corporation of defendant ICIC (Overseas) Ltd. ("Overseas"). Accompanying the motion were a Memorandum of the United States in Support of its Motion to Amend Order of Forfeiture to Include Assets Held in the Name "ICIC Investments Limited," a motion for leave to file the memorandum in excess of page limit,[1] and numerous exhibits supporting the government's claims of forfeitability. While implicitly recognizing that Investments was not charged as a defendant in this action, that Investments was not a party to the plea agreement, and that Investments was not specifically named in the Court's January 24, 1992 Order of Forfeiture, the government argues in its memorandum that assets held in the name of Investments are nonetheless forfeitable because

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[1] The motion for leave to file in excess of page limit has been granted in a separate order.

1325015-000-11011

Investments was the alter ego of one or more of the corporate defendants and because assets held in the name of Investments were transferred to Investments by the defendants after the United States' interest in them arose. Pursuant to 18 U.S.C. § 1963(d)(1)(A), the Court restrained fourteen New York financial institutions from interfering with, moving, transferring, disposing, altering, or otherwise changing the status quo of any assets held in the name of Investments pending resolution of the government's motion to amend.

In a filing dated July 7, 1992, the court-appointed fiduciaries for the four corporate defendants represented that they do not object to forfeiture of the assets of Investments as set forth in the government's motion, subject to the filing of claims pursuant to 18 U.S.C. § 1963(l). Counsel for Investments, however, submitted to the Court on July 7, 1992 a Memorandum of Points and Authorities in Opposition to Government's Motion to Amend Order of Forfeiture. The government filed a reply to Investments' opposition, claiming, inter alia, that Investments may challenge the forfeiture of assets only by filing a petition pursuant to 18 U.S.C. § 1963(l) after the assets are forfeited. On July 24, 1992, counsel for Investments filed a Motion for Leave to File Sur Reply Memorandum in Opposition to the Government's Motion to Amend Order of Forfeiture. Because Investments does not have standing to challenge the forfeiture at this time, see 18 U.S.C. § 1963(i), its motion for leave has been denied in a separate order.

Through its motion to amend and the exhibits attached thereto,

1325015-000-11012

the government has satisfactorily established that the accounts held by the various financial institutions in the names of the corporate defendants, the proceeds from the sale of the condominium purchased by Amjad Awan with funds from one of the corporate defendants, the legal fund established by one of the corporate defendants, and the claim filed on behalf of BCCI Overseas (Miami Agency) in the Florida bankruptcy proceeding of General Coffee Corporation are forfeitable under 18 U.S.C. § 1963, the plea agreement between the parties, filed December 19, 1991, and the Order of Forfeiture of January 24, 1992. Consequently, the forfeiture of those assets is ordered below. Additionally, because treating Investments as an alter ego of the corporate defendants is appropriate under the relevant law and facts for the reasons stated below, forfeiture of assets held in the name of Investments is also ordered.

Title 18 U.S.C. § 1963, the applicable forfeiture provision in this case, states in the most general of terms that "interests," "securities," and "claims" in property or "enterprises" relating to racketeering activities are forfeitable.[2] Numerous courts,

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[2] Subsection (a) of § 1963 states in relevant part:

> Whoever violates any provision of section 1962 of this chapter ... shall forfeit to the United States, irrespective of any provision of State law --
>
> (1) any interest the person has acquired or maintained in violation of section 1962;
> (2) any --
> (A) interest in;
> (B) security of;
> (C) claim against; or
> (D) property or contractual right of any

1325015-000-11013

including the Supreme Court, have acknowledged that the broad terms used to define forfeitable assets in § 1963 reflect a strong and unambiguous legislative intent to separate a convicted racketeer from all assets, in whatever form, obtained from and used to further racketeering activities. See, e.g., United States v. Busher, 817 F.2d 1409, 1412-13 (9th Cir. 1987) ("Section 1963 is purposely broad. ... [It] was designed to totally separate a racketeer from the enterprise he operates."); United States v. Ginsburg, 773 F.2d 798, 802 (7th Cir. 1985), cert. denied, 475 U.S. 1011 (1986) ("The statute is replete with words and phrases of extraordinary breadth further evidencing congressional intent to enact a statute of exceedingly broad scope."); United States v. Jacobson, 691 F.2d 110, 113 (2nd Cir. 1982) (use of the terms "interest" and "property ... right" reflects a Congressional intent to insure a broad reach of forfeiture sanctions). As the Supreme Court has stated:

> It undoubtedly was because Congress did not wish the forfeiture provision of § 1963(a) to be limited by rigid and technical definitions drawn from other areas of the law that it selected the broad term "interest" to describe the things that are subject to forfeiture under the statute. Congress selected this general term apparently because it was fully consistent with the pattern of the RICO statute in utilizing terms and concepts of breadth.

> kind affording a source of influence over;
> any enterprise which the person has established, operated, controlled, conducted, or participated in the conduct of in violation of section 1962; and
>
> (3) any property constituting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of section 1962.

1325015-000-11014

Russello v. United States, 464 U.S. 16, 21 (1983). In light of the deliberately broad language of § 1963 and the ambitious purpose of RICO, interpretation of the term "interest" to include the assets of a racketeering corporation's alter ego clearly is warranted.[3]

The government's motion to amend and the voluminous exhibits attached thereto satisfactorily establish that Investments was the alter ego of one or more of the corporate defendants. It is unnecessary to reiterate every relevant fact supporting the Court's determination; it is sufficient to note as particularly significant the frequent commingling of property and business affairs of Investments and Overseas, the financial dependence of Investments on Overseas and related entities, the commonality of ownership and management of Investments and Overseas, and the sharing of the same building, business logo, telex, post office box, and telephone line for facsimile. Facts contained in the Report of the Joint Provisional Liquidators of International Credit and Investment Company (Overseas) Limited, attached to the court-appointed fiduciaries' response to the government's motion to amend, also lend support for the disregard of Investments' separate corporate form. Page 2 of the Report, dated August 30, 1991, states:

In a number of material respects, the ICIC Group [i.e.,

---

[3] Although it has not addressed piercing the corporate veil in a RICO context, the Supreme Court has consistently held that a corporate form should not be respected when to do so would defeat a legislative policy or work fraud or injustice. See, e.g., First National City Bank v. Banco Para el Comercio Exterior de Cuba, 462 U.S. 611, 630 (1983); Anderson v. Abbott, 321 U.S. 349, 363, reh'g denied, 321 U.S. 804 (1944); Taylor v. Standard Gas & Electric Co., 306 U.S. 307, 322 (1939).

1325015-000-11015

> Investments, Overseas, and their sibling and parent corporations] appears to have conducted its affairs as a single entity, without clearly identifying which company or entity within the ICIC Group was concerned with or responsible for any particular transaction. This has further complicated the Provisional Liquidators' investigations.

Given the relationship between Investments and the named defendants as established by the government's exhibits and, to a lesser extent, the Report of the Joint Provisional Liquidators submitted by the court-appointed fiduciaries for the four corporate defendants, and in light of the broad language of § 1963(a) and the legislative history of RICO, the Court disregards the corporate form of Investments and considers the assets of Investments forfeitable "interests" of the named corporate defendants. To do otherwise would seriously undermine the legislative purpose of § 1963, namely, to "'punish, deter, incapacitate, and ... directly to remove the corrupting influence from the channels of commerce.'" Russello at 28 (quoting 116 Cong.Rec. 18955 (remarks of Sen. McClellan)).[4]

Accordingly, for the reasons stated above, it is hereby

ORDERED that the assets listed on the attached pages entitled "Second Supplemental List of Forfeited Property" and all property held in the United States in the name of ICIC Investments Ltd. whether or not listed on the attached pages are declared forfeited and subject to the Court's Order of Forfeiture of January 24, 1992.

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[4] The Court, of course, may be required to revisit the forfeitability of assets held in Investments' name if a third party properly raises the issue in a petition filed pursuant to 18 U.S.C. § 1963(l).

1325015-000-11016

It is FURTHER ORDERED that the United States Marshals Service shall seize all assets forfeitable under this Order which are enumerated on the "Second Supplemental List of Forfeited Property" attached hereto. In the case of each bank account appearing on the "Second Supplemental List of Forfeited Property," the United States Marshals Service is directed to seize the property forthwith. In the case of the claim in bankruptcy appearing under the heading "Esanu Katsky Korins & Siger" on the "Second Supplemental List of Forfeited Property," the United States Marshals Service is directed to inform the bankruptcy trustee, Mr. Joel Weiss of Esanu Katsky Korins & Siger of New York, New York, of the manner in which any distribution from the bankruptcy estate to BCCI shall be transferred to the United States Marshals Service.

It is FURTHER ORDERED that upon receipt of notice from the United States Marshals Service that the property has been seized, it shall be the responsibility of the United States of America to notify all interest parties by fastest means available of their right to file a claim pursuant to 18 U.S.C. § 1963(l) asserting legal right, title or interest in the property.

IT IS SO ORDERED.
July 29, 1992

JOYCE HENS GREEN
United States District Judge

1325015-000-11017

Second Supplemental List of Forfeited Property

Account No.	Account Name	Approx. Balance
** Bank of California Corp.		
91-212373-1121	BCCI (Overseas) Chittigong	398,724.15
91-209411-1121	BCCI (Overseas) Dhaka	3,155,691.38
91-212399-1121	BCCI (Overseas) Sri Lanka	84,930.45
91-212407-1121	BCCI (Overseas) Sri Lanka	420,947.93
** Subtotal **		4,060,293.91
** Bank of New York		
Suspense	BCCI (Overseas) Kenya	30,238.40
180676	ICIC (Overseas) Ginnie Mae Book Entry	118,708.66
180676	ICIC (Overseas) Ginnie Mae interest distributions	9,489.09
180676	ICIC (Overseas)	527,592.32
180650	ICIC Investments Ltd.	14,534,639.16
** Subtotal **		15,220,667.63
** Bear Stearns & Co., Inc.		
055-69205	ICIC Investments Ltd.	34,376,678.00
089-69205	ICIC Investments Ltd.	514,845.00
** Subtotal **		34,891,523.00
** Capital Bank		
0902205099	BCCI (Overseas) Jamaica	351,769.41
0902204203	BCCI (Overseas) Paraguay	639,404.78
** Subtotal **		991,174.19
** Esanu Katsky Korins & Siger		
	General Coffee Corp. claim in bankruptcy	4,925,000.00
** First American Bank, N.A.		
3-446-611	BCCI Legal Fund (administered by Skadden Arps)	68,919.87
** First American Title Ins. Co.		
Escrow Account	Amjad Awan (Proceeds of sale of condo)	140,478.46

** Goldman, Sachs & Co.		
001-37937-9-911	ICIC Investments Ltd.	0.00
032-34066-3	ICIC Investments Ltd.	360,602.60
** Subtotal **		
		360,602.60
** Mabon Securities Corp.		
04-4051	ICIC Investments Ltd.	20,240,717.09
46-0305	ICIC Investments Ltd.	452.50
46-2633	ICIC Investments Ltd.	0.00
48-2633	ICIC Investments Ltd.	0.00
** Subtotal **		
		20,241,169.59
** Morgan Stanley & Co.		
0424245	ICIC Investments Ltd.	128,392.89
737-0120128947	ICIC Investments Ltd.	128,726.20
** Subtotal **		
		257,119.09
** Oppenheimer & Co., Inc.		
05391180	ICIC Investments Ltd.	6,907,935.00
05391180	ICIC Investments Ltd. T-notes	16,421,620.00
** Subtotal **		
		23,329,555.00
** Prudential Securities, Inc.		
TNT880170-85	ICIC Investments Ltd.	151.39
** Security Pacific Int'l Bank		
04012039	BCCI (Overseas) Manila	443.00
03005016	BCCI (Overseas) Paris	1,225.00
** Subtotal **		
		1,668.00

*** Total ***		
		$104,488,322.73

29B-WF-171994 Sub FS-59

Searched
Serialized DB
Indexed
Filed DB

1325015-000-11020

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

MAR 24 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. Thereupon, an Order of Forfeiture was entered. Paragraph 1(e) of that Order of Forfeiture provides that the four corporate defendants named in this action shall forfeit to the United States ownership interests in all property located in the United States, including, without limitation, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined or discovered pursuant to paragraph 10 of the plea agreement, in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf

of Court Appointed Fiduciaries of BCCI in the course of the management or disbursement of the liquidation estates as described in the plea agreement.

On March 20, 1992, pursuant to 18 U.S.C. § 1963, the plea agreement, and paragraph 1(e) of the January 24, 1992 Order of Forfeiture, counsel for the United States of America filed a motion requesting that the Court order forfeiture of a quantity of personal property of unknown value, including office furniture and computer equipment, held by Withers Transfer & Storage of Coral Gables, 357 Almeria Avenue, Coral Gables, Florida and owned by BCCI (Overseas) Ltd., one of the four named corporate defendants.[1] Attached to the motion as Exhibit A were inventory lists describing with particularity the property held by Withers Transfer & Storage which the government seeks forfeited.[2]

Without objection by counsel for the corporate defendants, and it appearing that all assets listed in Exhibit A to the United States' Motion to Amend Order of Forfeiture to Include Additional Property are assets of BCCI (Overseas) Ltd. and are located within the United States, it is hereby

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[1] According to the government's motion, the court-appointed fiduciaries advised counsel for the government of the existence of the property which is the subject of this Order.

[2] Although one of the inventory lists contained in Exhibit A and entitled "Packing List" was printed on the letterhead of Security Forwarding Ltd. of Sixth Terrace, Centreville, Nassau, Bahamas, counsel for the government represents that all assets listed in Exhibit A, including those contained in the "Packing List," are held in the United States by Withers Transfer & Storage of Coral Gables.

1325015-000-11022

ORDERED that the assets held by Withers Transfer & Storage of Coral Gables and listed on the attached pages entitled "Ex. A. Crim. No. 91-0655 (JHG)" are declared forfeited and subject to the Court's Order of Forfeiture of January 24, 1992. The United States Marshal's Service is directed to seize those assets forthwith.

It is FURTHER ORDERED that upon receipt of notice from the United States Marshal's Service that the property has been seized, it shall be the responsibility of the United States of America to notify all interested parties of their right to file a claim pursuant to 18 U.S.C. § 1963(l) asserting legal right, title or interest in the property.

IT IS SO ORDERED.
March 24, 1992

JOYCE HENS GREEN
United States District Judge

1325015-000-11023

WITHERS
WORLDWIDE

10890 N.W. 29th STREET, MIAMI, FLORIDA 33172 / TELEX 512488 WITHERS CGBL
PHONE (305) 477-0030 / FAX (305) 477-1327

March 2, 1992

Ms. A. Katherine Toomey
Nussbaum & Wald
Suite 200
One Thomas Circle, N.W.
Washington, D.C. 20005-5802

Re:"Storage Account No. 26392 - Bank of Credit & Commerce"

Dear Ms. Toomey:

In response to your Fax letter of March 2, 1992 hereattached you will find copy of the inventory of goods in storage, also I would like to mention that the actual balance due to Withers is $5,749.38.

I remain at your disposition

Truly yours,

Lloyd Roach

FILED
MAR 24 1992
CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

Ex. A. Crim No. 91-0655 (JHG)

CONTRACTOR OR CARRIER

Withers Transfer & Storage Of Coral Gables

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

PAGE NO. 1 | NO. OF PAGES

AGENT Withers

AGENT'S REFERENCE NO.

OWNER'S GRADE OR RATING AND NAME Bank of Credit & Commerce

CONTRACT OR GBL NO.

ORIGIN LOADING ADDRESS Miami STATE Florida

GOVT. SERVICE ORDER NO.

DESTINATION Abu Dhabi United Arab Emirates.

VAN NUMBER

DESCRIPTIVE SYMBOLS

B-w - BLACK & WHITE TV
C - COLOR TV
CP - CARTON PACKED
PBO - PACKED BY OWNER
CD - CARTON DISASSEMBLED
DBO - DISASSEMBLED BY OWNER
PB - PROFESSIONAL BOOKS
PE - PROFESSIONAL EQUIPMENT
PP - PROFESSIONAL PAPERS
MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS

BE - BENT
BR - BROKEN
BU - BURNED
CH - CHIPPED
CU - CONTENTS & CONDITION UNKNOWN
D - DENTED
F - FADED
G - GOUGED
L - LOOSE
M - MARRED
MO - MOTHEATEN
R - RUBBED
RU - RUSTED
SC - SCRATCHED
SH - SHORT
SO - SOILED
T - TORN
W - BADLY WORN
Z - CRACKED

LOCATION SYMBOLS

1. Arm
2. Bottom
3. Corner
4. Front
5. Left
6. Legs
7. Rear
8. Right
9. Side
10. Top
11. Veneer
12. Edge
13. Corner
14. Back

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CN. BLT.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
001		CARTON Computer Parts	"	
2		" "	"	
3		" "	"	
4		" "	"	
5		" "	"	
6		" "	"	
7		" "	"	
8		" "	"	
9		" "	"	
010		" "	"	
1		" "	"	
2		CRATE Computer		
3				
4				
5				
6				
7				
8				
9				
0				
1				
2				
3				
4				
5				
6				
7				
8				
9				
0				

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING - BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO. | TAPE COLOR

NOS. FROM | THRU

AT ORIGIN	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE	AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE		OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE

FORM 2280 REV. '71

WILBUR PRINTING, INC 330 SCHMITT BLVD., FARMINGDALE, N.Y. 11735

1325015-000-11025

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

Withers Transfer & Storage Of Coral Gables

PAGE NO. 1 — NO. OF PAGES 7

AGENT LTS AUC — CARRIER'S REFERENCE NO. 74823

OWNER'S TRADE OR RATING AND NAME BANK OF CREDIT & COMMERCE — CONTRACT OR GBL NO.

ORIGIN LOADING ADDRESS 1200 BRICKELL AVE — CITY MIAMI — STATE FL — GOVT. SERVICE ORDER NO.

DESTINATION ABUDHABI — VAN NUMBER

DESCRIPTIVE SYMBOLS

B/W - BLACK & WHITE TV; C - COLOR TV; CP - CARRIER PACKED; PLO - PACKED BY OWNER; CU - CARRIER DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS

B - BENT; BA - BROKEN; BU - BURNED; CH - CHIPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; P - PACKED; G - GOUGED; L - LOOSE; M - MARRED; MI - MILDEW; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS

1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Right; 9. Side; 10. Top; 11. Veneer; 12. Edge; 13. Center; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CU. FT.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
#1 13 1A	B	DESK	SC ALL OVER M	
X 2A	B	↓	↓	
#1 3A	B			
#1 4A	B			
#1 5A	B			
#1 6A	B	↓	↓	
#1 7A	B	DESK	SC ALL OVER M	
#1 8A	B	RETURN	" " " " II 137	
#1 9A	B	DESK	" " " "	
#1 14 10A	B	RETURN	" " " " II 139	
X 1A	B	Chair	6 SC TWF	
X 2A	B	"	" " " " "	
#1 3A	B	Planter	SC ALL OVER M	
#1 4A	B	"	" " " "	
#1 5A	B	Chair	6 SC TWF	
#1 6A	B	"	" " " " "	AH0118
#1 7A	B B	Planter	SC ALL OVER	241
#1 8A	B	"	" " "	WITHERS TFR & STGE
#1 9A	B	Chair	6 SC TWF	LOT NO
#1 15 10A	B	"	↓	
X 1A	B	"	↓	
#1 2A	B	"	↓	
X 3A	B	"	6 SC TWF	
#1 4	B	DESK	SC ALL OVER	
#1 5A	B	Return	" " " II 154	
#1 6A	B	DESK	" " "	
#1 7A	B	RETURN	" " " II 156	
#1 8A	B	Chair	6 SC TWF	
#1 9A	B	"	"	
#1 16 10A	B	"	"	
X 1A	B	"	↓	
#1 2A	B	Chair	6 SC TWF	LOT NO AH0118 130 WITHERS TFR. & STGE.
#1 3A	B		↓	LOT NO AH0118 400 WITHERS TFR. & STGE.
#1 4	B		↓	
#1 5A	B		↓	
#1 6A	B		↓	
#1 7A	B		↓	
#1 8A	B		↓	
#1 9A	B	↓	↓	
#1 17 10A	B	Chair	6 SC TWF	

ITEM NO. — REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING: BEFORE SIGNING CHECK SHIPMENT COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO ALEVIE — TAPE COLOR White — NOS. FROM 131 — THRU 397

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE		CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE
AT ORIGIN	(SIGNATURE)	12-3-90	AT DESTINATION	(SIGNATURE)	
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	12-3-90		OWNER OR AUTHORIZED AGENT (SIGNATURE)	

FORM 1100 REV. '91 — WILDIN PRINTING, INC. 135 DUMONT BLVD., FARMINGDALE, N.Y. 11735

1325015-000-11026

Withers Transfer & Storage Of Coral Gables

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

PAGE NO. 1 NO. OF PAGES 7

AGENT WITHERS

SHIPPER'S REFERENCE NO. 24822

OWNER'S GRADE OR RATING AND NAME BANK OF CREDIT & COMMERCE

CONTRACT OR GBL. NO.

ORIGIN LOADING ADDRESS 1200 BRICKELL AVE CITY MIAMI STATE FL

GOVT. SERVICE ORDER NO.

DESTINATION ABUDHABI

VAN NUMBER

DESCRIPTIVE SYMBOLS
BW - BLACK & WHITE TV; C - COLOR TV; CP - CRATED PACKED; PBO - PACKED BY OWNER; CD - CRATED DISASSEMBLED; DUO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS
BE - BENT; BA - BROKEN; BU - BURNED; CR - CRIPPLED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; F - FADED; G - GOUGED; L - LOOSE; M - MARRED; MO - MOTH EATEN; R - RUSTED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS
1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Right; 9. Side; 10. Top; 11. Veneer; 12. Edge; 13. Center; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CR. RLF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
#1 1 7A	B	Chair	6SC WTF	
#1 2A	B	"	" " " " "	
#2 3A	B	DESK	SC ALL OVER	
#1 4A	B	Return	" " " # 173	
#2 5A	B	DESK	" " "	
#1 6A	B	Return	" " " II 175	
#2 7A	B	Chair	6SC WTF	
#2 8A	B			
#2 9A	B			
#1 & 10A	B			
#2 1A	B			
#2 2A	B			
#2 3A	B.B			
#2 4A	B			
#2 5A	B			
#2 6A	B	↓	↓ ↓ ↓ ↓ ↓	
#2 7A	B	Chair	6SC WTF	
#1 8A	B	Table	6SC 10SC	
#1 9A	B	"	" " " "	
#1 10A	B	"	" " " "	
#1 1A	B	CART	D SC ALL OVER	
#1 2A	B	OS Chair	W-W	
#1 3A	B	" "	"	
#2 4A	B	" Safe	"	
#1 5A	B	Fruit Table	SC ALL OVER	
#2 6A	B	Marble Base	W-W	
#2 7	B	Glass Top		
#1 8A	B	PLANTER	SC ALL OVER	
#1 9A	B	"	" " "	
#1 10A	B	"	" " "	
#2 1A	B	Centre Table Top	10SC	
#2 2A	B	↓	↓ ↓	
#2 3A	B			
#2 4A	B			
#2 5A	B	↓	↓ ↓	
#2 6A	B	Coffee Table Top	10SC	
#2 7A	B	Chair	6SC WFT	
#2 8A	B	"	↓ ↓ ↓ ↓ ↓	
#1 #1 9A	B B	"		
#1 2 10A	B	"	6SC WFT	

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING - BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO AH0118 TAPE COLOR White

NOS. FROM 131 THRU 399

AT ORIGIN	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE 12-3-90	AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE 12-3-90		OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE

FORM 5100 REV. '91

MILNER PRINTING, INC 335 DENNETT BLVD., FARMINGDALE, N.Y. 11735

1325015-000-11027

(CONTRACTOR OR CARRIER)

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

Withers Transfer & Storage Of [redacted] Gables

AGENT: WTS AUL	CARRIER'S REFERENCE NO.: 20433
OWNER'S GRADE OR RATING AND NAME: BANK OF CREDIT & COMMERCE	CONTRACT OR GBL. NO.
ORIGIN LOADING ADDRESS: 1200 BRICKELL AVE CITY: MIAMI STATE: FL	GOVT. SERVICE ORDER NO.
DESTINATION: ABUDHABI	VAN NUMBER

DESCRIPTIVE SYMBOLS
B&W - BLACK & WHITE TV; C - COLOR TV; CP - CANNER PACKED; PBO - PACKED BY OWNER; CD - CANNER DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS
BE - BENT; BA - BROKEN; BU - BURNED; CH - CHIPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; P - PACKED; G - GOUGED; L - LOOSE; M - MARRED; MI - MILDEW; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS
1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Right; 9. Side; 10. Top; 11. Underside; 12. Edge; 13. Center; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
#1 21A	D	Chair	6SC WFT	
#1 2A	B			
#1 3A	B			
#1 4A	BB			
#1 5A	B			
#2 6A	B			
#1 7A	D			
#1 8A	B			
#1 9A	B			
#1 220A	B			
#1 1A	B			
#1 2A	B			
#1 3A	B			
#1 4A	B			
#1 5A	B			
#2 6A	B			
#1 7A	B			
#1 8A	B			
#1 9A	B	↓	↓	
#1 230A	B	Chair	6SC WFT	
#1 1A	B	"	" " " " "	
#1 2A	B	OS CHAIR	NW	
#1 3A	B	" "	"	
#1 4A	B	" "	"	
#1 5A	B	" "	"	
#1 6A	B	" "	"	
#1 7A	B	OS CHAIR	"	
#1 8A	B	Planter	SC ALL OVER	
#1 9A	B	"	" " "	
#1 240A	B	~~OS CHAIR~~ MARBLE TOP	N-W	
#2 1A	B	MARBLE BASE	"	
#2 2A	B	Chair	6SC WFT	
#2 3A	B	"	" " " " "	
#2 4A	B	DESK	SC ALL OVER	
#2 5A	B	Credenza	" " "	
#1 6A	B	"	" " "	
#2 7A	B	DESK	" " "	
#2 8A	B	Planter	" " "	
#1 9A	B	"	" " "	
#1 250A	B	Planter	" " "	

AH0118 237 WITHERS TFR. & STGE.

AH0118 244 WITHERS TFR. & STGE.

ITEM NO.	REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO [illegible] INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING - BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE.

TAPE LOT NO. AH0118 TAPE COLOR WHITE

NOS. FROM 131 THRU 394

AT ORIGIN	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE 12-3-90	AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE 12-3-90		OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE

FORM 5190 REV '91

MILDIN PRINTING, INC., 138 SCHMITT BLVD., FARMINGDALE, N. Y. 11735

1325015-000-11028

Withers Transfer & Storage Of Coral Gables

PAGE NO. 4 NO. OF PAGES 7

AGENT WTS AUL CARRIER'S REFERENCE NO. 34833

OWNER'S GRADE OR RATING AND NAME BANK OF CREDIT & Commerce CONTRACT OR BILL NO.

ORIGIN LOADING ADDRESS 1200 BRICKELL AVE CITY MIAMI STATE FL GOVT. SERVICE ORDER NO.

DESTINATION ABUDHABI VAN NUMBER

DESCRIPTIVE SYMBOLS
B/W - BLACK & WHITE TV; C - COLOR TV; CP - CARRIER PACKED; PAO - PACKED BY OWNER; CD - CARRIER DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS
BE - BENT; BA - BROKEN; BU - BURNED; CH - CHIPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; F - FADED; G - GOUGED; L - LOOSE; M - MARRED; MS - MILDEW; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS
1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Back; 9. Side; 10. Top; 11. Veneer; 12. Edge; 13. Corner; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
#1 5 1A	B	Chair	6SC WFT	
#3 2	B	Desk	SC ALL OVER	
#1 3A	B	Planter		
#1 4A	B			
#1 5A	B			
#1 6A	B			
#1 7A	B	Planter	SC ALL OVER	
#1 8A	B	Chair	" 6 SO WFT	
#1 9A	B	"	" " " " " "	
#1260A	B	"	" " " " " "	
#2 1A	B	"		
#2 2A	B	"		
#3 3A	B	"		
#2 4A	B	"		
#2 5A	B	"	" " " " " "	
#2 6A	B	Desk	SC ALL OVER	
#2 7A	B	Return	" " " #266	
#1 8A	B	Chair	6SC WFT	
#2 9A	B	"	" " " " "	
#2270A	B	"	" " " " "	
#2 1A	B	Desk	SC ALL OVER	
#2 2A	B	"	" " "	
#1 3A	B	Return	" " " #272	
#2 4A	B	Chair	6SC WFT	
#2 5A	B	"	" " " " "	
#2 6A	B	"	" " " " "	
#2 7A	B	"	" " " " "	
#3 8A	B	"	" " " " "	
#2 9A	B	"	" " " " "	
#2280A	B	"	" " " " "	
#3 1A	B	"	" " " " "	
#3 2A	B	Chair	" " " " "	
#2 3A	B	Desk	SC ALL OVER	
#2 4A	B	"	" " "	
#2 5A	B	Chair	6SC WFT	
#2 6A	B			
#2 7A	B			
#2 8A	B			
#3 9A	B			
#2290A	B	Chair	6SC WFT	

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING - BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO AH0118 TAPE COLOR White NOS. FROM 131 THRU 390

AT ORIGIN	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE 12-3-90	AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE 12-3-90		OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE

FORM 1100 REV. '91

MILBIN PRINTING, INC., 130 SCHMITT BLVD., FARMINGDALE, N. Y. 11735

1325015-000-11029

Withers Transfer & Storage Of Coral Gables

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

PAGE NO. 5 NO. OF PAGES 7

AGENT WTS AUL

CARRIER'S REFERENCE NO. 34833

OWNER'S GRADE OR RATING AND NAME BANK OF CREDIT & COMMERCE

CONTRACT OR GBL NO.

ORIGIN LOADING ADDRESS 1100 BRICKELL CITY AUF STATE MIAMI

GOVT. SERVICE ORDER NO.

DESTINATION ABUDHABI

VAN NUMBER

DESCRIPTIVE SYMBOLS
BW - BLACK & WHITE TV; C - COLOR TV; CP - CARRIER PACKED; PBO - PACKED BY OWNER; CD - CARRIER DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS
BE - BENT; BA - BROKEN; BU - BURNED; CH - CHIPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; F - FADED; G - GOUGED; L - LEGGE; M - MARRED; MI - MILDEW; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS
1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Leg; 6. Rear; 7. Seat; 8. Back; 9. Side; 10. Top; 11. Under; 12. Edge; 13. Center; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
#1	1A B	DESK	SC ALL OVER	
#2	2A B	"	" " "	
#3	3A B	CHAIR	GSC WFT	
#4	4A B	DESK	SC ALL OVER GG	
#5	5A B	RETURN	" " " # 294	
#6	6A B	DESK	" " "	
#7	7A B	RETURN	" " " # 296	
#8	8A B	SAFE	PBO CU	
#9	9A B	CHAIR	GSC WFT	
#10	0A B	"	" " " "	
#11	1A B	"	" " " "	
#12	2A B	"	" " " "	
#13	3A B	TABLE TOP	SC ALL OVER	
#14	4A B	DESK	" " "	
#15	5A B	RETURN	" " " # 304	
#16	6A B	DESK	" " "	
#17	7A B	RETURN	" " " # 306	
#18	8A B	LAMP	CU	
#19	9A B	TABLE BASE	SC ALL OVER	
#20	0A B	DISH CTN KITCHEN	CP	
#21	1A B	MICROWAVE OVEN	"	
#22	2A B	SM REFRIGERATOR	MCU	
#23	3A B	TRASH CANS 3 & A		
#24	4A B	STEP STOOL		
#25	5A B	" LADDER		
#26	6A B	PICTURE/PRINTS	CP	
#27	7A B	FLOOR MATS 27	EA	
#28	8A B	FLAT CTN	PBO CU	
#29	9A B	DESK MATS 4	EA	
#30	0A B	MIRROR CTN PICTURE	CP	
#31	1A B	" " "	"	
#32	2A B	" " "	"	
#33	3A B	" " "	"	
#34	4A B	DISH " COMPUTERS	CP	
#35	5A B	" " "	"	
#36	6A B	" " "	"	
#37	7A B	4 DRAWER FILE CABINET	D.SC ALL OVER	
#38	8A B	" " " "	" " "	
#39	9A B	" " " "	" " "	
#40	0A B	5 DRAWER " "	" " "	

ITEM NO. | REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING - BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO. AH0118 TAPE COLOR White

NOS. FROM 131 THRU 398

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) [SIGNATURE]	DATE		CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) [SIGNATURE]	DATE
AT ORIGIN		12-3-90	AT DESTINATION		
	OWNER OR AUTHORIZED AGENT [SIGNATURE]	DATE 12-3-90		OWNER OR AUTHORIZED AGENT [SIGNATURE]	DATE

FORM 5108 REV '71

WILBUR PRINTING INC 338 SCHMITT BLVD., FARMINGDALE, N.Y. 11735

1325015-000-11030

NAME OF CARRIER

Withers Transfer & Storage Of Coral Gables

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

PAGE NO. 6 | NO. OF PAGES 7

AGENT WTS AUL | CARRIER'S REFERENCE NO. 24811

OWNER'S GRADE OR RATING AND NAME: BANK OF CREDIT & COMMERCE | CONTRACT OR GBL NO.

ORIGIN LOADING ADDRESS: 1100 BRICKELL AVE CITY MIAMI STATE FL | GOVT. SERVICE ORDER NO.

DESTINATION: ABUDHABI | VAN NUMBER

DESCRIPTIVE SYMBOLS
BW - BLACK & WHITE TV; C - COLOR TV; CP - CARRIER PACKED; PBO - PACKED BY OWNER; CO - CARRIER DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS
B - BENT; BR - BROKEN; BU - BURNED; CH - CRAPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; F - FADED; G - GOUGED; L - LOOSE; M - MARRED; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SM - SPOTTED; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS
1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Seat; 9. Side; 10. Top; 11. Varnish; 12. Edge; 13. Center; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CN. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
331A	B	5 Drawer file cabinet	LSC All over	
2A	B	" " " "	" " "	
3A	B	2 wheel dolly		
4A	B	Fire Proof File Cabinet	LSC	
5A	B	" " " "	" "	
6A	B	" " " "	" "	
7A	B	Metal Case	" "	
8A	BB	5 Drawer File cabinet	" "	
9A	B	↓ ↓ ↓	↓ ↓ ↓	
340A	BB			
1A	B	↓ ↓ ↓	↓ ↓ ↓	
2A	B	5 Drawer File	Cabinet LSC	
3A	BB	STG Cabinet		
4A	B	Tote Box Computer	Books CP	
5A	B	Books/Box "	" "	
6	B	Sm Table	LOSC	
7A	B	" CTN Telephone	PBO CH	
8A	B	Tote Box Papers	CP	
9A	B	Chair	LSC WFT	
350A	B	"	" " " " "	
1A	B	"	" " " " "	
2A	B	"	" " " " "	
3A	B	"	" " " " "	
4A	B	Printer Stand w/Books		
5A	B	Micro- CTN Picture	CP	
6A	B	" " "	"	
7A	B	" " "	"	
8	B	Marble Table Base		
9A	B	Glass Top	CP	
360A	B	Planter	SC All over	
1A	B	OS Sofa	NW	
2A	B	" "	"	
3A	B	End Table	LOSC	
4A	B	Brass Table Base		
5A	B	" " "		
6A	B	" " "		
7A	B	Planter	SC All over	
8A	B	Chair	LSC WTF	
9A	B	"	" " " " "	
370A	B	"	" " " " "	

ITEM NO. | REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING - BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE.

TAPE LOT NO. AH0118 | TAPE COLOR WHITE | NOS. FROM 131 | THRU 399

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE		CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE
AT ORIGIN	(SIGNATURE)	12-3-90	AT DESTINATION	(SIGNATURE)	
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	12-3-90		OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE

FORM 3100 REV. '71

MERRIN PRINTING, INC 330 SCHMITT BLVD., FARMINGDALE, N.Y. 11735

1325015-000-11031

Withers Transfer & Storage Of [redacted] Gables

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

PAGE NO. 7 NO. OF PAGES 7

AGENT WTS AUL

CARRIER'S REFERENCE NO. 32833

OWNER'S GRADE OR RATING AND NAME BANK OF CREDIT & COMMERCE

CONTRACT OR GBL. NO.

ORIGIN LOADING ADDRESS 1200 BRICKELL AVE CITY MIAMI STATE FL

GOVT. SERVICE ORDER NO.

DESTINATION ABUDHABI

VAN NUMBER

DESCRIPTIVE SYMBOLS
B&W - BLACK & WHITE TV; C - COLOR TV; CP - CARRIER PACKED; PAO - PACKED BY OWNER; CD - CARRIER DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS
BE - BENT; BA - BROKEN; BU - BURNED; CH - CHIPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; F - FADED; G - GOUGED; L - LOOSE; M - MARRED; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS
1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Right; 9. Side; 10. Top; 11. Veneer; 12. Edge; 13. Corner; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
#3 1A	B	Dish CTN Computers	CP	
#2 2	B	Desk	SC ALL OVER	
#3 3A	B	Side	W-W	
#1 4A	B	Chair	GSC W FT	
#1 5	B	Sm Conference Table	10SC	
#1 6A	B	Planter	SC ALL OVER	
#1 7A	B	2 Drawer File cabinet	DSC 104	
#2 8A	B	Dish CTN Computers	CP	
#3 9A	B	Table	10SC GSC	
#3 10A	B	Folding Table	" " " "	
#1 1A	B	Sm Desk	" " " "	
#2 2A	B	Printer STAND		
#1 3A	B	Folding Table	10SC	
#2 4A	B	2 Drawer File Cabinet	10SCD	
#2 5A	B	Dish CTN Computers	CP	
#2 6A	B	Tote by Plastic Trays	"	
#2 7A	"	Dish CTN Computers	CP TSAP	
#1 8A	B	Mirror " Picture	CP	
#1 9A	B	" " "	"	
#1 10A	B	" " "	"	
#2 1A	B	Dish " Computers	"	
#1 2A	B	" " "	"	
#2 3A	B	TABLE TOP	SC CH 10G	
#1 4A	B	" BASE	SC CH ALLOVER	
#2 5A	B	" "	" " " "	
#1 6A	B	DISH CTN Computers	CP	
#1 7A	B	Wire Cart	M-L	
#1 8A	B	Tote By Folders	CP	
#1 9A	B	" " "	"	
400				
1				
2				
3				
4				
5				
6				
7				
8				
9				
410				

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO [illegible] INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED."

WARNING - BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE.

TAPE LOT NO. AH011R TAPE COLOR White

NOS. FROM 131 THRU 398

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE		CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE
AT ORIGIN	(SIGNATURE)	12-3-90	AT DESTINATION	(SIGNATURE)	
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE 12-3-90		OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE

FORM 1100 REV. '71

MILBIN PRINTING, INC. - 138 SCHMITT BLVD., FARMINGDALE N. Y. 11735

1325015-000-11032

Withers Transfer & Storage Of Cora[redacted]bles

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

AGENT: Withers	[redacted]'s REFERENCE NO.: 24822-2
OWNER'S GRADE OR RATING AND NAME: BANK OF [illegible] Credit & Contract Int'l	CONTRACT OR GBL NO.
ORIGIN LOADING ADDRESS: OFFICE Move to ADU DABI — CITY — STATE	GOVT. SERVICE ORDER NO.
DESTINATION: [illegible] WS 3	VAN NUMBER

DESCRIPTIVE SYMBOLS
B/W - BLACK & WHITE TV; C - COLOR TV; CP - CARTON PACKED; PBO - PACKED BY OWNER; CD - CARTON DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS
BE - BENT; BA - BROKEN; BU - BURNED; CH - CHIPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; P - PADED; G - GOUGED; L - LOOSE; M - MARRED; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS
1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Back; 9. Side; 10. Top; 11. Veneer; 12. Edge; 13. Center; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CA. ALP.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
57 1A		DESK	SC 5 10, 5, 8, 4, 12, 7	
B 2A		Chair	SC 10, 6, SO	
B 3A		Chair	SO	
B 4A		DESK	SC 5 10, 12, 4, 5, 7	
B 5A		Return	SC 5 10, 6, 8, 7, 4, 12, 5	
B 6A		End table	SC 5 10, 12, 5, 7	
B 7A		Sofa	SO	
B 8A		End table	SC 5 12, 5, 8, 10, 7	
B 9A		Flat cartons	P.B.O table	
B 10A		Flat cartons	P.B.O table	
B 1A		Pot	SC 5 10, 12, 4, 5	
B 2A		Pot	SC 5 10, 12, 4, 5	
B 3A		Pot	SC 5 10, 12, 4, 5	
B 4A		DESK	SC 5 12, 10, 4, 5, 8, 7	
B 5A		Glass top		Damaged LOT NO. AJ 0182 070 WITHERS
B 6A		DESK	SC 5 10, 12, 4, 5 8 7	
B 7A		DESK	SC 5 10, 12, 4, 5 8 7	
B 8A		DESK	SC 5 10, 12, 4, 5 8 7	
B 9A		Chair	SO	
B 10A		Chair	SO	
B 1A		Chair	SO	
B 2A		Chair	SO	
B 3A		Chair	SO	
4A		DESK	SC 5 10, 12, 5 8 7, 4	
5A		DESK	SC 5 10, 12, 5 8 7, 4	
B 6A		Chair	SO	
B 7A		Chair	SO	
B 8A		DESK	SC 5 10, 12, 5, 8 7, 4	
B 9A		DESK	SC 5 11, 12, 5, 8 7, 4	
B 10A		Chair	SO	
B 1A		DESK	SC 5 12, 10, 4, 5 8 7	
B 2A		Chair	SC BROKEN	
B 3A		DESK	SC, 5, 10, 4, 12,	
B 4A		Return	9, 10, 6, SC, 4, 5	
B 5A		TABLE	BR, D, R, CH,	
B 6A		CHAIR	D, R, SC, SO	
B 7A		WOOD TABLE	SC, W, D, F, CH,	
B 8A		SOFA	SO, R,	
B 9A		WOODEN POT	SC, D, F, CH, SO, R,	
0				

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO [illegible] INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING — BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO. — TAPE COLOR — NOS FROM — THRU

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE		CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)
AT ORIGIN	(SIGNATURE)	12-3-70	AT DESTINATION	(SIGNATURE)
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE		OWNER OR AUTHORIZED AGENT (SIGNATURE)

[illegible] 1000 REV. '71

WILBUR PRINTING, INC 535 SCHMITT BLVD., FARMINGDA.

1325015-000-11033

SECURITY FORWARDING SERVICE LTD.
INTERNATIONAL FREIGHT FORWARDERS

TELEPHONE 58093

Sixth Terrace, Centreville
NASSAU, BAHAMAS

P. O. BOX N-9770

JOB No. _____

PACKING LIST

DATE January 8th, 1991

CONSIGNEE:
Bank of Credit & Commerce Int'l

MARKS:

CASE No. DIMENSIONS 100 Cubic Feet NET WT. 550 LBS GROSS WT. 559 LBS

CTN. NO.	ARTICLES	CONDITION	WT.
1	Ncr Terminal, Key Board & Cord		34 LBS
2	Ncr Terminal, Key Board & Cord		33
3	Ncr Terminal, Key Board & Cord		34
4	2020 Terminal, Key Board & Cord		38
5	Ncr Terminal, Key Board & Cord		33
6	7900 Terminal & Key Board		33
7	7900 Terminal & Key Board		33
8	7900 Terminal & Key Board		34
9	Ncr Pmc, Hpsl0, Hmpsc		17
10	Otc Printer		51
11	Ibm Ps/2, Printer, Display & Cables		95
12	Crate (Computer)		124

SECURITY FORWARDING SERVICE

1325015-000-11034

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

Withers Transfer & Storage Of Coral Gables

AGENT Withers

LOT NO. 1 NO. OF PACKS 8

SHIPPER'S REFERENCE NO.

SHIPPER'S NAME OR MAILING AND EMAIL: Bank of Credit & Commerce

CONTRACT OR GBL NO. 21900

ORIGIN LOADING ADDRESS: 1200 Brickell Ave CITY 15th Floor STATE Miami, FL.

COST, SERVICE ORDER NO.

DESTINATION: Jamaica

VAN NUMBER 47

DESCRIPTIVE SYMBOLS
B/W = BLACK & WHITE TV; C = COLOR TV; CP = CARRIER PACKED; PBO = PACKED BY OWNER; CD = CARRIER DISASSEMBLED; DBO = DISASSEMBLED BY OWNER; PP = PROFESSIONAL BOOKS; PE = PROFESSIONAL EQUIPMENT; PP = PROFESSIONAL PAPERS

EXCEPTION SYMBOLS
BE = BENT; BR = BROKEN; BU = BURNED; CH = CHIPPED; CU = CONTENTS & CONDITION UNKNOWN; D = DENTED; F = FADED; G = GOUGED; L = LOOSE; M = MARRED; MD = MILDEW; MO = MOTHEATEN; R = RUBBED; RU = RUSTED; SC = SCRATCHED; SH = SHORT; SO = SOILED; T = TORN; W = BADLY WORN; X = CRACKED

LOCATION SYMBOLS
1. ARM; 2. BOTTOM; 3. CORNER; 4. FRONT; 5. LEFT; 6. LEG; 7. REAR; 8. RIGHT; 9. SIDE; 10. TOP; 11. VENEER; 12. BOWL

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	CON. NET.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
A01	•	Sm. Carton	cp Supplies	
A 2	•			
A 3	•			
A 4	•			
A 5	•		Desk top Items	
A 6	•			
A 7	•			
A 8	•			
A 9	•			
A10		Sm. Carton	cp Supplies	OUT 12/4/90
A11	•	Med. Carton	PBO CU	
A12	•	Med. Carton	PBO CU	
A13		Med. Carton	cp Plastic Paper Trays	OUT 12/4/90
A14		Sm. Carton	cp Supplies	
A15			Supplies	
A16			Papers & Forms	
A17			Supplies	
A18			Supplies	
A19	•		Paper Desk Drawer	
A20			Supplies	OUT 12/4/90
A 1	•		Papers & Books	
A 2			Papers & Folders	OUT 12/4/90
A 3			Books	
A 4	•		Supplies	
A 5			Binders	OUT 12/4/90
A 6	•	Med. Carton	cp Books - Records	
A 7	•	Med. Carton	cp Books & Files	
A 8		Sm. Carton	cp Desktop	OUT 12/4/90
A 9	•		Files	
A30	•		Books	
A 1	•		Books	
A 2	•	ND	Books	
A 3			Books	OUT
A 4			Books	12/4/90
A 5	•		Books	
A 6	•		Books	
A 7	•		Files	
A 8		Sm. Carton	PBO CU	OUT
A 9		Med Carton	cp Glasses	12/4/90
A40		Dish-Pack	cp Gold Rim China	

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO ___ INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO AH-0238 TAPE COLOR ORANGE

NOS FROM 001 THRU 040

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (PRINTED)	DATE		CONTRACTOR, CARRIER OR AUTHORIZED AGENT (WRITER)	DATE
AT ORIGIN	(SIGNATURE) Bobby Espinosa	12/4/90	AT DESTINATION	(SIGNATURE) [illegible]	4-23-91
	(SIGNATURE)			(SIGNATURE) James D. Stess	4-23-91

AH0238 000 WITHERS TFR. & STGE.

1325015-000-11035

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

PAGE NO. 2 NO. PAGES 5

Withers Transfer & Storage Coral Gables

AGENT Withers

SHIPPER'S REFERENCE NO.

SHIPPER'S SEAL OR RATING AND NAME: Bank of Credit & Commerce

CONTRACT OR LOT NO. 21900

ORIGIN LOADING ADDRESS: 1200 Brickell Ave 15th Fl. CITY: Miami STATE: Fl.

GOVT. SERVICE ORDER NO.

DESTINATION: Jamaica

VAN NUMBER 47

DESCRIPTIVE SYMBOLS
B = BLACK & WHITE TV; C = COLOR TV; CP = CARRIER PACKED; PBO = PACKED BY OWNER; CD = CARRIER DISASSEMBLED; DBO = DISASSEMBLED BY OWNER; PB = PROFESSIONAL BOOKS; PE = PROFESSIONAL EQUIPMENT; PP = PROFESSIONAL PAPERS

EXCEPTION SYMBOLS
BC = BENT; BR = BROKEN; BU = BURNED; CH = CHIPPED; CU = CONTENTS & CONDITION UNKNOWN; D = DENTED; F = FADED; G = GOUGED; L = LOOSE; M = MARRED; MI = MILDEW; MG = MUTILATED; R = RUBBED; RU = RUSTED; SC = SCRATCHED; SH = SHUNT; SO = SOILED; T = TORN; W = BADLY WORN; Z = CRACKED

LOCATION SYMBOLS
1. ARM; 2. BOTTOM; 3. CORNER; 4. FRONT; 5. LEFT; 6. LEGS; 7. REAR; 8. RIGHT; 9. SIDE; 10. TOP; 11. VENEER; 12. BACK

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	CU. FT.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
A 1	•	SM. CARTON	cp Files	
A 2	•	SM. CARTON	cp Files	
A 3	•	SM. CARTON	cp Files	
A 4	•	Med. CARTON	cp Files	
A 5	•	Med. CARTON	cp Files	
A 6		Mirror CARTON	cp Desk pads	
A 7		SM. CARTON	cp Supplies	
A 8				
A 9				
A 10				
A 11				
A 12				
A 13				
A 14	•	SM. CARTON	cp Files	
A 15	•	Med. CARTON	cp Files	
A 16		SM. CARTON	cp Supplies	
A 17		Dish-Pack	cp paper holders, Pen cups	
A 18		" "	" " " "	
A 19		SM. CARTON	cp Supplies	
A 20		SM. CARTON	cp Supplies	
A 1		Dish-Pack	cp Crystal	
A 2		Dish-Pack	cp Silver & Cutlery	
A 3		Dish-Pack	cp Chinaware	
A 4		SMALL CARTON	cp China Cups	
A 5		Med. CARTON	cp Tea Holder	
A 6		Med. CARTON	cp Misc.	
A 7		SM. CARTON	cp Supplies	
A 8				
A 9	•			
A 10				
A 1				
A 2				
A 3				
A 4				
A 5		SM. CARTON	cp Desk Accessories	
A 6		SM. CARTON	cp Supplies	
A 7		SM. CARTON	cp Supplies	
A 8		Mirror CARTON	cp Desk pads	
A 9		Med. CARTON	cp Desk Accessories	
A 80		Dish-Pack	cp Pen cups - Pen holders, Picture frames	

OUT 12/4/90

OUT 12/4/90

OUT 12/4/90

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO ____ INCLUSIVE AND A CANCELLED TAPE AND A TRUE AND COMPLETE LIST OF THE GOODS RECEIVED AND OF THE STATE OF THE GOODS RECEIVED"

BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE.

TAPE LOT NO. AA-0238 COLOR Orange

NOS. FROM 041 THRU 080

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE		CONTRACTOR, CARRIER OR AUTHORIZED AGENT (WHSLE.)	DATE
AT ORIGIN	(SIGNATURE) Rudy Espinosa	1/4/90	AT DESTINATION	(SIGNATURE) DICO	4-23-91
	UNDER OR AUTHORIZED AGENT	DATE		UNDER OR AUTHORIZED AGENT	DATE
	(SIGNATURE)			(SIGNATURE) Ernesto Flores	4-23-9

1325015-000-11036

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

Withers Transfer & Storage Of Coral Gables

AGENT Withers

[redacted] NO. 3 NO. OF PAGES 8

CARRIER'S REFERENCE NO.

OWNER'S GRADE OR RATING AND NAME Bank of Credit & Commerce

CONTRACT OR GBL. NO. J1900

ORIGIN LOADING ADDRESS 1200 Brickell Av. 15th Floor CITY Fla. STATE Fl.

GOVT. SERVICE ORDER NO.

DESTINATION Tamiami

VAN NUMBER 47

DESCRIPTIVE SYMBOLS

B/W-BLACK & WHITE TV; C-COLOR TV; CP-CARRIER PACKED; PBO-PACKED BY OWNER; CD-CARRIER DISASSEMBLED; DBO-DISASSEMBLED BY OWNER; PB-PROFESSIONAL BOOKS; PE-PROFESSIONAL EQUIPMENT; PP-PROFESSIONAL PAPERS

EXCEPTION SYMBOLS

BE-BENT; BR-BROKEN; BU-BURNED; CH-CHIPPED; CU-CONTENTS & CONDITION UNKNOWN; D-DENTED; F-FADED; G-GOUGED; L-LOOSE; M-MARRED; MI-MILDEW; MO-MOTHEATEN; R-RUBBED; RU-RUSTED; SC-SCRATCHED; SH-SHORT; SO-SOILED; T-TORN; W-BADLY WORN; Z-CRACKED

LOCATION SYMBOLS

1. ARM; 2. BOTTOM; 3. CORNER; 4. FRONT; 5. LEFT; 6. LEGS; 7. REAR; 8. RIGHT; 9. SIDE; 10. TOP; 11. VENEER; 12. EDGE

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
A 1	•	SM. CARTON	CP Telex	
A 2			Supplies	
A 3				OUT
A 4				12/4/90
A 5				
A 6				
A 7				
A 8				
A 9				
90		Med. CARTON	CP Supplies	
A 1		Med. CARTON	CP Supplies	
A 2		SM. CARTON	PBO CU	OUT
A 3		SM. CARTON	PBO CU	
A 4		LEG. CARTON	CP Supplies - plastic TRAYS	12/4/90
A 5		LEG. CARTON	CP plastic TRAYS	
A 6		DISH-PACK	CP DISHES	
A 7		DISH-PACK	CP DISHES	
A 8		LEG. CARTON	CP PANS-POTS - [illegible]	
A 9		LEG. CARTON	CP Pots Pans - [illegible]	
A 100		SM. CARTON	CP Supplies	
A 1	•	SM. CARTON	PBO CU H+K 37-38-40	
A 2	•		H+K 54-56	
A 3	A ✓	ND	H+K 48-60	
A 4	•		H+K 55-58-60	
A 5	•			
A 6	•		H+K 47	
17			H+K 60	
A 8	A ✓	ND	H+K 51-53	
A 9	•		H+K 53-56	
A 110	•		H+K 47	
A 1	•		H+K 44-46	
A 2	•	SM. CARTON	PBO CU	
A 3	•			
A 4	•			
A 5	•			
A 6	•	Med CARTON	PBO CU	
A 7	•	Med. CARTON	PBO CU	
A 8	•	SM. CARTON	PBO CU	
A 9	•			
A 120	•			

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO [illegible] INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED."

L.J. Lopez

BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO AH-0738 TAPE COLOR ORANGE

NOS. FROM 081 THRU

	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER)	DATE
AT ORIGIN	(SIGNATURE) Bobby Edmond	1/4/90
	OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE
AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE
	OWNER OR AUTHORIZED AGENT (SIGNATURE) [illegible]	4-23-91

FORM 3100 REV '71

MILGIN PRINTING, INC. 525 SCHANET BLVD. CARNEGIE, PA 15106

1325015-000-11037

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

Withers Transfer & Storage [redacted] Coral Gables

AGENT Withers

PAGE NO. 5 NO. OF PKS. 10

SHIPPER'S REFERENCE NO. 21900

SHIPPER'S NAME (First and Last) BANK OF Credit & Commerce

CONTRACT OR ORDER NO.

SHIPPER'S LOADING ADDRESS 1200 Brickell Ave. 15th Floor Mia, FL

CITY STATE

DATE SERVICE ORDER NO.

DESTINATION TAMPA

VAN NUMBER 47

DESCRIPTIVE SYMBOLS
B = BLACK & WHITE TV; C = COLOR TV; CP = CRATED PIANO; PAP = PACKED BY MOVER; UP = CRATED DISASSEMBLED; DBU = DISASSEMBLED BY OWNER; PB = PROFESSIONAL BOOKS; PE = PROFESSIONAL EQUIPMENT; PP = PROFESSIONAL PAPERS

EXCEPTION SYMBOLS
BC = BENT; BR = BROKEN; BU = BURNED; CH = CHIPPED; CU = CUNTENTS & CUSHION UNKNOWN; D = DENTED; F = FADED; G = GNAWED; L = LOOSE; MI = MILDEW; MO = MOTHEATEN; RU = RUSTED; SC = SCRATCHED; SM = SMOKE; SO = SOILED; T = TORN; W = VAULT WORN; Z = CRACKED

LOCATION SYMBOLS
1. ARM; 2. BOTTOM; 3. CUSHION; 4. FRONT; 5. LEFT; 6. BACK; 7. SIDE; 10. TOP; 11. WINDOW; 12. DOOR

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	NO. PKS.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
A1	1	SM. CARTON	PBO CU	
A2	A1			
A3				
A4				
A5	A1			
A6	A1			
A7				
A8				
A9				
A10	A1			
A11				OUT 12/14/90
A12				
A13		SMALL CARTON	PBO CU	← PICK UP AT 1110 BRICKELL AVE WHSE FILES
A14	A1			
A15				
A16		SMALL CARTON	PBO CU	
A17				
A18				
A19				
A20				
A21				
A22				
A23				
A24				
A25				
A26				
A27				
A28				
A29				
A30		SM. CARTON	PBO CU	

ITEM NO. REMARKS/EXCEPTIONS

"THE SHIPPER HAS CAREFULLY INVENTORIED AND ACKNOWLEDGES AGREES TO THE ITEMS AND CONDITIONS LISTED OF THE GOODS ITEMIZED AND OF THE STATE OF THE GOODS AS GIVEN." INCLUDING AND ACKNOWLEDGE THAT THIS BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TARIFF LOT NO. AH-232 TARIFF COLORADO

NOS FROM 161 THRU 200

AT ORIGIN	SHIPPER OR AUTHORIZED AGENT (SIGNATURE) Bobby Espinosa	DATE 1/4/90	AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (SIGNATURE)	DATE 4-22-91

1325015-000-11038

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

Withers Transfer & Storage Of [redacted] Gables

AGENT: Withers

VAN NO. 6 NO. PADS 8

SHIPPER'S REFERENCE NO.: 21900

CONTRACT OR GBL NO.

GOVT. SERVICE ORDER NO.

VAN NUMBER: 47

SHIPPER'S NAME OR MAILING AND BAME: BANK OF Credit & Commerce

ORIGIN LOADING ADDRESS: 1200 Brickell Ave 15th Flr. CITY: Miami STATE: Fl.

DESTINATION: Tampa

DESCRIPTIVE SYMBOLS
B-B=BLACK & WHITE TV; C=COLOR TV; CP=CARRIER PACKED; PBO=PACKED BY OWNER; CD=CARRIER DISASSEMBLED; DBO=DISASSEMBLED BY OWNER; PB=PROFESSIONAL BOOKS; PE=PROFESSIONAL EQUIPMENT; PP=PROFESSIONAL PAPERS

EXCEPTION SYMBOLS
BC=DENT; BR=BROKEN; BU=BURNED; CH=CHIPPED; CU=CONTENTS & CONDITION UNKNOWN; D=DENTED; F=FADED; G=GNAWED; L=LOOSE; M=MARRED; MI=MILDEW; MO=MOTHEATEN; R=RUBBED; RU=RUSTED; SC=SCRATCHED; SM=SMUDGE; SO=SOILED; T=TORN; W=HAULS WORN; Z=CRACKED

LOCATION SYMBOLS
1. ADM; 2. BOTTOM; 3. CORNER; 4. FRONT; 5. LEFT; 6. LEGS; 7. REAR; 8. RIGHT; 9. SIDE; 10. TOP; 11. VENEER; 12. WHEEL

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	SPC. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
A201		SM. CARTON	PBO CH	
A2				
A3				
A4				
A5				
A6				
A7				PICK UP
A8				AT
A9				
A210		SM. CARTON	PBO CH	1110 Brickell Ave
A1				
A2				WHSE Files
A3				
A4				
A5				
A6	A			
A7				
A8				
A9				
A220		SM. CARTON	PBO CH	OUT 12/4/90
A1	A			
A2	A			
A3	A			
A4	A			
A5	A			
A6	A			
A7	A			
A8	A			
A9	A			
A230		SMALL CARTON	PBO CH	
A1				
A2				
A3	A			
A4				
A5	A			
A6	A			
A7	A			
A8	A			
A9				
A240	A	SM. CARTON	PBO CH	

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE COMPARED THE ITEMS LISTED AND NUMBERED 1 TO ____ INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

BEFORE SIGNING CHECK SHIPMENT, COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO. A1-238 TAPE COLOR ORANGE

NOS FROM 201 THRU 240

AT ORIGIN — CONTRACTOR, CARRIER OR AUTHORIZED AGENT (PRINTED): [redacted] DATE: 1/4/90

(SIGNATURE) Bobby Enders

AT DESTINATION — CONTRACTOR, CARRIER OR AUTHORIZED AGENT (PRINTED): [redacted] DATE: 4-11-91

(SIGNATURE)

1325015-000-11039

29B-WF-171994 Sub FS-60

Searched
Serialized SRB
Indexed
Filed SRB

1325015-000-11040

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

JAN 3 1 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. Thereupon, an Order of Forfeiture was entered directing the United States Marshal Service to seize certain assets forthwith. The Order of Forfeiture also provided that upon receipt of an updated and verified list of forfeitable assets held by American Express Bank Ltd., Bank of California Corp., Capital Bank, and Oppenheimer & Co., Inc. (hereafter, the "list"), and upon approval by the Court of the list, the assets attributed to those four institutions would become subject to the Order of Forfeiture and should then be seized forthwith.

Pursuant to the Court's Order of Forfeiture of January 24, 1992, counsel for the United States filed a "First Supplemental List of Forfeited Property" which, according to the United States,

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reflected the verification of the amounts previously listed on page four of Exhibit A to the Court's January 24, 1992 Order of Forfeiture. Accompanying the list was a brief memorandum advising the Court of certain matters pertaining to the First Supplemental List.

It should be noted from the outset that, among the numerous filings received by the Court, the names of certain entities holding assets have not always been consistently or correctly referred to. For example, in certain submissions, Capital Bank has been referred to as "Capital Bank Miami." In addition, American Express Bank Ltd. has sometimes been referred to as "American Express," Oppenheimer & Co., Inc. has been mentioned as "Oppenheimer & Co.," and ICIC Investments Ltd. has been listed as "ICIC Investment Ltd." On this date the names of institutions contained in lists submitted with the Court have been clarified and, by this Order, the Court amends all past incorrect references to those entities.

In its memorandum accompanying the First Supplemental List, the United States advised the Court, inter alia, that although the amounts and numbers of the accounts held by Capital Bank have been confirmed with the account holder, the Comptroller of the State of Florida, Capital Bank has declined to provide direct confirmation of that information without further Order of this Court. Because the account holder has confirmed the accuracy of the amount and numbers of the accounts held by Capital Bank, and because the defendants in this case do not challenge the forfeitability of the

1325015-000-11042

assets attributed to Capital Bank in the First Supplemental List, the Court finds additional confirmation by Capital Bank unnecessary.

In addition to the United States' representations concerning assets held by Capital Bank, the memorandum accompanying the First Supplemental List also advises the Court that on January 28, 1992, in the course of confirming account information with Oppenheimer & Co., Inc., it was learned that an account or accounts at that institution, numbered 05391180, are held in the name of ICIC Investments Ltd. and not in the name of any of the four corporate defendants. The United States alleges that although not specifically listed in the name of any of the defendants in this case, the assets held in the account or accounts numbered 05391180 are nonetheless the assets of the corporate defendants and are subject to forfeiture pursuant to paragraph 1(e) on the January 24, 1992.

Although the government asserted this position in its most recent filing, after discussion at a hearing held this date, the United States proposed, and counsel for the court-appointed fiduciaries agreed, that there should be a period of time before those assets were forfeited in which the government could make a detailed investigation to determine whether or not it was entitled to those funds contained in account or accounts numbered 05391180. Pursuant to its proposal, the government moved for entry of an order restraining the movement or other disposition of any assets held in the name of ICIC Investments Ltd. at Oppenheimer & Co.,

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Inc. as well as at other institutions. The BCCI defendants consented to the motion. Since the action is deemed appropriate, prudent, and in the public interest, the Court has issued a separate Order granting the government's motion. Accordingly, those amounts in account or accounts named ICIC Investments Ltd. and numbered 05391180 at Oppenheimer & Co., Inc. will not be forfeited at this time.

Therefore, it is hereby

ORDERED that the assets listed on the attached pages entitled "First Supplemental List of Forfeited Property" are declared forfeited and subject to this Court's Order of Forfeiture of January 24, 1992.

It is FURTHER ORDERED that all references to account or accounts numbered 05391180, Oppenheimer & Co., Inc., contained in Exhibit A attached to the Court's Order of Forfeiture of January 24, 1992 are stricken and those accounts named ICIC Investments Ltd. and numbered 05391180 presently held by Oppenheimer & Co., Inc. shall not be forfeited pending further Order of this Court.

It is FURTHER ORDERED that, in addition to those assets ordered forfeited by the January 24, 1992 Order of Forfeiture, and pursuant to Rule 32(b)(2), Federal Rules of Criminal Procedure, the assets listed in the "First Supplemental List of Forfeited Property" attached hereto shall be seized forthwith by the United States Marshal Service or its duly authorized representative and disposed of in accordance with the law.

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It is FURTHER ORDERED that all references to "American Express," "Capital Bank Miami," "ICIC Investment Ltd.," and "Oppenheimer & Co." are hereby amended to read "American Express Bank Ltd.," "Capital Bank," "ICIC Investments Ltd.," and "Oppenheimer & Co., Inc." respectively.

The Clerk of the Court is hereby directed to send copies of this Order to all counsel of record and the United States Marshal.

IT IS SO ORDERED.
Entered this 31th day of January, 1992.

JOYCE HENS GREEN
United States District Judge

1325015-000-11045

First Supplemental List of Forfeited Property

Account No.	Account Name	Balance
American Express Bank Ltd.		**New York**
1509800	Union National Bank	30,832,640.32[1]
1605800	BCCI	61,629,475.21
703876	BCCI S.A. - Abu Dhabi	8,818,703.73
703876[2]	BCCI S.A. - Abu Dhabi	23,037,303.36
Brokerage Deposit	BCCI (Overseas)	12,681,119.10[3]
3/53066	BCCI (Overseas) Chittigong	610,940.61
3/53165	BCCI (Overseas) Dhaka	4,305,427.70
3/53173	BCCI (Overseas) Dakar	734,692.31
698316	BCCI (Overseas) Karachi	353,870.68
3/705517	BCCI (Overseas) Lahore	4,222,444.79
714758	BCCI (Overseas) Macau	247,751.59
Suspense Deposit	BCCI (Overseas) Macau	1,336,863.84
3/52977	BCCI (Overseas) Nairobi	606,571.81[4]
53116	BCCI (Overseas) Seoul	335,246.63
3/711036	BCCI (Overseas) Seychelles	358,297.24
** Subtotal **		150,111,348.92
Bank of California Corp.		**New York**
91212381	BCCI Mali	1,283,092.84

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[1] This account contains an additional amount of approximately $236,653.45 not presently subject to forfeiture. Only the amount specified plus interest from January 28, 1992, is presently subject to forfeiture.

[2] This account is divided into two parts to reflect offsets taken by American Express from account 703876.

[3] This amount includes a $500,000 offset taken by American Express.

[4] This account contains an additional amount of approximately $82,000 not presently subject to forfeiture. Only the amount specified plus interest from January 28, 1992, is presently subject to forfeiture.

Capital Bank		**Miami**
850053580		3,053,641.00
902204122		1.00
902205102		24,215.00
902205110		946,485.00
** Subtotal **		4,024,342.00
Oppenheimer & Co., Inc.		**New York**
05391184	BCCI (Overseas)	2,991,107.70

29B-WF-171994 Sub ES-61

Searched
Serialized JJB
Indexed
Filed JJB

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

JAN 24 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

The United States of America and the four corporate defendants in this case (collectively, "BCCI") have entered into a Plea Agreement dated December 19, 1991, by which the defendants agree to plead guilty to an offense under Title 18, United States Code, Section 1962, and to forfeiture of the assets of the four corporate defendants located in the United States pursuant to Section 1963 of Title 18.

As recited on the record today in open court, the Court has determined pursuant to Rule 11(e), Federal Rules of Criminal Procedure, that the Plea Agreement is acceptable to the Court. The Court has determined pursuant to Rule 11(f), Federal Rules of Criminal Procedure, that there is a factual basis for the pleas of guilty and for the forfeiture of the defendants' assets as set forth in the Superseding Information, the Plea Agreement, the statements of counsel in open Court, and the testimony of the representative of the defendants.

1325015-000-11049

It is hereby ORDERED, ADJUDGED and DECREED as follows:

1. Pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3), the following property located in the United States of the four corporate defendants is hereby condemned and forfeited to the United States of America:

(a) the deposits and other assets listed on Exhibit A, which Exhibit A is hereby made a part of this Order, except those funds listed on Exhibit A which are held by American Express Bank Ltd., Bank of California, Capital Bank Miami, and Oppenheimer & Co., Inc., because counsel have been unable at this time to reconfirm or update the list of assets held by those institutions. Counsel for the parties to this case shall provide to the Court, by January 29, 1992 at 12:00 noon, an updated list of forfeitable assets held by American Express Bank Ltd., Bank of California, Capital Bank Miami, and Oppenheimer & Co., Inc., at which time, upon approval by the Court, such assets shall become subject to this Order of Forfeiture.

(b) the net proceeds from the future sale or other disposition or transfer of any stock, security or other interest in Independence Bank, but not the stock, security or other interest itself;

(c) the net proceeds from the future sale or other disposition or transfer of any stock, security or other interest in First American Bankshares, Inc., but not the stock, security or other interest itself;

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(d) the balance of the liquidation estates of the Los Angeles and New York agencies of BCCI, S.A., but not the estates themselves, upon completion of liquidation proceedings conducted by the New York banking and the California banking entities in accordance with the laws of California and New York. For purposes of the foregoing, the "liquidation estates" shall consist of all of the rights and interests of the Superintendent of Banks of the states of New York and California under their respective state law banking statutes with respect to the assets of BCCI, S.A. located in their respective states and the assets of the New York and California agencies of BCCI, S.A. The liquidation estates do not include the assets enumerated in Exhibit A; and

(e) the entirety of BCCI's ownership interests in all other property located in the United States, including, without limitations, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined or discovered pursuant to paragraph 10 of the Plea Agreement, in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf of Court Appointed Fiduciaries of BCCI in the course of the management or disbursement of the liquidation estates as described in the Plea Agreement.

2. The Court finds that the above-listed forfeited assets constitute interests acquired or maintained by the defendants, in violation of Title 18, United States Code, Section 1962; or are

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interests in, securities of, claims against, or property or contractual rights of various kinds affording a source of influence over an enterprise which the defendants established, operated, controlled, conducted, or participated in, in violation of Title 18, United States Code, Section 1962; or are property constituting or derived from, proceeds the defendants obtained, directly or indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962.

3. It is further ORDERED that, except as specifically excepted in paragraph 1(a) and as noted in paragraph 4, each of the financial institutions and entities listed on Exhibit A shall immediately pay to the United States Marshal for the District of Columbia or his duly authorized representative:

1) the entire contents of the accounts listed on Exhibit A, including interest accrued;

2) any funds transferred since July 5, 1991, from any account listed on Exhibit A that are still within the possession or control of the financial institution, regardless of the account into which those funds were transferred and regardless of the reason for the transfer; and

3) any other funds in any other account held by BCCI (Overseas) or International Credit and Investment Company (Overseas).

Such payments shall not be limited to the "Approximate Amounts" listed on Exhibit A if the balance as of this date is greater than the Approximate Amount. For the purposes of this paragraph, an

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"account listed on Exhibit A" includes any account that previously held funds listed on Exhibit A, or any account to which such funds have been transferred.

4. With respect to the funds listed on Exhibit A as being held on deposit in the Court Registry Investment System ("CRIS") interest-bearing account administered by the United States District Court for the Southern District of Texas, such funds are hereby ORDERED forfeited to the United States. In lieu of the immediate transfer of those funds pursuant to paragraph 3, the United States shall take all necessary steps pursuant to Title 28, United States Code, Section 2042, to obtain an order directing the transfer of those funds to the United States Marshal for the District of Columbia.

5. It is further ORDERED that to the extent necessary to carry out the terms of this Order, BCCI, pursuant to the Plea Agreement, shall assist the financial institutions and entities listed on Exhibit A in the transfer of such funds.

6. It is further ORDERED that the United States Marshal's Service shall deposit all funds received pursuant to this Order of Forfeiture in the Department of Justice Seized Asset Deposit Fund Account (hereafter, "the Account") and invest it with interest as permitted by Title 28, United States Code, Section 524(c), as amended October 28, 1991.

7. Pursuant to the ancillary hearing procedures set forth in Title 18, United States Code, Section 1963(l), no disbursements shall be made from the Account without further Order of this Court.

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Should it appear that no claim has been made with respect to particular assets transferred to the Account pursuant to Section 1963(l), or at such time as such claims to such assets have been resolved, the Court will entertain motions from the government for the disbursement of those assets.

8. As the proceeds identified in paragraphs 1(b) through (e) become available, the Department of Justice, on behalf of the United States, shall apply to this Court for appropriate Orders effecting the transfer and deposit of such proceeds into the Account. The notice provisions of Section 1963(l) shall apply to each asset so transferred to the Account pursuant to such further Orders.

9. Pursuant to Rule 32(b)(2), Federal Rules of Criminal Procedure, it is further ORDERED that each of the above listed properties, except as specifically excepted in paragraph 1(a) and as noted in paragraph 4, shall be seized forthwith by the United States Marshal for the District of Columbia or his duly authorized representative and disposed of in accordance with the law and this Order of Forfeiture.

The Clerk is hereby directed to send copies of this Order to all counsel of record and the United States Marshal.

IT IS SO ORDERED.
Entered this 24th day of January, 1992.

JOYCE HENS GREEN
United States District Judge

1325015-000-11054

EXHIBIT A

Account No.	Account Name	Approx. Balance
Bank of New York		**New York**
018872-500	BCCI (Overseas) Barbados	202,708.55
8109803821	BCCI (Overseas) Barbados	101,108.90
019054-500	BCCI (Overseas) Bombay	3,245,017.16
8109803155	BCCI (Overseas) Bombay	851,642.06
8900054840	BCCI (Overseas) Bombay	159,383.66
018856-500	BCCI (Overseas) Cayman	1,834,405.29
8109292983	BCCI (Overseas) Cayman	50,919.08
8900051531	BCCI (Overseas) Cayman	745.86
8900053658	BCCI (Overseas) Cayman	0.00
8900054301	BCCI (Overseas) Cayman	300,027.55
8900054328	BCCI (Overseas) Cayman	310,849.60
8900054794	BCCI (Overseas) Cayman	33,057.60
8900054921	BCCI (Overseas) Cayman	152,093.70
019089-500	BCCI (Overseas) Panama	8,016,979.39
8109298752	BCCI (Overseas) Panama	144,240.44
8900053399	BCCI (Overseas) Panama	386,467.59
* Subtotal **		15,789,646.43
Citibank		**New York**
36054705	BCCI (Overseas)	11,064,150.00
36060398	BCCI (Overseas)	4,402.00
Custody Account	BCCI (Overseas)	1,181,398.00
Custody Acct 089543	BCCI (Overseas)	537,000.00
** Subtotal **		12,786,950.00
Court Registry Investment System		**S.D. Tex.**
86078	BCCI (Overseas) Macau	109,112.75
86047	BCCI (Overseas) Muscat	4,339,738.83
86052[1]	BCCI S.A. - Abu Dhabi	60,563,405.50
86041	BCCI (Overseas) Seoul	80,770.71
** Subtotal **		81,709,103.07
Doha Bank Ltd.		**New York**

[1] This account contains additional funds not subject to forfeiture. Only the amount specified, plus interest accrued since July 18, 1991, is subject to forfeiture.

5804511	BCCI (Overseas)		500,308.00
First Florida			**Tampa**
440-757-7116	Capital Equiv. Dep.		15,299,703.58
First National Bank of Louisville			**Louisville**
70328615	BCCI (Overseas)		3,727,520.97
Hufstedler, Kaus & Ettinger			**Los Angeles**
Intermagnetics Trust Acct			487,448.84
Kemper Security			**Chicago**
1278-4388	BCCI (Overseas)		583,305.00
Mabon Securities			**New York**
04-4050	BCCI (Overseas)		2,661,808.53
Manufacturers Hanover			**New York**
none)	BCCI (Overseas)		40,240.00
Paine Webber			**New York**
DN-R5056-01	BCCI (Overseas)		73000.00
Security Pacific Intl			**New York**
05007001	BCCI (Overseas)	Abidjan	3,305,447.05
07012001	BCCI (Overseas)	Cayman	4,124,193.31
04020101	BCCI (Overseas)	Istanbul	1,723,590.57
04020023	BCCI (Overseas)	Izmir, Turkey	308,079.19
04011002	BCCI (Overseas)	Karachi	3,056,794.59
05011001	BCCI (Overseas)	Khartoum	701,251.94
04012039	BCCI (Overseas)	Manila	783,178.47
04020030	BCCI (Overseas)	Mersin, Turkey	116,667.53
05008001	BCCI (Overseas)	Monrovia	103,500.48
03005016	BCCI (Overseas)	Paris, France	857,082.72
04018017	BCCI (Overseas)	Seoul, Korea	5,714,329.75
04031016	BCCI (Overseas)	Shenzhen China	589,044.22
05009001	BCCI (Overseas)	Sierra Leone	2,056,883.83
04027001	BCCI (Overseas)	Sri Lanka	1,818,758.32
05012001	BCCI (Overseas)	Togo	104,511.45
** Subtotal **			25,363,313.42

Security Pacific National		**New York**
607750471	BCCI (Overseas) Abu Dhabi	1,785,845.00
607750491	BCCI (Overseas) Abu Dhabi	44,500,000.00
** Subtotal **		46,285,845.00
** Total		$188,692,117.56

The following accounts and approximate amounts are as they appear on Schedule B of the Plea Agreement but have not been reconfirmed or updated by counsel:

American Express Bank Ltd. New York, New York	$60,255,910	Ref. # 16211581 (From Acct.#703876)
	$31,793,704	Acct. #703876 (Includes Offsets)
	$30,009,792	Acct. #160300 [2] (From Acct.#703876)
	$12,027,031	Acct. ## 53066; 353066; 53173; 353173; 53165; 353165; 698316; 714758; 53116; 52977; 352977; 705517; 3705517;and 711036
	$12,444,311	Brokerage Account-Deposit (Includes Offsets) (Account Number Unknown)
Bank of California New York, New York	$ 1,283,093	(Account Number Unknown)
Capital Bank Miami Miami, Florida	$ 24,215 $ 946,485 $ 3,053,641 $ 1	Acct. #902205102 Acct. #0902205110 Cert. #085-0053580 Acct. #902204122
Oppenheimer & Co., Inc. New York, New York	$ 2,919,400 $15,802,870 $ 6,184,803	Acct. #05391184 Client Acct. #05391180 Client Acct. #05391180
**Total	$176,745,256	

[2] This account contains additional funds not subject to forfeiture. Only the amount specified plus interest accrued since July 5, 1991 is subject to forfeiture.

b6
b7C

United States District Court

for the District of Columbia

UNITED STATES OF AMERICA

V.

#1-BCCI HOLDINGS (LUXEMBOURG), S.A.

(Name of Defendant)

JUDGMENT IN A CRIMINAL CASE

(For Offenses Committed On or After November 1, 1987)

Criminal Case Number: 91-0655

FILED

Michael Nussbaum, Esquire

Defendant's Attorney

JAN 24 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

THE DEFENDANT:

☒ pleaded guilty to ~~count(s)~~ the Superseding Information filed 12/19/91.

☐ was found guilty on count(s) _____ after a plea of not guilty.

Accordingly, the defendant is adjudged guilty of such count(s), which involve the following offenses:

Title & Section	Nature of Offense	Date Offense Concluded	Count Number(s)
18 USC 1962(c) & 1962(d)	Racketeering	From in or about January of 1978, to in or about July of 1991	1
18 USC 2	Aiding & Abetting	From in or about January of 1978, to in or about July of 1991	1

The defendant is sentenced as provided in the attached Order of Forfeiture ~~pages 2 through x of this judgment~~. The sentence is imposed pursuant to the Sentencing Reform Act of 1984..

☐ The defendant has been found not guilty on count(s) _____, and is discharged as to such count(s).

☒ ~~Count(s)~~ Original Indictment filed 11/15/91 (is) ~~(are)~~ dismissed on the motion of the United States.

☒ It is ordered that the defendant shall pay a special assessment of $ 200.00, for ~~count(s)~~ Superseding Information, which shall be due ~~☒ immediately ☐ as follows:~~ within 60-days.

IT IS FURTHER ORDERED that the defendant shall notify the United States attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. The Court imposed no additional fine.

Defendant's Soc. Sec. No.: _____

Defendant's Date of Birth: _____

Defendant's Mailing Address:

_____

_____

Defendant's Residence Address:

_____

_____

January 24, 1992

Date of Imposition of Sentence

Signature of Judicial Officer

Joyce Hens Green - U.S. District Judge

Name & Title of Judicial Officer

January 24, 1992

Date

United States District Court
for the District of Columbia
A TRUE COPY
NANCY MAYER-WHITTINGTON, Clerk
By Joe A. Wood, Jr.
Deputy Clerk

1325015-000-11059

U.S. Department of Justice

Washington, D.C. 20530

July 23, 1993

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MEMORANDUM

TO: [redacted]
Federal Bureau of Investigation

FROM: [redacted]
Asset Forfeiture Office
Criminal Division

b6
b7C

SUBJECT: Orders of Forfeiture

Enclosed per your request are five orders of forfeiture dated:

January 24, 1992
January 31, 1992 } 3920-92-F-0115 thru 0131
March 24, 1992
April 15, 1992
July 29, 1992 - 3920-92-F-0231 thru 0243

(X)

293-WF-171994 Sub FS-62

[redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 26 1993
FBI - OKLAHOMA CITY

[redacted]

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1325015-000-11060

29B - WF - 171994 Sub FS - 63

Searched
Serialized BB
Indexed
Filed BB

1325015-000-11061

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
August 18, 1993

[redacted] b6 b7C

Asset Forfeiture Office
Criminal Division
U.S. Department of Justice
Washington, D.C. 20530

Dear Sir:

Re: Disposition of Seized
Property Known as
1230 Reading Drive,
Orlando, Florida 32804

Enclosed is a copy of an August 5, 1993, letter addressed to SA [redacted] of this office, relating to the referenced matter. By telephone on August 3, 1993, Ms. [redacted] Orlando, FL 32854; telephone [redacted] requested information about how she might reacquire the house she said she formerly owned at [redacted] Drive, Orlando, Florida 32804; property which, in 1989, apparently was seized in a BCCI-related case in the Middle District of Florida, further identified only as "89-A12CIVT NIMMONS." Both the Orlando U.S. Marshal's Office and a realtor (Coldwell Banker) reportedly told her that the property had been forfeited to the government. b6 b7C

This is office has no information relating to the referenced matter other than that received from Ms. [redacted]. Therefore, we would appreciate it if you would provide Ms. [redacted] with any available information. b6 b7C

Thank you for your assistance in this matter.

Very truly yours,

Robert M. Bryant
Special Agent in Charge

1-Addressee (Enc. 1)
1-[redacted]
1-WMFO (29B-WF-171994 Sub FS)

By: [redacted] b6 b7C
Supervisory Special Agent

JNR:jr.
(3)

1325015-000-11062

Enc

cc: Ms. [redacted]
[redacted]
Orlando, FL 32854

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b7C

1325015-000-11063

[redacted]
Orlando, Florida 32854
August 5, 1993

b6
b7C

Mr. [redacted]
Federal Bureau of Investigation
9th & Pennsylvania Avenue
Washington, D.C. 20535

b6
b7C

Dear Mr. [redacted]

b6
b7C

I was hoping that by now I would have received some correspondence from your office regarding the status of our previous communications related to my house.

I have drafted a letter (copy enclosed) to President Bill Clinton, Senator Bob Graham and U.S. Representatives Jim Bacchus and Bill McCollum in another effort to assist me with obtaining the information I have requested.

Please do not delay in corresponding with me. I am eagerly awaiting for your reply.

Sincerely,

[redacted]

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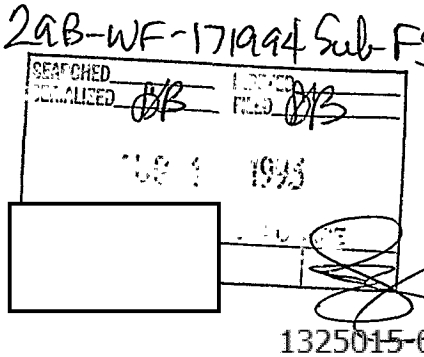
(K)



[redacted]

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2AB-WF-171994 Sub-FS-64

1325015-000-11064

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 9/22/93

TO : ADIC, NEW YORK

FROM : SAC, WMFO (29B-WF-171994 SUB FS)(P)(C-5)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

As New York will recall, captioned matter is the investigation to determine the nature and extent of the illegal activities of the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) in the U.S.; and that, as a part of its 1991 plea-negotiations with the U.S., BCCI was ordered by the U.S. District Court for the District of Columbia to forfeit any and all of its assets, either known or discovered, in the U.S. To date, such forfeitures have exceeded $750 million.

Part of BCCI's activities in the U.S. involved the ownership and control of FIRST AMRICAN BANK OF NEW YORK (FABNY), which was approved to open and operate in NY State in 1983. FIRST AMERICAN BANKSHARES (FABS), parent of FABNY, was itself a wholly-owned subsidiary of CREDIT AND COMMERCE AMERICAN HOLDINGS (CCAH), which BCCI illegally acquired and controlled through nominees. As a matter of practice, BCCI used undisclosed nominees, both individual and corporate, to hold its U.S. assets.

FABNY established its headquarters at 350 Park Avenue, New York, NY, for which space subject [redacted] as FABS' [redacted], signed a long-term lease in or about September, 1982. Witnesses have told WMFO that BCCI

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2-New York
1-WMFO
JNR:jnr
(3)

29B-WF-171994 Sub FS -65

Searched
Serialized Su
Indexed
Filed Per Su

Approved: RMB DFB Transmitted (Number) (Time)

1325015-000-11065

Rec'd 9/24/93 JFB

personnel found and selected that "excessively large and expensive" location, and that, along with [redacted] subjects CLARK M. CLIFFORD, AGHA HASAN ABEDI and [redacted] worked together to cause FABS to enter into the lease and, in January, 1984, to assign it to FABNY. The space was so large that some of it was never occupied. Between 1982 and 1992, the lease supposedly cost FABNY $30 million for space that was not used. Even [redacted] at one point is reported to have lamented the fact FABNY's profitability was hurt by the fact that FABNY had to pay such exorbitant rent. b6 b7C

WMFO strongly suspects that the building at 350 Park Avenue was owned and controlled by BCCI through nominees, who probably would have been associated with Kuwait, the United Arab Emirates or Saudi Arabia. If BCCI's ownership can be established, the building would be forfeitable to the U.S.

Witnesses have told WMFO that BCCI personnel introduced [redacted] to two groups of brokers during the search for suitable office space: HUBERT & HUBERT, represented by [redacted] and CUSHMAN & WAKEFIELD, represented by [redacted] and a Mr. FNU [redacted] The lessor of the space was FOSTER LYNN COMPANY, represented by a Mr. FNU [redacted] (phonetic). b6 b7C

LEADS

NEW YORK DIVISION

At New York, NY: will conduct investigation to develop a complete picture of the ownership of the building at 350 Park Avenue, particularly from 1980 onward, to include all recorded title and mortgage information, and interviews of anyone who may have dealt with or represented the owners in leasing the property.

1325015-000-11066

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

b6
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Subfs
29B-WF-171994

Searched
Serialized
Indexed
Filed

b6
b7C

WDC

[redacted]

(Finis)

1325015-000-11067

3920-93-F-0214

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

FROM: [redacted] b6 b7C

TO: FBI. WASH. FLD. Ofc.

FAX NUMBER: 324-6426

DATE: 9/13/93

NUMBER OF PAGES INCLUDING THIS SHEET: 9

NAME OF PERSON TO CONTACT UPON RECEIPT:

TELEPHONE NUMBER OF PERSON TO CONTACT UPON RECEIPT:

SPECIAL INSTRUCTIONS: [redacted] b6 b7C - this is the recent BCCI forfeiture order, for info.

One note: the court deleted BCC Misr from the attached Exhibit A (note the gap among the first American Bank of New York entries) — but did not correct the arithmetic. Actual amount forfeited now $101,135,749.15

249-WF-171994 Sub FS

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 13 1993
FBI/DOJ WASH. FIELD OFFICE

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL 202 514-5522

1325015-000-11069

Judge Sand for the transfer of the subject funds to the Marshals Service. It is

FURTHER ORDERED that in the case of any property transferred by this Court from First American Bank of New York to the Court Registry Investment System on March 18, 1993 that is listed on the Third Supplemental List, such funds shall be transferred to the Marshals Service forthwith, except that in the case of the funds transferred from the account held by BCC S.A. Espanola, only one-third of the funds in the Court Registry shall be transferred to the United States Marshals Service. It is

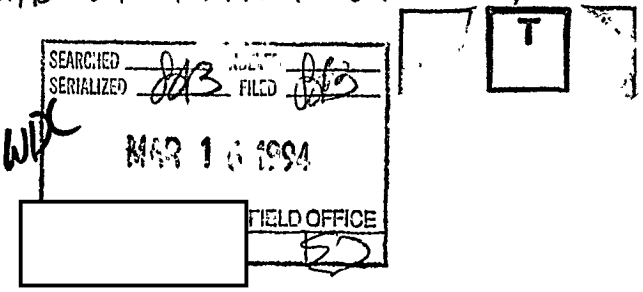
FURTHER ORDERED that in the case of the assets of BCC Canada, BCC Botswana Ltd., and BCC Zimbabwe Ltd., and the remaining two-thirds of the assets of BCC S.A. Espanola that were transferred from First American Bank of New York to the Court Registry Investment System on March 18, 1993, the government shall notify the liquidators of each entity, respectively, of its right to apply for the release of those funds, and such funds shall be released to the respective liquidators or their successors upon receipt by the Court of such application. It is

FURTHER ORDERED that the United States Marshals Service is directed to seize forthwith all other property listed on the Third Supplemental List that is not already in the possession of the Marshals Service. It is

FURTHER ORDERED that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title, or interest in all

1325015-000-11073

29B-WF-171994 Sub FS -67



T

WFC

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1325015-000-11078

ATTN: PARALEGAL SPECIALIST 46

Routing Slip
0-7 (Rev. 9-2- [redacted] o Offices Checked)

TO: ~~SAC~~ [redacted]

TO: LEGAT,

b6
b7C

☐ Albany	☐ Indianapolis	☐ Omaha	☐ Bern
☐ Albuquerque	☐ Jackson	☐ Philadelphia	☐ Bogota
☐ Anchorage	☐ Jacksonville	☐ Phoenix	☐ Bonn
☐ Atlanta	☐ Kansas City	☐ Pittsburgh	☐ Bridgetown
☐ Baltimore	☐ Knoxville	☐ Portland	☐ Brussels
☐ Birmingham	☐ Las Vegas	☐ Richmond	☐ Canberra
☐ Boston	☐ Little Rock	☐ Sacramento	☐ Hong Kong
☐ Buffalo	☐ Los Angeles	☐ St. Louis	☐ London
☐ Butte	☐ Louisville	☐ Salt Lake City	☐ Mexico City
☐ Charlotte	☐ Memphis	☐ San Antonio	☐ Montevideo
☐ Chicago	☐ Miami	☐ San Diego	☐ Ottawa
☐ Cincinnati	☐ Milwaukee	☐ San Francisco	☐ Panama City
☐ Cleveland	☐ Minneapolis	☐ San Juan	☐ Paris
☐ Columbia	☐ Mobile	☐ Savannah	☐ Rome
☐ Dallas	☐ Newark	☐ Seattle	☐ Tokyo
☐ Denver	☐ New Haven	☐ Springfield	
☐ Detroit	☐ New Orleans	☐ Tampa	
☐ El Paso	☐ New York City	☒ Washington Metropolitan Field	
☐ Honolulu	☐ Norfolk	☐ Quantico	
☐ Houston	☐ Oklahoma City		
☐ ASAC, Brooklyn-Queens (MRA)			

2/24/94
Date

RE: 3920-92-F-231-243
29B-WF-171994
(BCCI) Hidden Assets

Retention For appropriate
☐ For information ☐ optional ☒ action ☐ Surep, by _____

☐ The enclosed is for your information. If used in a future report, ☐ conceal all sources, ☐ paraphrase contents.

☐ Enclosed are corrected pages from report of SA _____ dated _____.

Remarks: [redacted]

[redacted] b6 b7C

Please submit a copy of the order of forfeiture referenced in WMFO's airtel dated 9/3/92. None of the files has a copy in it at present. Response is requested by COB 3/8/94.

Thank you,

[redacted]

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Enc.
Bullie
Urfile

3/12/94 a

WDL

FBI/DOJ

1325015-000-11079

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

JAB 5/5/94
C-4
29B-WF-171994 Sub FS
5/5/94
2

29B-WF-171994 Sub FS
-68

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 05 1994
FBI [redacted]

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1325015-000-11080

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 5/4/94

TO : DIRECTOR, FBI
ATTN: FSPU

FROM : ADIC, WMFO (29B-WF-171994)
ATTN: SA [redacted] b6 b7C

SUBJECT : 3920-93-F-195 THROUGH 203
3920-93-F-205 THROUGH 215
US VS BCCI

Re FSPU R/S dtd 4/22/94 requesting status.

This matter is commonly referred to as the BCCI case.

WMFO/FAST is closing all captioned seizure files. FAST is acting as processor only. Questions concerning the criminal case, requests for criminal orders of forfeiture, etc., should be directed to DOJ Money Laundering Section, ATTN: T/A STEF CASSELA, or [redacted] b6 b7C

Direct questions concerning this matter to SA [redacted] ext. 7118. b6 b7C

1-FBIHQ, ATTN: FSPU
1-WMFO
(1-29B-WF-171994 SUB FS)

EPG:epg
(2)

5/5/94 (2)

29B-WF-171994 SUB FS -69

Searched
Serialized
Indexed
Filed

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-11081

U.S. Depart[redacted]of Justice

Washington, D.C. 20530

OCT 27 1995

October 25, 1994

[redacted] b6 b7C

Special Agent
Federal Bureau of Investigations
7799 Leesburg Pike
Suite 200, South Tower
Falls Church, Virginia 22043

Re: Citizen assistance regarding BCCI litigation

Dear Special Agent [redacted] b6 b7C

The attached letter was received in our office last week, apparently from a citizen who wishes to assist in the BCCI litigation for a fee. I am making the referral to you to determine in what manner to respond to the citizen's inquiry.

Please let me or Stefan Cassella know what you decide.

Yours truly,

GERALD MCDOWELL
[redacted]

[redacted] b6 b7C

att

29B-WF-171954 Sub 55-90

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT [redacted] 1994
FBI — WASH. FIELD OFFICE

1325015-000-11082

[redacted]

b6
b7C

New Market, Virginia 22844

October 10, 1994

Mr. Stefan D. Cassella
Asset Forfeiture Office
P.O. Box 27322
Central Station
Washington, D.C. 20038

Re: Information on Additional BCCI Assets

Dear Mr. Cassella:

The reason I am writing you is to inquire as to whether the United States will pay a fee of twenty five (25%) for information which will provide the government additional forfeiture concerning the Bank of Credit and Commerce International SA interest in additional bank accounts in the United States either through its subsidiaries or otherwise.

I believe that I have information available concerning additional accounts which BCCI SA had either a direct or indirect interest through their subsidiaries.

I understand that under 18 USC 1963(g)(3) the Attorney General can award compensation to indiduals who provide information which leads to forfeiture under 18 USC 1963.

Please let me know if you will agree on behalf of the United States to pay the 25% fee of any additional amount that may be forfeited to the United States based on the information that I supply your office or the United States.

Your early reply will be appreciated.

Sincerely,

[redacted]

b6
b7C

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.)
USA Today

Date: p. 7-D 1/26/95
Edition:

Title:

Character:
or
Classification:
Submitting Office:

Indexing:

Legal Notice

UNITED STATES OF DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	CRIMINAL NUMBER 91-0655 (JHG)

NOTICE OF FORFEITURE

NOTICE IS HEREBY GIVEN that on December 21, 1994, in the above-captioned case, the Honorable Joyce Hens Green, United States District Judge for the District of Columbia, entered a preliminary Order of Forfeiture condemning and forfeiting the following properties to the United States of America:

Fourth Supplemental List of Forfeited Property

Description	Approx. Value
Excess funds from liquidation of New York agency of BCCI S.A.	$ 77,000,000.00
Excess funds from liquidation of California agency of BCCI S.A. not included in Third Supplemental List of Forfeited Property	$ 3,647,571.00
Funds at Chase Manhattan Bank representing interest owed to BCCI S.A. on bonds issued by the Republic of Venezuela: Account No. C20135 B	$ 5,086.56
Accounts of BCCI S.A. Dubai at Bank of New York: (transferred to Court Registry Investment System)	$ 3,600.00
Accounts of BCCI (Overseas) Bombay at New York Ageny of BCCI S.A.: Account Nos. 2044100105 and 2044100207 (transferred to Court Registry Investment System)	$ 45,163.04
Carlson Farm, Sherman Connecticut	$ 2,000,000.00
Assets of BCCI Nigeria at American Express Bank, Account N. 3/52977 ("BCCI (Overseas) Nairobi")	$ 82,156.99
Bankruptcy distributions to BCCI:	
American Mills (transferred to Court Registry Investment System)	$ 7,000.00
Domino Investment, Ltd.	$ 23,673.14
Fastrax, Inc.	$197,500.00
Remittance of funds paid in contempt proceeding in the U.S. District Court for the Southern District of Florida, including interest (held by Nussbaum & Wald)	$165,233.00
61.156 percent of the amount distributable to CCAH shareholders as a consequence of the liquidation or other disposition of their indirect interest in First American Corporation	$287,000,000.00
Willow Hollow, Houston TX:	$850,000.00
Bank of America National Trust and Savings Ass'n Acct. No. 6599-09995 BCCI Overseas - Bombay Acct. No. 6597-09996 BCCI Overseas - Sri Lanka	 $4,545.47 $10,430.00

YOU ARE HEREBY NOTIFIED that the United States intends to dispose of each to the forfeited properties in such manner as the Attorney General of the United States may direct, consistent with the plea agreement entered into by the defendants and the United States on December 19, 1991. Any person or entities having or claiming a legal right, title or interest in any of the aforementioned properties must, **WITHIN THIRTY (30) DAYS** of the final publication of this notice or actual receipt thereof, whichever is earlier, petition the United States District Court for the District of Columbia for a hearing to adjudicate the validity of his/her alleged interest in the property pursuant to Title 18, United States Code, Section 1963(1). If a hearing is requested, it shall be held before the Court alone, without a jury. Claimants will bear the burden of proof in all such cases. Petitions that fail to allege an interest sufficient to maintain a claim under §1963(1) shall be subject to dismissal without a hearing.

The petition shall be signed by petitioner under penalty of perjury and shall identify the particular property or properties in which the petitioner claims a legal right, title or interest; the nature and extent; of the such right, title or interest in each property; the time and circumstance of the petitioner's acquisition of the right, title and interest in each property; and any additional facts and documents supporting the petitioner's claim and relief sought.

A hearing on the petition shall, to the extent practicable and consistent with the interests of justice, be held within thirty (30) days of filing of the petition. The Court may consolidate the hearing on the petition with a hearing on any other petition filed by a person other than any of the defendants named above. The petitioner may testify and present evidence and witnesses on his own behalf and cross-examine witnesses who appear at the hearing.

Your petition must be filed with the United States District Court for the District of Columbia in Criminal No. 91-0655 (JHG) at the following address:

3rd and Constitution Ave., N.W.
Washington, D.C. 20001

Furthermore, you must serve the United States Department of Justice with you petition at the following address:

Asset Forfeiture Office
P.O. Box 27322, Central Station
Washington, D.C. 20038
Attn: Michele L. Crawford, Esq.

And you should mail a copy of the petition to counsel for the court-appointed fiduciaries as follows:

Michael Nussbaum, Esq.
Nussbaum & Wald
Suite 200
One Thomas Circle
Washington, D.C. 20005

IF YOU FAIL TO FILE A PETITION TO ASSERT YOUR RIGHT, TITLE OR INTEREST IN THE ABOVE-DESCRIBED PROPERTY, WITHIN THIRTY (30) DAYS OF THIS NOTICE, YOUR RIGHT, TITLE AND INTEREST IN THIS PROPERTY SHALL BE LOST AND FORFEITED TO THE UNITED STATES. THE UNITED STATES THEN SHALL HAVE CLEAR TITLE TO THE PROPERTY HEREIN DESCRIBED AND MAY WARRANT GOOD TITLE TO ANY SUBSEQUENT PURCHASER OR TRANSFEREE.

86

B-WF-171994 SUBFS -71

SEARCHED INDEXED
SERIALIZED FILED
JAN 26 1995
FBI — WASH. FIELD OFFICE

FBI/DOJ

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 29B-WF-171994

1900 Half Street
Washington D. C. 20535
January 27, 1995

Mr. [redacted] b6 b7C
[redacted]
New Market, VA 22844

Dear Sir:

Re: Information on Additional BCCI Assets; Your Letter to Stefan D. Cassella, 10/10/94.

It has come to our attention that you believe you have information regarding "additional accounts (in) which BCCI SA had ...(an) interest through their subsidiaries."

Please contact Special Agent [redacted], either by calling him at (202)324-6408, or writing to him at 7799 Leesburg Pike, Suite 200 South, Falls Church, VA 22043, to arrange an appointment to be interviewed. As to the matter of any "award compensation" agreement, you should be aware that the government does not and will not agree to pay for information it has not had the opportunity to evaluate. SA [redacted] report(s) of the interview(s) of you would serve as proof that you provided any information deemed worthy of a reward. b6 b7C

Thank you for your interest and cooperation in this matter.

Very truly yours,

Anthony E. Daniels
Assistant Director in Charge

by: [redacted] b6 b7C
Supervisory Special Agent

1 - Addressee
1 - WMFO

29B-WF-171994 Sub FS -72

FBI—WMFO

1325015-000-11085

Memorandum

To : ADIC, WMFO (29B-WF-171994) (P) Date 2/27/95

From : SA [redacted] (C-1)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

The purpose of this correspondence is to reopen and assign the above captioned case to the writer. On 2/13/95, the case agent [redacted] FBI furnished SA [redacted] FBI with a copy of an ex parte pre trial restraining order filed in U.S. District Court, District of Columbia against GHAITH PHARON. PHARON is currently outside the jurisdiction of the court in another country. Until he is extradited or voluntarily returns to the United States the assets identified in the retraining order cannot be forfeited.

b6
b7C

1-29B-WF-171994 FS
AC:ac attachments

Reopened & Assigned to [redacted] 3/9/95 WDC

3/9/95

29B-WF-171994 Sub FS-73

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 28 1995
FBI—WASH. METRO FIELD OFFICE

b6
b7C

1325015-000-11086

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. AGHA HASAN ABEDI SWALEH NAQVI, and GHAITH R. PHARAON, Defendants	CRIMINAL NUMBER 91-0655 (JHG) Defendant 03

FILED

FEB 0 8 1995

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

EX PARTE PRE-TRIAL RESTRAINING ORDER

This matter having come before the Court upon the Motion of the United States of America for the entry of restraining and repatriation orders pursuant to 18 U.S.C. § 1963(d)(1)(A) and it appearing to the satisfaction of this Court:

1. That the Board of Governors of the Federal Reserve System issued a Notice of Assessment of Civil Money Penalties against the defendant Ghaith R. Pharaon on July 29, 1991 (amended on September 13, 1991), and that on September 17, 1991, upon motion of the Board of Governors of the Federal Reserve System, the District Court for the Southern District of New York in Case Number 91 Civ. 6250, styled "Board of Governors of the Federal Reserve System v. Ghaith R. Pharaon," issued an Order to Show Cause and Temporary Restraining Order directed to defendant Ghaith R. Pharaon;

(N)

2. That on October 11, 1991, the District Court for the Southern District of New York, with the consent of the Parties, modified its Order of September 17, 1991, by appointing a monitor to, inter alia, oversee the continuing business operations of InterRedec, Inc., with the objective of preserving the value and assets thereof;

3. That on January 15, 1993, a federal grand jury of this district returned a Superseding Indictment charging the above-named defendants with violation of 18 U.S.C. § 1962(d) and alleging that the proceeds they obtained directly and indirectly from said violation, as set forth in Racketeering Acts One through Six of Count Three of the Superseding Indictment, or an amount of cash equivalent thereto, were forfeitable to the United States of America pursuant to 18 U.S.C. § 1963(a)(3);

4. That the restraining order of the District Court for the Southern District of New York may, at any time, be dissolved and the presently restrained property, or a portion thereof, returned to the control of Defendant Ghaith Pharaon through InterRedec, Inc.;

5. That the United States has moved, ex parte, for restraining and repatriation orders pursuant to 18 U.S.C. § 1963(d)(1)(A) in order to preserve the availability of the property alleged to be forfeitable in the Superseding Indictment

1325015-000-11088

and to prevent the defendant Ghaith R. Pharaon or others from alienating, encumbering or wasting said property;

6. That, based upon the Superseding Indictment and the supporting Application and Memorandum submitted by the United States, there is reasonable cause to believe that the value of the property alleged to be forfeitable in the Superseding Indictment is not less than $102,500,000.00;

7. That, based upon the Superseding Indictment and the supporting Application and Memorandum submitted by the United States, there is reasonable cause to believe that the property described in Attachment A is a portion of the direct or indirect proceeds described in the Superseding Indictment, supporting Application and Memorandum or represents the cash equivalent thereof; and

8. That, based upon the Superseding Indictment and the supporting Application and Memorandum submitted by the United States, reasonable cause has been shown for the entry by this Court of a restraining order to preserve the property described in Attachment A up to a value of $102,500,000.00, should any such property be released, in whole or in part, other than for the purpose of satisfying a civil money penalty imposed by the Board of Governors of the Federal Reserve System, from the Temporary Restraining Order of September 17, 1991 (modified by the Order of

1325015-000-11089

October 11, 1991), as amended, entered by the District Court for Southern District of New York in case number 91 Civ. 6250 (PKL) and for the entry by this Court of a repatriation order directing the defendant Ghaith R. Pharaon to deposit into the registry of this Court money or other property in the amount of $102,500,000.00.

It is, therefore, the ORDER or this Court that:

9. The defendant Ghaith R. Pharaon, InterRedec, Inc., and any other person or entity, including their agents, servants, employees, attorneys, and/or any others acting in concert with them, having any interest or control over the property described in Attachment A, should any such property be released, in whole or in part, other than for the purpose of satisfying a civil money penalty imposed by the Board of Governors of the Federal Reserve System, from the Temporary Restraining Order of September 17, 1991 (modified by the Order of October 11, 1991), as amended, entered by the District Court for Southern District of New York in case number 91 Civ. 6250 (PKL), shall not, without approval of this Court upon notice to the United States and an opportunity for the United States to be heard:

a) alienate, dissipate, transfer, sell, assign, lease, pledge, encumber, or dispose of, in any manner, directly or indirectly;

b) cause to be alienated, dissipated, transferred, sold, assigned, leased, pledged, encumbered, or disposed of in any manner; or

1325015-000-11090

c) take, or cause to be taken, any action which could have the effect of concealing or moving from the jurisdiction of this Court, or that would have the effect of depreciating, damaging or in any way diminishing the value of any property named in this Order;

EXCEPT THAT InterRedec, Inc. shall be permitted to conduct, either directly or through entities controlled by it, ordinary, arm's length, and reasonable business activities necessary and appropriate to preserve the business entities which it owns or controls as going concerns and to continue to do business in the ordinary course, so long as such actions do not result in the transfer of assets or monies, directly or indirectly, to the defendant Ghaith R. Pharaon.

10. It is further ORDERED that the Parties shall, should the property described in Attachment A be released, in whole or in part, other than for the purpose of satisfying a civil money penalty imposed by the Board of Governors of the Federal Reserve System, from the Temporary Restraining Order of September 17, 1991 (modified by the Order of October 11, 1991), as amended, entered by the District Court for Southern District of New York in case number 91 Civ. 6250 (PKL), present to this Court, within one week of any such release, a plan for the appointment of a monitor to oversee InterRedec's compliance with this Order.

11. It is further ORDERED that the defendant Ghaith R. Pharaon, InterRedec, Inc., and any other person or entity having

1325015-000-11091

any interest or control over the property, or portions thereof, described in Attachment A, should any such property be released, in whole or in part, other than for the purpose of satisfying a civil money penalty imposed by the Board of Governors of the Federal Reserve System, from the Temporary Restraining Order of September 17, 1991 (modified by the Order of October 11, 1991), as amended, entered by the District Court for Southern District of New York in case number 91 Civ. 6250 (PKL), will be allowed to execute a satisfactory performance bond pursuant to 18 U.S.C. § 1963(d)(1). The Court will make the determination as to whether the performance bond is satisfactory, and this Order will be in effect until such time as the Court determines that the proffered bond is satisfactory.

12. It is further ORDERED that the defendant Ghaith R. Pharaon shall FORTHWITH repatriate to the United States and deposit into the registry of the Court all proceeds of the racketeering activity located outside the United States in which he has any interest valued at $1,000 or more, up to a total value of $102,500,000.00.

13. It is further ORDERED that, pursuant to Federal Rule of Criminal Procedure 49(b), service of this Order, the United States' Ex Parte Application for Pre-Trial Restraining Order, and the United States' Memorandum of Points and Authorities in Support of Ex Parte Application for Pre-Trial Restraining Order may be effected by service upon Richard Lawler, Esquire, of Whitman & Ransom, counsel for Ghaith R. Pharaon, by service upon

1325015-000-11092

Ghaith R. Pharaon at his last known address, by service on Dooley E. Culbertson, Chairman of the Board and Chief Executive Officer of InterRedec, Inc., and by service upon K. Chris Todd, counsel for InterRedec Inc.

14. This Order shall remain in effect until further order of the Court or until the Court modifies the Order as appears necessary in the interest of justice and consistent with the purposes of 18 U.S.C. § 1963.

So ORDERED this 15th day February, 1995, at 10:30 AM o'clock.

UNITED STATES DISTRICT JUDGE

United States District Court
for the District of Columbia
A TRUE COPY

NANCY MAYER-WHITTINGTON, Clerk

By Joe A. Wood, Jr.
Deputy Clerk

1325015-000-11093

ATTACHMENT A

All funds, property and assets of any kind owned or held by or for InterRedec, Inc. specifically including, but not limited to, InterRedec's interest in the following entities (including all assets owned or controlled by such entities) and assets:

InterRedec Southern Company, Inc.

River Oaks, Inc.

Montgomery Cablevision & Entertainment, Inc.

Falcon Cement Company, Inc.

Savannah Plastics, Inc.

Ordevco Hotel Corporation

InterRedec Apartments, Inc.

InterRedec Real Estate Development, Inc.

Parkway Property Owners Association

InterRedec (California), Inc.

Ogeechee River Investments, Inc.

River Oaks Investments, Inc.

American Specialty Insurance Company

Tri-Star Insurance Company

Ellis Brokerage, Inc.

Ellis Insurance Services, Inc.

Ellis Insurance Services N.W., Inc.

River Oaks Premium Finance Company (GA)

River Oaks Premium Finance Company (CA)

Sterling Bluff, Inc.

Clearview Baking Corporation

Concord Investments, Inc.

InterRedec Sulphur Corporation

Richmond Hill Holdings, Inc.

Soap Opera Update Magazine, Inc.

U P Holdings Limited

InterRedec Engineering, Inc.

Continental Precision, Inc.

571 acres of unimproved property across Highway 144 from the other Richmond Hill property

ISI Leasing

Ordevco, Inc.

River Bend Securities, Inc.

Maui Waikiki Investments, Inc.

The Links Club

Concorde Finance & Investment, Inc.

Concorde Holdings

Pharaon Foundation

Pan American Holdings

Reedy Corporation

InterRedec (Dallas)

International Sourcing & Marketing

Continental Finance & Investment

Falcon-Gulf Coast /Falcon Tidewater

Shares in MetroBank, N.A.

JOJA Limited Partnership (Airplane Ownership)

International Systems, Inc. and/or Notes associated therewith

Memorandum

To : ADIC, WMFO (29B-WF-171994) (P) Date 2/27/95

From : SA [redacted] (C-1) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
00:WMFO

On 2/24/95, [redacted] b6 b7C
DEPARTMENT OF JUSTICE (DOJ), telephone number (202) 514-1322 provided SA [redacted] FBI with the following attached document the fourth forfeiture order in the BCCI investigation. The United States Marshals in New York City are currently in the process of seizing and liquidating the property identified in the court order.

2913-WF-171994 Sub FS -74

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 28 1995
FBI — WASH. METRO FIELD OFFICE

1-29B-WF-171994 (Sub FS)

AC:ac

1325015-000-11096

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED

DEC 21 1994

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of Forfeited Property, see Order of Forfeiture, July 29, 1992, and

Fourth Supplemental List of Forfeited Property

Description	Approx. Value
Excess funds from liquidation of New York agency of BCCI S.A.	$ 77,000,000.00
Excess funds from liquidation of California agency of BCCI S.A. not included in Third Supplemental List of Forfeited Property	$ 3,647,571.00
Funds at Chase Manhattan Bank representing interest owed to BCCI S.A. on bonds issued by the Republic of Venezuela: Account No. C20135 B	$ 5,086.56
Account of BCCI, S.A. Dubai at Bank of New York: (transferred to Court Registry Investment System)	$ 3,600.00
Accounts of BCCI (Overseas) Bombay at New York agency of BCCI S.A.: Account Nos. 2044100105 and 2044100207 (transferred to Court Registry Investment System)	$ 45,163.04
Carlson Farm, Sherman, Connecticut	$ 2,000,000.00
Assets of BCCI Nigeria at American Express Bank, Account No. 3/52977 ("BCCI (Overseas) Nairobi")	$ 82,156.99
Bankruptcy distributions to BCCI:	
American Mills (transferred to Court Registry Investment System)	$ 7,000.00
Domino Investments, Ltd.	$ 23,673.14
Fastrax, Inc.	$ 197,500.00
Remittance of funds paid in contempt proceeding in the U.S. District Court for the Southern District of Florida, including interest (held by Nussbaum & Wald)	$ 165,233.00
61.156 percent of the amount distributable to CCAH shareholders as a consequence of the liquidation or other disposition of their indirect interest in First American Corporation.	$ 287,000,000.00

Exhibit A -- Cr. No. 91-0655 (JHG)

Willow Hollow, Houston TX		$850,000.00
Bank of America National Trust and Savings Ass'n		
Acct No. 6599-09995	BCCI Overseas - Bombay	$4,545.47
Acct No. 6597-09996	BCCI Overseas - Sri Lanka	$10,430.00

1325015-000-11103

Memorandum

To : ADIC, WMFO (29B-WF-171994) (FS) Date 3/10/95

From : SA [redacted] (C-1) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
00:WMFO

WMFO FAST has a limited role acting as an administrative processor monitoring and reporting to FSPU assets seized from criminal orders of forfeitures in the above captioned investigation. Attached is the fourth criminal order of forfeiture entered by the Honorable JOYCE GREEN, United States District Judge, District of Columbia forfeiting properties of the Bank and Commerce International (BCCI) and of the International Credit and Investment Company (Investments). This order was entered on December 21, 1994.

For information of FSPU, WMFO FAST only recently learned of the fourth criminal order of forfeiture from the case agent, [redacted] SA, FBI (WMFO). Trial Attorney's STEF CASSELLA and [redacted] DEPARTMENT OF JUSTICE (DOJ) have handled all forfeiture matters concerning this investigation. WMFO FAST has not been kept apprised by DOJ of any claims, petitions, or objections concerning the assets seized pursuant to the fourth court order. b6 b7C

In conclusion the U.S. Marshals in New York City are still in the process of taking possession of the assets outlined in the fourth court order. SA [redacted] WMFO FAST will keep FSPU informed of any new developments as the information becomes available. b6 b7C

1-29B-WF-171994 (FS)

AC:ac

29B-WF-171994 Sub FS-76

WDC

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 17 1995
FBI — WASH. METRO FIELD OFFICE
WDC

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

VIA FEDERAL EXPRESS

May 10, 1995

Mr. [redacted] b6 b7C
Special Agent
FEDERAL BUREAU OF INVESTIGATION
7799 Leesburg Pike, Suite 200
Falls Church, VA 22043

Dear Mr. [redacted] b6 b7C

Here is the documentation you requested regarding the eleven remittances we have made to the U.S. Marshals. These remittances total $73,500,000.00.

Attached is a report we are developing, but have not yet finalized, which outlines the sources of the funds. As you can see, the remittances are co-mingled as to both forfeiture order and source. If you need further information, please let me know and we will be happy to provide it.

Very truly yours,

Robb Evans
Trustee

cc : Stefan D. Cassella, Esq.
Deputy Director, Asset Forfeiture Office
U.S. DEPARTMENT OF JUSTICE
1400 New York Avenue, 10th Floor
Washington, D.C. 20005
(w/ enclosures)

29B-WF-171944 Sub FS -77

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 11 1995
FBI — WASH. FIELD OFFICE

[redacted] b6 b7C

1325015-000-11127

ROBB EVANS, TRUSTEE

RECORD OF SURPLUS FUNDS

TRANSFERRED TO U.S. MARSHAL

UPDATED: APRIL 14, 1995

DATE TRANSFERRED	AMOUNT TRANSFERRED	FED. RES. BANK REF. #
26-Aug-93	$35,964,405.69	23802004S
22-Oct-93	$1,000,000.00	29501382S
22-Dec-93	$250,000.00	35601435S
18-Feb-94	$4,250,000.00	04904910S
19-Apr-94	$150,000.00	10902878S
17-Jun-94	$1,300,000.00	16805605S
16-Aug-94	$8,850,000.00	22802381S
14-Oct-94	$200,000.00	28702373S
13-Dec-94	$3,035,594.31	34701160S
13-Feb-95	$17,000,000.00	04402729S
14-Apr-95	$1,500,000.00	10401891S
TOTAL	$73,500,000.00	

NEXT DATE FOR TRANSMISSION : JUNE 13, 1995

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of April 30, 1995

Forfeiture Order Date	19-Aug-93	21-Dec-94	21-Dec-94	10-Jan-95	
State	California	California	New York	New York	Total
Forfeiture Orders					
Cash	34,379,642	3,647,571	20,000,000	0	58,027,213
Loans	20,245,041	0	28,696,395	0	48,941,436
Real Property	13,894,680	0	10,617,380	15,200,000	39,712,060
Miscellaneous Property	31,445	0	0	0	31,445
Other	0	0	0	5,950	5,950
Total Forfeiture Orders	68,550,808	3,647,571	59,313,774	15,205,950	146,718,103
Net Remittance To The US Marshal					
Sources of Funds					
Asset Conversions:					
Cash	34,379,642	3,647,571	20,000,000	0	58,027,213
Loans	6,581,405	0	205,181	0	6,786,586
Real Property	20,779,808	0	0	0	20,779,808
Miscellaneous Property	49,094	0	0	0	49,094
Other	164,610	0	0	0	164,610
Total Asset Conversions	61,954,559	3,647,571	20,205,181	0	85,807,311
Total Revenue Collection (1)	*(Excluding Proceeds From Sale of Real Property & Misc Property)*				3,792,244
Total Sources of Funds					89,599,556
Uses of Funds					
Seller Financing and Cash Disbursements					(12,590,313)
Operating Account Balance					(1,009,243)
Special Reserve to Fund Deferred Maintenance and Capital Improvement					(2,500,000)
Surplus Account Balance as of April 30, 1995					0
Total Uses of Funds					(16,099,556)
Net Remittances to The US Marshal (See Attached Schedule 1)					73,500,000
Present Book Value Per Budget					
Cash	0	0	0	0	0
Loans	17,255,996	0	11,280,567	0	28,536,563
Real Property	3,173,311	0	4,475,000	10,000,000	17,648,311
Miscellaneous Property	0	0	0	0	0
Other	5,668	0	0	5,950	11,618
Total PBV Per Budget	20,434,975	0	15,755,567	10,005,950	46,196,492

Note: (1) Excluding proceeds from sale of FF&E of $49,094 (not in use by the Trustee) and sale of REO of $20,779,808.

Robb Evans, Trustee

725 South Figueroa Street, Suite 2301
Los Angeles, California 90017-5423
Telephone No.: (213) 955-8305
Fax No.: (213) 955-8344

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: August 26, 1993

b6
b7C

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 791-9763

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear Bob,

This is to inform you that the wire has been sent and the Federal Reserve Bank reference no. is 238 020 04 S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

b6
b7C

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Trial Attorney, U.S. Department of Justice

PLEASE CALL IF YOU DO NOT RECEIVE ALL PAGES.

238 020 045
Fed Ref #

First Interstate Bank

ORDER FOR DOMESTIC MONEY TRANSFER

BRANCH/DEPARTMENT NAME: LA Main Office	BRANCH/ACCOUNTING UNIT NO.: 149	DATE: August 26, 1993	ASSIGNED REF. NO.: 1263-4169
VALIDATION USED: RMNN TO. JD	TIME: 9:47	[redacted]	b6 b7C
TAN: —	AMOUNT: 35,964,405.69	TEST-VALUE: 237-1020	CORRECTED TEST: TKM / INITIAL: A
DEBIT ACCOUNT NO.: 149-240-134	ABA OR CREDIT ACCOUNT NO.: ABA # 02103 0004	ORIGINATOR BY ORDER OF (PERSON OR COMPANY): Robb Evans, Trustee	

BENEFICIARY BANK AND ADDRESS: U.S. Treasury, Federal Reserve Bank of New York, NY, NY

BENEFICIARY ACCOUNT NO.: ALC # 00008154

REFERENCE NO.: Criminal No. 91-0655 (JHG)

BENEFICIARY INFORMATION: SPMS
U.S. Marshal District Office, Attn: Bob Johnson (212) 791-1350

Received from remitter the following sums:

Amount of transfer	$	35,964,405.69
Telegraphic Transfer Charges (See SPI 6 1000)	$	Waive
Total	$	35,964,405.69

FUNDS RECEIVED

- ☐ Cash
- ☐ Check on Acct. No. _____
- ☒ We Charge your Account

Teller: [redacted]

Payment is to be made upon presentation of proper identification only. Customer is aware that funds transfer will be effected through fastest available means. First Interstate Bank will not be liable for delays resulting from conflict between the time of presentment of this order and the deadlines of the Federal Reserve Bank of any financial institutions operate in different time-zones. In any case, the liability of First Interstate Bank that exceeds the amount of transfer is limited to compensation for use of funds at the average Fed Funds rate for the length of the delay.

[redacted] b6 b7C

[redacted] (OR TYPE OF AUTHORIZATION) IN PERSON

[redacted] TELEPHONE (213) 955-8305

APPROVED: (AU[redacted]

CALL TO WIRE TRANSFER DEPARTMENT

CALL RECEIVED BY: TEGA / BATS [redacted] TIME COMPLETED: 9:47 b6 b7C

P3 - SAVE
TIPS 84

CT-3810 (Rev. 8-91) FICA #40679

1325015-000-11131 35,964,405.69

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2301
Los Angeles, California 90017-5423

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: October 22, 1993

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 791-9763

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

b6
b7C

If there are any transmission problems, please call (213) 955-8305.

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear Bob,

This is to inform you that the wire has been sent and the Federal Reserve Bank reference no. is 29501382-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

for [redacted]

b6
b7C

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Trial Attorney, U.S. Department of Justice
[redacted], Esq., Brobeck, Phleger & Harrison

b6
b7C

First Interstate Bank

ORDER FOR DOMESTIC MONEY TRANSFER

FED # 2950 1382

BRANCH/DEPARTMENT NAME		BRANCH/ACCOUNTING UNIT NO.	DATE	ASSIGNED REF. NO.
L.A. Main Office		149	October 22, 1993	1001-82 001 [illegible]
VALIDATOR USED		TIME	OR[illegible]	
STG. CAN		9:00	[redacted]	
TAN	AMOUNT	TEST VALUE	CORRECTED [illegible]	AU[illegible]
—	1,000,000.00	411-5286	TRM	
DEBIT ACCOUNT NO.	ABA OR CREDIT ACCOUNT NO.		ORIGINATOR BY ORDER OF (PERSON OR COMPANY)	
149-240-134	ABA # 02103 0004		Robb Evans, Trustee	

BENEFICIARY BANK AND ADDRESS
U.S. Treasury, Federal Reserve Bank of New York, NY, NY

BENEFICIARY ACCOUNT NO.	REFERENCE NO.
ALC # 00008154	Criminal No. 91-0655 (JHG)

BENEFICIARY INFORMATION
U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350

Received from remitter the following sums:

Amount of transfer	$	1,000,000.00
Telegraphic Transfer Changes (See SPI 6 1000)	$	[illegible]
Total	$	1,000,000.00

FUNDS RECEIVED

- ☐ Cash
- ☒ Check on Acct. No. 149240134
- ☐ We Charge your Account

Teller: _____

Payment is to be made upon presentation of proper identification only. Customer is aware that funds transfer will be effected through fastest available means. First Interstate Bank will not be liable for delays resulting from conflict between the time or presentment of this order and the deadlines of the Federal Reserve Bank of any financial institutions operate in different time zones. In any case, the liability of First Interstate Bank that exceeds the amount of transfer is limited to compensation for use of funds at the average Fed Funds rate for the length of the delay.

[redacted] b6 b7C

	(OR TYPE OF AUTHORIZATION)	
[redacted]	KNOWN - IN PERSON	
[illegible] et, Suite 2301, Los Angeles, California 90017-5423		TELEPHONE (213) 955-8305
[redacted]		

CALL TO WIRE TRANSFER DEPARTMENT

		TIME COMPLETED
[redacted]	[redacted]	9:18

b6 b7C

BAL - 1,080,539.61 93-Sat
OP TIP - 10:33

CT-3810 (Rev. 8-91) FICA #40579

FILE COPY

1325015-000-11133

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2301
Los Angeles, California 90017-5423

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson **DATE:** Dec. 22, 1993 b6 b7C

FIRM: U.S. MARSHALS SERVICE **FAX NO.:** (212) 791-9763

FROM: [redacted] **NO. OF PAGES:** two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305.

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MESSAGE

Dear Bob,

This is to inform you that the wire has been sent and the Federal Reserve Bank reference no. is 35601435-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted] b6 b7C

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Trial Attorney, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison b6 b7C

First Interstate Bank

Ref. # 3560435 S

ORDER FOR DOMESTIC MONEY TRANSFER

BRANCH/DEPARTMENT NAME	BRANCH/ACCOUNTING UNIT NO.	DATE	ASSIGNED REF. NO.
L.A. Main Office	149	Dec 22 1993	1139-22 DEC
VALIDATION USED	TIME		b6 b7C
	9:15		
TAN	AMOUNT	TEST VALUE	CORRECTED TEST / INITIAL
	250,000 NV	393-17769	
DEBIT ACCOUNT NO.	ABA OR CREDIT ACCOUNT NO.	ORIGINATOR BY ORDER OF (PERSON OR COMPANY)	
149-240-134	ABA # 02103 0004	Robb Evans, Trustee	

BENEFICIARY BANK AND ADDRESS
U.S. Treasury, Federal Reserve Bank of New York, NY, NY

BENEFICIARY ACCOUNT NO.	REFERENCE NO.
ALC # 00008154	Criminal No. 91-0655 (JHG)

BENEFICIARY INFORMATION
U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350

Received from remitter the following sums:

Amount of transfer	$	250,000.00
Telegraphic Transfer Changes (See SPI 6 1000)	$	
Total	$	250,000.00

FUNDS RECEIVED

- ☐ Cash
- ☑ Check on Acct. No 149-240-13
- ☐ We Charge your Account

Teller: _____

Payment is to be made upon presentation of proper identification only. Customer is aware that funds transfer will be effected through fastest available means. First Interstate Bank will not be liable for delays resulting from conflict between the time or presentment of this order and the deadlines of the Federal Reserve Bank of any financial institutions operate in different time zones. In any case, the liability of First Interstate Bank that exceeds the amount of transfer is limited to compensation for use of funds at the average Fed Funds rate for the length of the delay.

[redacted] b6 b7C

(OR TYPE OF AUTHORIZATION)
authorization on file

725 South Figueroa Street, Suite 2301, Los Angeles, California 90017-5423

TELEPHONE
(213) 955-8305

APPROVED: (AUTHORIZED SIGNER)
[redacted]

CALL TO WIRE TRA[redacted]

CALL RECEIVED BY:	CALL PLACED BY:	TIME COMPLETED
[redacted]	[redacted]	9:35 b6 b7C

CT-3810 (Rev. 8-91) FICA #40679

1325015-000-11135

REQUESTOR

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2301
Los Angeles, California 90017-5423

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: February 18, 1994

b6
b7C

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 791-9763

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305.

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MESSAGE

Dear Mr. Johnson,

This is to inform you that the wire has been sent and the Federal Reserve Bank reference no. is 04904910-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

b6
b7C

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Trial Attorney, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison

b6
b7C

1325015-000-11136

02/18/94 14:17 [redacted]

First Interstate Bank

Ref 04904910S

ORDER FOR DOMESTIC MONEY TRANSFER

BRANCH/DEPARTMENT NAME	BRANCH/ACCOUNTING UNIT NO.	DATE	ASSIGNED REF. NO.
L.A. Main Office	149	Feb. 18, 1994	1710-18 Fed
VALIDATION USED: Known	TIME	ORDER TAKEN BY	
TAN: —	AMOUNT: 4250,000	TEST VALUE: TKM	CORRECTED TEST: 316-17727 INITIAL
DEBIT ACCOUNT NO.: 149-240-134	ABA OR CREDIT ACCOUNT NO.: ABA # 02103 0004	ORIGINATOR BY ORDER OF (PERSON OR COMPANY): Robb Evans, Trustee	
BENEFICIARY BANK AND ADDRESS: U.S. Treasury, Federal Reserve Bank of New York, NY, NY			
BENEFICIARY ACCOUNT NO.: ALC # 00008154	REFERENCE NO.: Criminal No. 91-0655 (JHG)		
BENEFICIARY INFORMATION: U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350			

Received from remitter the following sums:

Amount of transfer	$ 4,250,000.00
Telegraphic Transfer Changes (See SPI 6 1000)	$ CRA
Total	$ 4,250,000.—

FUNDS RECEIVED

- ☐ Cash
- ☐ Check on Acct. No. ____
- ☒ We Charge your Account
  Teller: 1642-4013

Payment is to be made upon presentation of proper identification only. Customer is aware that funds transfer will be effec through fastest available means. First Interstate Bank will not be liable for delays resulting from conflict between the time or pres ment of this order and the deadlines of the Federal Reserve Bank of any financial institutions operate in different time zones any case, the liability of First Interstate Bank that exceeds the amount of transfer is limited to compensation for use of fund the average Fed Funds rate for the length of the delay.

b6
b7C

[redacted]

(OR TYPE OF AUTHORIZATION)

[redacted] South Figueroa Street, Suite 2301, Los Angeles, C[redacted]-5423 TELEPHONE (213) 955-830

APPROVED: (AUTHORIZED SIGNE[redacted]

b6
b7C

CALL TO WIRE TRANSFER DEPARTMENT

CALL RECEIVED BY:	CALL PLACED BY:	TIME COMPLETED

Bal - 4,250,000.00 P3-SA

CT-3810 (Rev. 8-91) FICA #40679

1325015-000-11137

FILE COPY

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2301
Los Angeles, California 90017-5423

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: April 19, 1994

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 791-9763

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

b6
b7C

If there are any transmission problems, please call (213) 955-8305.

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MESSAGE

Dear Mr. Johnson,

This is to inform you that the wire has been sent and the Federal Reserve Bank reference no. is 10902878-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

b6
b7C

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Trial Attorney, U.S. Department of Justice
[redacted], Esq., Brobeck, Phleger & Harrison

b6
b7C

First Interstate Bank 1D902878-5 Order For Domestic Money Transfer

OFFICE / CENTER NAME	OFFICE / CENTER NO.	WIRE ITEM NO.	DATE
L.A. Main Office	149	2466-19APR94	April 19, 1994

DOMESTIC WIRE DETAILS

REPETITIVE NO.	SEND DATE	DOLLAR AMOUNT	TESTKEY
	April 19, 1994	$150,000.00	72- 17662

DEBIT ACCOUNT (TYPE / #)	REQUESTED BY
149-240-134	Robb Evans, Trustee
ADDRESS: 725 S. Figueroa St., Ste. 2301,	ADDITIONAL ADDRESS:
CITY: Los Angeles,	STATE AND ZIPCODE: California 90017-5423

DESTINATION BANK ABA	BANK NAME
021030004	Federal Reserve Bank of New York
BANK ADDRESS: New York	CITY, STATE, ZIPCODE: New York
WIRE PAYABLE TO: U.S. Treasury	CREDIT TO ACCOUNT NO.: ALC #00008154
NOTICE TYPE	NOTIFICATION INFORMATION: Ref. No. Criminal No. 91-0655 (JHG)
ADDITIONAL INFORMATION: U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350	

RECEIVED FROM REMITTER THE FOLLOWING SUMS:		FUNDS RECEIVED:
AMOUNT OF TRANSFER	$ 150,000.00	Charge Acct. No. 149240134
FEE	$ WAIVED	Check on Acct. No.
TOTAL	$ 150,000.00	Cash (Limited to $1,000)

Customer is aware that funds transfer will be effected through the fastest available means. First Interstate Bank will not be liable for delays resulting from conflicts between the time or presentment of this order and the deadlines of the Federal Reserve Bank or any financial institution, especially where ... operate in different time zones. In any case, the liability of First Interstate Bank that exceeds the a... for use of funds at the average Fed Funds rate for the length of the delay.

b6 b7C

[redacted] IDENTIFICATION: [redacted] SENT OK. KNOW

[redacted] Street, Suite 2301, Los Angeles, CA 90017-5423 TELEPHONE: (213) 955-8305

BANK VERIFICATION & AUTHORIZATION

ATTACH SCREEN PRINT TO FILE COPY (RCONFR STATUS)

ACCOUNT BALANCE (HOLD PLACED)	CALL BACK PERFORMED BY (BANK)	CALLBACK VERIF.
	Mr. Evan Wash Then	[redacted]

b6 b7C

REQUESTOR AND CALL BACK RECIPIENT VERIFIED TO SCHEDULE "A" OR CT-3801 BY: Mr. Evan

WRITTEN CONFIRMATION RECEIVED BY

REVIEWED BY (OFFICE / CENTER MANAGER) | DATE

ORDER TAKEN BY [redacted] RELEASED BY (IF APPLICABLE) [redacted]

b6 b7C

CT-3310 (Rev. 6-93) DOMESTIC WIRE

04. 19. 94 01:33 PM

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson **DATE:** June 17, 1994 b6 b7C

FIRM: U.S. MARSHALS SERVICE **FAX NO.:** (212) 791-9763

FROM: [redacted] **NO. OF PAGES:** two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305.

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear Mr. Johnson, b6 b7C

This is to inform you that the wire has been sent and the Federal Reserve Bank reference no. is 16805605-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Trial Attorney, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison b6 b7C

First Interstate Bank

FFT # 16805605-S

16805605-S Order For Domestic Money Transfer

OFFICE / CENTER NAME	OFFICE / CENTER NO.	WIRE ITEM NO.	DATE
L.A. Main Office	149	2487 - 17 JUN 94	June 17, 1994

DOMESTIC WIRE DETAILS

REPETITIVE NO.	SEND DATE	DOLLAR AMOUNT	TESTKEY
	June 17, 1994	$1,300,000.00	2016 17935

DEBIT ACCOUNT (TYPE / #)	REQUESTED BY
149-240-134	Robb Evans, Trustee
ADDRESS: 725 S. Figueroa St., Ste. 2260,	ADDITIONAL ADDRESS:
CITY: Los Angeles,	STATE AND ZIPCODE: California 90017-5422

DESTINATION BANK ABA	BANK NAME
021030004	Federal Reserve Bank of New York
BANK ADDRESS: New York	CITY, STATE, ZIPCODE: New York
WIRE PAYABLE TO: U.S. Treasury	CREDIT TO ACCOUNT NO.: ALC #00008154
NOTICE TYPE	NOTIFICATION INFORMATION: Ref.No. Criminal No. 91-0655 (JHG)
ADDITIONAL INFORMATION: U.S. Marshal-District Office SDNY Attn: Bob Johnson (212) 791-1350	

RECEIVED FROM REMITTER THE FOLLOWING SUMS:	FUNDS RECEIVED:
AMOUNT OF TRANSFER $ 1,300,000.00	Charge Acct. No.
FEE $ N/A	Check on Acct. No.
TOTAL $ 1,300,000.00	Cash (Limited to $1,000)

Customer is aware that funds transfer will be effected through the fastest available means. First Interstate Bank will not be liable for delays resulting from conflicts between the time or presentment of this order and the deadlines of the Federal Reserve Bank or any financial institu[redacted]s operate in different time zones. In any case, the liability of First Interstate Bank that exceeds the amo[redacted]cation for use of funds at the average Fed Funds rate for the length of the delay. b6 b7C

S[redacted]UEST	IDENTIFICATION
[redacted]treet, Suite 2260, Los Angeles, CA 90017-5422	TELEPHONE: (213) 955-8305

BANK VERIFICATION & AUTHORIZATION

ATTACH SCREEN PRINT TO FILE COPY (RCONFR STATUS)

ACCOUNT BALANCE (HOLD PLACED)	CALLBACK PERFORMED BY (BANK)	CALLBACK VERIFIED BY (CUSTOMER)
OR 1,300,000.		
REQUESTOR AND CALLBACK RECIPIENT VERIFIED TO SCHEDULE "A" OR CT-3901 BY:		
WRITTEN CONFIRMATION RECEIVED BY		DATE
REVIEWED BY (OFFICE / CENTER MANAGER)		DATE

ORDER TAK[redacted]	APPRO[redacted]	[redacted]	[redacted]

b6 b7C

CT-3810 (Rev. 05/93) [redacted]WIRE

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: Aug. 16, 1994

b6
b7C

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 791-9763

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305.

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MESSAGE

b6
b7C

Dear Mr. Johnson,

This is to inform you that the wire for $8,850,000.00 has been sent and the Federal Reserve Bank reference no. is 22802381-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Acting Deputy Director, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison

b6
b7C

First Interstate Bank

Order For Domestic Money Trans

OFFICE / CENTER NAME	OFFICE / CENTER NO.	WIRE ITEM NO.	DATE
L.A. Main Office	149	2000 -/6 Aug 74	Aug. 16, 1994

Fed 228023815

DOMESTIC WIRE DETAILS

REPETITIVE NO.	SEND DATE	DOLLAR AMOUNT	TESTKEY
	Aug. 16, 1994	$8,850,000.00	384-15214

DEBIT ACCOUNT (TYPE / #)	REQUESTED BY
149-240-134	Robb Evans, Trustee
ADDRESS: 725 S. Figueroa St., Ste. 2260,	ADDITIONAL ADDRESS:
CITY: Los Angeles,	STATE AND ZIPCODE: California 90017-5422

DESTINATION BANK ABA	BANK NAME
021030004	Federal Reserve Bank of New York
BANK ADDRESS: New York	CITY, STATE, ZIPCODE: New York
WIRE PAYABLE TO: U.S. Treasury	CREDIT TO ACCOUNT NO.: ALC #00008154
NOTICE TYPE	NOTIFICATION INFORMATION: Ref.No. Criminal No. 91-0655 (JHG)
ADDITIONAL INFORMATION: U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350	b6 b7C

RECEIVED FROM REMITTER THE FOLLOWING SUMS:	FUNDS RECEIVED:
AMOUNT OF TRANSFER $ 8,850,000.00	Charge Acct. No. 149240134
FEE $ e	Check on Acct. No.
TOTAL $ 8,850,000 CO	Cash (Limited to $1,000)

Customer is aware that funds transfer will be effected through the fastest available means. First Interstate Bank will not be liable for del
resu time or presentment of this order and the deadlines of the Federal Reserve Bank or any fir b6
inst ions operate in different time zones. In any case, the liability of First Interstate Bank that exce b7C
ar sation for use of funds at the average Fed Funds rate for the length of the delay.

[redacted] EQUEST	IDEN[redacted]
[redacted]eroa Street, Suite 2260, Los Angeles, CA 90017-5422	(213) 955-8305

BANK VERIFICATION & AUTHORIZATION

ATTACH SCREEN PRINT TO FILE COPY (RCONFR STA

ACCOUNT BALANCE (HOLD PLACED)	CALLBACK PERFORMED BY (BANK)	CALLBACK VERIFIED BY (CUSTOMER)
8,850,000.00		

REQUESTOR AND CALLBACK RECIPIENT VERIFIED TO SCHEDULE "A" OR CT-3801 BY:

WRITTEN CONFIRMATION RECEIVED BY	DATE
REVIEWED BY (OFFICE / CENTER MANAGER)	DATE

b6 b7C

[redacted]

PUT BY	RELEASED BY (IF APPLICABLE)

WIRE

1325015-000-11143

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson **DATE:** Oct. 14, 1994 b6 b7C

FIRM: U.S. MARSHALS SERVICE **FAX NO.:** (212) 791-9763

FROM: [redacted] **NO. OF PAGES:** two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305.

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear Mr. Johnson, b6 b7C

This is to inform you that the wire for $200,000.00 has been sent and the Federal Reserve Bank reference no. is 28702373-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Acting Deputy Director, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison b6 b7C

10/14/94 11:36 ☎213 [redacted]14 2718

First Interstate Bank Fed Ref #2870237[redacted] Order For Domestic Money Transfer

OFFICE / CENTER NAME	OFFICE / CENTER NO.	WIRE ITEM NO.	DATE
L.A. Main Office	149	2043	Oct. 14, 1994

DOMESTIC WIRE DETAILS

REPETITIVE NO.	SEND DATE	DOLLAR AMOUNT	TESTKEY
	Oct. 14, 1994	$200,000.00	301-17485

DEBIT ACCOUNT (TYPE / #)	REQUESTED BY
149-240-134	Robb Evans, Trustee
ADDRESS: 725 S. Figueroa St., Ste. 2260,	ADDITIONAL ADDRESS:
CITY: Los Angeles,	STATE AND ZIPCODE: California 90017-5422

DESTINATION BANK ABA	BANK NAME
021030004	Federal Reserve Bank of New York
BANK ADDRESS: New York	CITY, STATE, ZIPCODE: New York
WIRE PAYABLE TO: U.S. Treasury	CREDIT TO ACCOUNT NO.: ALC #00008154
NOTICE TYPE:	NOTIFICATION INFORMATION: Ref.No. Criminal No. 91-0655 (JHG)
ADDITIONAL INFORMATION: U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350	

RECEIVED FROM REMITTER THE FOLLOWING SUMS:	FUNDS RECEIVED:
AMOUNT OF TRANSFER $ 200,000.00	Charge Acct. No. 149240134
FEE $ Waived FW	Check on Acct. No.
TOTAL $ 200,000.00	_____ Cash (Limited to $1,000)

Customer is aware that funds transfer will be effected through the fastest available means. First Interstate Bank will not be liable for dela[illegible] resulting from conflicts between the time or presentment of this order and the deadlines of the Federal Reserve Bank or any financ[illegible] institut[illegible]itutions operate in different time zones. In any case, the liability of First Interstate Bank that exceeds t[illegible] amou[illegible]pensation for use of funds at the average Fed Funds rate for the length of the delay. b6 b7C

SIGN[illegible]	[illegible]F REQUEST	[illegible]
X [illegible]ee		
AD[illegible] [illegible]gueroa Street, Suite 2260, Los Angeles, CA 900[illegible]5422		TELEPHONE (213) 955-8305

BANK VERIFICATION & AUTHORIZATION

ATTACH SCREEN PRINT TO FILE COPY (RCONFR STATI

ACCOUNT BALANCE (HOLD PLACED)	CALLBACK PERFORMED BY (BANK)	CALLBACK VERIFIED BY (CUSTOMER)
200001.75		

REQUESTOR AND CALLBACK RECIPIENT VERIFIED TO SCHEDULE "A" OR CT-3801 BY:

WRITTEN CONFIRMATION RECEIVED BY	DATE
REVIEWED BY (OFFICE / CENTER MANAGER)	DATE
[signature]	10-14-94

		INPUT BY	RELEASED BY (IF APPLICABLE)
		[signature]	[signature]

b6 b7C

DOMESTIC WIRE

CT-3810 (Rev. 05/93)

1325015-000-11145

10. 14. 94 11:36 AM 3

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: Dec. 13, 1994

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 791-9763

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

b6
b7C

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MESSAGE

Dear Mr. Johnson,

b6
b7C

This is to inform you that the wire for $3,035,594.31 has been sent and the Federal Reserve Bank reference no. is 34701160-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Acting Deputy Director, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison

b6
b7C

First Interstate Bank Fed 347011605 Order F Domestic Money Transfer

OFFICE / CENTER NAME	OFFICE / CENTER NO.	WIRE ITEM NO.	DATE
L.A. Main Office	149	1300	Dec. 13, 1994

DOMESTIC WIRE DETAILS

REPETITIVE NO.	SEND DATE	DOLLAR AMOUNT	TESTKEY
	Dec. 13, 1994	$3,035,594.31	221 19226

DEBIT ACCOUNT (TYPE / #)	REQUESTED BY
149-240-134	Robb Evans, Trustee
ADDRESS	**ADDITIONAL ADDRESS**
725 S. Figueroa St., Ste. 2260,	
CITY	**STATE AND ZIPCODE**
Los Angeles,	California 90017-5422

DESTINATION BANK ABA	BANK NAME
021030004	Federal Reserve Bank of New York
BANK ADDRESS	**CITY, STATE, ZIPCODE**
New York	New York
WIRE PAYABLE TO	**CREDIT TO ACCOUNT NO.**
U.S. Treasury	ALC #00008154
NOTICE TYPE	**NOTIFICATION INFORMATION**
	Ref.No. Criminal No. 91-0655 (JHG)

ADDITIONAL INFORMATION
U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350

RECEIVED FROM REMITTER THE FOLLOWING SUMS:	FUNDS RECEIVED:
AMOUNT OF TRANSFER $ 3,035,594.31	Charge Acct. No. 149-240134
FEE $ Waived RW	Check on Acct. No.
TOTAL $ 3,035,594.31	Cash (Limited to $1,000)

Customer is aware that funds transfer will be effected through the fastest available means. First Interstate Bank will not be liable for delays resulting from conflicts between the time or presentment of this order and the deadlines of the Federal Reserve Bank or any financial institutions operate in different time zones. In any case, the liability of First Interstate Bank that exceeds the amount of compensation for use of funds at the average Fed Funds rate for the length of the delay. b6 b7C

REQUEST	IDENTIFICATION
[redacted]	known RW
[redacted] Figueroa Street, Suite 2260, Los Angeles, CA 90017-5422	TELEPHONE (213) 955-8305

BANK VERIFICATION & AUTHORIZATION

ATTACH SCREEN PRINT TO FILE COPY (RCONFR STATUS)

ACCOUNT BALANCE (HOLD PLACED)	CALLBACK PERFORMED BY (BANK)	CALLBACK VERIFIED BY (CUSTOMER)
3,035,594.31		

REQUESTOR AND CALLBACK RECIPIENT VERIFIED TO SCHEDULE "A" OR CT-3801 BY:

WRITTEN CONFIRMATION RECEIVED BY	DATE
REVIEWED BY (OFFICE / CENTER MANAGER)	DATE

b6 b7C

[redacted] PUT BY [redacted]

DOMESTIC WIRE

CT-3810 (Rev. 05-93)

12. 13. 94 11:35 AM FBI

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: Feb. 13, 1995

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 791-9763

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

b6
b7C

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MESSAGE

Dear Mr. Johnson,

b6
b7C

This is to inform you that the wire for $17,000,000.00 has been sent and the Federal Reserve Bank reference no. is 04402729-S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Deputy Director, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison

b6
b7C

1325015-000-11148

2/13/95 14:20

First Interstate Bank [redacted] Order [redacted] Domestic Money Transfer

OFFICE / CENTER NAME	OFFICE / CENTER NO.	WIRE ITEM NO.	DATE
L.A. Main Office	149	2576	Feb. 13, 1995

DOMESTIC WIRE DETAILS

REPETITIVE NO.	SEND DATE	DOLLAR AMOUNT	TEST KEY
	Feb. 13, 1995	$17,000,000.00	455-1801%

DEBIT ACCOUNT (TYPE / #)	REQUESTED BY
149-240-134	Robb Evans, Trustee
ADDRESS: 725 S. Figueroa St., Ste. 2260,	ADDITIONAL ADDRESS:
CITY: Los Angeles,.	STATE AND ZIPCODE: California 90017-5422

DESTINATION BANK ABA	BANK NAME
021030004	Federal Reserve Bank of New York
BANK ADDRESS: New York	CITY, STATE, ZIPCODE: New York
WIRE PAYABLE TO: U.S. Treasury	CREDIT TO ACCOUNT NO.: ALC #00008154
NOTICE TYPE:	NOTIFICATION INFORMATION: Ref. No: Criminal No. 91-0655 (JHG)
ADDITIONAL INFORMATION: U.S. Marshal District Office SDNY Attn: Bob Johnson (212) 791-1350	

RECEIVED FROM REMITTER THE FOLLOWING SUMS:

AMOUNT OF TRANSFER $17,000,000.00

FEE $ waived RW

TOTAL $17,000,000 W

FUNDS RECEIVED:

Charge Acct. No. 149240134

Check on Acct. No. _____

_____ Cash (Limited to $1,000)

Customer is aware that funds transfer will be effected through the fastest available means. First Interstate Bank will not be liable for delays resulting from [redacted] the time or presentment of this order and the deadlines of the Federal Reserve Bank or any financial institutions operate in different time zones. In any case, the liability of First Interstate Bank that exceeds the compensation for use of funds at the average Fed Funds rate for the length of the delay. b6 b7C

SOURCE OF REQUEST	IDENTIFICATION
[redacted] Figueroa Street, Suite 2260, Los Angeles, CA 90017-5422	TELEPHONE: (213) 955-8305

BANK VERIFICATION & AUTHORIZATION

ATTACH SCREEN PRINT TO FILE COPY (RCONFR STATUS)

ACCOUNT BALANCE (HOLD PLACED)	CALLBACK PERFORMED BY (BANK)	CALLBACK VERIFIED BY (CUSTOMER)
17,000,000 W		
REQUESTOR AND CALLBACK RECIPIENT VERIFIED TO SCHEDULE "A" OR CT-3801 BY:		
WRITTEN CONFIRMATION RECEIVED BY		DATE
REVIEWED BY (OFFICE / CENTER MANAGER)		DATE

ORDER TAKEN BY	APPROVED BY	INPUT BY	RELEASED BY (IF APPLICABLE)

DOMESTIC WIRE

CT-3810 (Rev. 05/93)

1325015-000-11149

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. Robert Johnson

DATE: April 14, 1995

b6
b7C

FIRM: U.S. MARSHALS SERVICE

FAX NO.: (212) 637-6130

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

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MESSAGE

Dear Mr. Johnson,

b6
b7C

This is to inform you that the wire for $1,500,000.00 has been sent and the Federal Reserve Bank reference no. is 10401891S.

Enclosed is a copy of the executed money transfer.

Sincerely,

[redacted]

cc: Mr. Robb Evans, Trustee
Stefan D. Cassella, Esq., Deputy Director, U.S. Department of Justice
[redacted] Esq., Brobeck, Phleger & Harrison

b6
b7C

1325015-000-11150

/95 11:31 ☎213 614 2718 FIB LA MAIN 149 ☑001

Attn: Jeff

WIRE - Wire Transfer Entry Screen 210149 WL1612 14-APR-95 11:24
Resolved; Received by TR/MN Arizona T
Wire Transfer Type - Outgoing FEDWIRE Item Status RCONFR

Repetitive Number NONE Item No 1556-14APR95 Send Date 14-APR-95

Waive Charge N Dollar Amt 1,500,000.00/USD Testkey 404 18045
Seq # 00000000 FED Ref # 10401891S Release Time 104410 Ack Time 1120
Debit Acct Type/# CAD/149240134 Req By ROBB EVANS TRUSTEE
Add1 725 S FIGUEROA ST STE 2260 Add2
City LOS ANGELES ST CA ZIP 90017

Dest Bank ABA 021030004 Bank Name US TREASURY FRB NEW YORK
Addr City NEW YORK ST NY ZIP

Payable To US TREASURY Account Number ALC 00008154

Notification Type LTR Notification Info REF NO CRIMINAL NO 91 0655 JHG

Additional Information
US MARSHAL DISTRICT OFFI CE SDNY ATTN BOB JOHNSON 212 637 6000

actn ____ p1 _____ p2 _____ memo

4700

1

09

1325015-000-11151

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 5/15/95

ROBERT EVANS, Trustee for the United States of America, 725 South Figueroa Street, Suite 2260, Los Angeles California 90017-5422 was advised of the identity of the interviewing agent and the nature of the investigation. He voluntarily provided the following information:

EVANS was appointed by the Department of Justice as trustee overseeing the complex assets listed in the criminal BCCI forfeiture orders. The trustee has never tracked specific asset being liquidated from a particular forfeiture order but has maintained a list of the wire transfers when assets have been sold and transferred to the Marshal's Service. To date EVANS has liquidated $73,500,000.00 (seventy-three million five hundred thousand dollars) of assets and provided the United States Marshal's Service in New York with eleven bank remittance wire transfers.

On 2/13/95, EVANS provided BOB JOHNSON, United States Marshal Service with a $17,000,000.00 (seventeen million dollar) wire transfer from assets liquidated predominately from the fourth order of forfeiture. EVANS could not be more specific as to the type of property sold which generated this most recent money transfer. He concluded the conversation by advising he would furnish SA [redacted] with a copy of all eleven wire transfers. b6 b7C

(telephonically)

Investigation on 5/1/95 at NVMRA File # 29B-WF-171994 Sub FS-78

by SA [redacted], FBI Date dictated 5/5/95 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 5/15/95

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(telephonically)

Investigation on 5/1/95 at NVMRA File # 29B-WF-171994 Sub FS-78

by SA [redacted] FBI Date dictated 5/5/95 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Memorandum

To : ADIC, WMFO (29B-WF-171994) (P) Date 5/16/95

From : SA [redacted] (C-1) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF-FAG;
00:WMFO

Attached is a 5/2/95, facsimile requesting ROBERT EVANS, United States trustee provide SA [redacted] FBI with eleven wire transfers documenting the liquidation of BCCI assets. b6 b7C

1-29B-WF-171994 FS

29B-WF-171994 Sub FS-79

AC:ac

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 19 1995
FBI—WASH. METRO FIELD OFFICE

FD-448 (Rev. 5-23-90)

WASHINGTON METROPOLITAN FIELD OFFICE
Northern Virginia Metropolitan Resident Agency
Squad C-[redacted]81

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- [X] Immediate
- [ ] Priority
- [ ] Routine

- [ ] Top Secret
- [ ] Secret
- [ ] Confidential
- [ ] Sensitive
- [ ] Unclassified

Time Transmitted: _____
Sender's Initials: _____
Number of Pages: _____

To: Robert Evans (Name of Office) **Date:** 5/2/95

Facsimile number: (213) 955-8344

Attn: M. Evans (Name) Room Telephone No.)

From: FBI-WMFO-NVMRA (Name of Office)

Subject: BCCI

Special Handling Instructions: Please hand carry to M. Evans

Originator's Name: [redacted] **Telephone:** 202-324-9073

b6
b7C

Originator's Facsimile Number: 202/324-6426

Approved: [signature]

FBI/DOJ

1325015-000-11155

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

7799 Leesburg Pike, Suite 200
Falls Church VA, 22043

May 2, 1995

Bank of Credit and Commerce International

Robert Evans, Trustee
725 South Figueroa Street, Suite 2260
Los Angeles California, 90017-5422

Dear Mr. Evans,

Pursuant to our conversation on May 1, 1995, concerning the tracking of assets listed in the four forfeiture orders involved in the BCCI investigation.

Please provide the thirteen bank remittance records ie, receipts documenting the liquidation of assets to the United States Marshal's Service and any reports analyzing and or identifying the source of assets the trustee has liquidated to date. I'm especially interested in the fourth forfeiture order specifically a February 13, 1995, transaction involving $17,000,000.00.

Sincerely,

[redacted]

Special Agent, FBI

b6
b7C

1325015-000-11156

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

(Indicate page, name of newspaper, city and state.)
Washington Post

Date:
Edition: P. C-5 5/23/95

Title: Hidden Interest
29B-WF-171994 FS

Character:
or
Classification:
Submitting Office: WMFO/NVMRA

Indexing:

THE WASHINGTON POST 5/23/95 P C-5

2 Sheikhs Pay $10 Million to Settle Claims From BCCI's Demise

Reuter

NEW YORK, May 22—The rulers of two of the seven United Arab Emirates have paid $10 million to settle claims resulting from the collapse of the Bank of Credit and Commerce International (BCCI), officials said today.

Sheikh Humaid bin Rashid al-Nuaimi, emir of Ajman, and Sheikh Hamad bin Mohammed al-Sharqi, emir of Fujairah, were nominee shareholders—they allowed their names to be used as stockholders when they really were not—in a holding company BCCI set up for its illegal ownership of a U.S. bank, according to a statement by Manhattan District Attorney Robert Morgenthau, the Federal Reserve and the Justice Department.

The $10 million payment is part of the terms of two agreements reached by Sheikh al-Nuaimi and Sheikh al-Sharqi, officials said.

Of that sum, $2 million will go toward settlement of claims by creditors and depositors of BCCI, and $1 million will go to the Federal Reserve for processing BCCI records, they said.

The two also paid $7 million to settle a lawsuit in connection with BCCI's ownership of the District-based First American Bank. The two emirs were nominee shareholders in Credit and Commerce American Holdings N.V., which BCCI set up illicitly for its ownership of First American.

Luxembourg-registered BCCI was closed down in July 1991 by banking regulators around the world after it was alleged to have perpetrated the largest international bank fraud ever.

The $10 million settles all the claims against the two emirs regarding their roles in the holding company, officials said. Also as part of the agreement, neither sheikh was charged with nor admitted to any criminal acts. Both are cooperating with ongoing investigations and prosecutions, officials said.

Meanwhile, Saudi Sheikh Khalid bin Mahfouz welcomed a Luxembourg court settlement in which he agreed to pay $245 million to the liquidators of BCCI in return for lawsuits being dropped against him.

"This settlement terminates litigation in several countries and involves the withdrawal of all allegations made against me by the liquidators, just as all charges were withdrawn by the U.S. authorities some 18 months ago," Mahfouz said in a statement.

Under last Friday's deal, BCCI's liquidators agreed to drop all lawsuits totalling $50 billion in five countries against the sheikh, his associate, Pakistani banker Haroon Kahlon and the National Commercial Bank of Saudi Arabia. The sheikh, Kahlon and the NCB withdrew their countersuits, the statement said.

It stressed that the NCB, which is 98.8 percent-owned by the Mahfouz family, had made no financial contribution to the settlement, and that with $600 million in deposits and loans to BCCI, Mahfouz was one of the victims of its demise.

The main $1.8 billion payment settlement by Abu Dhabi, the bank's main shareholder, to liquidators, has been stalled since four former London-based BCCI employees filed an appeal against the deal.

(1) 29B-WF-171994 FS

MAY 25 1995
FBI—WASH. METRO FIELD OFFICE

29B-WF-171994 Sub FS-90

FBI/DOJ
1325015-000-11157

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/27/1995

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X9073

Approved By: [redacted]

Drafted By: [redacted] ac

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF-FAG;
00:WMFO

Synopsis: Disposition of Evidence.

Details: On 9/27/95, [redacted] Attorney at Law [redacted] b6 b7C [redacted] representing the interest of the Superintendent of New York in the BCCI investigation telephonically contacted SA [redacted] WMFO FAST.

[redacted] advised his client has approximately 4,100 (four thousand one hundred boxes) of BCCI documents stored at 530 5th Avenue New York City, New York. The New York Superintendent has reviewed the above described evidence and has determined for his purposes it has no further evidentiary value. Historically different agencies over the years have utilized the documents for criminal prosecutions on separate related matters across the country. b6 b7C

[redacted] believes the four orders of forfeiture issued by Judge Green provides after the New York Superintendent has completed his analysis of the documents the evidence is to be turned back over to the Department of Justice. [redacted] orginally informed [redacted]. Asset forfeiture, DOJ of the situation and she referred him to SA [redacted] (C-1) x9073. b6 b7C

1-29B-WF-171994 (FS)
1-SA [redacted] b6 b7C

AC:ac

29B-WF-171994 Sub FS-82

Committed INDEXED FILED
OCT 12 1995
FBI — WASH. METRO FIELD OFFICE

1325015-000-11162

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: ADIC, WMFO From: SA [redacted] b6 b7C
Re: 29B-WF-171994 (FS), 09/27/1995

[redacted] concluded the conversation by requesting the Department of Justice make arrangements to take custody of the documents by early November of 1995. b6 b7C

♦♦

1325015-000-11163

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/04/1995

To: ADIC, WMFO

From: SA [redacted]
C-1, NVMRA
Contact: SA [redacted]

b6
b7C

Approved By: [redacted]

Drafted By: [redacted]:AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Synopsis: BCCI INVESTIGATION.

Enclosures: Copies of Four Forfeiture Orders.

X

Details: On 9/26/95, [redacted], Asset Forfeiture Office, Department of Justice provided the following attached documents concerning the above captioned investigation.

b6
b7C

1-29B-WF-171994 (FS)
1- SA [redacted]
(attachments)
AC:ac

b6
b7C

29B-WF-171994 Sub FS-83

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
OCT 12 1995
FBI — WASH. METRO FIELD OFFICE

1325015-000-11164

U. S. Department of Justice

Criminal Division

Washington, D.C. 20530

September 26, 1995

Special Agent [redacted] b6 b7C
Federal Bureau of Investigation
Suite 200
7799 Leesburg Pike
Falls Church, Virginia 22043

Re: Copies of Orders of Forfeiture pertaining to United States v. BCCI Holdings (Lux.) et al, Crim. No. 91-0655 (JHG)

Dear Agent [redacted] b6 b7C

I have enclosed for your information and record-keeping copies of the Orders of Forfeiture in the above-styled case.

Sincerely,

Gerald McDowell
Director
Asset Forfeiture Office

Stefan D. Cassella
Deputy Director

[redacted] b6 b7C

P.O. Box 27322
Central Station
Washington, D.C. 20038

1325015-000-11165

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

APR 15 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. Thereupon, an Order of Forfeiture was entered. Paragraph 1(e) of that Order of Forfeiture provides that the four corporate defendants named in this action shall forfeit to the United States ownership interests in all property located in the United States, including, without limitation, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined or discovered pursuant to paragraph 10 of the plea agreement, in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf

of Court Appointed Fiduciaries of BCCI in the course of the management or disbursement of the liquidation estates as described in the plea agreement.

On March 20, 1992, pursuant to 18 U.S.C. § 1963, the plea agreement, and paragraph 1(e) of the January 24, 1992 Order of Forfeiture, counsel for the United States of America filed a motion requesting that the Court order forfeiture of a quantity of personal property of unknown value, including office furniture and computer equipment, held by Withers Transfer & Storage of Coral Gables, 357 Almeria Avenue, Coral Gables, Florida and owned by BCCI (Overseas) Ltd., one of the four corporate defendants. Attached to the motion as Exhibit A were inventory lists describing with particularity the property held by Withers Transfer & Storage which the government sought forfeited. On March 24, 1992, without objection by counsel for the corporate defendants, the Court granted the government's motion, ordered the property forfeited, and directed the United States Marshals Service to seize the assets forthwith.

On April 13, 1992, counsel for the government filed a motion to amend the March 24, 1992 Order of Forfeiture to include newly discovered property also belonging to BCCI (Overseas) Ltd. and located at Withers Transfer & Storage. Attached to the motion as "Exhibit 1 Crim. No. 91-0655 (JHG)" were two inventory lists describing with particularity the property which the government seeks forfeited.

Without objection by counsel for the corporate defendants, and

1325015-000-11185

it appearing that all assets listed in Exhibit 1 to the United States' Motion to Amend Order of Forfeiture to Include Additional Property are assets of BCCI (Overseas) Ltd. and are located within the United States, it is hereby

ORDERED that the assets held by Withers Transfer & Storage and listed on the attached pages entitled "Exhibit 1 Crim. No. 91-0655 (JHG)" are declared forfeited and subject to the Court's Order of Forfeiture of January 24, 1992. The United States Marshals Service is directed to seize those assets forthwith.

It is FURTHER ORDERED that upon receipt of notice from the United States Marshals Service that the property has been seized, it shall be the responsibility of the United States of America to notify all interested parties of their right to file a claim pursuant to 18 U.S.C. § 1963(l) asserting legal right, title or interest in the property.

IT IS SO ORDERED.
April 15, 1992

Joyce Hens Green
JOYCE HENS GREEN
United States District Judge

1325015-000-11186

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

Withers Transfer & Storage Of Coral Gables

PAGE NO. | NO. OF PAGES: 1 of 256-4

AGENT

CARRIER'S REFERENCE NO.

SHIPPER'S NAME OR RATING AND NAME: BCCI - Office Relocation

CONTRACT OR BILL NO.

ORIGIN LOADING ADDRESS: 1000 Brickell | CITY | STATE

GOVT. SERVICE ORDER NO.

DESTINATION: Add to storage -

VAN NUMBER

DESCRIPTIVE SYMBOLS

BW - BLACK & WHITE TV; C - COLOR TV; CP - CARRIER PACKED; PBO - PACKED BY OWNER; CD - CARRIER DISASSEMBLED; DBO - DISASSEMBLED BY OWNER; PB - PROFESSIONAL BOOKS; PE - PROFESSIONAL EQUIPMENT; PP - PROFESSIONAL PAPERS; MCU - MECHANICAL CONDITION UNKNOWN

EXCEPTION SYMBOLS

BE - BENT; BR - BROKEN; BU - BURNED; CH - CHIPPED; CU - CONTENTS & CONDITION UNKNOWN; D - DENTED; P - PACKED; S - SOILED; L - LOOSE; M - MARRED; MO - MOTHEATEN; R - RUBBED; RU - RUSTED; SC - SCRATCHED; SH - SHORT; SO - SOILED; T - TORN; W - BADLY WORN; Z - CRACKED

LOCATION SYMBOLS

1. Arm; 2. Bottom; 3. Corner; 4. Front; 5. Left; 6. Legs; 7. Rear; 8. Right; 9. Side; 10. Top; 11. Varies; 12. Inner; 13. Center; 14. Inside

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR

ITEM NO.	CU. FT.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
1	A	Table	SCCS 10,11B1, G5	
2	A	Table	SCCS 10,11B5 G5	
3	A	Chair	SO Dirty SCCS 10B1, G5	
4	A	Chair	SO Dirty SCCS 10B1, G5	
5	A	Chair	SO P	
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40				

ITEM NO. | REMARKS/EXCEPTIONS: Rec'd Empty

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO ____ INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING → BEFORE SIGNING CHECK SHIPMENT COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO | TAPE COLOR

NOS FROM | THRU

AT ORIGIN	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE 3-14-91	AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE
	SHIPPER OR AUTHORIZED AGENT (SIGNATURE)	DATE 3-14-91		SHIPPER OR AUTHORIZED AGENT (SIGNATURE)	DATE

Form 1100 REV '91

WILSON PRINTING INC 100 SCHMITT BLVD., FARMINGDALE, N. Y. 11735

STORAGE LOT NO. WD145 370 OTHERS

Exhibit 1 Crim. No. 91-0655 (JHG)

1325015-000-11187

GILBIN PRINTING, INC., 120 SCHMITT BLVD., FARMINGDALE N. Y. 11735

CONTRACTOR OR CARRIER

HOUSEHOLD GOODS DESCRIPTIVE INVENTORY

PAGE NO. 1 OF 1 PAGES

WITHERS TRANSFER & STORAGE OF CORAL GABLES
357 Almeria Avenue Coral Gables, FL 33134

AGENT

CARRIER'S REFERENCE NO. 40# 12467-V

OWNER'S GRADE OR RATING AND NAME: Bank of Credit & Commerce

CONTRACT OR GBL NO.

ORIGIN LOADING ADDRESS: 1200 Brickell Ave CITY 19th Floor STATE

GOVT. SERVICE ORDER NO.

DESTINATION: WH # 1

VAN NUMBER

DESCRIPTIVE SYMBOLS
B"W - BLACK & WHITE TV
C - COLOR TV
CP - CARRIER PACKED
PBO - PACKED BY OWNER
CD - CARRIER DISASSEMBLED
DBO - DISASSEMBLED BY OWNER
PB - PROFESSIONAL BOOKS
PE - PROFESSIONAL EQUIPMENT
PP - PROFESSIONAL PAPERS

EXCEPTION SYMBOLS
Bt - Bent
Bn - Broken
Bu - Burned
Cm - Chipped
Cy - Contents & Condition Unknown
D - Dented
F - Faded
G - Gouged
L - Loose
Ma - Marred
Mi - Mildew
Mo - Motheaten
R - Rubbed
Ru - Rusted
Sc - Scratched
Sh - Short
So - Soiled
T - Torn
W - Badly Worn
Z - Cracked

LOCATION SYMBOLS
1. Arm
2. Bottom
3. Corner
4. Front
5. Left
6. Legs
7. Back
8. Right
9. Side
10. Top
11. Veneer
12. Edge

NOTE: THE OMISSION OF THESE SYMBOLS INDICATES GOOD CONDITION EXCEPT FOR NORMAL WEAR.

ITEM NO.	CR. REF.	ARTICLES	CONDITION AT ORIGIN	EXCEPTIONS (IF ANY) AT DESTINATION
1		Triangle Table Desk	SCGD 4/12,10 5 X 5 7 M ON TL	1 BROKEN PIECE
2				(TOP SECTION)
3			Bk Hum Dsk & Bc	
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LOT NO AG 0068 220 WITHERS TFR. & STGE.

LOT NO AG 0068 219 WITHERS TFR. & STGE.

LOT NO AG 0068 218 WITHERS TFR. & STGE.

LOT NO AG 0068 217 WITHERS TFR. & STGE.

ITEM NO. REMARKS/EXCEPTIONS

"WE HAVE CHECKED ALL THE ITEMS LISTED AND NUMBERED 1 TO ___ INCLUSIVE AND ACKNOWLEDGE THAT THIS IS A TRUE AND COMPLETE LIST OF THE GOODS TENDERED AND OF THE STATE OF THE GOODS RECEIVED"

WARNING → BEFORE SIGNING CHECK SHIPMENT COUNT ITEMS AND DESCRIBE LOSS OR DAMAGE IN SPACE ON THE RIGHT ABOVE

TAPE LOT NO | TAPE COLOR

NOS FROM | THRU

CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE 11-17-88	AT DESTINATION	CONTRACTOR, CARRIER OR AUTHORIZED AGENT (DRIVER) (SIGNATURE)	DATE
OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE 11-18-88		OWNER OR AUTHORIZED AGENT (SIGNATURE)	DATE

GILBIN PRINTING, INC. 120 SCHMITT BLVD., FARMINGDALE N. Y. 11735

1325015-000-11188

b6
b7C

United States District Court

for the District of Columbia

UNITED STATES OF AMERICA

V.

#1-BCCI HOLDINGS (LUXEMBOURG), S.A.

(Name of Defendant)

JUDGMENT IN A CRIMINAL CASE

(For Offenses Committed On or After November 1, 1987)

Criminal Case Number: 91-0655

Michael Nussbaum, Esquire

Defendant's Attorney

FILED

JAN 24 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

THE DEFENDANT:

☒ pleaded guilty to ~~count(s)~~ the Superseding Information filed 12/19/91.

☐ was found guilty on count(s) _____ after a plea of not guilty.

Accordingly, the defendant is adjudged guilty of such count(s), which involve the following offenses:

Title & Section	Nature of Offense	Date Offense Concluded	Count Number(s)
18 USC 1962(c) & 1962(d)	Racketeering	From in or about January of 1978, to in or about July of 1991	1
18 USC 2	Aiding & Abetting	From in or about January of 1978, to in or about July of 1991	1

The defendant is sentenced as provided in the attached Order of Forfeiture ~~pages 2 through _____ of this judgment~~. The sentence is imposed pursuant to the Sentencing Reform Act of 1984..

☐ The defendant has been found not guilty on count(s) _____, and is discharged as to such count(s).

☒ ~~Count(s)~~ Original Indictment filed 11/15/91 (is) ~~(are)~~ dismissed on the motion of the United States.

☒ It is ordered that the defendant shall pay a special assessment of $ 200.00, for ~~count(s)~~ Superseding Information, which shall be due ~~immediately~~ within 60-days.

IT IS FURTHER ORDERED that the defendant shall notify the United States attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. The Court imposed no additional fine.

Defendant's Soc. Sec. No.: _____

Defendant's Date of Birth: _____

Defendant's Mailing Address:

_____

_____

Defendant's Residence Address:

_____

_____

January 24, 1992
Date of Imposition of Sentence

Signature of Judicial Officer

Joyce Hens Green - U.S. District Judge
Name & Title of Judicial Officer

January 24, 1992
Date

United States District Court
for the District of Columbia
A TRUE COPY
NANCY MAYER-WHITTINGTON, Clerk
By Joe A. Wood, Jr.
Deputy Clerk

1325015-000-11220

29B-WF-171994 Sub FS-84

SEARCHED BB INDEXED BB
SERIALIZED BB FILED BB
NOV 0 2 1995
FBI — WASH. METRO FIELD OFFICE

...STRICT OF COLUMBIA

OCT 17 ... 32 ... '95

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	CRIMINAL NUMBER 91-0655 (JHG)
UBAF BANK LIMITED, 30 Gresham Street, London EC2V 7LP, England, Petitioner.	

FILED

OCT 17 1995

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER GRANTING JOINT MOTION
FOR APPROVAL OF STIPULATION AND
DISBURSEMENT OF FUNDS RELATING TO
JUDGMENT IN FAVOR OF UBAF BANK LIMITED

Upon consideration of the Stipulation of Settlement Relating to Judgment in Favor of UBAF Bank Limited and the Joint Motion for Approval of Stipulation and Disbursement of Funds Relating to Judgment in Favor of UBAF Bank Limited,

(N)

It is hereby ORDERED that the Stipulation of Settlement Relating to Judgment in Favor of UBAF Bank Limited is approved;

It is FURTHER ORDERED that the United States shall disburse the sum described in paragraph 1 of the Stipulation in the manner prescribed in paragraphs 2 through 4 of the Stipulation.

IT IS SO ORDERED.

October 17, 1995

Joyce Hens Green

JOYCE HENS GREEN
United States District Judge

By Joel A. Wood, Jr.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

STIPULATION OF SETTLEMENT RELATING TO
JUDGMENT IN FAVOR OF UBAF BANK LIMITED

WHEREAS on August 22, 1995, this Court entered an Order Granting the Petition of UBAF Bank Limited (the "Order") and ordering the return of the claimed funds plus interest; and,

WHEREAS the United States asserts that it is exempt under principles of sovereign immunity from any obligation to pay interest on seized assets; and

WHEREAS the claimed funds have actually accrued interest since their seizure; and

WHEREAS the parties seek to resolve all issues without appeal and without further litigation;

The parties, the United States of America, the Court-Appointed Fiduciaries, on behalf of BCCI Holdings (Luxembourg), S.A.; Bank of Credit and Commerce International, S.A.; Bank of Credit and Commerce International (Overseas) Limited; and

International Credit and Investment Company (Overseas) Limited (collectively, the "Defendants"), and UBAF Bank Limited, by and through their undersigned attorneys, hereby stipulate and agree to an execution of the Order, as follows:

1. The parties agree to file with the Court a joint motion and proposed order calling for disbursement to UBAF Bank Limited on Thursday, October 19, 1995, of the sum of $19,048,749.99. The United States represents that this amount constitutes the entire amount due to UBAF Bank Limited pursuant to the Order, including principal in the amount of $16,438,472.28, pre-seizure interest of $1,316,851.29, and post-seizure interest of $1,293,426.42 through October 19, 1995.

2. UBAF Bank Limited shall provide to the United States, at least three business days in advance of remittance, a complete set of written instructions stating the account to which the United States should wire transfer the funds, and identifying October 19, 1995 as the date the wire transfer is to take place.

3. The United States shall execute the wire transfer on such date, October 19, 1995, in accordance with UBAF Bank Limited's written instructions described in paragraph 2 above; UBAF Bank Limited shall bear all responsibility and risk of delay or loss arising from its own actions when the remittance is wire transferred in accordance with paragraph 2 of this Stipulation.

4. If despite the United States' best efforts it does not execute the wire transfer on October 19, 1995, then the United States shall promptly invest the funds and pay to UBAF Bank

1325015-000-11233

Limited any interest that actually accrues on the funds identified in paragraph 1 through the date of ultimate execution of the wire transfer.

5. UBAF Bank Limited shall accept the remittance described herein in full satisfaction of all claims and causes of action UBAF Bank Limited has, has had, or ever will have, whether now known or unknown, against the United States, the Court-Appointed Fiduciaries and/or the Defendants, in connection with the transfer of approximately $16.4 million by UBAF Bank Limited on July 5, 1991, and/or the seizure, detention, forfeiture, and remission of the same, and does so for its present officers, directors, and agents acting in their official capacities, including without limitation any appeal or motion to in any way reconsider or question the Judgment entered in favor of UBAF Bank Limited in this proceeding on August 22, 1995, and including any claim in the liquidation proceedings for any or all of the Defendants, and also including any claims and/or causes of action against the United States' attorneys, agents, officers and employees, but excluding any actions to enforce this Stipulation.

6. The United States hereby waives, abandons and forgoes any and all claims, motions, appeals, or suggestions to in any way reconsider, set aside, amend, modify or withdraw the Judgment entered in favor of UBAF Bank Limited on August 22, 1995, that it has, has had or ever will have, but excluding any actions to enforce this Stipulation.

7. The Court Appointed Fiduciaries on behalf of the Defendants,

1325015-000-11234

hereby agree not to initiate or maintain any claim, suit or cause of action, of any kind whatsoever, in or by way of legal proceedings or otherwise, against UBAF Bank Limited, arising from or relating in any way to the transfer of approximately $16.4 million by UBAF Bank Limited on July 5, 1991, and/or the seizure, detention, forfeiture, and remission of the same, including without limitation any appeal of, or motion to in any way reconsider or question, the Judgment entered in favor of UBAF Bank Limited on August 22, 1995, but excluding any actions to enforce this Stipulation. Notwithstanding the foregoing, the Court Appointed Fiduciaries make no representation concerning their ability to bind, or contract on behalf of, former agencies or branches of the Defendants.

8. Each party shall bear its own costs and attorney's fees.

9. This Stipulation shall be binding upon and inure to the benefit of each of the parties' successors and assigns.

10. This Stipulation constitutes the entire agreement among and between the parties with respect to the subject matter hereof. This Stipulation may not be amended or supplemented by the parties, and no waivers of or consents to departures from the provisions hereof shall be effective, unless set forth in a writing signed by, and delivered to, all the parties.

11. Each party has read the foregoing terms and conditions and agrees, by the signature below of its authorized attorney, to be bound to each and every term herein.

12. Each party agrees that this Stipulation is to be effective

1325015-000-11235

on the date that the Court enters an order approving this Stipulation and directing the disbursement of funds in accordance with this Stipulation.

Executed, this ___ day of October, 1995, at Washington, D.C.

Respectfully submitted,

Gerald E. McDowell
Director
Asset Forfeiture Office

Stefan D. Cassella
Deputy Director

By:

Barton Legum, Esq.
Counsel for UBAF Bank Ltd.
Debevoise & Plimpton
875 Third Avenue
New York, New York 10022
Tel.: (212) 909-6239

By:

Michele L. Crawford
Trial Attorney
P.O. Box 27322
Central Station
Washington, D.C. 20038
Tel.: (202) 514-1263

By:

A. Katherine Toomey, Esq.
Counsel for the Court-Appointed Fiduciaries
Nussbaum & Wald
One Thomas Circle
Washington, D.C. 20005
Tel.: (202) 833-8900

1325015-000-11236

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

AUG 22 1995

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER GRANTING THE PETITION OF UBAF BANK LIMITED

The following represents the Court's findings of fact and conclusions of law as a result of the hearing on the petition of UBAF Bank Limited ("UBAF") held on August 17, 1995. For the reasons expressed below, the petition is granted.

I. Findings of Fact

A. Background

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively "BCCI") and the plea agreement between them and the United States of America. Thereupon, and in accordance with 18 U.S.C. § 1963, an Order of Forfeiture was entered. Paragraph 1(e) of the Order provides that the corporate defendants named in this action shall forfeit to the United States ownership interests in all property located in the United States, including, without limitation, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined

(N)

AUG 23 1995

or discovered in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf of court-appointed fiduciaries of BCCI in the course of the management or disbursement of the liquidation estates as described in the plea agreement. Attached to the January 24, 1992 Order as Exhibit A was a list of specific BCCI accounts, with corresponding numbers, names, and approximate balances, which the United States Marshals Service was directed to seize forthwith. Because the government was unable to verify certain information concerning additional forfeitable accounts at the time the Order of Forfeiture was entered, the Court issued a supplemental Order on January 31, 1992 which directed immediate seizure of the specific assets listed therein.

In satisfaction of 18 U.S.C. § 1963(l)(1), and to inform third parties of potential rights to seek recovery of assets declared forfeited, the United States published notice of the Order of Forfeiture, as amended, during the period between February 13, 1992 and March 27, 1992 in eleven major United States newspapers including the Wall Street Journal, the New York Times, the Chicago Tribune, and the Los Angeles Daily Journal. See Government's Compliance with Order of May 8, 1992, filed May 12, 1992. In addition, personal notice was sent to over 340 persons and entities as late as April 3, 1992. Id.

On June 24, 1992, the government filed a Motion to Amend Order of Forfeiture to Include Additional Property, seeking forfeiture

1325015-000-11238

and seizure of assets in newly discovered bank accounts held in the names of the corporate defendants, proceeds from the sale of a condominium purchased with resources provided by a corporate defendant, money remaining in a "BCCI Legal Fund" established by one of the corporate defendants for the defense of its employees' legal interests, a bankruptcy distribution to one of the corporate defendants, and assets held at various New York financial institutions in the name of ICIC Investments Ltd., a sibling corporation of defendant ICIC (Overseas) Ltd. The Court granted the government's motion and issued an Order of Forfeiture on July 29, 1992. The United States subsequently provided notice of the Order to potential claimants.

The government subsequently filed another motion to amend the Order of Forfeiture of January 24, 1992 to include additional property on the schedule of property subject to forfeiture. Attached to this motion was the proposed Third Supplemental List of Forfeited Property, which included accounts held at various financial institutions in the United States in the names of the corporate defendants as well as money held by the Court-Appointed Liquidators, the Trustee and several law firms. This motion was granted on August 19, 1993. The United States provided notice of this Order of Forfeiture in accordance with 18 U.S.C. § 1963(l)(1) by mailing a Notice of the Order of Forfeiture to 523 individuals and entities with a possible legal right, interest or title in the forfeited property and by causing a copy of the same Notice to be published in nine newspapers of general circulation, including the

1325015-000-11239

New York Times, the Wall Street Journal, the Washington Post and the USA Today. See Notice to the Court, filed September 21, 1993.

In response to the August 19, 1993 Order of Forfeiture, a number of claimants, including UBAF, filed claims. In accordance with a briefing schedule established by the Court, the United States filed a motion to dismiss UBAF's petition. The government asserted that this petitioner lacked standing to assert its claim and that it failed to state a claim upon which relief can be granted. After oral argument, this Court denied the United States' motion to dismiss. The parties then engaged in discovery, after which this Court held the August 17, 1995 evidentiary hearing.

B. UBAF's Petition

On May 2, 1991, Banque Marocaine du Commerce Exterieur, Casablanca ("BMCE"), issued a letter of credit through UBAF for approximately $16,000,000.[1] The letter of credit was intended to cover a shipment of crude oil, and was issued at the request of the buyer of the crude oil, Societe Anonyme Marocaine De L Industrie De Raffinage. It was to be paid through Bank of Credit and Commerce (Emirates) ("BCC(E)").[2] See Declaration of George C. Kimber ¶ 4, United States Ex. P.

Pursuant to this letter of credit, UBAF was obligated to pay BCC(E)'s main branch, located in Abu Dhabi, United Arab Emirates. See Id.; UBAF Exs. 1-3; United States Exs. H-I. On June 16, 1991,

---

[1]All references to money are in United States dollars.

[2]BCC(E) is now known as Union National Bank, and was at all times independent of the defendants herein.

1325015-000-11240

BCC(E) transmitted a telex to UBAF demanding payment under the letter of credit. UBAF Ex. 4. Two weeks later, on July 1, 1991, BCC(E) sent a revised telex to UBAF demanding payment in the amount of $16,438,492.28. UBAF Ex. 5. This revised telex instructed UBAF to send the payment to BCC(E)'s account number 86058[3] at BankAmerica International in New York ("BankAmerica"). Id.

On July 5, 1991, UBAF's letter of credit department attempted to effect the payment by requesting, via a written "Remittance Instruction", that the UBAF General Payments Department ("General Payments"), make the payment. United States Exs. K, L; Deposition of Fatema Rasiwalla ["Rasiwalla Dep."] at 8, 13; Deposition of Eva M. Kemble at 48-49. The Remittance Instruction named "Bank of Credit and Commerce Int Abu Dhabi", account number 86058 as the beneficiary of the payment. In processing this instruction, General Payments selected the "Short Name" "CRCOMCAYAD" from the "Short Names List".[4] Deposition of Despo Pieri at 16-20, 28-29; Deposition of Ian M. MacLeod at 43-44, 76; Rasiwalla Dep. at 30. The selection of the "Short Name" "CRCOMCAYAD" generated "Bk Credit & Commerce (GC) Abu Dh" for use as the beneficiary in the July 5, 1991 payment order and telex confirmation. It is undisputed that

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[3]BCC(E)'s account at BankAmerica was number 86058, BCCI S.A. Abu Dhabi's account at BankAmerica was 86052. The similarity between these account numbers is irrelevant to this patition.

[4]The "Short Name" was a code that generated a particular name and address to be inserted into the beneficiary name section of a payment order and confirmation telex. Stipulation ¶ 9; Rasiwalla Dep. at 30-31.

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the selection of "Bk Credit & Commerce (GC) Abu Dh" as the beneficiary was the result of a clerical error at UBAF.

At 11:12 a.m.[5] on July 5, 1991, General Payments sent a payment order to Bankers Trust Company in New York ("Bankers Trust") directing it to pay $16,438,472.28 to BankAmerica. The payment order identified "Bk Credit & Commerce (GC) Abu Dhabi" as the beneficiary and did not specify a bank account or other numerical identifier. At 3:24 p.m., Bankers Trust sent a payment order through CHIPS to BankAmerica directing it to make a payment in the amount of $16,438,472.28 to "Bk Credit & Commerce; (GC)Abu Dh". See UBAF Ex. 11; United States Ex. A. The originator of the payment order was identified as UBAF. BankAmerica received the payment order at 3:25 p.m.

By the time BankAmerica received the payment order, it was aware of the situation involving BCCI. Early that morning, before 9:00 a.m., BankAmerica personnel became aware that BCCI had been seized by regulators. Deposition of June A. Findlay ["Findlay Dep."] at 151. Throughout the day, bank regulators were at BankAmerica. Due to the seizure, BankAmerica would not make any payments on the BCCI accounts and any reference to a BCCI account had to go through BankAmerica's legal department. Id. at 158, 190, 230 (noting that no payments could be made out of the BCCI S.A. Abu

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[5]Any reference to a time of day in this opinion will be to the time it was in New York when a particular event occurred. It is understood that there was a five-hour time difference between New York and London on July 5, 1991. For example, the payment order sent to Bankers Trust at 11:12 a.m. New York time was sent at 4:12 p.m. London time.

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Dhabi account on July 5, 1991).[6] This information was transmitted to the Money Transfer Unit around noon.

There was, however, no change in BankAmerica's treatment of incoming credits to BCCI accounts, id. at 158-59, so BankAmerica's Money Transfer Unit attempted to process the payment order received from Bankers Trust. Because the payment order included the name of the beneficiary but no account number or other numerical identifier, BankAmerica's Money Transfer Unit had to process it manually.[7] Although BankAmerica had "no written guidelines" for the manual processing of payment orders, several steps were commonly taken to determine the proper beneficiary. Id. at 48. BankAmerica personnel could rely on directories, lists of account holders, BankAmerica policies and experience. Money Transfer Unit personnel also had the discretion to seek assistance from BankAmerica's Account Administration[8] department who could consult "you will receive" messages[9] or contact the remitting bank or the

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[6]BankAmerica's computer system was also programmed so that a note was displayed to signal that a payment order might be related to a BCCI entity; such a note was displayed upon receipt of the UBAF payment order.

[7]This was not an uncommon occurrence at BankAmerica. Ricci Acosta, then-operations manager in the Money Transfer Unit, testified that of the approximately 20,000 payment orders received each day in 1991, BankAmerica's Money Transfer Unit had to process 4000-5000 manually.

[8]The department currently known as Global Sales Support Services was known as Account Administration in 1991. Findlay Dep. at 8.

[9]A "you will receive" message is a notification from a customer to a bank that the bank should expect to receive a particular money transfer. Findlay Dep. at 106. Relevant to this proceeding, BCC(E) sent a telex to BankAmerica on July 4, 1991 indicating that

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customer to verify the beneficiary. Id. at 33, 44, 46-48, 106, 149, 283. It is also perhaps noteworthy that there was more pressure to process incoming payment orders (as opposed to outgoing payment orders) in a timely fashion. Id. at 50-51.

The Money Transfer Unit completed processing the payment order at 6:03 p.m. The money was credited to BCCI S.A.'s account number 86052. Notwithstanding that the incoming payment order instructed BankAmerica to credit as beneficiary "Bk Credit and Commerce; (GC)Abu Dh", BankAmerica credited BCCI S.A. as the "beneficiary's bank", and noted that BCC (GC) Abu Dhabi was the beneficiary. UBAF Ex. 11. BankAmerica transmitted this information to BCCI S.A. Abu Dhabi via BankAmerica's BAMTRAC electronic communication system.

Because July 5, 1991 was a Friday, the erroneous transfer was not detected until July 8, 1991, the next business day. On this date, BankAmerica received a telex from BCCI S.A. Abu Dhabi indicating that the $16 million credit was in error. Later that morning, UBAF, having realized the mistake, sent a revised payment order through Bankers Trust to BankAmerica. See Deposition of Gary Bishop at 44. Because BCCI S.A.'s accounts had been frozen, however, the money could not be retrieved.

This was not the first time that BCCI S.A. and BCC(E) had been mistaken at BankAmerica. There had been a history of confusion between the BCC(E) and BCCI accounts at BankAmerica, and a similar

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"YOU WILL RECEIVE FOR OUR A/C NO. 48586058 VALUE 5.7.91 THE FLG AMTS. IN CASE OF NON-RECEIPT PL INFORM BY RTN TLX"; one of the amounts listed on this telex is $16,431,631.44 from the "Samir" order. UBAF Ex. 6. This "you will receive" message was never consulted in connection with the payment order at issue.

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mistake had been made on July 4, 1991. Id. at 213; UBAF Ex. 18; see Findlay Dep. at 219-20 (noting that not all the confusion was the fault of BankAmerica). In fact, on July 5, 1991, BankAmerica had no fewer than 13 accounts that began with the words "Bank of Credit and Comerce" or "BCC".[10] It is undisputed, however, that there was no account at BankAmerica in the name of "Bk Credit & Commerce (GC) Abu Dh", "Bank of Credit and Commerce (Grand Cayman) Abu Dhabi", or with the words "Bank of Credit and Commerce" "Grand Cayman" and "Abu Dhabi" in it. Findlay Dep. at 93, 117-18; Deposition of Roger S. Burden at 28-30.

Nonetheless, the association between the BCCI S.A. Abu Dhabi account and a payment order referencing Grand Cayman was not taken out of thin air. BCCI S.A. had a division known as the Treasury Portfolio Management Division ("TPMD"), which was located in Abu Dhabi and managed the surplus funds of BCCI S.A., BCCI (Overseas) and their branches, subsidiaries and affiliates. Every day, the surplus liquidity of these entities was transferred to BCCI's

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[10]The accounts were:

Bank of Credit and Commerce International, S.A.-New York;
Bank of Credit and Commerce International, S.A.-London;
Bank of Credit and Commerce International, S.A.-Luxembourg;
Bank of Credit and Commerce International, S.A.-Djibouti;
Bank of Credit and Commerce International, S.A.-Abu Dhabi;
Bank of Credit and Commerce International, S.A.-Tokyo;
Bank of Credit and Commerce International (Overseas)-Muscat;
Bank of Credit and Commerce International (Overseas)-Seoul;
Bank of Credit and Commerce International (Overseas)-Macau;
Bank of Credit and Commerce Cameroon;
BCCI Finance International Limited;
Bank of Credit and Commerce International (Lebanon) S.A.L.;
and Bank of Credit and Commerce (Emirates).

UBAF Ex. 13.

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Central Treasury, which was maintained by BCCI (Overseas). The Central Treasury was located in Grand Cayman and was often referred to as the Grand Cayman Treasury.

TPMD made the investment and other decisions regarding funds of the Central Treasury. To perform this function, TPMD had control of certain accounts which were used to receive and transfer funds owned by the Grand Cayman Treasury. Certain of these accounts were held in the name BCCI S.A. Abu Dhabi. Account 86052 at BankAmerica was one such account.

II. Conclusions of Law

A. Forfeitures Pursuant to 18 U.S.C. § 1963

Title 18, United States Code, § 1963 sets forth an orderly procedure by which third parties seeking to recover interests in forfeited property may obtain judicial resolution of their claims. The provision granting standing to parties seeking to amend an order of forfeiture to exclude certain property states:

> Any person, other than the defendant, asserting a legal interest in property which has been ordered forfeited to the United States pursuant to this section may, within thirty days of the final publication of notice or his receipt of notice . . ., whichever is earlier, petition the court for a hearing to adjudicate the validity of his alleged interest in the property.

18 U.S.C. § 1963(l)(2); see generally United States v. BCCI Holdings (Luxembourg), S.A., 46 F.3d 1185 (D.C. Cir. 1995). Section 1963(l)(6) sets forth the substantive elements which a third party must establish to successfully obtain amendment of an order of forfeiture and provides in full:

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> If, after the hearing, the court determines that the petitioner has established by a preponderance of the evidence that--
>
> (A) the petitioner has a legal right, title, or interest in the property, and such right, title, or interest renders the order of forfeiture invalid in whole or in part because the right, title, or interest was vested in the petitioner rather than the defendant or was superior to any right, title, or interest of the defendant at the time of the commission of the acts which gave rise to the forfeiture of the property under this section; or
>
> (B) the petitioner is a bona fide purchaser for value of the right, title, or interest in the property and was at the time of purchase reasonably without cause to believe that the property was subject to forfeiture under this section;
>
> the court shall amend the order of forfeiture in accordance with its determination."[11]

Only by establishing standing and satisfaction of all requisite elements of either § 1963(l)(6)(A) or (B) may a party obtain judicial relief from an order of forfeiture. See United States v. Schwimmer, 968 F.2d 1570, 1584 (2d Cir. 1992) ("The only role of the District Court is to amend the order of forfeiture where a genuine property interest of the sort specified in § 1963(l)(6) is demonstrated.") (emphasis in the original); United States v. Lavin, 942 F.2d 177, 187 (3d Cir. 1991) ("Those third parties who fall outside of the [limited avenues of relief], regardless of how sympathetic they are, must petition the Attorney General for

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[11]Title 18 U.S.C. § 1963(l)(6) contains exactly the same language as 21 U.S.C. § 853(n)(6), the statute providing for forfeiture in criminal narcotics cases, and it appears that no court has interpreted these two provisions differently. Because the two subsections are identical and because of the relative dearth of case law interpreting and applying § 1963(l), the Court's opinion relies on reasoning contained in § 853(n) cases as well as in § 1963(l) cases.

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relief.") If a third party fails to allege in its petition all elements necessary for recovery, including those relating to standing, the court may dismiss the petition without providing a hearing. See United States v. Campos, 859 F.2d 1233, 1240 (6th Cir. 1988); United States v. Magsean, 649 F. Supp. 820, 825 (D. Nev. 1986), aff'd without opinion, 822 F.2d 62 (9th Cir. 1987); S. Rep. No. 225, 98th Cong., 2d Sess., reprinted in 1984 U.S.Code Cong. & Ad. News 3374, 3391.

As noted above, a party must have a "legal interest in property which has been ordered forfeited to the United States" to have standing pursuant to 18 U.S.C. § 1963(l)(2). A general, unsecured creditor does not possess an interest in any specific asset of a debtor and merely has a general interest in the debtor's entire estate. See BCCI Holdings (Luxembourg), S.A., 46 F.3d at 1191 ("bank depositors, as general creditors, have no interest in the specific accounts to which their deposits might be traced, only in the defendant's estate as a whole--and therefore have no interest in particular assets forfeited"); United States v. BCCI Holdings (Luxembourg), S.A., 814 F. Supp. 106, 110 (D.D.C. 1993); Schwimmer, 968 F.2d at 1581 ("A general creditor has no interest in a particular asset or particular funds that is either vested or superior to a defendant's. He may have a right to receive payment, but he does not have a property interest superior to defendant's in any particular asset or funds . . . ."); Campos, 859 F.2d at 1240 (unsecured creditors who filed third-party claims "failed to allege or make a prima facie showing of any legal right, title, or

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interest in the forfeited property") (emphasis added); United States v. Reckmeyer, 836 F.2d 200, 206 & n. 3 (4th Cir. 1987) ("Unlike secured creditors, general creditors cannot point to any one specific asset and claim that they are entitled to payment of the value of that specific asset. General creditors instead enjoy a legal interest in the entire estate of the debtor."); Hageman, 649 F. Supp. at 828 ("The Court . . . concedes the trade creditors do not, in a technical sense, have legal interests in the forfeited property."). Because general creditors are unable to assert interests in specific assets, they cannot assert legal rights, titles, or interests "in property which has been ordered forfeited" as required by § 1963(l)(2), at least in situations where a defendant's entire estate is not subject to forfeiture. See Reckmeyer, 836 F.2d at 206 n. 3 ("It is the dilemma of linking their interest to a specific asset rather than the problem of asserting a legal interest in the debtor's estate that frustrates general creditors who attempt to contest . . . forfeitures.").

B. Wire Transfers Under UCC Article 4A

The critical question with regard to the instant petition is whether UBAF has a "legal interest" in the disputed funds. Such an interest is necessary to satisfy the standing requirements of § 1963(l)(2) and, as this Court has previously noted, such an interest would operate to the exclusion of any interest of BCCI, thereby satisfying the substantive requirements of § 1963(l)(6)(A).

UBAF's interest in the disputed funds arises out of electronic wire transfers. It is, therefore, governed by Article 4A of the

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Uniform Commercial Code ("U.C.C.").[12] See U.C.C. § 4A-101, Official Comment (this article provides a "comprehensive body of law that defines the rights and obligations that arise from wire transfers"). Pursuant to Article 4A, a funds transfer is completed when the bank of the beneficiary of the funds transfer accepts a payment order. U.C.C. § 4A-104(a). Such acceptance occurs, subject to certain conditions, at the earliest of: (1) when the bank pays the beneficiary or notifies the beneficiary of receipt of the order or that the account has been credited; (2) when the bank receives payment of the entire amount of the transfer; or (3) the beginning of the bank's next funds-transfer business day. U.C.C. § 4A-209(b). Because an accepted transfer cannot be revoked without the consent of the beneficiary, Middle East Banking Co. v. State Street Bank Int'l, 821 F.2d 897, 901-02 (2d Cir. 1987) ("Returns and refunds to a third party that are unauthorized by a customer give rise to an action against the bank . . . and unilateral actions of this nature are undertaken by a bank at its own peril") (citation omitted), and the beneficiary's bank incurs an obligation to the beneficiary upon acceptance of the funds, see U.C.C. § 4A-404 ("if a beneficiary's bank accepts a payment order, the bank is obliged to pay the amount of the order to the beneficiary of the order"), the ownership interest in those funds must pass from the originator upon completion of the funds transfer. See Shawmut Worcester County Bank v. First American Bank

[12]Article 4A has been adopted in over forty states and was adopted in New York on January 1, 1991. U.C.C. § 4A-102, Official Comment.

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& Trust, 731 F. Supp. 57, 60 (D. Mass. 1990) (completion of a wire transfer "extinguished Shawmut's 'ownership interest' in the funds as personal property" prohibiting recovery on a conversion theory).

UBAF asserts that the funds transfer at issue was never "accepted" by BCCI S.A. Abu Dhabi on two independent Article 4A grounds. First, relying on the fact that BankAmerica credited the account of BCCI S.A. as a "beneficiary's bank" not as a "beneficiary", UBAF Ex. 11, UBAF asserts that the wire transfer was rejected. Pursuant to the New York U.C.C. Law[13]:

> If a receiving bank suspends payments, all unaccepted payment orders issued to it are deemed rejected at the time the bank suspends payments.

N.Y. U.C.C. Law § 4-A-210(3).[14] Thus, UBAF argues, when BankAmerica issued the notification to BCCI S.A. Abu Dhabi via BAMTRAC, it issued a payment order to BCCI S.A. Abu Dhabi as beneficiary's bank to credit the account of the beneficiary "Bk Credit & Commerce (CC) Abu Dh". Because BCCI S.A. had been seized by regulators before this payment order issued, UBAF claims that the payment order was rejected when issued and the funds never were properly credited to the BCCI S.A. Abu Dhabi account.

Second, UBAF claims that even if UBAF credited BCCI S.A. as "beneficiary", it could not do so. Pursuant to Article 4A:

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[13]It is undisputed that New York U.C.C. Law applies to this case.

[14]See N.Y. U.C.C. Law § 4-104(m) ("'Suspends payments' with respect to a bank means that it has been closed by order of the supervisory authorities, that a public officer has been appointed to take it over or that it ceases or refuses to make payments in the ordinary course of business"); see also N.Y. U.C.C. Law § 4-A-105(3) (incorporating this definition into Article 4A).

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> if, in a payment order received by the beneficiary's bank, the name, bank account number, or other identification of the beneficiary refers to a nonexistent or unidentifiable person or account, no person has rights as a beneficiary of the order and acceptance of the order cannot occur.

N.Y. U.C.C. Law § 4-A-207(1). UBAF argues that "Bk Credit & Commerce (GC) Abu Dh" referred to a "nonexistent" and "unidentifiable" entity within the meaning of this section.

This second contention is dispositive.[15] It is undisputed that there was no account at BankAmerica on July 5, 1991 under the name "Bk Credit & Commerce (GC) Abu Dh". Critically, of all the accounts at BankAmerica on July 5, 1991 that contained the words "Bank of Credit and Commerce" or "BCC" in the name, not one included "Grand Cayman" (or "GC"). Under these circumstances, this Court simply cannot conclude that "Bk Credit & Commerce (GC) Abu Dh" referred to anything but a "nonexistent" beneficiary. The

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[15]Because this issue is dispositive, the Court need not resolve UBAF's alternative theory of recovery. The legal questions presented by the alternative theory are novel, more complex and, because some arose at the hearing, have not been adequately briefed by the parties. For example, UBAF can only recover under this theory if BCCI S.A. had "suspend[ed] payments" within the meaning of N.Y. U.C.C. Law § 4-A-210(3). Because Article 4A treats separate branches of banks as distinct banks and the Abu Dhabi branch of BCCI S.A. was not shutdown until July 17, 1991, it is unclear whether BCCI S.A. Abu Dhabi had "suspend[ed] payments" on July 5, 1991. See N.Y. U.C.C. Law § 4-A-105(1)(b) ("A branch or separate office of a bank is a separate bank for purposes of this article."). Further, the United States claims that the payment order BankAmerica received from Bankers Trust defined BankAmerica's role as that of beneficiary bank and instructed BankAmerica to credit the account of the beneficiary, "Bk Credit & Commerce (GC) Abu Dh". It is unclear whether BankAmerica could change its role in the funds transfer to that of intermediary bank or whether the law presumes that it complied with the payment order as it was issued. Certainly Professor Benjamin Geva, the United States' expert, testified that BankAmerica could not "magically" change its own role in the funds transfer.

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United States' attempt to demonstrate that the Grand Cayman Treasury account somehow renders "Bk Credit & Commerce (GC) Abu Dh" an existing beneficiary, is simply unavailing. Where, as here, a payment order identifies a beneficiary only by name, and the words or abbreviations used to express that name collectively reference no account or entity, the intended beneficiary is "nonexistent" and there can be no acceptance of the payment order. Any attempt to explain why BankAmerica believed that the intended beneficiary was identifiable as BCCI S.A. Abu Dhabi plainly ignores the disjunctive wording of the statute. N.Y. U.C.C. Law § 4-A-207(1) ("if, in a payment order received by the beneficiary's bank, the name . . . of the beneficiary refers to a nonexistent or unidentifiable person or account, no person has rights as a beneficiary of the order") (emphasis added). Cf. Reves v. Ernst & Young, 113 S. Ct. 1163, 1169 (1993) ("if the statutory language is unambiguous, in the absence of a clearly expressed legislative intent to the contrary, that language must ordinarily be regarded as conclusive") (quotation omitted).

The result might be different if the payment order listed the intended beneficiary simply as "Bank of Credit and Commerce". These words (or their abbreviations) collectively refer to a number of accounts, and the intended beneficiary would likely be merely ambiguous, not "nonexistent". In contrast, the words (or their abbreviations) used in the payment order in the instant case--"Bank of Credit and Commerce", "Grand Cayman" and "Abu Dhabi"--did not collectively reference any account at BankAmerica. The Court is

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not unaware of the volume of transactions that occur via electronic transfers on a daily basis[16], and that inaccuracies and mistakes are not uncommon. The only logical conclusion, however, is that "Bk Credit & Commerce (GC) Abu Dh" refers to a "nonexistent" entity and no acceptance of the payment order occurred by operation of N.Y. U.C.C. Law § 4-A-207(1).

Even were the beneficiary merely ambiguous, UBAF would still prevail because BankAmerica did not take reasonable steps to identify the intended beneficiary.[17] Because BCCI S.A. had been shutdown on July 5, 1991 and no money could be taken from its accounts--a fact clearly known to BankAmerica personnel--BCCI's accounts should have been considered "special handling accounts" and treated differently than usual.[18] BankAmerica personnel recognized that the events of July 5, 1991 involving BCCI were "an entirely unusual situation". Findlay Dep. at 154. This need for

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[16]Professor Hal S. Scott, UBAF's expert, testified that $1 trillion is transferred by wire each day.

[17]The parties do not dispute the use of a "reasonableness" inquiry to determine whether an intended beneficiary is "unidentifiable". Such an approach will be adopted here. To apply the literal terms of the statute would render the term "unidentifiable" virtually superfluous because the intended beneficiary will almost never be "unidentifiable" if the bank takes reasonable steps to ascertain the beneficiary's identity. For example, the bank could always call its customer (or its customer's customer) and there would be no doubt.

[18]For example, BankAmerica could have searched the "you will receive" messages before crediting the account of BCCI S.A. Such a simple inquiry, which was used on occasion at BankAmerica, would have revealed that BCC(E) was expecting to receive a wire transfer of over $16 million--not the exact sum but strikingly similar--on July 5, 1991. But see Findlay Dep. at 150 (noting that there had been a problem in the past with "you will receive" messages from BCC(E)).

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special treatment was exacerbated by the history of confusion between the BCCI S.A. and BCC(E) accounts at BankAmerica, and the fact that BankAmerica could have placed the money in a virtually risk-free "suspense" account pending a determination of the beneficiary of the payment order. See Findlay Dep. at 129-30, 133-34.[19] In short, a reasonably prudent banker presented with this inexact payment order on the day of an enormous, worldwide bank seizure would have taken further steps to ensure that the money was not erroneously--and inextricably--credited to one of the seized accounts. The beneficiary of the payment order was, therefore, "unidentifiable" within the meaning of N.Y. U.C.C. Law § 4-A-207(1) and no acceptance of the payment order occurred.

III. Conclusion

This Court concludes that by operation of N.Y. U.C.C. Law § 4-A-207(1), UBAF has a "legal interest" in the forfeited funds sufficient to satisfy both the standing requirements of 18 U.S.C. § 1963(l)(2) and the substantive requirements of 18 U.S.C. § 1963(l)(G)(A). Accordingly, it is hereby

ORDERED that the petition filed by UBAF Bank Limited is granted. This Court's August 19, 1993 Order of Forfeiture shall be

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[19]Although Ms. Findlay testified that BankAmerica discourages the use of the suspense accounts, Findlay Dep. at 130, the fact that any money erroneously placed in BCCI accounts was practically irretrievable should have constituted "a good reason" to use such an account. Id.

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amended to exclude reference to the $16,438,492.28 seized from account number 86052 in the name of BCCI S.A. Abu Dhabi at BankAmerica International in New York. Petitioner is also entitled to interest accrued from on or about July 5, 1991 to on or about August 19, 1993 and interest accrued from on or about August 19, 1993 to the date of final execution of this Order; it is

FURTHER ORDERED that there shall be no disbursement of any funds referenced herein until final resolution of this matter on appeal, if any there be; and it is

FURTHER ORDERED that, there being no just reason for delay, the clerk shall enter final judgment with regard to the petition granted herein.

IT IS SO ORDERED.

August 22, 1995

JOYCE HENS GREEN
United States District Judge

1325015-000-11256

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
vs.	)	
	)	
	)	Criminal No. 91-0655 (JHG)
BCCI HOLDINGS (LUXEMBOURG), S.A.,	)	
BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.,	)	
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED,	)	
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED	)	
Defendants		

FILED

AUG 22 1995

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

JUDGMENT

Judgment be and is hereby entered for UBAF Bank Limited against the United States of America pursuant to the Court's order dated August 22, 1995.

NANCY M. MAYER-WHITTINGTON, Clerk

August 22, 1995

By: Joe A. Wood, Jr.
Joe A. Wood, Jr.
Deputy Clerk

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FBI — WASH. METRO FIELD OFFICE

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/30/1995

To: ADIC, WMFO

From: SA [redacted]
C-1, NVMRA
Contact: SA [redacted] X 9073

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Enclosures: 10/18/95, cover memorandum, and 10/17/95, court order disbursement of funds relating to judgment in favor of UBAF Bank Limited.

Details: On 10/18/95, [redacted], Criminal Division, Department of Justice provided SA [redacted] with the enclosed documents listed above regarding the BCCI investigation. Pursuant to a court order dated 8/19/93, the Asset Forfeiture Management Staff, Department of Justice is preparing to remit $19,048,749.99 by wire transfer to UBAF Bank Limited's correspondent bank account at Bankers Trust Company, New York.

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1-29B-WF-171994 (FS)

1-SA [redacted]

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FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

See Attached

(Indicate page, name of newspaper, city and state.)

Date: 12/16/95
Edition Washington Post

Title: BCCI - Still Playing At a Court Near You

Character: 29B-WF-171994 FS
or
Classification:
Submitting Office: WMFO

Indexing: ⊗

29B-WF-171994 Sub FS - 87

(1) 29B-WF 171994 FS

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FEB 08 1996
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BCCI—Still Playing, and Paying, at a Cour

By Sharon Walsh
Washington Post Staff Writer

Maybe you thought that the cases spawned by the BCCI international banking scandal, which led to full employment for dozens of white-collar lawyers in the defense of various individuals and corporations, were over.

Think again.

It has been more than two years since Washington lawyer Robert A. Altman was acquitted of all criminal charges stemming from his involvement with BCCI. And it has been 2½ years since First American Bankshares Inc., which was found to be illegally owned by BCCI, was sold to banking giant First Union Corp. for more than $450 million.

But those four letters—standing for the Bank of Credit and Commerce International—which came to symbolize the largest and, perhaps, most complicated banking fraud in history, still are at the heart of a number of legal cases bringing in millions of dollars for lawyers, including some in Washington.

"At its peak, it was a massive case, with lawyers in London, Luxembourg and the U.S.," said Washington attorney Plato Cacheris, who represented the former head of Saudi intelligence, Kamal Adham, who paid $105 million in restitution in New York for his role in BCCI. "And it's still keeping a lot of lawyers employed."

Starting today, yet another piece of the BCCI saga is scheduled to unfold as the Federal Reserve Board's enforcement action against Saudi businessman Ghaith R. Pharaon begins in New York. Pharaon, the Fed has alleged, was the front man for BCCI in illegally purchasing Independence Bank in Encino, Calif. The failure of that bank cost taxpayers, through the bank insurance fund, more than $100 million.

Pharaon won't attend the hearing by an administrative law judge, which should determine whether the Fed may assess a $37 million fine against him. That's because he is a fugitive residing in Saudi Arabia.

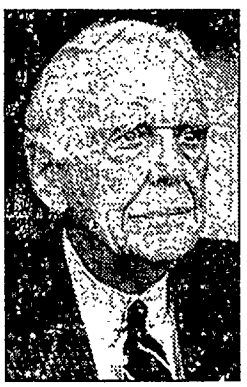
But his attorney, John M. Newell of New York's Whitman, Breed, Abbott & Morgan, will be there. Newell is just one of dozens of lawyers in New York and Washington who are still sending out bills in the BCCI case. Newell did not return phone calls seeking comment last week.

Richard A. Small, special counsel to the Fed, and Thomas C. Baxter Jr., general counsel of the Federal Reserve Bank of New York, are leading the Fed's team.

High on the list of Washington law firms with big fees in the BCCI case are Jones, Day, Reavis & Pogue and Corbin Silverman & Senseverino, the firms working for Harry W. Albright Jr., the court-appointed trustee for First American Bankshares Inc., and its board.

Albright reported to the court a year ago that the cost of pursuing various lawsuits on behalf of First American was $9.8 million. Of that amount, $7.8 million has been spent on legal fees and $1.7 million on salaries of First American personnel involved in supporting the litigation.

The bulk of the legal fees have gone to Jones, Day, Reavis & Pogue for work on cases ranging from fighting the move to pay Clifford and Altman's legal fees to suing various BCCI shareholders and winning a fight with the Internal Revenue Service over a $220 million tax claim.



Clark Clifford

Robert Altman

Joyce Hens Green

- The government has recovered $1.6 billion from various defendants in the BCCI case.
- U.S. District Judge Joyce Hens Green has ordered that $450 million be released for the use of the U.S. government and BCCI's worldwide victims fund.
- The U.S. government lost $255 million because of BCCI's illegal ownership of U.S. financial institutions.
- The cost of civil litigation to First American's board and its trustee arising out of the BCCI scandal is $9.8 million from July 1992 to June 1994.
- Clark M. Clifford and Robert A. Altman are seeking to be reimbursed for $10 million in legal defense fees.

THE WASHINGTON POST

Jones, Day, with Washington managing partner Stephen J. Brogan at the helm, has represented the bank in numerous lawsuits, including a $1.5 billion civil racketeering suit brought against Clifford, Altman and other defendants. At the end of last month, U.S. District Judge Joyce Hens Green denied a motion by Clifford and Altman's attorneys to throw the case out.)

The Justice Department's asset forfeiture office asked Green last year to institute a procedure to disburse some of the assets from the sale of First American, in part, to "include some effective means of controlling costs," said the government brief, citing the legal fees.

Green declined to do so.

Also working for Albright is Sol Corbin of the New York firm of Corbin Silverman & Senseverino, which has collected about $2.4 million in fees since the trustee was appointed in June 1992.

Albright, a New York lawyer and former chairman of the Dime Savings Bank, is paid $300,000 a year plus expenses for his services as trustee. He is said to believe that the fees charged by Jones, Day are "a bargain," for the results the firm has gotten.

Clifford and Altman still face huge legal fees from the civil racketeering suit brought by the board of First American and an enforcement action brought by the Federal Reserve Board. The Fed's action seeks $10 million from the two, who provided legal representation for both BCCI and First American, for allegedly concealing the true ownership of First American.

The two men, who have vehemently denied wrongdoing, would not comment on the upcoming cases. Clifford, who has not gone to his office in more than a year, and Altman, who has a law office in the District, are represented in the Fed cases by William B. Shields, a New York attorney, and by Carl S. Rauh and Mitchell S. Ettinger of Skadden, Arps, Slate Meagher & Flom. Altman has also filed to represent himself before the Fed.

William H. Jeffress at Miller, Cassidy, Larroca & Lewin represents Clifford and Altman in the civil suit filed by Jones, Day. In addition, Miller Cassidy has filed suit in U.S. District Court seeking to have the First American board pay $10 million in legal fees that went to Skadden, Arps, and the New York firms of Newman & Schwartz, and Stillman, Friedman & Shaw for Clifford and Altman's legal bills there.

Clifford and Altman argue that because they were indicted and Altman was tried—and acquitted—as officers of First American, the bank should pay those legal fees. The bank has replied that Clifford and Altman harmed the bank to the tune of millions of dollars and, in turn, has sued them and other defendants for $1.5 billion.

Miller, Cassidy has also filed suit in Superior Court in the District on behalf of Clifford as managing partner of the now-defunct law firm of Clifford & Warnke. That suit seeks $1.6 million in legal fees Clifford says the law firm was owed by First American.

Another huge chunk of money—perhaps as much as $100 million, according to sources—has been paid in the past several years to lawyers outside the country who work for BCCI's liquidators. While the court-appointed liquidators of BCCI, which had offices in 70 countries, has lawyers all over the world, they're represented in Washington by Nussbaum & Wald. Michael Nussbaum was out of the country and could not be reached for comment late last week.

Another firm that has been well compensated

1:25015000-11262

for its efforts is Washington's Patton, Boggs, representing the ruling family of Abu Dhabi, which was the majority owner of BCCI when the bank failed. There are no public records on how much Patton, Boggs has been paid and lawyers working for Abu Dhabi did not return telephone calls.

There also are scores of lawyers who have been involved in litigating 156 claims of third parties who say that BCCI owed them money or that their money was trapped in wire transfers going through BCCI on the fateful day when the international bank was shut down. The third parties include American Express Bank, Bank of New York, Bank of California, Bank of Yokohama and Barclay's Bank.

Stefan D. Cassella and half a dozen other lawyers at the Justice Department's office of asset forfeiture have handled the third-party claims for the government.

None of the government prosecutors or agencies who have worked for years on the BCCI case could say how much the government's cases have cost. But they point out that the government has recovered $1.6 billion from various sources. Half of that will go to the U.S. government and half will be turned over to the worldwide victims' fund for BCCI depositors.

Green recently issued an order disbursing $450 million to be divided between the government and the victims' fund. But, thus far, the depositors who lost billions in BCCI, virtually all of whom live outside the United States, have received none of their money.

Referred to a Higher Court

One witness who will not appear in future cases involving BCCI is Agha Hasan Abedi, the founder of the bank. As Judge Joyce Hens Green noted in a recent court ruling: "Although no formal suggestion of death has been filed in this litigation, it has been widely reported that the defendant Abedi is now deceased."

Abedi died on Aug. 5.

No Objections

There really are times when defense lawyers and prosecutors can agree.

Take this Wednesday, when U.S. Attorney Eric H. Holder Jr. and white-collar lawyer Reid H. Weingarten, longtime friends, are teaming up to launch "See Forever," a program to provide education, job training and family services to small groups of youths coming out of the Oak Hill Youth Center and Spruce Cottage, the District's juvenile correctional facilities.

The program will be competitive, serving only those youths, ages 16 to 18, who "demonstrate the most promise and sincere interest in changing their lives" when they leave these facilities, the founders said.

Holder said the program will be one "kids want to get into. It will . . . jam-pack their day with activities, so when we drop them off at night they are too tired to do anything but go to sleep, and then come back and hang out with us again."

There's still a lot to be done, Weingarten said, adding, "If the world were perfect, we'd start accepting kids at the beginning of the year, we hope."

Staff writer Saundra Torry also contributed to

WASHINGTON BUSINESS
1325015-000-11263

29B-WF-171994 (FS)

ac

On 2/1/96, [redacted], Money Laundering Section, Department of Justice advised the fifth order of forfeiture in the BCCI investigation has been delayed and will be issued by the court in March of 1996.

b6
b7C

1325015-000-11264

29B-WF-171994 Sub FS-88

29B-WF-171994 (FS)

ac

On 2/1/96, [redacted] Money Laundering Section, Department of Justice advised the fifth order of forfeiture in the BCCI investigation has been delayed and will be issued by the court in March of 1996.

b6
b7C

1325015-000-11265

29B-WF-171994 (FS)

AC:ad

On 2/13/96, [redacted] in the above captioned investigation furnished the following information: b6 b7C

[redacted] advised on 2/12/96, she wired transferred $2.2 million dollars to Robert Johnson, U.S. Marshal Service, New York City representing the liquidation of forfeited assets in the BCCI case. [redacted] stated on 2/14/96, she would fax a break down of the money revealing which forfeiture order it originated from. b6 b7C

29B-WF-171994 Sub FS-89

1325015-000-11266

29B-WF-171994 (FS)

AC:

On 2/13/96, [redacted] in the above captioned investigation furnished the following information: b6 b7C

[redacted] advised on 2/12/96, she wired transferred $2.2 million dollars to Robert Johnson, U.S. Marshal Service, New York City representing the liquidation of forfeited assets in the BCCI case. [redacted] stated on 2/14/96, she would fax a break down of the money revealing which forfeiture order it originated from. b6 b7C

29B-WF-171994 Sub FS-89

SEARCHED INDEXED
SERIALIZED FILED
FEB 20 1996
FBI—WASH. METRO FIELD OFFICE

29B-WF-171994 Sub 5 -90

SEARCHED INDEXED
SERIALIZED FILED
FEB 13 1996
FBI — WASH. METRO FIELD OFFICE

MEMORANDUM

DATE: JANUARY 15, 1996

TO: Mr [redacted] b6 b7C
Federal Bureau of Investigation
FAX: (202)324-6426

FROM: [redacted] b6 b7C
Robb Evans, Trustee
FAX: (213)-955-8366

PAGE: 3PAGES (INCLUDING COVER PAGE)

SUBJECT: REMITTANCE

Hope you had a great holiday!

Attached please find the remittance schedule and the cash flow report. If you need more information or have any questions, please call me at (213) 955-8368. I am usually in the office around 6:30 AM.

Best Regards,

[redacted] b6 b7C

1325015-000-11269

ROBB EVANS, TRUSTEE
SCHEDULE OF DISTRIBUTION TO US MARSHAL
From: May 5, 1993 to December 31, 1995

From Account	Date Sent	Payment Sent	Comments
First Interstate Bank: 149-2-40134	26-Aug-93	35,964,405.69	By Order of August 19, 1993
First Interstate Bank: 149-2-40134	22-Oct-93	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	17 Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	16-Aug-94	8,850,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Oct-94	200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Dec-94	3,035,594.31	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Feb-94	17,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13 Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Dec-95	1,000,000.00	60 Day Remittance
Total		88,000,000.00	

ROBB EVANS, TRUSTEE

SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL

As of December 31, 1995

Forfeiture Order Date	19-Aug-93	21-Dec-94	21-Dec-94	10-Jun-95	03-Nov-95	
State	California	California	New York	New York	New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	20,000,000	0	49,000,003	107,027
Loans	20,245,041	0	28,696,395	0	7,050,559	55,992.
Real Property	13,894,680	0	10,617,360	15,200,000	2,035,184	41,747..
Miscellaneous Property	31,445	0	0	0	0	31..
Other	0	0	0	5,930	106,063,264	106,069..
Total Forfeiture Orders	68,550,808	3,647,571	59,313,774	15,205,930	164,149,037	310,8..
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	20,000,000	0	0	58,027
Loans	22,884,847	0	366,814	0	404,721	23,676..
Real Property	21,043,370	0	1,468,096	500,000	0	23,009
Miscellaneous Property	49,094	0	0	0	0	49..
Other	124,228	0	22,645	0	157,090	304..
Total Asset Conversions	78,481,182	3,647,571	21,857,755	500,000	561,811	105,069..
Total Revenue Collection (1)	5,162,618		436,421	0	257,087	5,86..
Total Sources of Funds	83,643,800	3,647,571	22,295,176	500,000	818,898	110,9..
Uses of Funds						
Seller Financing and Cash Disbursements	(11,724,374)	0	(5,923,152)	(500,000)	(1,282)	(18,148..
Operating Account Balance	(750,000)	0	(750,000)	0	0	(1,50..
Special Reserve Account (2)	(766,079)	0	(916,256)	0	(817,665)	(2,5..
Surplus Balance as of 12/31/95	(755,686)	0	0	0	0	(75..
Total Uses of Funds	(13,996,139)	0	(7,589,408)	(500,000)	(818,898)	(22,905..
Net Remittances	69,646,661	3,647,571	14,705,768	0	(0)	88,0..
Present Book Value Per Budget						
Cash	2,272,765	0	1,666,256	0	49,817,565	53,756,68
Loans	3,725,571	0	11,701,052	0	3,707,433	19,.34,07
Real Property	3,323,311	0	3,073,092	9,367,546	1,220,000	17.3.,09
Miscellaneous Property	0	0	0	0	0	
Other Assets	42,996	0	36,154	0	2,740,324	2,819,47
Total Liabilities	(165,136)	0	(2,265,964)	(1,163,364)	(1,000,000)	(4,594,46
Total PBV Per Budget:	9,259,508	0	14,210,590	8,734,184	56,485,422	88,689..

Notes: *(1) Excluding gains on sale of FF&E of $49,094.38 (not in use by the Trustee) and gains on sale of REO of $8,095,187.50.*

(2) Special Reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/07/1995

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMF0

Enclosures: Fourth Order of Forfeiture.

Reference: 11/1/95, [redacted] FSPU. b6 b7C

Details: Pursuant to FSPU's request is a status update concerning the following seizures: A) 3920-95-F-058, 82,156.99; B)3920-95-F-059, $10,430.00; C) 3920-95-F-060, $4,545.47 and D)3920-95-F-097, $17,000,000.

All of the above seizures were incorporated in the fourth judicial order of forfeiture and have been transferred by the court appointed trustee to the United States Marshal's Service. [redacted] Department of Justice has advised until all assets have been identified and seized no final orders of forfeiture will be issued by the court. b6 b7C

1-Bureau
(FSPU Attn: [redacted] b6 b7C

4-WMFO
(3920-95-F-058)
(3920-95-F-059)
(3920-95-F-060)
(3920-95-F-097)

1-SA [redacted] b6 b7C

AC:ac

29B-WF-171994 Sub FS Sub-21-4

SEARCHED ... INDEXED ...
SERIALIZED ... FILED ...
NOV 0 8 1995
FBI—WASH. METRO FIELD OFFICE

1325015-000-11272

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/22/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X9073

Approved By: [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
CO:WMFO

Enclosures: Facsimile of schedule of distribution to USMS Service from May 5, 1993 to December 31, 1995 & summary of cumulative distribution to USMS.

Details: On 1/15/96, Robb Evans and [redacted] b6 b7C handling the liquidation of assets in the captioned investigation provided the attached chart. From 5/15/93 until 12/31/95, $88,000,000.00 has been remitted to US Marshals Service (via wire transfer) pursuant to four criminal orders of forfeiture.

Assets being liquidated range from fungible property i.e. cash to real estate involving other investors not associated with this investigation. Assets are continually being liquidated from all four forfeiture orders. More complex assets take longer to liquidate depending on the real estate market and other economic indicators.

Assets remitted to date off the December 1994 fourth order equal approximately $19,000,000.00. A fifth order of forfeiture is scheduled in late January of 1996.

1 - SA [redacted] b6 b7C
1 - 29B-WF-171994 (Sub)
1 - 3920-95-F-0058
1 - 3920-95-F-0059

29B-WF-171994 Sub #5-91

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 13 '96
FBI—WASH. METRO FIELD OFFICE

Rec'd 3/13/96

1325015-000-11273

(05/31/95)

FEDERAL BUREAU OF INVESTIGATION

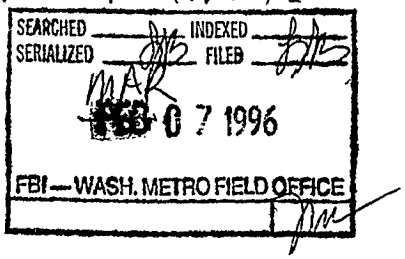
To: ADIC, WMFO From: SA [redacted]
Re: 209A-WF-198483 (FSO, 12/14/1995

b6
b7C

1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-96-F-0024

1325015-000-11274

29B-WF-171994 Sub FS -92



Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305
Facsimile
(213) 955-8344
Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr [redacted] b6 b7C

DATE: Mar. 4, 1996

FIRM: Federal Bureau of Investigations

FAX NO.: 202-324-6426

FROM: [redacted]

NO. OF PAGES: three (3)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

The message is directed only to the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear [redacted] b6 b7C

Please call me at (213) 955-8305 if you need any more information, otherwise I will talk to you at the next dividend remittance.

Respectfully, b6 b7C

[redacted]

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of February 12, 1996

Forfeiture Order Date	19-Aug-93	21-Dec-94	21-Dec-94	03-Nov-95	
State	California	California	New York	New York	Total
Forfeiture Orders					
Cash	34,379,642	3,647,571	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,650	0	25,817,380	2,035,184	41,747,214
Miscellaneous Property	31,445	0	0	0	31,445
Other	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	74,519,724	164,149,037	310,867,141
Net Remittance To The US Marshal					
Sources of Funds					
Asset Conversions:					
Cash	24,379,642	3,647,571	20000,000	1,000,000	59,027,213
Loans	22,525,404	0	443,424	370,601	23,909,428
Real Property	21,043,370	0	1,960,096	0	23,003,466
Miscellaneous Property	49,094	0	0	0	49,094
Other	124,298	0	22,843	857,091	304,143
Total Asset Conversions	68,691,730	3,647,571	22,426,365	1,727,691	106,293,365
Total Investment Earnings (1)	5,239,308	0	925,693	741,298	6,492,000
Total Sources of Funds	83,291,037	3,647,571	22,931,852	2,474,989	112,785,365
Uses of Funds					
Seller Financed Cash Disbursements	(10,685,757)	0	(8,476,227)	(1,374,804)	(10,585,787)
Operating Accounts Balance	(748,636)	0	(750,000)	0	(1,498,638)
Special Reserve Account (2)	(500,000)	0	(6,000,000)	(1,000,000)	(2,500,000)
Seizure Differences at 2/1/96	0	0	0	0	0
Total Uses of Funds	(11,934,973)	0	(15,226,227)	(2,374,985)	(29,535,365)
Net Remittance	71,356,064	3,647,571	7,705,625	(0)	80,250,000
Present Distribution Per Budget					
Cash	1,248,658	0	1,741,773	49,000,000	51,990,431
Loans	5,716,014	0	11,844,842	3,421,983	18,982,838
Real property	3,423,258	0	1,960,096	175,000	5,558,354
Miscellaneous Property	0	0	0	0	0
Other	5,668	0	22,843	857,091	885,602
Total Distributions	10,393,598	0	15,569,553	53,454,074	77,417,225
Net Remittance	60,962,466	3,647,571	61,135,751	(53,454,074)	72,291,714

Notes: (1) Investment earnings are made up of interest earned by the Trustee and income arising from the sale of assets.
Certain assets have been retained by the United States Government, in lieu of forfeiture amounts,
as ordered by various state and federal courts, in the New York Litigation.

NOMINAL TRUSTEE
SCHEDULE OF DISTRIBUTION TO US MARSHAL
From: May 5, 1994 To: January 12, 1995

From Account	Date Sent	Payment Sent	Comments
First Interstate Bank 1493-2-00134	26-Aug-94	35,96[illegible]	By Order of August 19, 1993
First Interstate Bank 1493-2-00134	22-Oct-93	1,600,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	17-Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	16-Aug-94	8,550,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	14-Oct-94	100,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	13-Dec-94	2,025,590.31	60 Day Remittance
First Interstate Bank 1493-2-00134	14-Feb-95	17,000,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	10-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	13-Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	12-Dec-95	1,000,000.00	60 Day Remittance
First Interstate Bank 1493-2-00134	12-Feb-96	2,000,000.00	60 Day Remittance
		90,270,001.60	

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/06/1996

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X9073

Approved By: [redacted]

Drafted By: [redacted]:ac

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Enclosures: 3/6/96, facsimile from [redacted] b6 b7C

Details: The facsimile provides a schedule of distribution of assets from Robb Evans court appointed trustee to the United States Marshal's Service from 5/4/93 to 2/12/96.

1-29B-WF-171994 (FS)
1-SA [redacted] b6 b7C

AC:ac

◆◆

29B-WF-171994 Sub FS-93

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1325015-000-11279

29B-WF-171994-FS-94

Kan Kate

APR 1 [illegible]

[illegible] FIELD OFFICE

[redacted] ac

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1325015-000-11280

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/11/96

To: ADIC, WMFO

From: SA [redacted]
C-1, NVMRA
Contact: SA [redacted] X 9073

b6
b7C

Approved By: ASSA [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Details: On 4/10/96, [redacted], Asset Forfeiture/Money Laundering Section, Department of Justice furnished the following information: The fifth order of forfeiture in the above captioned investigation has been delayed. No specific date has been scheduled but [redacted] anticipates within the next four to six weeks the court will issue the fifth order of forfeiture. The reason for the delay is to ensure DOJ has an opportunity to identify all potential assets subject to forfeiture.

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[redacted] concluded the conversation by stating the BCCI investigation is "getting toward the end." She does not believe additional orders of forfeiture are "imminent." However, it may take Robb Evans, the court appointed trustee a significant length of time to liquidate assets (i.e real estate). Then [redacted] promised to contact SA [redacted] when the fifth order of forfeiture becomes available.

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(1) - 29B-WF-171994 (FS)
1 - FSPU [redacted]
1 - 3920-95-F-0058
1 - 3920-95-F-0059
1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-95-F-0024
1 - 3920-96-F-0097
1 - SA [redacted]

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1325015-000-11281

2AB-WF-171994 Sub FS-95

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SERIALIZED Kate FILED Kate

MAY 2 8 1996

FBI — WASH. METRO FIELD OFFICE

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1325015-000-11282

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/15/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: ASSA [redacted] b6 b7C

Drafted By: SA [redacted] :ac

File Number(s): 29B-WF-171994 (FF) (Pending)

Title: U.S. v HIDDEN INTERESTS; MAJOR CASE #38
3920-96-F-0134

Entry (Check One): [ ] New Case [X] Change or Add

[X] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[ ] Order of Forfeiture	[ ] Police Reports

[X] Other Subsequent Materials
Facsimile dated April 30, 1996 from [redacted] b6 b7C

1-3920-96-F-0134
1- Bureau, FSPU (ATTN: [redacted]
(1-)WMFO (29B-WF-171994) (FS)
ATTACHMENTS

[redacted] b6 b7C

1325015-000-11283

Seizure Form

Asset <A> | Date <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
WFO		05		96-0134	N

(7) Case Number: 96-WF-217994

(8) Case Name: HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:

(10) Case Agent: SA [redacted] b6 b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
4/12/96	CRIMINAL ORDER	12/21/94	

(15) Seizing Agent: SA [redacted] /C-1

(16) Phone Number: 202-324-9073

(17) Seized From: BCCI HOLDINGS

(18) Place/Address Where Seized:

(19) City:

(20) State:

(21) Seizure: DC	Judicial District (22) Processing: DC	(23) Forfeiture Statute: 18 USC 982	(24) Violation Statute: 18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
1.2 mil	Y		CURRENCY	BANK ACCT	JUDICIAL

(31) Asset Description: BCCI ASSETS TOTALLING 1.8 MILLION IN US CURRENCY

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	N
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:
(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?		
(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?
(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?		

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:
ROBB EVANS, TRUSTEE	149-240-134

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

1325015-000-11284

Asset ID: <A> | Date: <B> | Page 2

Asset Description: <C>

Seizure Form

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI HOLDINGS		Owner	
(95) Address:		Lienholder	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Seized From	X
(100) Contact Name (if business):	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated?	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
		Owner	
(95) Address:		Lienholder	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Seized From	
(100) Contact Name (if business):	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated?	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

Seizure Form

Asset ID: <A>

Date: <B>

Asset Description: <C>

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI HOLDINGS		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: DEPARTMENT OF JUSTICE			(134) Agency Case ID:	
(135) Adopted From? NO			(136) Agency Type (Federal, State, Local, -or- Foreign): FEDERAL	
(137) Address:			(138) City: WASHINGTON	
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:	(143) Sharing Possible? N
(144) Contact Name: STEF CASSELLA, TRIAL ATTORNEY				(145) Contact Phone Number:

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:				(145) Contact Phone Number:

(133) Agency Name:			(134) Agency Case ID:	
(135). Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:				(145) Contact Phone Number:

Seizure Form

Asset ID: <A>	Date: <B>
Asset Description: <C>	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
	FEDERAL RESERVE BANK, NEW YORK	4/12/96

(149) Storage Facility Address:

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
NY	NY		$	

PREPARED BY

(154) Signature:	(155) Date:
	5.14.96
(156) Prep: SA	(157) Title: SA

APPROVED BY

(158) Signature:	(159) Date:
(160) Approved By:	(161) Title:

b6
b7C

Probable Cause

SEE ATTACHED

<D>

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. [redacted] b6 b7C

DATE: Apr. 30, 1996

FIRM: Federal Bureau of Investigation

FAX NO.: (202) 324-6426

FROM: [redacted]

NO. OF PAGES: three (3)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear [redacted] b6 b7C

How are you? Hope everything's going well with you since the last time we spoke.

Attached, please find the Analysis of the Cash Distribution to U.S. Marshals. If you have any questions, please give me a call.

With warm regards,

[redacted] b6 b7C

ROBB EVANS, TRUSTEE
SCHEDULE OF DISTRIBUTION TO US MARSHAL
From: May 5, 1993 to April 12, 1996

From Account	Date Sent	Payment Sent	Comments
First Interstate Bank: 149-2-40134	26-Aug-93	35,964,405.69	By Order of August 19, 1993
First Interstate Bank: 149-2-40134	22-Oct-93	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	17-Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	16-Aug-94	8,850,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Oct-94	200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Dec-94	3,035,594.31	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Feb-94	17,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Dec-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Feb-96	2,200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Apr-96	1,800,000.00	60 Day Remittance
Total		92,000,000.00	

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of April 12, 1996

Forfeiture Order Date State	19-Aug-93 California	21-Dec-94 California	21-Dec-94 New York	03-Nov-95 New York	Total
Forfeiture Orders					
Cash	34,379,642	3,647,571	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	31,445
Other	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	74,519,724	164,149,037	310,867,141

Net Remittance To The US Marshal

Sources of Funds

Asset Conversions:					
Cash	34,379,642	3,647,571	20,000,000	1,000,000	59,027,213
Loans	24,376,781	0	503,880	598,640	25,479,300
Real Property	21,143,370	0	2,044,071	0	23,187,441
Miscellaneous Property	49,094	0	0	0	49,094
Other	124,228	0	22,845	157,090	304,163
Total Asset Conversions	80,073,116	3,647,571	22,570,796	1,755,730	108,047,212
Total Revenue Collection (1)	5,479,402	0	532,037	1,136,475	7,147,914
Total Sources of Funds	85,552,517	3,647,571	23,102,833	2,892,205	115,195,126

Uses of Funds

Seller Financing and Cash Disbursements	(10,527,546)	0	(8,334,896)	(1,833,108)	(20,695,549)
Operating Account Balance	(1,378,310)	0	(62,169)	(59,098)	(1,499,577)
Special Reserve Account (2)	0	0	0	(1,000,000)	(1,000,000)
Surplus Balance	0	0	0	0	0
Total Uses of Funds	(11,905,856)	0	(8,397,065)	(2,892,206)	(23,195,126)
Net Remittances	73,646,662	3,647,571	14,705,768	(0)	92,000,000

Present Book Value Per Budget

Cash	1,378,310	0	62,169	49,059,098	50,499,577
Loans	2,833,637	0	11,499,944	3,226,215	17,559,796
Real Property	3,232,254	0	12,790,640	1,490,000	17,512,894
Miscellaneous Property	0	0	0	0	0
Other Assets	5,668	0	53,276	2,731,522	2,790,466
Total Liabilities	(255,030)	0	(275,445)	(1,000,000)	(1,530,475)
Total PBV Per Budget	7,194,838	0	24,130,584	55,506,835	86,832,258

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $8,0989,162.74.*
(2) Special Reserve for New York claims.

04/30/96 09:10 ☎213 622 2681 ROBB EVANS 002

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2913-WF-171994 (FF) 96

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FBI — WASH. METRO FIELD OFFICE

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[redacted]

[redacted]

1325015-000-11293

DIGENOVA & TOENSING

901 15TH STREET, N.W., STE. 430
WASHINGTON, D.C. 20005-1702
TELEPHONE (202) 289-7701
FACSIMILE (202) 289-7706

FACSIMILE TRANSMISSION

Date: July 29, 1996 **Time:** 12:53:54 PM **Client No:** 0017

To: [redacted] FBI Special Agent b6 b7C

Telephone: 202-324-9073

Fax Number: 202-324-6426

From: [redacted] b6 b7C

Direct Line: [redacted]

Number Of Pages: 2 Including This Page

Handling Of Originals:
___ Original Will Be Sent By Regular Mail
_X_ No Original Will Be Forwarded
___ Original Will Be Sent By Other Means

Message: Mr. [redacted] forwarded this letter to me following your interview with him at Allenwood. It arrived today. If you need anything further, please do not hesitate to contact me. b6 b7C

THIS COMMUNICATION IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering this communication to the intended recipient, please notify us immediately by telephone at the above telephone or fax number and return the original of this transmission and any attachments to us via the mails at the above address.

PRIVATE AND CONFIDENTIAL

[redacted], Esquire,
diGenova and Toensing,
901, 15th Street, N.W.,
Suite 430,
Washington, D.C. - 20005.

July 25, 1996.

b6
b7C

Dear [redacted]

b6
b7C

Visit by officials on Wednesday, 24th July, 1996.

After the visit yesterday, I remembered the following:

On acquisition of shares in Chartouni Bank, later named Bank of Credit and Commerce International (Lebenon), by BCCI S.A. Luxembourg in 1973 or 1974, I along with Mr. [redacted] Board of this sibsidiary. When Mr. [redacted] of the bank, divested his remaining shares at the begining of the civil war in that country, and BCCI (Lebanon) became a wholly owned subsiidary of BCCI Holdings, I replaced Mr. [redacted] BCCI (Lebanon). This was, however not an executive position and was a nominal position in addition to my other responsibilities based at Central Support Organization of BCCI Group at London. During the Lebanese civil war, occasional meetings of its Board of Directors and annual meeting of its shareholders were held at London to dispose of routine business, which were [redacted]. After some years, when the civil hostilities intensified and Mr. [redacted] BCCI Lebanon had to be called back to London, I relinquished my position as [redacted] in favour of Mr. [redacted]

b6
b7C

I shall be grateful if this information is passed on to:

Mr [redacted] Special Agent,
Tel.: (202) 324- 9073
Fax.: (2020 324- 6426

b6
b7C

I also requested Mr. [redacted] who interviewed me yesterday, to advise the Department of Justice of my co-operation, to which he was kind enough to agree. I shall be thankful if you will kindly follow up this with him. If he has any further questions about my functions as [redacted] of BCCI (Lebanon), I shall be glad to answer them.

b6
b7C

With regards,

[redacted]

b6
b7C

1325015-000-11295

29B-WF-171994(FS) 5/97

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SERIALIZED ____ FILED
JUN 26 1996
FBI-WASH. METRO FIELD OFF.

[redacted]

b6
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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/24/1996

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X9073

Approved By: [redacted]

Drafted By: [redacted] ac

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF-FAG;
OO:WMFO

Synopsis: Status update.

Details: On 6/21/96, the following individuals attended a meeting at the offices of Department of Justice, 1400 New York Avenue, N.W., Washington, DC: [redacted] b6 b7C
DOJ, [redacted], Special Agent, FBI, [redacted]
II, Dyncorp Inc., [redacted] both court appointed [redacted]

[redacted] advised DOJ has identified potential assets b6 b7C subject to forfeiture under the control of BCCI's Lebanon branch. In order to seize these assets it will be necessary to prove BCCI Lebanon was not an independent subsidiary but instead was controlled by the parent company BCCI Holding Group. All the participants attending believe [redacted] BCCI should be interviewed at Allenwood Penitentiary, located in Pennsylvania.

1-29B-WF-171994 (FS)
1-Sa [redacted] b6 b7C

AC:ac

1325015-000-11297

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: ADIC, WMFO From: SA [redacted] b6 b7C
Re: 29B-WF-171994 (FF), 06/24/1996

During the course of the interview the following topics should be discussed with [redacted] b6 b7C

(1) Whether BCCI Holding Group and BCCI Lebanon entered into any management agreements?
(2) Whether BCCI Holding Group supplied staff from the home office to BCCI Lebanon?
(3) What regional organization did BCCI Lebanon belong to in the company hierarchy?
(4) Whether BCCI Holding Group had to approve of certain BCCI Lebanon loan agreements if a certain high dollar threshold was triggered?
(5) Whether BCCI Lebanon engaged in any "loan parking" at the request of BCCI Holding Group? This practice would hide bad loans from bank regulators.
(6) What type of shareholder agreements did BCCI Lebanon have?
(7) Did BCCI Lebanon use nominee shareholders to hide who had true ownership?
(8) How much real capitol (capitol at risk) did BCCI generate through shareholder agreements and how much subordinate capitol (capitol not at risk) was raised?
(9) Whether BCCI Lebanon engaged in "nonrecourse lending"? This technique utilizes a nominee shareholder and allowed the stock issuing subsidiary never to loose control of the shares.
10) Whether BCCI Lebanon used " routing account," to transfer money from BCCI Group without the source of the assets being identified?.
11) What is the status of BCCI Lebanon? Is it still in business?
12) What is the status of [redacted]? b6 b7C
13) Did BCCI Lebanon and BCCI Holding Group use the same letterhead?
14) Who were the BCCI Lebanon corporate officers and who did they report to?
15) Was [redacted] a standard nominee used by BCCI? b6 b7C

[redacted] concluded the meeting by stating she will contact [redacted] defense attorney and schedule a date and a time during the latter part of July 1996 when the interview can be conducted. The fifth order of forfeiture in the BCCI investigation is scheduled for July 31, 1996. b6 b7C

1325015-000-11298

296-WF-171994 Sub 98 ~~Sub 5~~ 4

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SERIALIZED ____ FILED ____
AUG 06 1996
FBI-WASH. METRO FIELD OFFICE

DC [redacted]

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 7/29/96

[redacted] also known as (AKA) [redacted], a Pakistani male, born in Agra, India, on [redacted], voluntarily provided the following information regarding BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) LEBANON. b6 b7C

In approximately 1972, BCCI LUXEMBOURG was established. In approximately late 1973 or early 1974 BCCI LUXEMBOURG purchased the CHARTOUNI family owned bank located in Lebanon and formed BCCI LEBANON. In 1974, BCCI HOLDING COMPANY acquired BCCI LEBANON from BCCI LUXEMBOURG as part of an internal transaction between the two entities.

The management positions within BCCI LEBANON were made by appointment from the home office (BCCI LUXEMBOURG). [redacted] was named [redacted] Board and [redacted] was named BCCI LEBANON's [redacted] (job description unknown) was an additional bank officer assigned to the credit department. [redacted] stated he would contact the writer if he could recall any other additional names of bank officials appointed to BCCI LEBANON. b6 b7C

[redacted] was unaware of any official management agreement between BCCI LEBANON and BCCI LUXEMBOURG. However, BCCI LEBANON would have adhered to the following guidelines: b6 b7C

1) The name of the bank was changed from CHARTOUNI to BCCI LEBANON.

2) The bank was required to follow the CENTRAL BANK OF LEBANON's rules and regulations especially in the area of credit. Strict capital limits on credit extensions had to be followed. [redacted] was unable to recall any specific dollar threshold requirements. b6 b7C

3) BCCI LEBANON was not to over extend its capital by engaging in long term business loans.

4) All bank employees were hired locally by BCCI LEBANON except for the individuals mentioned above.

Investigation on 7/24/96 at Allenwood PA

File # 29B-WF-171994 (FF)

by [redacted] Date dictated 7/29/96 b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

b6 b7C

5) BCCI LUXEMBOURG controlled the majority of BCCI LEBANON'S stock and [redacted] and his family were [redacted] was unaware of the details of the stock break down. [redacted] was unaware of any nominee shareholders.

b6 b7C

6) BCCI LEBANON established its own local board of directors including but not limited to CHARTOUNI and ABIDI.

In approximately 1975 or 1976 the civil war in Lebanon intensified and [redacted] was transferred to BCCI's London office and [redacted] replaced him. Because of the hostilities [redacted] to BCCI HOLDING GROUP. During this time frame BCCI LEBANON's primary business activity remained in small commercial loans to local businesses which were secured by real estate as collateral. BCCI HOLDING GROUP's position regarding BCCI LEBANON was to "hold the fort" until the war was over and real estate values had an opportunity to rise and a buyer could be found to sell the bank.

b6 b7C

[redacted] recalled the office building housing BCCI LEBANON was hit by a shell during the civil war and the home office became very concerned for their employees safety. By 1990, [redacted] was recalled to the London because of the dangerous conditions which existed. First name Unknown (FNU) [redacted] BCCI LEBANON's [redacted] was appointed [redacted] during the interim. [redacted] continued to report to [redacted] and periodically visited the home office once every six months.

b6 b7C

[redacted] had no direct knowledge of [redacted] reports to [redacted] However, occasionally [redacted] met with [redacted] on approximately two or three visits characterized as "routine courtesy calls" in London. [redacted] was under pressure from the LEBANESE bank regulators to ensure BCCI LEBANON had sufficient assets to remain solvent. Sporadically, the HOLDING GROUP would infuse capital in small increments of $50,000 or $100,000 to BCCI LEBANON. [redacted] stated he had the [redacted] these transfers up until approximately 1991. [redacted] believed [redacted] character was "honest and of good intention." He had no reason to believe [redacted] was diverting funds from the BCCI HOLDING GROUP or away from BCCI LEBANON.

b6 b7C

No one from BCCI HOLDING GROUP was anxious to visit BCCI LEBANON because of the war. Very few visits if any were conducted by the home office's management, auditors or inspection staff. BCCI LEBANON's day to day functions were independent from BCCI HOLDING GROUP. At no time did BCCI LEBANON's assets exceed five million dollars. [redacted] advised he was unaware of any

b6 b7C

b6
b7C

significant amounts of money passing through the bank. Since the bank was so small and inconsequential auditors never included BCCI LEBANON on the HOLDING GROUP'S consolidated balance sheets.

BCCI LEBANON was not part of any regional organization within BCCI HOLDING GROUP. No institutional transactions passed from BCCI LEBANON to the rest of the BCCI subsidiaries except for the possibility of individuals who may have had accounts at more than one BCCI subsidiary.

In late 1991, BCCI HOLDING GROUP's new management was no longer interested in retaining BCCI LEBANON. During this time frame [redacted] visited management in ABU DABI trying to explore different options to convince them to keep BCCI LEBANON open. He proposed BCCI HOLDING GROUP give BCCI LEBANON a soft loan whereby the bank's employees would repay the loan and eventually buy the bank. Another scenario involved a local Lebanese syndicate purchasing a majority of stock in BCCI LEBANON and infusing new capital into the enterprise. [redacted] does not believe either of these proposals were accepted as viable by management.

b6
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When queried [redacted] denied BCCI LEBANON utilized financial techniques such as loan parking, nonrecourse lending or routing accounts. The reason these techniques could not be incorporated was because the Lebanese bank regulators would not allow it and BCCI LEBANON's assets were minimal.

b6
b7C

[redacted] concluded the conversation by suggesting investigators research BCCI LEBANON's statement of condition and balance sheets located in the BCCI office in ABU DABI. addition investigators should contact [redacted] with the FEDERAL RESERVE in Washington DC concerning BCCI LEBANON's activities.

b6
b7C

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 7/29/96

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Investigation on 7/24/96 at Allenwood PA

File # 29B-WF-171994 (FF) - 98

by [redacted] Date dictated 7/29/96 b6 b7C

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1325015-000-11303

29B-WF-171994 (FS) -99

SEARCHED INDEXED
SERIALIZED FILED
AUG 14 1996
FBI-WASH. METRO FIELD OFFICE

1325015-000-11304

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/15/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: SSA [redacted] b6 b7C

Drafted By: SA [redacted] :js

File Number(s): 29B-WF-171994 (FS) (Pending)
3920-95-F-0058,3920-95-F-0059,3920-95-F-0060,3920-95-F-0097,3920-96-F-0024

Title: U.S. v HIDDEN INTEESTS

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[ ] Order of Forfeiture	[ ] Police Reports

[X] Other Subsequent Materials
Status updates for 3920-95-F-0058,3920-95-F-0059,3920-95-F-0060,3920-95-F-0097

1- Bureau, FSPU (ATTN: [redacted]) b6 b7C
1- WMFO (29B-WF-171994) (FS)
1- 3920-95-F-0058
1-3920-95-F-0059

1325015-000-11305

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: Director, FBI From: ADIC, Washington Metropolitan Field Office
Re: 000-WF-000000,06/12/1995

1-3920-95-F-0060
1-3920-95-F-0097
1-SA [redacted]
ATTACHMENTS

b6
b7C

1325015-000-11306

[redacted], Money Laundering Section, Department of Justice (DOJ), has advised SA [redacted] that all assets seized to date in the BCCI investigation (pursuant to four forfeiture orders) will not be forfeited until DOJ is confident all potential forfeitable property is identified.

b6
b7C

DOJ is in the process of working on a fifth order of forfeiture regarding the remaining assets to be completed in the fall of 1996. No timetable has been established by DOJ regarding the completion of this investigation. Currently, WMFO FAST has been conducting interviews at the request of (DOJ) regarding assets controlled by BCCI's subsidiaries, including Lebanon.

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 09/18/96

To: ADIC, WMFO

From: SA [redacted]
C-1, NVMRA
Contact: SA [redacted] X9073

b6
b7C

Approved By: SSA [redacted]

Drafted By: [redacted] AC:js

File Number(s): 29B-WF-171994 (FS)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO:WMFO

Enclosures: Chronology of Events and flow chart of BCCI operations Internationally.

Details: The above cited materials were copied from "BCCI, Dirty Money," by Mark Potts, Nicholas Kochan and Robert Whittington.

1-29B-WF-171994 (FS)
1-SA [redacted]

b6
b7C

29B-WF-171994-FS-100

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 23 1996
FBI-WASH. METRO FIELD OFFICE

1325015-000-11308

The Tangled World of BCCI

Capcon Financial Services
London
(Several common shareholders, employees and customers)

Bank of Credit and Commerce International S.A.
(and related entities)
Headquarters: London
Licensed: Luxembourg
Owners: Middle Eastern and Pakistani investors;
Bank of America-30% (1972-1980);
bin-Mahfouz family-20% (1986-1989);
Abu Dhabi-77% (1990-1991)
Top Executives: Agha Hasan Abedi, Swaleh Naqvi

BCCI offices and branches in more than 70 nations
Major Customers: Gulf Group, Abu Nidal, Manuel Noriega, CIA

BCCI Foundation
Headquarters: London
Chartered: Cayman Islands
(owned part-interest in BCCI)

Third World Foundation

Third World Prize

Note: Pharaon and many of the Middle Eastern investors who owned First American on BCCI's behalf also owned stock in BCCI

BCCI Overseas
Cayman Islands

International Credit and Investment Co. (ICIC)
(and related entities)
Headquarters: Cayman Islands
(The "bank within the bank."
Owned part-interest in BCCI)

Banks owned through Ghaith Pharaon

Independence Bank
Encino, California

Central Savings
Miami, Florida

National Bank of Georgia
Atlanta, Georgia
(Later sold to First American Bank)

Banks owned through Middle Eastern nominee shareholders

Credit and Commerce Amercan Holdings (CCAH) (shell company)

Credit and Commerce American Investment (CCAI) (shell company)

First American Bankshares
(formerly Financial General Bankshares)
Headquarters: Washington D.C.
Top Executives: Clark Clifford, Robert Altman (both owned stock in CCAH and ran CCAH and CCAI)

Affiliates partly or wholly owned by BCCI and/or ICIC

Banco Mercantil
Colombia

Iran/Arab Bank
Iran

Kuwait International Finance Co. (KIFCO)
Kuwait

Bank de Commerce et de Placements
Switzerland

KEY

——— Direct ownership

------- Indirect ownership or unusual relationship

1325015-000-11309

Chronology of Events

1922—Agha Hasan Abedi is born a Shi'ite Muslim in Lucknow, India, the son of the administrator for the Rajah of Mahmudabad.

1959—Abedi founds United Bank Ltd. in Pakistan with 10 million rupees from the Saigol family.

1972—September: Fearing the impending nationalization of United and other Pakistani banks, Abedi and a group of investors including Bank of America and Sheik Zayed of Abu Dhabi found BCCI with $2.5 million in capital. The new bank's intention is to provide commercial banking services in the Third World.

1975—Acting through the Pakistani Gokal family, BCCI tries unsuccessfully to purchase New York's Chelsea National Bank.

1976—BCCI sets up International Credit and Investment Co., the Cayman Islands subsidiary that owned stock in its own parent company and was to become known as "the bank within the bank."

1977—BCCI's assets reach $2.2 billion. October: Abedi is introduced to former Carter administration official Bert Lance and hires Lance as a consultant to help BCCI buy U.S. banks.

1978—British regulators, concerned about BCCI's rapid growth, refuse to issue the bank a full banking license.

January: Ghaith Pharaon buys National Bank of Georgia on behalf of BCCI from Lance and other investors. January: BCCI hires Clark Clifford and Robert Altman to be its American lawyers. Acting

1325015-000-11310

through a group of clients, BCCI begins purchasing Financial General Bankshares (FGB) stock on the advice of Lance.

February: Financial General management files suit against BCCI, charging that its clients are investing in FGB as an organized group. The Securities and Exchange Commission soon files a similar suit, and the investors settle it by agreeing to disclose their relationships with each other and make a public tender offer.

July: Credit and Commerce American Holdings (CCAH) and Credit and Commerce American Investment (CCAI) are formed to purchase stock in FGB.

October: CCAH and CCAI, representing BCCI's clients, make a $70 million bid for FGB.

1979—BCCI's largest customer, the Gokal brothers' Gulf Group, is allowed to increase its borrowings from the bank in spite of the group's financial troubles.

February: The Federal Reserve Board rejects the CCAH/CCAI bid for Financial General, citing objections by Maryland regulators about the hostile nature of the takeover.

1980—Bank of America, concerned about BCCI's loan and management practices, sells its stock in the bank. BCCI establishes the Third World Prize, seen by Abedi as the equivalent of the Nobel Peace Prize.

April: CCAH and CCAI bring their attempt to buy Financial General to a vote of the company's shareholders, but it is narrowly defeated.

July: FGB management finally agrees to a takeover by CCAH and CCAI for $180 million, including an injection of new capital.

1981—Terrorist Abu Nidal opens an account at BCCI in London. Former President Jimmy Carter is introduced to Abedi by Lance. Abedi becomes a major benefactor of Carter's favorite charities.

April: The Federal Reserve Board holds an unusual hearing into the FGB takeover attempt. Clifford and Altman pledge that BCCI itself will have nothing to do with the financing or control of the bank.

August: The Fed approves Financial General takeover. September: Abedi creates the BCCI Foundation.

1982—BCCI begins opening offices in Miami, San Francisco and other U.S. cities.

January: Manuel Noriega becomes a BCCI client.

April: After approval by New York authorities, CCAH/CCAI takes over Financial General Bankshares. The bank's name is changed to First American Bankshares and Clifford and Altman are installed as its top executives.

1983—BCCI buys Banco Mercantil, a Colombian bank with branches in Medellin and Cali, centers of the cocaine trade. First American buys two Bankers Trust branches in New York in a deal allegedly negotiated by BCCI.

1984—BCCI's assets reach $16 billion. Capcom Financial Services is founded to handle commodities trading for BCCI and other clients. Shareholders include several investors with close ties to BCCI.

1325015-000-11311

1985—Concerned about BCCI's rapid growth, the Luxembourg Monetary Institute asks auditor Price Waterhouse to launch an inquiry into the bank, but ultimately concludes that any problems are the result of poor management practices. In reality, BCCI is in the process of losing $1 billion from ill-advised and fraudulent treasury trading.

April: BCCI sets up an Americas Coordinating Committee to direct the marketing efforts of BCCI, First American and National Bank of Georgia.

October: BCCI, acting through Ghaith Pharaon, purchases control of Independence Bank of Encino, Calif. A BCCI employee is named chairman of Independence.

1986—

May: BCCI contemplates buying a small bank in Miami through a front man, but the deal is later dropped.

June: Price Waterhouse reports $430 million in losses in BCCI's treasury operation. To cover the losses, Abedi siphons $150 million from the BCCI pension account in the Cayman Islands.

June: The CIA circulates a report on BCCI to law enforcement agencies suggesting that the intelligence agency knows that BCCI illicitly owns First American. The CIA itself is using BCCI to help finance Iran-contra deals and for intelligence operations in Afghanistan.

July: Clifford and Altman buy stock in First American's parent company, CCAH, using $15 million borrowed from BCCI.

July: BCCI brings in the bin-Mahfouz family as investors to help bail out losses at the bank.

December: Concerned that Pharaon's financial troubles may result in seizure of National Bank of Georgia, BCCI arranges for First American to get an option to buy NBG from Pharaon.

December: U.S. Customs Service agents begin the Operation C-Chase money-laundering investigation in Tampa.

1987—British intelligence learns of BCCI's connections with Abu Nidal.

April: Upset with the bank's internal accounting and management practices, Ernst & Whinney resigns as one of BCCI's two auditors. Price Waterhouse becomes the company's sole auditor.

April: Abedi boasts to executives of BCCI's Far East region: "You are now with the First American Group of banks."

August: After the Georgia legislature approves interstate banking law—thanks in part to $1.25 million spent by BCCI on lobbying—First American acquires NBG from BCCI for more than $220 million.

December: International "college" of regulators is created to examine BCCI.

1988—Pharaon, using money borrowed from BCCI, begins purchasing 25 percent of CenTrust Savings, giving BCCI control of the shares.

February: Abedi has a heart attack and later undergoes heart transplant surgery.

1325015-000-11312

March: Clifford and Altman sell a portion of their CCAH shares for a net profit of $9.8 million in a deal arranged by BCCI.

September: BCCI executive Amjad Awan tells an undercover federal officer that BCCI owns First American.

October: BCCI officials are arrested in Tampa at fake bachelor party; the bank and others are charged with money-laundering.

1989—Senate investigator Jack Blum, unable to interest federal prosecutors in information that BCCI owns First American, goes to New York District Attorney Robert Morgenthau, who begins an investigation of BCCI.

October: Bin-Mahfouz family sells its 20 percent stake in BCCI to Abu Dhabi royal family, giving Abu Dhabi a 55 percent stake.

November: Price Waterhouse, in a preliminary report about fiscal 1989, gives BCCI a fairly clean bill of health and says the bank had a profit of $9 million in the first nine months of 1989. BCCI's assets reach a peak of more than $23 billion.

December: Federal Reserve writes Altman asking about rumors that BCCI has made loans to First American shareholders despite assurances to the contrary. Altman tells Fed he knows of no such loans, but doesn't mention loans he and Clifford received from BCCI to buy their stock in the company.

1990—

January: BCCI pleads guilty to money-laundering charges in Tampa and is fined a record $14.8 million.

February: Price Waterhouse tells BCCI it has discovered unusual transactions that may have been fraudulent and declines to approve the bank's annual audit.

March: BCCI sets up an internal task force to investigate the irregularities found by Price Waterhouse.

April: Price Waterhouse reports to BCCI management that the bank lost $498 million in 1989. The accounting firm begins to tell authorities in Britain and Luxembourg about BCCI's problems.

April: Abu Dhabi, apparently oblivious to the full extent of BCCI's problems, takes control of the bank with 77 percent of the stock and announces plans to move headquarters to Abu Dhabi from London. After a personal appeal by the ailing Abedi, Abu Dhabi Sheik Zayed agrees to pump new funds into the bank. BCCI lays off 4,000 workers, about 25 percent of the total work force.

May: Washington business magazine *Regardies* publishes a detailed story raising questions about the overlaps between BCCI and First American shareholders.

July: BCCI chief executive Swaleh Naqvi flies to Abu Dhabi with his secret files on the bank, which are turned over to Price Waterhouse.

October: Sheik Zayed, grasping the problems at the bank, forces Abedi and Naqvi to resign.

1325015-000-11313

November: The Federal Reserve begins a formal investigation into the ownership of First American.

1991—

February: The Washington Post reports that BCCI appears to secretly own First American. The Federal Reserve orders First American to stop doing business with BCCI.

March: The Federal Reserve orders BCCI to sell its secret holding in First American.

March: The Bank of England appoints Price Waterhouse to thoroughly investigate BCCI's finances.

June 28: Price Waterhouse delivers a report to the Bank of England describing massive fraud at BCCI.

July 3: Luxembourg puts the Gokal family's Gulf International Holdings S.A. into receivership.

July 5: The Bank of England and other regulators around the world shut down BCCI.

July 29: The Federal Reserve formally charges BCCI, its top executives, Pharaon and several First American shareholders with the illegal takeover of the U.S. banks and proposes fining them a total of $200 million. Simultaneously, New York District Attorney Morgenthau indicts BCCI, Abedi and Naqvi for fraud, larceny and money-laundering.

August: Clifford and Altman resign from First American. Nicholas Katzenbach, former U.S. attorney general, takes over as chairman.

September: Several BCCI executives, including Naqvi, are arrested in Abu Dhabi. Extradition to the U.S., however, is uncertain.

September: Clifford and Altman appear before a congressional committee investigating BCCI and its relationship with First American. "Our consciences are clear," Clifford says.

November: Tentative plans set for liquidation of BCCI. The bank's total losses are said to exceed $9.4 billion.

December: Federal and state authorities settle charges against BCCI, which pleads guilty to racketeering charges involving money-laundering and the illegal takeover of First American and other U.S. banks. The bank agrees to forfeit more than $550 million in U.S. assets, some of which will be used to bail out financially troubled First American and Independence banks. The plea agreement does not cover any individuals, and state and federal investigations continue.

1992—

January 14: British court approves liquidation plan, under which BCCI creditors and depositors will get 30 to 40 cents on the dollar.

1325015-000-11314

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/10/97

To: FSPU, PROPERTY PROCUREMENT & MANAGEMENT SECTION **Attn:** [redacted] b6 b7C

From: SA [redacted]
C-1 FORFEITURE
Contact: DA [redacted] X9072

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
OO: WMFO

Synopsis: Update of seizure files for FSPU

Details: The purpose of this memorandum is to inform FSPU that the corresponding seizure files have been closed based on the fact that the U. S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Criminal Division advised that until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court. If you have any questions, you can direct them to DA [redacted], X9072. b6 b7C

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FS-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FS-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FS-3	3920-96-F-0186	$3,00,000	US CURRENCY
SUB FS-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FS-5	3920-97-F-0028	$60,000,000	US CURRENCY
SUB FS-6	3920-97-F-0052	$650,000.00	US CURRENCY

(1) 29B-WF-171994
1- [redacted] FSPU b6 b7C

29B-WF-171994-FS-101

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JAN 14 19
FBI - WASH. METRO FIELD OFFICE

1325015-000-11315

AC 014010 EC

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/14/97

To: ADIC, WFO

From: WFO
C-1/FAST
Contact: DA [redacted], EXT 7118 b6 b7C

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC:js

File Number(s): ~~196A-WF-187640~~ 29B-WF-171994 (Pending)

Title: [redacted] b6 b7C
ET AL;
FBW; MF; ITSP;
OO: WMFO

Details: The purpose of this EC is to request that 29B-WF-171994 (SUB FS) be reassigned to SA Bob Roth, C-1.

Reassignment from Squad C-3 to Squad C-1 DN 5-14-97
SA [redacted] SA Roth 5/14/97 b6 b7C

1 29B-WF-171994 (SUB FS)

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29B-WF-171994-FS

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 14 1997
FBI [redacted] METRO FIELD OFFICE

1225015-000-11316

(103)

29B-WF-171994 SUB AF-

SEARCHED DN INDEXED DN
SERIALIZED DN FILED DN

JUN 26 1997

FBI - WASH. METRO FIELD OFFICE

RWB/COM

Robb Evans
Trustee for
The United States of America
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(213) 955-8305

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(213) 955-8344

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76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. [redacted]
Special Agent

FIRM: Federal Bureau of Investigation

DATE: June 26, 1997

FAX NO.: (202) 252-7753

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

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b7C

If there are any transmission problems, please call (213) 955-8305

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MESSAGE

Attached, please find a copy of the "Summary of Cumulative Distributions to the U.S. Marshal" as of June 6, 1997. We apologize for the delay.

1325015-000-11318

06/26/97 09:13 ☎213 622 2681 ROBB EVANS 001/002

002/002
ROBB EVANS
213 622 2681
06/26/97 09:14

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE U.S. MARSHAL
As of June 6, 1997

Forfeiture Order Date / State	19-Aug-93 California	21-Dec-94 California	20-Sep-96 California	21-Dec-94 New York	03-Nov-95 New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	0	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	0	31,445
Other	0	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	0	74,519,724	164,149,037	310,867,141
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	28,874,369	0	0	804,406	3,585,899	33,264,674
Real Property	24,033,346	0	0	13,509,261	2,394,597	39,937,204
Miscellaneous Property	109,094	0	0	0	2,093	111,187
Other	124,228	0	0	863,342	199,276	1,186,846
Total Asset Conversions	87,520,679	3,647,571	9,512,823	35,177,009	55,181,865	191,039,948
Total Revenue Collection (1)	6,205,220	0	0	880,355	3,276,000	10,361,575
Total Sources of Funds	93,725,899	3,647,571	9,512,823	36,057,364	58,457,865	201,401,522
Uses of Funds						
Seller Financing and Cash Disbursements	(12,638,280)	0	0	(16,582,325)	(4,857,437)	(34,078,042)
Operating Account Balance	(553,183)	0	0	0	(930,298)	(1,483,481)
Special Reserve Account (2)	0	0	0	(864,871)	(1,775,129)	(2,640,000)
Surplus Balance	0	0	0	0	0	0
Total Uses of Funds	(13,191,462)	0	0	(17,447,196)	(7,562,865)	(38,201,522)
Net Remittances	80,534,437	3,647,571	9,512,823	18,610,168	50,895,001	163,200,000
Present Book Value Per Budget						
Cash	703,183	0	0	864,871	2,555,428	4,123,481
Loans	1,246,049	0	0	15,475,875	321,851	17,043,775
Real Property	2,813,988	0	0	600,000	8,469,196	11,883,184
Miscellaneous Property	0	0	0	0	0	0
Other Assets	5,668	0	0	14,168	2,739,723	2,759,558
Total Liabilities	(770,361)	0	0	(266,648)	(2,640,000)	(3,677,010)
Total FBV Per Budget	3,998,526	0	0	16,688,265	11,446,197	32,132,989

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $15,720,614.59.*
(2) Special reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and necessary capital improvements, and for New York Claims.

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

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(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr [redacted]
Special Agent

DATE: August 13, 1997

FIRM: Federal Bureau of Investigation

FAX NO.: (202) 278-2598

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

b6
b7C

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MESSAGE

Attached is the revised "Summary of Cumulative Distributions to the U.S. Marshal". I apologize for any inconvenience caused.

104

29B-WF-171994-FS

SEARCHED [illegible] INDEXED [illegible]
SERIALIZED [illegible] FILED [illegible]
AUG 14 1997
FBI - WASHINGTON FIELD

1325015-000-11320

08/13/97 15:31 ☎213 622 2681 ROBB EVANS 001/002

002/002
ROBB EVANS
213 622 2681
08/13/97 15:32

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of August 5, 1997

Forfeiture Order Date / State	19-Aug-93 California	21-Dec-94 California	20-Sep-96 California	21-Dec-94 New York	03-Nov-95 New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	20,245,041	0	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	0	31,445
Other	0	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	9,512,823	74,519,724	164,149,037	320,379,964
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	28,880,296	0	0	1,362,598	3,596,349	33,839,244
Real Property	24,033,346	0	0	13,758,164	2,703,695	40,495,205
Miscellaneous Property	109,094	0	0	0	2,093	111,187
Other	124,228	0	0	863,342	199,276	1,186,846
Total Asset Conversions	87,526,606	3,647,571	9,512,823	35,984,104	55,501,413	192,172,518
Total Revenue Collection (1)	6,230,423	0	0	915,108	3,590,604	10,736,136
Total Sources of Funds	93,757,030	3,647,571	9,512,823	36,899,212	59,092,018	202,908,654
Uses of Funds						
Seller Financing and Cash Disbursements	(12,638,280)	0	0	(16,582,325)	(5,177,162)	(34,397,767)
Operating Account Balance	(584,313)	0	0	(506,719)	(379,855)	(1,470,887)
Special Reserve Account (2)	0	0	0	0	(2,640,000)	(2,640,000)
Surplus Balance	0	0	0	0	0	0
Total Uses of Funds	(13,222,593)	0	0	(17,089,044)	(8,197,017)	(38,508,654)
Net Remittances	80,534,437	3,647,571	9,512,823	19,810,168	50,895,001	164,400,000
Present Book Value Per Budget						
Cash	584,313	0	0	506,719	3,019,855	4,110,887
Loans	1,370,122	0	0	14,334,367	1,068,615	16,773,104
Real Property	2,813,988	0	0	600,000	8,310,540	11,724,528
Miscellaneous Property	0	0	0	0	0	0
Other Assets	5,668	0	0	8,890	2,735,122	2,749,680
Total Liabilities	(755,491)	0	0	(297,309)	(2,640,000)	(3,692,800)
Total PBV Per Budget	4,018,600	0	0	15,152,667	12,494,132	31,665,399

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $15,809,959.43.*
(2) Special reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and necessary capital improvements, and for New York Claims.

Robb Evans
Trustee for
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FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr [redacted]
Special Agent

DATE: August 7, 1997

b6
b7C

FIRM: Federal Bureau of Investigation

FAX NO.: (202) 278-2598

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

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MESSAGE

Attached, please find a copy of the "Summary of Cumulative Distributions to the U.S. Marshal" as of August 5, 1997.

105

29B-WF-171994 SUBFS.

SEARCHED DM INDEXED DM
SERIALIZED DM FILED DM
AUG 6 1997
FBI - WASH. METRO FIELD OFFICE

KOTH

1325015-000-11322

08/08/97 08:30 213 622 2681 ROBB EVANS 001/002

002/002
ROBB EVANS
213 622 2681
08:31
08/08/97

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of August 5, 1997

Forfeiture Order Date	19-Aug-93	21-Dec-94	20-Sep-96	21-Dec-94	03-Nov-95	
State	California	California	California	New York	New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	20,245,041	0	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	0	31,445
Other	0	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	9,512,823	74,519,724	164,149,037	320,379,964
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	28,880,296	0	0	1,362,598	3,596,349	33,839,244
Real Property	24,033,346	0	0	13,758,164	2,703,695	40,495,205
Miscellaneous Property	109,094	0	0	0	2,093	111,187
Other	124,228	0	0	863,342	199,276	1,186,846
Total Asset Conversions	87,526,606	3,647,571	9,512,823	35,984,104	55,501,413	192,172,518
Total Revenue Collection (1)	6,230,423	0	0	915,108	3,590,604	10,736,136
Total Sources of Funds	93,757,030	3,647,571	9,512,823	36,899,212	59,092,018	202,908,654
Uses of Funds						
Seller Financing and Cash Disbursements	(12,638,280)	0	0	(16,582,325)	(5,177,162)	(34,397,767)
Operating Account Balance	(584,313)	0	0	0	(886,574)	(1,470,887)
Special Reserve Account (2)	0	0	0	0	(2,640,000)	(2,640,000)
Surplus Balance	0	0	0	0	0	0
Total Uses of Funds	(13,222,593)	0	0	(16,582,325)	(8,703,736)	(38,508,654)
Net Remittances	80,534,437	3,647,571	9,512,823	20,316,887	50,388,281	164,400,000
Present Book Value Per Budget						
Cash	543,737	0	0	0	3,567,150	4,110,887
Loans	1,370,122	0	0	14,334,367	1,068,615	16,773,104
Real Property	2,813,988	0	0	600,000	8,310,540	11,724,528
Miscellaneous Property	0	0	0	0	0	0
Other Assets	5,668	0	0	8,890	2,735,122	2,749,680
Total Liabilities	(755,491)	0	0	(297,309)	(2,640,000)	(3,692,800)
Total PBV Per Budget	3,978,024	0	0	14,645,948	13,041,427	31,665,399

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $15,809,959.43.*
(2) Special reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and necessary capital improvements, and for New York Claims.

BOB

6/30/97

Mr. [redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97. b6 b7C

✓3920-92-F-231 - 243 - Has a final order been issued yet?
3920-93-F-196 - 203 - Has a final order been issued yet?
3920-93-F-205 - 215 - Has a final order been issued yet?
3920-96-F-023
3920-96-F-024
3920-96-F-186
3920-96-F-195
3920-97-F-028
3920-97-F-042
3920-97-F-047
3920-97-F-048
3920-97-F-052
3920-97-F-075
3920-97-F-076
3920-97-F-086
3920-97-F-089
3920-97-F-093
3920-97-F-095
3920-97-F-096
3920-97-F-098
3920-97-F-099
3920-97-F-104
3920-97-F-126
3920-97-F-129

b6 b7C

[redacted] Have [redacted] help you. Since you have BCCI, tell [redacted] that there is no final order for any of the BCCI seizures. per Ed - Order is coming could be years

Thank you,

[redacted]

106

SUBFF-

29B-WF-171994(BCCI)

SEARCHED INDEXED
SERIALIZED FILED
JUL 01 1997
FBI/WASH METRO FIELD OFFICE

Roth

Precedence: ROUTINE **Date:** 08/29/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: SA Robert Roth, Ext. 2300

Approved By: A/SSA [redacted] b6 b7C

Drafted By: Roth Robert M:lh

File Number(s): **29B-WF-171994;**
65A-WF-202740;
29C-WF-205558;
196C-WF-201171

Title: **FORFEITURE MATTERS - STATUS UPDATE**

Details: Reference FSPU communication dated 06/30/97 requesting status updates for the following seizures:

The following seizures are **BCCI** matters. WFO/FAST continues to await receipt of the Final Order in these cases. WFO/FAST will forward a copy of the Final Order to FSPU upon receipt.

3920-92-F-231 thru 243
3920-93-F-196 thru 203
3920-93-F-205 thru 215
3920-95-F- 58 thru 60
3920-95-F- 97
3920-96-F- 24
3920-96-F-134
3920-96-F-186
3920-96-F-195
3920-97-F- 28
3920-97-F-52
3920-97-F-75
3920-97-F-126

CONTINUED -- OVER

107

CC: 1-BUREAU, FSPU (ATTN: [redacted] b6 b7C
19-WFO
(1- 29B-WF-171994 SUB FS)
(15- 65A-WF-202740 Each Seizure File)
(1- 29C-WF-205558)
(2-196C-WF-201171)

29B-WF-171994 SUB FS

SEARCHED INDEXED
SERIALIZED FILED
AUG 29 1997
FBI - WASHINGTON FIELD

ROTH

1325015-000-11325

FEDERAL BUREAU OF INVESTIGATION

The following are [ ] seizures. A Final Decree of Forfeiture was executed in the Eastern District of Virginia on 7/24/97:

b6
b7C

3920-97-F- 47 - The USAO-EDVA has recognized the interest of petitioner Northwest Federal Credit Union. The USAO will deliver the check to petitioner. WFO/FAST released the Chevy Lumina van to the USMS on 8/20/97. The vehicle will be sold and proceeds deposited in the Crime Victim's Fund.

3920-97-F-48 - WFO/FAST has closed this seizure, as the item is included in seizure #3920-97-F-0104. WFO/FAST apprised FSPU of this by EC dated 7/22/97.

3920-97-F- 93 thru 95 - Checks were released to USMS-EDVA on 5/7/97. USMS deposited the money in the Crime Victim's Fund 8/6/97.

3920-97-F-96- Check was released to USMS-EDVA on 6/27/97. USMS deposited the money in the Crime Victim's Fund 8/6/97.

3920-97-F-97 - The USAO-EDVA has recognized the interest of petitioner SELCO Credit Union. The USAO has instructed the USMS to remit payment to SELCO in the amount of $7547.82 plus interest. The remaining amount will be deposited in the Crime Victim's Fund.

3920-97-F-98 - Check was released to the USMS-EDVA on 5/8/97. The USMS deposited the money in the Crime Victim's Fund on 8/6/97.

3920-97-F- 99- USAO is attempting to obtain the funds from OPM.

3920-97-F-101 - Foreign coins/currency have been delivered to the USMS. Will be sold and proceeds deposited in Crime Victim's Fund.

3920-97-F-102 - WFO/FAST will deliver the misc. household items to the USMS. Items will be sold and proceeds deposited into Crime Victim's Fund.

3920-97-F-103 - WFO/FAST will deliver the firearms to FBIHQ for destruction.

3920-97-F-104 - WFO/FAST will deliver the misc. electronic items to the USMS. Items will be sold and proceeds deposited into Crime Victim's Fund.

3920-97-F-129 - Report from USMS indicates currency deposited into Crime Victim's Fund 8/6/97.

3920-97-F-131 - In accordance with the Final Decree, the USMS-EDVA prepared a quitclaim deed to First Union Bank, which held the note and had the property in foreclosure. The deed was forwarded to First Union on 8/15/97. WFO/FAST forwarded a copy of the deed to FSPU by EC dated 8/28/97. WFO/FAST has now closed out this matter.

3920-97-F-0076 - Awaiting ruling on Comdisco petition (WFO/FAST sent petition investigation report to USAO-EDVA on 4/4/97).

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

3920-97-F-0086 [redacted] In Forma Pauperis request was accepted by WFO/FAST and forwarded to the USAO-DC on 5/28/97. Civil judicial forfeiture proceedings are pending. b6 b7C

3920-97-F-0089 [redacted] In Forma Pauperis request was accepted by WFO/FAST. FAST forwarded the Civil Forfeiture Report to the USAO-DC on 8/5/97. b6 b7C

Questions concerning the above may be directed to SA Robert M. Roth at 278-2300.

Precedence: ROUTINE **Date:** 03/02/1998

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: SA Robert Roth, Ext. 2300

Approved By: SSA [redacted] b6 b7C

Drafted By: Roth Robert M:lh

File Number(s): **29B-WF-171994**
29C-WF-205558
196C-WF-201171
273B-WF-207039
273B-WF-207603

Title: **FORFEITURE MATTERS - STATUS UPDATE**

Details: Reference FSPU communication dated 02/12/98 requesting status updates for the following seizures:

The following seizures are **BCCI** matters. WFO/FAST continues to await receipt of the Final Order in these cases. WFO/FAST will forward a copy of the Final Order to FSPU upon receipt.

3920-92-F-231 thru 243
3920-93-F-197
3920-93-F-200
3920-93-F-203
3920-93-F-207-211
3920-93-F-214-215
3920-95-F- 58 thru 60
3920-95-F- 97
3920-96-F- 24
3920-96-F- 97
3920-96-F-134
3920-96-F-186
3920-96-F-195
3920-97-F-28
3920-97-F-52
3920-97-F-75
3920-97-F-126

CONTINUED -- OVER

108

CC: 1-BUREAU, FSPU (ATTN: [redacted] b6 b7C
6-WFO
(1- 29B-WF-171994 SUB FS)
(1- 29C-WF-205558 SUB FF 1)
(1-196C-WF-201171SUB FF 1)
(1-196C-WF-201171SUB FF 4)
(1-273B-WF-207039)
(1-273B-WF-207603)

29B-WF-171994 SUB FS

SEARCHED INDEXED
SERIALIZED FILED
MAR 0 2 1998
FBI

ROTH

LN98623.EC

FEDERAL BUREAU OF INVESTIGATION

3920-97-F-0076- On 2/25/98, the Asset Forfeiture Money Laundering Section, DOJ, advised that the petition matter is pending review at that office.

3920-97-F-0086- Civil judicial forfeiture proceedings are pending at USAO-DC. Verified Complaint for Forfeiture In Rem executed 1/9/98. WFO/FAST forwarded copy to FSPU by EC dated 3/2/98. The USAO advises it will move for default in approximately one month.

3920-97-F-0089- Civil judicial forfeiture proceedings are pending at USAO-DC. Verified Complaint for Forfeiture In Rem executed 1/9/98. WFO/FAST forwarded copy to FSPU by EC dated 3/2/98. The USAO advises it will move for default in approximately one month.

3920-97-F-0090 - Civil judicial forfeiture proceedings are pending at USAO-DC. The USAO is, however, currently negotiating with subjec[redacted] attorney to have[redacted] claim withdrawn. b6 b7C

3920-97-F-0122 - Civil judicial forfeiture proceedings are pending at USAO-DC. The USAO is, however, currently negotiating with subjec[redacted] attorney to have[redacted] claim withdrawn. b6 b7C

Questions concerning the above may be directed to SA Robert M. Roth at 278-2300.

Precedence: ROUTINE **Date:** 03/24/1998

To: FBI Headquarters **Attn:** Finance Division, FSPU (NP300)

From: WFO
Squad C-1/FAST
Contact: PS [redacted], Ext. 2295 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]

File Number(s): **29B-WF-171994**
166E-WF-180680
166E-WF-171109
273B-WF-205890
273A-WF-208099
273B-WF-209601
166E-WF-200828

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 02/12/98 requesting status updates for the following seizures:

3920-92-F-115 thru 131 -- These are BCCI matters. WFO/FAST continues to await receipt of the Final Order in these cases. WFO/FAST will forward a copy of the Final Order to FSPU upon receipt.

* Please note: These seizures have been reassigned to SA Robert M. Roth

---

3920-95-F-132 -- A copy of the signed Consent Order of Forfeiture is attached for this seizure. It is noted that WFO/FAST previously forwarded a copy of this order to FBIHQ, FSPU by EC dated 12/8/97.

3920-96-F-0153 and 0154 -- Judicial forfeiture proceedings are pending -- the USOA-DC has recently filed a civil complaint against the property.

CC: 1- BUREAU, FSPU (ATTN: [redacted]) -10 b6 b7C
8-WFO
(1- 29B-WF-171994 SUB FF)
(1- 166E-WF-180680)
(2- 166E-WF-171109)
(1- 273B-WF-205890)
(1- 273A-WF-208099)
(1- 273B-WF-209601)
(1- 166E-WF-200828)

29B-WF-171994 SUB FF

SEARCHED INDEXED
SERIALIZED FILED
MAR 2 3 1998
FBI - WASHINGTON FIELD

[redacted] b6 b7C

LH98821.EC

1325015-000-11330

FEDERAL BUREAU OF INVESTIGATION

3920-97-F-0042 -- Judicial forfeiture proceedings are pending -- the USAO-MD has filed an amended complaint.

3920-97-F-0134 -- The USAO-DC approved MPD's sharing request. The USMS was notified on 12/4/97 to dispose of the property. To date, it has not been sold. A copy of the approved sharing request and signed Order of Forfeiture are attached for this seizure.

3920-97-F-0154 -- This matter was referred to the USAO-DC. On 11/6/97, that office advised WFO/FAST that is was declining prosecution on this matter. The vehicle was released to [redacted] on 11/19/97. Copies of the declination letter and release memo are enclosed for this seizure. This matter is closed out at WFO. b6 b7C

3920-97-F-0168 - On 3/20/98, the USAO-DC advised that the information necessary for the Final Order is still under seal. It is anticipated that this matter will be unsealed within the upcoming weeks.

Any questions concerning the above may be directed to Paralegal Specialist [redacted] at (202)278-2295. b6 b7C

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: ESPU (NP300)

b6
b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: NVRA X 3226

Approved By:

Drafted By: -lit

Case ID #: 29B-WF-171994
3920-92-F-0124, 3920-92-F-0116, 3920-92-F-0115,
and 3920-92-F-0121

Title: U.S. V. BCCI (Round 1)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA)
CATS

CC: 4-BUREAU, ATTN:
3920-92-F-0124, 3920-92-F-0116, 3920-92-F-0115,
and 3920-92-F-0121
(1) - WFO, 29B-WF-171994 -110

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1325015-000-11332

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v. Criminal No. 91-0655 (JHG)

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.,
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED,
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED,

Defendants.

FILED
JAN 31 1992
CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. Thereupon, an Order of Forfeiture was entered directing the United States Marshal Service to seize certain assets forthwith. The Order of Forfeiture also provided that upon receipt of an updated and verified list of forfeitable assets held by American Express Bank Ltd., Bank of California Corp., Capital Bank, and Oppenheimer & Co., Inc. (hereafter, the "list"), and upon approval by the Court of the list, the assets attributed to those four institutions would become subject to the Order of Forfeiture and should then be seized forthwith.

Pursuant to the Court's Order of Forfeiture of January 24, 1992, counsel for the United States filed a "First Supplemental List of Forfeited Property" which, according to the United States,

1325015-000-11333

reflected the verification of the amounts previously listed on page four of Exhibit A to the Court's January 24, 1992 Order of Forfeiture. Accompanying the list was a brief memorandum advising the Court of certain matters pertaining to the First Supplemental List.

It should be noted from the outset that, among the numerous filings received by the Court, the names of certain entities holding assets have not always been consistently or correctly referred to. For example, in certain submissions, Capital Bank has been referred to as "Capital Bank Miami." In addition, American Express Bank Ltd. has sometimes been referred to as "American Express," Oppenheimer & Co., Inc. has been mentioned as "Oppenheimer & Co.," and ICIC Investments Ltd. has been listed as "ICIC Investment Ltd." On this date the names of institutions contained in lists submitted with the Court have been clarified and, by this Order, the Court amends all past incorrect references to those entities.

In its memorandum accompanying the First Supplemental List, the United States advised the Court, inter alia, that although the amounts and numbers of the accounts held by Capital Bank have been confirmed with the account holder, the Comptroller of the State of Florida, Capital Bank has declined to provide direct confirmation of that information without further Order of this Court. Because the account holder has confirmed the accuracy of the amount and numbers of the accounts held by Capital Bank, and because the defendants in this case do not challenge the forfeitability of the

1325015-000-11334

assets attributed to Capital Bank in the First Supplemental List, the Court finds additional confirmation by Capital Bank unnecessary.

In addition to the United States' representations concerning assets held by Capital Bank, the memorandum accompanying the First Supplemental List also advises the Court that on January 28, 1992, in the course of confirming account information with Oppenheimer & Co., Inc., it was learned that an account or accounts at that institution, numbered 05391180, are held in the name of ICIC Investments Ltd. and not in the name of any of the four corporate defendants. The United States alleges that although not specifically listed in the name of any of the defendants in this case, the assets held in the account or accounts numbered 05391180 are nonetheless the assets of the corporate defendants and are subject to forfeiture pursuant to paragraph 1(e) on the January 24, 1992.

Although the government asserted this position in its most recent filing, after discussion at a hearing held this date, the United States proposed, and counsel for the court-appointed fiduciaries agreed, that there should be a period of time before those assets were forfeited in which the government could make a detailed investigation to determine whether or not it was entitled to those funds contained in account or accounts numbered 05391180. Pursuant to its proposal, the government moved for entry of an order restraining the movement or other disposition of any assets held in the name of ICIC Investments Ltd. at Oppenheimer & Co.,

1325015-000-11335

Inc. as well as at other institutions. The BCCI defendants consented to the motion. Since the action is deemed appropriate, prudent, and in the public interest, the Court has issued a separate Order granting the government's motion. Accordingly, those amounts in account or accounts named ICIC Investments Ltd. and numbered 05391180 at Oppenheimer & Co., Inc. will not be forfeited at this time.

Therefore, it is hereby

ORDERED that the assets listed on the attached pages entitled "First Supplemental List of Forfeited Property" are declared forfeited and subject to this Court's Order of Forfeiture of January 24, 1992.

It is FURTHER ORDERED that all references to account or accounts numbered 05391180, Oppenheimer & Co., Inc., contained in Exhibit A attached to the Court's Order of Forfeiture of January 24, 1992 are stricken and those accounts named ICIC Investments Ltd. and numbered 05391180 presently held by Oppenheimer & Co., Inc. shall not be forfeited pending further Order of this Court.

It is FURTHER ORDERED that, in addition to those assets ordered forfeited by the January 24, 1992 Order of Forfeiture, and pursuant to Rule 32(b)(2), Federal Rules of Criminal Procedure, the assets listed in the "First Supplemental List of Forfeited Property" attached hereto shall be seized forthwith by the United States Marshal Service or its duly authorized representative and disposed of in accordance with the law.

1325015-000-11336

It is FURTHER ORDERED that all references to "American Express," "Capital Bank Miami," "ICIC Investment Ltd.," and "Oppenheimer & Co." are hereby amended to read "American Express Bank Ltd.," "Capital Bank," "ICIC Investments Ltd.," and "Oppenheimer & Co., Inc." respectively.

The Clerk of the Court is hereby directed to send copies of this Order to all counsel of record and the United States Marshal.

IT IS SO ORDERED.
Entered this 31th day of January, 1992.

JOYCE HENS GREEN
United States District Judge

1325015-000-11337

First Supplemental List of Forfeited Property

Account No.	Account Name		Balance
✓ **American Express** Bank Ltd.			**New York**
1509800	Union National Bank		30,832,640.32[1]
1605800	BCCI		61,629,475.21[1]
703876	BCCI S.A. - Abu Dhabi		8,818,703.73
703876[2]	BCCI S.A. - Abu Dhabi		23,037,303.36
Brokerage Deposit	BCCI (Overseas)		12,681,119.10[3]
3/53066	BCCI (Overseas)	Chittigong	610,940.61
3/53165	BCCI (Overseas)	Dhaka	4,305,427.70
3/53173	BCCI (Overseas)	Dakar	734,692.31
698316	BCCI (Overseas)	Karachi	353,870.68
3/705517	BCCI (Overseas)	Lahore	4,222,444.79
714758	BCCI (Overseas)	Macau	247,751.55
Suspense Deposit	BCCI (Overseas)	Macau	1,336,863.84
3/52977	BCCI (Overseas)	Nairobi	606,571.81[4]
53116	BCCI (Overseas)	Seoul	335,246.63
3/711036	BCCI (Overseas)	Seychelles	358,297.24
** Subtotal **			150,111,348.92
✓ **Bank of California Corp.**			**New York**
91212381	BCCI Mali		1,283,092.84

92-124

92-110

[1] This account contains an additional amount of approximately $236,653.45 not presently subject to forfeiture. Only the amount specified plus interest from January 28, 1992, is presently subject to forfeiture.

[2] This account is divided into two parts to reflect offsets taken by American Express from account 703876.

[3] This amount includes a $500,000 offset taken by American Express.

[4] This account contains an additional amount of approximately $82,000 not presently subject to forfeiture. Only the amount specified plus interest from January 28, 1992, is presently subject to forfeiture.

1325015-000-11338

✓ Capital Bank			Miami
850053580			3,053,641.00
902204122			1.00
902205102			24,215.00
902205110			946,485.00
** Subtotal **			4,024,342.00 92-15
✓ Oppenheimer & Co., Inc.			New York
05391184	BCCI (Overseas)		2,991,107.70 92-121

RECEIVED
4 Feb FM '92

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	CRIMINAL NUMBER 91-0655 (JHG)

GOVERNMENT'S COMPLIANCE WITH ORDER OF JANUARY 24, 1992

The United States of America, by its counsel, in compliance with paragraph 1(a) of this Court's Order of January 24, 1992 ("Order of Forfeiture") hereby submits an updated list of forfeitable assets held by American Express Bank Ltd., Bank of California Corp., Capital Bank, and Oppenheimer & Co., Inc.[1] (See Attachment A.) This list reflects the verification, at the Court's direction, of the amounts previously listed on page four of Exhibit A to the Order of Forfeiture as unverified accounts and account balances.

The government further advises the Court that on January 28, 1992, in the course of confirming the account information with

[1] The amounts and account numbers listed for American Express, Bank of California and Oppenheimer & Co. have been confirmed with counsel for those institutions. The amounts and account numbers for Capital Bank have been confirmed with the account holder, the Controller of the State of Florida. For the reasons set forth in the attached letter to counsel (see Attachment B), Capital Bank has declined to provide confirmation directly without further order of this Court.

Oppenheimer & Co., the government learned for the first time that an account at that institution, listed on Attachment A as account number 05391180, is held in the name of "ICIC Investment, Ltd." and not in the name of any of the four corporate defendants. The government also has reason to believe that other funds, not listed on Attachment A, are held in the name "ICIC Investment, Ltd." at at least two other financial institutions in the United States.

We believe that assets held in the name "ICIC Investments, Ltd." are the assets of the corporate defendants and are subject to forfeiture pursuant to paragraph 1(e) of the Order of Forfeiture. Accordingly, we have included the Oppenheimer / ICIC Investment funds on the attached list of accounts to be made a part of Exhibit A of the Order of Forfeiture, and we contemplate seeking a restraining order from this Court, pursuant to Title 18, United States Code, Section 1963, restraining the movement of any funds held in the name "ICIC Investment, Ltd." at the other financial institutions to preserve the availability of that property pending confirmation of its existence and its addition to the Order of Forfeiture. See 18 U.S.C. § 1963(d).

WHEREFORE, the government asks that Exhibit A to the Order

1325015-000-11341

of Forfeiture be amended by striking page four and inserting the attached "First Supplemental List of Forfeited Property."

Respectfully Submitted,

GEORGE W. PROCTOR
Director
Asset Forfeiture Office
U.S. Department of Justice

by: _____
STEFAN D. CASSELLA
Trial Attorney
(202) 514-1263

1325015000-11342

First Supplemental List of Forfeited Property

Account No.	Account Name	Balance
American Express		**New York**
1509800	Union National Bank	30,832,640.32[1]
1605800	BCCI	61,629,475.21
703876	BCCI S.A. - Abu Dhabi	8,818,703.73
703876[2]	BCCI S.A. - Abu Dhabi	23,037,303.36
Brokerage Deposit	BCCI (Overseas)	12,681,119.10[3]
3/53066	BCCI (Overseas) Chittigong	610,940.61
3/53165	BCCI (Overseas) Dhaka	4,305,427.70
3/53173	BCCI (Overseas) Dakar	734,692.31
698316	BCCI (Overseas) Karachi	353,870.68
3/705517	BCCI (Overseas) Lahore	4,222,444.79
714758	BCCI (Overseas) Macau	247,751.59
Suspense Deposit	BCCI (Overseas) Macau	1,336,863.84
3/52977	BCCI (Overseas) Nairobi	606,571.81[4]
53116	BCCI (Overseas) Seoul	335,246.63
3/711036	BCCI (Overseas) Seychelles	358,297.24
** Subtotal **		150,111,348.92
Bank of California Corp.		**New York**
91212381	BCCI Mali	1,283,092.84

---

[1] This account contains an additional amount of approximately $236,653.45 not presently subject to forfeiture. Only the amount specified plus interest from January 28, 1992, is presently subject to forfeiture.

[2] This account is divided into two parts to reflect offsets taken by American Express from account 703876.

[3] This amount includes a $500,000 offset taken by American Express.

[4] This account contains an additional amount of approximately $82,000 not presently subject to forfeiture. Only the amount specified plus interest from January 28, 1992, is presently subject to forfeiture.

Capital Bank		**Miami**
850053580		3,053,641.00
902204122		1.00
902205102		24,215.00
902205110		946,485.00
** Subtotal **		4,024,342.00
Oppenheimer & Co.		**New York**
05391184	BCCI (Overseas)	2,991,107.70
05391180	ICIC Investment Ltd.	6,299,809.33
05391180	ICIC Investment Ltd.	16,553,490.00
** Subtotal **		25,844,407.03

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was mailed postage pre-paid to Michael Nussbaum, Nussbaum & Wald, Suite 200, One Thomas Circle, N.W., Washington, D.C. 20005, Attorney for Court-Appointed Fiduciaries.

1/29/92
(Date)

Stefan D. Cassella

1325015-000-11345

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)
[redacted]
b6
b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-92-F-0115, 3920-92-F-0116, 3920-92-F-0117,
3920-92-F-0118, 3920-92-F-0119, 3920-92-F-0120,
3920-92-F-0121, 3920-92-F-0122, 3920-92-F-0123,
3920-92-F-0124, 3920-92-F-0125, 3920-92-F-0126,
3920-92-F-0127, 3920-92-F-0128, 3920-92-F-0129,
3920-92-F-0130 and 3920-92-F-0131

Title: U.S. V. BCCI (Round 1)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA)
CATS

CC: 17-BUREAU, ATTN: [redacted]
b6
b7C
3920-92-F-0115, 3920-92-F-0116, 3920-92-F-0117,
3920-92-F-0118, 3920-92-F-0119, 3920-92-F-0120,
3920-92-F-0121, 3920-92-F-0122, 3920-92-F-0123,

[redacted]

LT990423.ec

1325015-000-11346

To: FINANCE From: WASHINGTON FIELD
Re: 29B-WF-171994, 2/10/1999

3920-92-F-0124, 3920-92-F-0125, 3920-92-F-0126,
3920-92-F-0127, 3920-92-F-0128, 3920-92-F-0129,
3920-92-F-0130 and 3920-92-F-0131
(1) - WFO, 29B-WF-171994 /111

1325015-000-11347

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

JAN 24 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

The United States of America and the four corporate defendants in this case (collectively, "BCCI") have entered into a Plea Agreement dated December 19, 1991, by which the defendants agree to plead guilty to an offense under Title 18, United States Code, Section 1962, and to forfeiture of the assets of the four corporate defendants located in the United States pursuant to Section 1963 of Title 18.

As recited on the record today in open court, the Court has determined pursuant to Rule 11(e), Federal Rules of Criminal Procedure, that the Plea Agreement is acceptable to the Court. The Court has determined pursuant to Rule 11(f), Federal Rules of Criminal Procedure, that there is a factual basis for the pleas of guilty and for the forfeiture of the defendants' assets as set forth in the Superseding Information, the Plea Agreement, the statements of counsel in open Court, and the testimony of the representative of the defendants.

1325015-000-11348

It is hereby ORDERED, ADJUDGED and DECREED as follows:

1. Pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3), the following property located in the United States of the four corporate defendants is hereby condemned and forfeited to the United States of America:

(a) the deposits and other assets listed on Exhibit A, which Exhibit A is hereby made a part of this Order, except those funds listed on Exhibit A which are held by American Express Bank Ltd., Bank of California, Capital Bank Miami, and Oppenheimer & Co., Inc., because counsel have been unable at this time to reconfirm or update the list of assets held by those institutions. Counsel for the parties to this case shall provide to the Court, by January 29, 1992 at 12:00 noon, an updated list of forfeitable assets held by American Express Bank Ltd., Bank of California, Capital Bank Miami, and Oppenheimer & Co., Inc., at which time, upon approval by the Court, such assets shall become subject to this Order of Forfeiture.

(b) the net proceeds from the future sale or other disposition or transfer of any stock, security or other interest in Independence Bank, but not the stock, security or other interest itself;

(c) the net proceeds from the future sale or other disposition or transfer of any stock, security or other interest in First American Bankshares, Inc., but not the stock, security or other interest itself;

1325015-000-11349

(d) the balance of the liquidation estates of the Los Angeles and New York agencies of BCCI, S.A., but not the estates themselves, upon completion of liquidation proceedings conducted by the New York banking and the California banking entities in accordance with the laws of California and New York. For purposes of the foregoing, the "liquidation estates" shall consist of all of the rights and interests of the Superintendent of Banks of the states of New York and California under their respective state law banking statutes with respect to the assets of BCCI, S.A. located in their respective states and the assets of the New York and California agencies of BCCI, S.A. The liquidation estates do not include the assets enumerated in Exhibit A; and

(e) the entirety of BCCI's ownership interests in all other property located in the United States, including, without limitations, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined or discovered pursuant to paragraph 10 of the Plea Agreement, in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf of Court Appointed Fiduciaries of BCCI in the course of the management or disbursement of the liquidation estates as described in the Plea Agreement.

2. The Court finds that the above-listed forfeited assets constitute interests acquired or maintained by the defendants, in violation of Title 18, United States Code, Section 1962; or are

1325015-000-11350

interests in, securities of, claims against, or property or contractual rights of various kinds affording a source of influence over an enterprise which the defendants established, operated, controlled, conducted, or participated in, in violation of Title 18, United States Code, Section 1962; or are property constituting or derived from, proceeds the defendants obtained, directly or indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962.

3. It is further ORDERED that, except as specifically excepted in paragraph 1(a) and as noted in paragraph 4, each of the financial institutions and entities listed on Exhibit A shall immediately pay to the United States Marshal for the District of Columbia or his duly authorized representative:

1) the entire contents of the accounts listed on Exhibit A, including interest accrued;

2) any funds transferred since July 5, 1991, from any account listed on Exhibit A that are still within the possession or control of the financial institution, regardless of the account into which those funds were transferred and regardless of the reason for the transfer; and

3) any other funds in any other account held by BCCI (Overseas) or International Credit and Investment Company (Overseas).

Such payments shall not be limited to the "Approximate Amounts" listed on Exhibit A if the balance as of this date is greater than the Approximate Amount. For the purposes of this paragraph, an

1325015-000-11351

"account listed on Exhibit A" includes any account that previously held funds listed on Exhibit A, or any account to which such funds have been transferred.

4. With respect to the funds listed on Exhibit A as being held on deposit in the Court Registry Investment System ("CRIS") interest-bearing account administered by the United States District Court for the Southern District of Texas, such funds are hereby ORDERED forfeited to the United States. In lieu of the immediate transfer of those funds pursuant to paragraph 3, the United States shall take all necessary steps pursuant to Title 28, United States Code, Section 2042, to obtain an order directing the transfer of those funds to the United States Marshal for the District of Columbia.

5. It is further ORDERED that to the extent necessary to carry out the terms of this Order, BCCI, pursuant to the Plea Agreement, shall assist the financial institutions and entities listed on Exhibit A in the transfer of such funds.

6. It is further ORDERED that the United States Marshal's Service shall deposit all funds received pursuant to this Order of Forfeiture in the Department of Justice Seized Asset Deposit Fund Account (hereafter, "the Account") and invest it with interest as permitted by Title 28, United States Code, Section 524(c), as amended October 28, 1991.

7. Pursuant to the ancillary hearing procedures set forth in Title 18, United States Code, Section 1963(l), no disbursements shall be made from the Account without further Order of this Court.

1325015-000-11352

Should it appear that no claim has been made with respect to particular assets transferred to the Account pursuant to Section 1963(l), or at such time as such claims to such assets have been resolved, the Court will entertain motions from the government for the disbursement of those assets.

8. As the proceeds identified in paragraphs 1(b) through (e) become available, the Department of Justice, on behalf of the United States, shall apply to this Court for appropriate Orders effecting the transfer and deposit of such proceeds into the Account. The notice provisions of Section 1963(l) shall apply to each asset so transferred to the Account pursuant to such further Orders.

9. Pursuant to Rule 32(b)(2), Federal Rules of Criminal Procedure, it is further ORDERED that each of the above listed properties, except as specifically excepted in paragraph 1(a) and as noted in paragraph 4, shall be seized forthwith by the United States Marshal for the District of Columbia or his duly authorized representative and disposed of in accordance with the law and this Order of Forfeiture.

The Clerk is hereby directed to send copies of this Order to all counsel of record and the United States Marshal.

IT IS SO ORDERED.
Entered this 24th day of January, 1992.

JOYCE HENS GREEN
United States District Judge

United States District Court
for the District of Columbia
A TRUE COPY
NANCY MAYER-WHITTINGTON, Clerk
By Joel A. Woods, Jr.

1325015-000-11353

EXHIBIT A

Account No.	Account Name	Approx. Balance
Bank of New York		**New York**
018872-500	BCCI (Overseas) Barbados	202,708.55
8109803821	BCCI (Overseas) Barbados	101,108.90
019054-500	BCCI (Overseas) Bombay	3,245,017.16
8109803155	BCCI (Overseas) Bombay	851,642.06
8900054840	BCCI (Overseas) Bombay	159,383.66
018856-500	BCCI (Overseas) Cayman	1,834,405.29
8109292983	BCCI (Overseas) Cayman	50,919.08
8900051531	BCCI (Overseas) Cayman	745.86
8900053658	BCCI (Overseas) Cayman	0.00
8900054301	BCCI (Overseas) Cayman	300,027.55
8900054328	BCCI (Overseas) Cayman	310,849.60
8900054794	BCCI (Overseas) Cayman	33,057.60
8900054921	BCCI (Overseas) Cayman	152,093.70
019089-500	BCCI (Overseas) Panama	8,016,979.39
8109298752	BCCI (Overseas) Panama	144,240.44
8900053399	BCCI (Overseas) Panama	386,467.59
** Subtotal **		15,789,646.43 - 92-0118
Citibank		**New York**
36054705	BCCI (Overseas)	11,064,150.00
36060398	BCCI (Overseas)	4,402.00
Custody Account	BCCI (Overseas)	1,181,398.00
Custody Acct 089543	BCCI (Overseas)	537,000.00
** Subtotal **		12,786,950.00 92-120
Court Registry Investment System		**S.D. Tex.**
86078	BCCI (Overseas) Macau	109,112.75
86047	BCCI (Overseas) Muscat	4,339,738.83
86052[1]	BCCI S.A. - Abu Dhabi	60,563,405.50
86041	BCCI (Overseas) Seoul	80,770.71
** Subtotal **		65,093,027 81,709,103.07 - 92-122
Doha Bank Ltd.		**New York**

[1] This account contains additional funds not subject to forfeiture. Only the amount specified, plus interest accrued since July 18, 1991, is subject to forfeiture.

55804511	BCCI (Overseas)	500,308.00	92-117
✓ **First Florida**		**Tampa**	
440-757-7116	Capital Equiv. Dep.	15,299,703.58	92-128
✓ **First National Bank of Louisville**		**Louisville**	
70328615	BCCI (Overseas)	3,727,520.97	97-127
✓ **Hufstedler, Kaus & Ettinger**		**Los Angeles**	
Intermagnetics Trust Acct		487,448.84	92-129
✓ **Kemper Security**		**Chicago**	
1278-4388	BCCI (Overseas)	583,305.00	92-119
✓ **Mabon Securities**		**New York**	
04-4050	BCCI (Overseas)	2,661,808.53	92-126
✓ **Manufacturers Hanover**		**New York**	
(none)	BCCI (Overseas)	40,240.00	92-123
✓ **Paine Webber**		**New York**	
DN-R5056-01	BCCI (Overseas)	73000.00	92-131
✓ **Security Pacific Intl**		**New York**	
05007001	BCCI (Overseas) Abidjan	3,305,447.05	
07012001	BCCI (Overseas) Cayman	4,124,193.31	
04020101	BCCI (Overseas) Istanbul	1,723,590.57	
04020023	BCCI (Overseas) Izmir, Turkey	308,079.19	
04011002	BCCI (Overseas) Karachi	3,056,794.59	
05011001	BCCI (Overseas) Khartoum	701,251.94	
04012039	BCCI (Overseas) Manila	783,178.47	
04020030	BCCI (Overseas) Mersin, Turkey	116,667.53	
05008001	BCCI (Overseas) Monrovia	103,500.48	
03005016	BCCI (Overseas) Paris, France	857,082.72	
04018017	BCCI (Overseas) Seoul, Korea	5,714,329.75	
04031016	BCCI (Overseas) Shenzhen China	589,044.22	
05003001	BCCI (Overseas) Sierra Leone	2,056,883.83	
04027001	BCCI (Overseas) Sri Lanka	1,818,758.32	
05012001	BCCI (Overseas) Togo	104,511.45	
** Subtotal **		25,363,313.42	92-125

✓ **Security Pacific National**			**New York**
607750471	BCCI (Overseas) Abu Dhabi		1,785,845.00
607750491	BCCI (Overseas) Abu Dhabi		44,500,000.00
** Subtotal **			46,285,845.00
** Total			$188,692,117.56

92-130

The following accounts and approximate amounts are as they appear on Schedule B of the Plea Agreement but have not been reconfirmed or updated by counsel:

American Express Bank Ltd. New York, New York	$60,255,910	Ref. # 16211581 (From Acct.#703876)
	$31,793,704	Acct. #703876 (Includes Offsets)
	$30,009,792	Acct. #160300 [2] (From Acct.#703876)
	$12,027,031	Acct. ## 53066; 353066; 53173; 353173; 53165; 353165; 698316; 714758; 53116; 52977; 352977; 705517; 3705517;and 711036
	$12,444,311	Brokerage Account-Deposit (Includes Offsets) (Account Number Unknown)
✓ **Bank of California** New York, New York	$ 1,283,093	(Account Number Unknown) 92-116
✓ **Capital Bank Miami** Miami, Florida	$ 24,215 $ 946,485 $ 3,053,641 $ 1 4,024,342	Acct. #902205102 Acct. #0902205110 Cert. #085-0053580 Acct. #902204122 } 92-115
Oppenheimer & Co., Inc. New York, New York	$ 2,919,400 $15,802,870 $ 6,184,803	Acct. #05391184 Client Acct. #05391180 Client Acct. #05391180
**Total	$176,745,256	

[2] This account contains additional funds not subject to forfeiture. Only the amount specified plus interest accrued since July 5, 1991 is subject to forfeiture.

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: ESPII (NP300)

b6
b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: NVRA X 3226

Approved By:

Drafted By: :llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA)
CATS

CC: 9-BUREAU, ATTN:

b6
b7C

3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994 -112

b6
b7C

LT990425.EC

1325015-000-11358

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED

DEC 21 1994

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of Forfeited Property, see Order of Forfeiture, July 29, 1992, and

Fourth Supplemental List of Forfeited Property

Description	Approx. Value
Excess funds from liquidation of New York agency of BCCI S.A.	$ 77,000,000.00
Excess funds from liquidation of California agency of BCCI S.A. not included in Third Supplemental List of Forfeited Property	$ 3,647,571.00
Funds at Chase Manhattan Bank representing interest owed to BCCI S.A. on bonds issued by the Republic of Venezuela: Account No. C20135 B	$ 5,086.56
Account of BCCI, S.A. Dubai at Bank of New York: (transferred to Court Registry Investment System)	$ 3,600.00
Accounts of BCCI (Overseas) Bombay at New York agency of BCCI S.A.: Account Nos. 2044100105 and 2044100207 (transferred to Court Registry Investment System)	$ 45,163.04
Carlson Farm, Sherman, Connecticut	$ 2,000,000.00
Assets of BCCI Nigeria at American Express Bank, Account No. 3/52977 ("BCCI (Overseas) Nairobi")	$ 82,156.99
Bankruptcy distributions to BCCI:	
American Mills (transferred to Court Registry Investment System)	$ 7,000.00
Domino Investments, Ltd.	$ 23,673.14
Fastrax, Inc.	$ 197,500.00
Remittance of funds paid in contempt proceeding in the U.S. District Court for the Southern District of Florida, including interest (held by Nussbaum & Wald)	$ 165,233.00
61.156 percent of the amount distributable to CCAH shareholders as a consequence of the liquidation or other disposition of their indirect interest in First American Corporation.	$ 287,000,000.00

Exhibit A -- Cr. No. 91-0655 (JHG)

1325015-000-11364

Willow Hollow, Houston TX — AFO will serve — $850,000.00

95-60

Bank of America National Trust and Savings Ass'n

Acct No. 6599-09995	BCCI Overseas - Bombay	Recd 2/22/95	$4,545.47 -134-1
Acct No. 6597-09996	BCCI Overseas - Sri Lanka	"	$10,430.00 -134-2

95-59

Exhibit A -- Cr. No. 91-0655 (JHG)

2 of 2

1325015-000-11365

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)
[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. V. BCCI (Round 5)

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

CC: 4-BUREAU, ATTN: [redacted] b6 b7C
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126
(1) - WFO, 29B-WF-171994 - 113

Seizure Log
Foims (PFA) LT
CATS LT b6 b7C

LT990426.ec

[redacted]

1325015-000-11373

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)
[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted], NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994 - 114
3920-92-F-0231, 3920-92-F-0232, 3920-92-F-0233,
3920-92-F-0234, 3920-92-F-0235, 3920-92-F-0236,
3920-92-F-0237, 3920-92-F-0238, 3920-92-F-0239,
3920-92-F-0240, 3920-92-F-0241, 3920-92-F-0242,
and 3920-92-F-0243

Title: U.S. V. BCCI (Round 2)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA) LT
CATS LT

CC: 13-BUREAU, ATTN: [redacted] b6 b7C
3920-92-F-0231, 3920-92-F-0232, 3920-92-F-0233,
3920-92-F-0234, 3920-92-F-0235, 3920-92-F-0236,
3920-92-F-0237, 3920-92-F-0238, 3920-92-F-0239,
3920-92-F-0240, 3920-92-F-0241, 3920-92-F-0242,

[redacted] b6 b7C

LT990423.ec

To: FINANCE From: WASHINGTON FIELD
Re: 29B-WF-171994, 2/10/1999

and 3920-92-F-0243
1 - WFO, 29B-WF-171994 - 114

1325015-000-11387

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

JUL 29 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

On January 24, 1992, this Court, following findings of fact and conclusions of law with supporting reasons made in open court, accepted the pleas of guilty of the four corporate defendants (collectively "BCCI") and the plea agreement between them and the United States of America. Thereupon, an Order of Forfeiture was entered. Paragraph 1(e) of that Order of Forfeiture provides that the four corporate defendants named in this action shall forfeit to the United States ownership interests in all property located in the United States, including, without limitation, real property and all tangible and intangible personal property, however held, whether subsequently identified, determined or discovered in the course of the ongoing liquidation proceedings described therein or otherwise identified, determined, or discovered in any manner at any time, but not property that may be brought into the United States by or on behalf of court-appointed fiduciaries of BCCI in

RECEIVED JUL 30 1 PM '92 U.S. MARSHAL DISTRICT OF COLUMBIA
RECEIVED JUL 30 10 AM '92 U.S. MARSHAL DISTRICT OF COLUMBIA

Second Supplemental List of Forfeited Property

Account No.	Account Name	Approx. Balance	
** Bank of California Corp.			
91-212373-1121	BCCI (Overseas) Chittigong	398,724.15	
91-209411-1121	BCCI (Overseas) Dhaka	3,155,691.38	
91-212399-1121	BCCI (Overseas) Sri Lanka	84,930.45	
91-212407-1121	BCCI (Overseas) Sri Lanka	420,947.93	
** Subtotal **		4,060,293.91	92-231
** Bank of New York			
Suspense	BCCI (Overseas) Kenya	30,238.40	
180676	ICIC (Overseas) Ginnie Mae Book Entry	118,708.66	
180676	ICIC (Overseas) Ginnie Mae interest distributions	9,489.09	
180676	ICIC (Overseas)	527,592.32	
180650	ICIC Investments Ltd.	14,534,639.16	principal plus interest
** Subtotal **		15,220,667.63	92-232
** Bear Stearns & Co., Inc.			
055-69205	ICIC Investments Ltd.	34,376,678.00	
089-69205	ICIC Investments Ltd.	514,845.00	
** Subtotal **		34,891,523.00	92-233
** Capital Bank			
0902205099	BCCI (Overseas) Jamaica	351,769.41	
0902204203	BCCI (Overseas) Paraguay	639,404.78	
** Subtotal **		991,174.19	92-234
** Esanu Katsky Korins & Siger	General Coffee Corp. claim in bankruptcy	4,925,000.00	92-235
** First American Bank, N.A.			
3-446-611	BCCI Legal Fund (administered by Skadden Arps)	68,919.87	92-236
** First American Title Ins. Co.			
Escrow Account	Amjad Awan (Proceeds of sale of condo)	140,478.46	92-237

** Goldman, Sachs & Co.			
001-37937-9-911	ICIC Investments Ltd.	0.00	
032-34066-3	ICIC Investments Ltd.	360,602.60	
** Subtotal **			
		360,602.60	92-238
** Mabon Securities Corp.			
04-4051	ICIC Investments Ltd.	20,240,717.09	
46-0305	ICIC Investments Ltd.	452.50	
46-2633	ICIC Investments Ltd.	0.00	
48-2633	ICIC Investments Ltd.	0.00	
** Subtotal **			
		20,241,169.59	92-239
** Morgan Stanley & Co.			
0424245	ICIC Investments Ltd.	128,392.89	
737-0120128947	ICIC Investments Ltd.	128,726.20	
** Subtotal **			
		257,119.09	92-240
** Oppenheimer & Co., Inc.			
05391180	ICIC Investments Ltd.	6,907,935.00	
05391180	ICIC Investments Ltd. T-notes	16,421,620.00	
** Subtotal **			
		23,329,555.00	92-241
** Prudential Securities, Inc.			
TNT880170-85	ICIC Investments Ltd.	151.39	92-242
** Security Pacific Int'l Bank			
04012039	BCCI (Overseas) Manila	443.00	
03005016	BCCI (Overseas) Paris	1,225.00	
** Subtotal **			
		1,668.00	92-243

*** Total ***			
		$104,488,322.73	

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300) [redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994 - 115
3920-93-F-0195, 3920-93-F-0196, 3920-93-F-0197,
3920-93-F-0198, 3920-93-F-0199, 3920-93-F-0200,
3920-93-F-0201, 3920-93-F-0202, 3920-93-F-0203,
3920-93-F-0205, 3920-93-F-0206, 3920-93-F-0207,
3920-93-F-0208, 3920-93-F-0209, 3920-93-F-0210,
3920-93-F-0211, 3920-93-F-0212, 3920-93-F-0213,
3920-93-F-0214, and 3920-93-F-0215

Title: U.S. V. BCCI (Round 3)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA)
CATS

CC: 20-BUREAU, ATTN: [redacted] b6 b7C
3920-93-F-0195, 3920-93-F-0196, 3920-93-F-0197,
3920-93-F-0198, 3920-93-F-0199, 3920-93-F-0200,

[redacted] b6 b7C

LT990424.ec

1325015-000-11398

To: FINANCE From: WASHINGTON FIELD
Re: 29B-WF-171994, 2/10/1999

3920-93-F-0201, 3920-93-F-0202, 3920-93-F-0203,
3920-93-F-0205, 3920-93-F-0206, 3920-93-F-0207,
3920-93-F-0208, 3920-93-F-0209, 3920-93-F-0210,
3920-93-F-0211, 3920-93-F-0212, 3920-93-F-0213,
3920-93-F-0214, and 3920-93-F-0215
(1) - WFO, 29B-WF-171994 -115

1325015-000-11399

Third Supplemental List of Forfeited Property

Account No.	Description	Approx. Value	
**	American Express Bank, New York ØBCCI-105		
	BCC S.A. Espanola	$1,238,712.54	93-195
**	Banco Bilbao Vizcaya, New York ØBCCI-106		
21018	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	58,000.00	93-196
**	Bank of Tokyo Trust Co., New York ØBCCI-107		
01-75111-5	BCCI (Overseas) Dhaka, Bangladesh	1,464.86	93-197
**	Bankers Trust Co., New York ØBCCI-108		
21001	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50	
21003	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	18,894.05	
** Subtotal **		54,781.55	93-198
**	Capital Bank, Miami ØBCCI-117		
0902205153	BCC Credit & Finance (Uruguay) S.A.	375,728.87	
0902205080	BCCI S.A. Sao Paulo (Brazil)	160,788.30	
0920013341	BCCI S.A. Sao Paulo (Brazil)	12,178.60	
0902205129	BCCI Trinidad & Tobago Merchant Bankers	197,499.20	
** Subtotal **		746,194.97	93-199
**	Chase Manhattan Bank, New York ØBCCI-109		
21041	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	13,527.00	93-200
**	Citibank, New York ØBCCI-110		
20949	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	74,250.00	93-201
**	Commercial Bank of Korea, New York ØBCCI-111		
21026	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	44,550.00	
20964	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50	
20989	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	38,115.00	
** Subtotal **		118,552.50	93-202

** Court Registry Investment System			ØBCCI-13-2
86052	BCC Emirates, Abu Dhabi	17,763,910.10	93-203
** Court-Appointed Liquidators of BCCI			ØBCCI-128
	1200 Reading Drive, Orlando, FL	300,000.00	
	Canal Place Bankruptcy	3,015,813.13	KATE TOOMEY, NUSSBAUM, 202,633-89
	M/V Aeolian	95,121.88	
** Subtotal **		3,414,077.28	93-215
** First American Bank of N.Y.			ØBCCI-112
10300015	BCC Emirates, Abu Dhabi	10,255.80	
11801008	BCC Ghana Ltd.	470,526.70	
11278002	BCC S.A. Espanola	7,190.00	
21304009	BCCI (Overseas) Barbados	9,466.74	
10884000	BCCI (Overseas) Bombay	43,650.66	
21301002	BCCI (Overseas) Cameroon	325.00	
11439008	BCCI (Overseas) Dhaka, Bangladesh	500.00	
10001026	BCCI (Overseas) Freetown, Sierra Leone	1,747.44	
20451002	BCCI (Overseas) Istanbul, Turkey	6,218.81	
550547877	BCCI (Overseas) Kingston, Jamaica	165,965.63	
11386001	BCCI (Overseas) Lahore, Pakistan	283,010.40	
20413009	BCCI (Overseas) Paris	30,581.69	
10753008	BCCI (Overseas) Sri Lanka	44,845.00	
11901007	BCCI S.A. Sao Paulo (Brazil)	22,875.22	
11900017	BCCI Trinidad & Tobago Merchant Bankers	5,047.40	
00023012	Banque de Commerce et de Placements S.A.	827,396.35	
10838007	National Bank of Oman	483,647.97	
** Subtotal **		2,576,824.93	-93-205
** First Interstate Bank Int'l, New York			ØBCCI-113
21046	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,169.75	93-206
** Foley & Lardner, Tampa, FL			ØBCCI-118
	Escrow Account	100,000.00	93-207
** Habib Bank Limited, New York			ØBCCI-114
21020	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	57,546.00	
20298	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	20,927.00	
** Subtotal **		78,473.00	93-209

**	Holland & Knight, Miami, FL Escrow Account ØBCCI-119	220,500.00	93-210
**	Janis Schuelke & Wechsler, Washington Escrow Account ØBCCI-127	63,454.22	93-211
**	Korea First Bank, New York Agency ØBCCI-115		
21017	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	40,000.00	93-212
**	Metro Bank, Houston, TX ØBCCI-120		
MBD900158	BCCI (Overseas) Dhaka, Bangladesh	30,800.00	93-213
**	Oppenheimer & Co., New York ØBCCI-116		
033-35263	North American Investment & Finance, Ltd U.S. Treasury notes	5,090,650.00	
033-35263	North American Investment & Finance, Ltd	1,032,315.17	
** Subtotal **		6,122,965.17	93-214
**	Trustee for BCCI S.A. Los Angeles ØBCCI-121		
	Real property	13,894,680.00	
	Coimbra Property, Kissimmee, FL Emerald Place Apts, Bermuda Dunes, CA Francor Property, Kissimmee, FL Int'l Industrial Park, Dade Co., FL		
	Cash Assets -121-1	34,379,641.99	
	Loans Receivable	20,245,040.68	
	Miscellaneous property	31,445.00	
** Subtotal **		68,550,807.67	93-208
*** Total ***		$101,302,465.54	

1325015-000-11407

Seizure Form

Ass[redacted] 92-FBI-000460 | Date/Tin[redacted] 4/01/99 15:05:38 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920920115	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:
	[redacted] b6 b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
01/24/92				Indictment	11/24/91	

(18) Seizing Agent:	(19) Phone Number:
[redacted]	(202) 324-9072 b6 b7C

(20) Seized From: BCCI

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Given	Not Given	NY

(24) Judicial Seizure:	(25) District Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
329750583.31	Y		Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 1)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	**(40) Forfeiture-Dependent Award?**	**(41) Quick Release Performed?**	**(42) Intra-Agency Assistance?**
N	N	N	N
(43) Suitable for Official Use?	**(44) OCDETF Case?**	**(45) Sharing Anticipated?**	**(46) Additional Agencies?**
N	N	N	Y

(Complete if Applicable) VEHICLE

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):
(67) Number of Cylinders:	**(68) Four Wheel Drive?**	**(69) Salvage Certificate?**

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

Seizure Form

Asset Description: BCCI Holdings (Round 1)

(95) Name: (Party ID 394787)	(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
BCCI		Owner	
(98) Address: (Seq No. 1)		Lienholder	
Not Given		Seized From	X
(99) City: Not Given	(100) State: DC	(101) Zip Code: 99999	(102) Country: USA
(103) Contact Name (if business): Not Given	(104) Phone Number:	Institution Seized From	
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):
(109) Incarcerated? N	(110) Prisoner ID:	Occupant	
(111) Institution Name (if incarcerated):		Victim	
(112) Institution Address: (Seq No. 1)		Other	
(113) City:	(114) State:	(115) Zip Code:	(116) Country:
(117) Represented by Counsel? N	(118) Attorney's Name (if any):		
(119) Firm's Name:	(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No. 1)			
(122) City:	(123) State:	(124) Zip Code:	(125) Country:

(95) Name: (Party ID)	(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
(98) Address: (Seq No.)		Owner	
(99) City:	(100) State:	(101) Zip Code:	(102) Country:
(103) Contact Name (if business):	(104) Phone Number:	Lienholder	
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):
(109) Incarcerated?	(110) Prisoner ID:	Seized From	
(111) Institution Name (if incarcerated):		Institution Seized From	
(112) Institution Address: (Seq No.)		Occupant	
(113) City:	(114) State:	(115) Zip Code:	(116) Country:
(117) Represented by Counsel?	(118) Attorney's Name (if any):	Victim	
(119) Firm's Name:	(120) Attorney's Phone Number:	Other	
(121) Attorney's Address: (Seq No.)			
(122) City:	(123) State:	(124) Zip Code:	(125) Country:

Seizure Form

Asset Description: BCCI Holdings (Round 1)

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	US V BCCI HOLDINGS(ROUND 1)		
(128) AUSA Name: STEFF CASELLA		(129) Judicial District: DC	(130) Phone Number: 202-514-1263
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name: US CUSTOMS HQ			(137) Agency Case ID:	
(138) Adopted From? N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name: DRUG ENFORCEMENT ADMINISTRATION			(137) Agency Case ID:	
(138) Adopted From? N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name:			(137) Agency Case ID:	
(138) Adopted From? N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code:	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

b7E

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	01/24/92

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate:	Per:
NEW YORK	NY	10007		

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	01/24/92
(163) Received By:	(164) Title:
Bob Johnson	AFU Chief

PREPARED BY

(165) Signature:	(166) Date:
	05/15/95
(167) Prepared By: [redacted]	(168) Title: SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	05/18/95
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 92-FBI-000460
Asset Description: BCCI Holdings (Round 1)

Probable Cause

The Washington Field Office (WFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from several criminal orders of forfeiture in U.S. v. Hidden Interests; Major case number 38. Robb Evans, trustee has been appointed to oversee the complex assets listed in the criminal BCCI forfeiture orders.

On October 4, 1998, a sixteen-count indictment was returned charging BCCI holdings (Luxumbourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] b6 b7C BCCI), and Capcom Financial Services, LTD. with [redacted]. The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989.

[redacted] b7E

On January 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Seizure Form

Asset ID: 92-FBI-000460
Asset Description: BCCI Holdings (Round 1)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	L CLAIM AMERICAN EXPRESS BANK	510000.00
		FI	
2	1	L Claim First Florida	434136.28
		FI	
3	1	State of New York	10000000.00
		FI	
4	1	Worldwide Victims Fund	172445610.42
		FI	
5	1	Amount Forfeited	55150403.39
		FI	
6	1	Amount Forfeited	54395061.86
		FI	
7	1	Worldwide Victims Fund	2611550.77
		FI	
8	1	Amount Forfeited	2611550.76
		FI	

Asset ID: 92-FBI-000460
Asset Description: BCCI Holdings (Round 1)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
9	1	Worldwide Victims Fund	1085912.00
		FI	
10	1	Amount Forfeited	1085911.99
		FI	
11	1	Balance of Account	29420445.84
		FI	

Asset ID: 92-FBI-000460
Asset Description: BCCI Holdings (Round 1)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920920115
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

Seizure Form

Ass[redacted]-92-FBI-000461 | Date/Tim[redacted]4/01/99 15:01:40 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920920116	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:
	[redacted]

b6
b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
07/29/92				Indictment	11/24/91	

(18) Seizing Agent:	(19) Phone Number:
[redacted]	(202) 324-9072

b6
b7C

(20) Seized From: BCCI

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Given	Not Given	NY

(24) Judicial Seizure:	(25) District Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
104488322.73	Y		Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 2)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

VEHICLE (Complete if Applicable)

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):
(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:				
(88) Air Worthiness Certificate?	(89) Log Books?				

ENGINES

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN,	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

Seizure Form

Asset ID: [redacted]2-FBI-000461 | Date/Time: [redacted]4/01/99 15:01:40

Asset Description: BCCI Holdings (Round 2)

(95) Name: (Party ID 395743)	(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
BCCI			
(98) Address: (Seq No. 1)		Owner	
NOT GIVEN			
(99) City:	(100) State: / (101) Zip Code: / (102) Country:	Lienholder	
NOT GIVEN	DC / 00000 / USA		
(103) Contact Name (if business):	(104) Phone Number:	Seized From	X
UNKNOWN UNKNOWN			
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient? / (107) Quick Release Date: / (108) Expenses Reimbursed ($):	Institution Seized From	
(109) Incarcerated?	(110) Prisoner ID:	Occupant	
N			
(111) Institution Name (if incarcerated):		Victim	
(112) Institution Address: (Seq No. 1)		Other	
(113) City:	(114) State: / (115) Zip Code: / (116) Country:		
(117) Represented by Counsel?	(118) Attorney's Name (if any):		
N			
(119) Firm's Name:	(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No. 1)			
(122) City:	(123) State: / (124) Zip Code: / (125) Country:		

(95) Name: (Party ID)	(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
(98) Address: (Seq No.)		Owner	
(99) City:	(100) State: / (101) Zip Code: / (102) Country:	Lienholder	
(103) Contact Name (if business):	(104) Phone Number:	Seized From	
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient? / (107) Quick Release Date: / (108) Expenses Reimbursed ($):	Institution Seized From	
(109) Incarcerated?	(110) Prisoner ID:	Occupant	
(111) Institution Name (if incarcerated):		Victim	
(112) Institution Address: (Seq No.)		Other	
(113) City:	(114) State: / (115) Zip Code: / (116) Country:		
(117) Represented by Counsel?	(118) Attorney's Name (if any):		
(119) Firm's Name:	(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No.)			
(122) City:	(123) State: / (124) Zip Code: / (125) Country:		

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	US V BCCI HOLDINGS (ROUND 2)		
(128) AUSA Name: STEFF CASELLA		(129) Judicial District: DC	(130) Phone Number: 202-514-1263
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name: US CUSTOMS HQ			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name: DRUG ENFORCEMENT ADMINISTRATION			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name:			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code:	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

b7E

Seizure Form

Asset ID: [redacted]2-FBI-000461	Date/Time: [redacted]/01/99 15:01:40
Asset Description: BCCI Holdings (Round 2)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	07/29/92

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate:	Per:
NEW YORK	NY	10007		

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	07/29/92
(163) Received By:	(164) Title:
Bob Johnson	AFUC

PREPARED BY

(165) Signature:	(166) Date:
	05/15/95
(167) Prepared By:	(168) Title:
	SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	05/18/95
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 92-FBI-000461
Asset Description: BCCI Holdings (Round 2)

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. ROBB EVANS, TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS.

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI"), [redacted] b6 b7C

BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH [redacted] THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI OFFICERS, [redacted], AND TWO NARCO-TRAFFICKERS, [redacted] WERE INDICTED ON MAY 4, 1989.

[redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Seizure Form

Asset ID: 92-FBI-000461
Asset Description: BCCI Holdings (Round 2)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	L Claim Bank of New York FI	403274.06
2	1	L Claim Bank of New York FI	25000.00
3	1	L Claim First American Bank FI	76378.65
4	1	L Claim First American Title FI	32049.91
5	1	Worldwide Victims Fund FI	50601150.18
6	1	Amount Forfeited FI	46238502.61
7	1	Amount Forfeited FI	1741550.00
8	1	Worlwide Victims Fund FI	2925772.43

Asset ID: 92-FBI-000461
Asset Description: BCCI Holdings (Round 2)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
9	1	Amount Forfeited	2925772.44
		FI	
10	1	Worldwide Victims Fund	515956.59
		FI	
11	1	Amount Forfeited	515956.60
		FI	
12	1	Balance of Account	6207563.01
		FI	

Asset ID: 92-FBI-000461
Asset Description: BCCI Holdings (Round 2)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920920116
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

Seizure Form

Ass[redacted] 92-FBI-000462 | Date/Tim[redacted]4/01/99 14:58:11 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920920117	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38
(9) Operation Name:	(10) Case Agent: [redacted] b6 b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
08/19/93				Indictment	11/24/91	

(18) Seizing Agent: [redacted] (19) Phone Number: (202) 324-9072 b6 b7C

(20) Seized From: BCCI

(21) Place/Address Where Seized: Not Given | (22) City: Not Given | (23) State: NY

Judicial	District	(26) Forfeiture Statute:	(27) Violation Statute:
(24) Seizure: NYS	(25) Processing: DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
101135749.15	Y		Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 3)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

VEHICLE (Complete if Applicable)

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):
(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

Seizure Form

Asset Description: BCCI Holdings (Round 3)

(95) Name: (Party ID 395735) BCCI		(96) Phone Number:		(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No. 1) NOT GIVEN				Owner
(99) City: NOT GIVEN	(100) State: DC	(101) Zip Code: 00000	(102) Country: USA	Lienholder
(103) Contact Name (if business): UNKNOWN UNKNOWN		(104) Phone Number:		Seized From X
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated? N	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No. 1)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):			
(119) Firm's Name:		(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No. 1)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(95) Name: (Party ID)		(96) Phone Number:		(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No.)				Owner
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	Lienholder
(103) Contact Name (if business):		(104) Phone Number:		Seized From
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated?	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No.)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):			
(119) Firm's Name:		(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No.)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

Seizure Form

Asset Description: BCCI Holdings (Round 3)

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	US V BCCI HOLDINGS (ROUND 3)		
(128) AUSA Name: STEFF CASELLA		(129) Judicial District: DC	(130) Phone Number: 202-514-1263
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name: US CUSTOMS HQ			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name: DRUG ENFORCEMENT ADMINISTRATION			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name:			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NC	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

b7E

Seizure Form

Asset ID: [redacted]2-FBI-000462	Date/Time: [redacted]/01/99 14:58:11
Asset Description: BCCI Holdings (Round 3)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	08/19/93

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate: Per:
NEW YORK	NY	10007	

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	08/19/93
(163) Received By:	(164) Title:
Bob Johnson	AFUC

PREPARED BY

(165) Signature:	(166) Date:
	05/15/95
(167) Prepared By:	(168) Title:
	SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	05/18/95
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 92-FBI-000462
Asset Description: BCCI Holdings (Round 3)

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. ROBB EVANS, TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS.

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI"), [redacted] b6 b7C BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH [redacted]. THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI OFFICERS, [redacted] AND TWO NARCO-TRAFFICKERS [redacted] WERE INDICTED ON MAY 4, 1989.

[redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Asset ID: 92-FBI-000462
Asset Description: BCCI Holdings (Round 3)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	L Claim Capitol Bank FI	131566.13
2	1	L Claim Court Registry investment System FI	17755323.57
3	1	L Claim First American Bank of New York FI	418504.89
4	1	L Claim First American Bank of New York FI	101852.39
5	1	L Claim First American Bank of New York FI	3420.46
6	1	L Claim First American Bank of New York FI	157950.00
7	1	L Claim First American Bank of New York FI	328120.96
8	1	Janis Schuelke & Wechsler FI	41797.73

Asset ID: 92-FBI-000462
Asset Description: BCCI Holdings (Round 3)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
9	1	Court Appointed Fiduciaries	5000000.00
		FI	
10	1	Amount Forfeited	28240886.43
		FI	
11	1	Worldwide Victims Fund	14587397.95
		FI	
12	1	Amount Forfeited	14587397.95
		FI	
13	1	Worldwide Victims Fund	3474496.52
		FI	
14	1	Amount Forfeited	3474496.52
		FI	
15	1	Balance of Account	28454367.69
		FI	

Asset ID: 92-FBI-000462
Asset Description: BCCI Holdings (Round 3)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920920117
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

Seizure Form

Ass[redacted] 95-FBI-003535 | Date/Tim[redacted]4/01/99 14:55:21 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920950097	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:

b6
b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
12/21/94				Indictment	11/24/91	

(18) Seizing Agent:	(19) Phone Number:
	(202) 324-9072

b6
b7C

(20) Seized From:
BCCI

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Given	Not Given	NY

(24) Seizure: Judicial District	(25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
371041959.20	Y	02/06/99	Financial Instrument	04	Criminal

(34) Asset Description:
BCCI Holdings (Round 4)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

VEHICLE

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):

(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN, UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

Seizure Form

Asset Description: BCCI Holdings (Round 4)

(95) Name: (Party ID 395744) BCCI		(96) Phone Number:		(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No. 1) NOT GIVEN				Owner
(99) City: NOT GIVEN	(100) State: DC	(101) Zip Code: 00000	(102) Country: USA	Lienholder
(103) Contact Name (if business): UNKNOWN UNKNOWN		(104) Phone Number:		Seized From X
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated? N	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No. 1)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):			
(119) Firm's Name:		(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No. 1)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(95) Name: (Party ID)		(96) Phone Number:		(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No.)				Owner
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	Lienholder
(103) Contact Name (if business):		(104) Phone Number:		Seized From
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated?	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No.)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):			
(119) Firm's Name:		(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No.)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655 (JHG)	U.S. V. BBI HOLDINGS (ROUND 4)		
(128) AUSA Name: STEFF CASSELLA		(129) Judicial District: DC	(130) Phone Number: 202-514-1263
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name: US CUSTOMS HQ			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name: DRUG ENFORCEMENT ADMINISTRATION			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name: [redacted]			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code: [redacted]	(146) Sharing Possible: N
(147) Contact Name:				(148) Contact Phone Number:

b7E

Seizure Form

Asset ID: [redacted]5-FBI-003535	Date/Time: [redacted]/01/99 14:55:21
Asset Description: BCCI Holdings (Round 4)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	12/21/94

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate: Per:
NEW YORK	NY	10007	

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	12/21/94
(163) Received By:	(164) Title:
Bob Johnson	AFU Chief

PREPARED BY

(165) Signature:	(166) Date:
	05/15/95
(167) Prepared By:	(168) Title:
	SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	05/18/95
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 95-FBI-003535
Asset Description: BCCI Holdings (Round 4)

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. ROBB EVANS, TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS.

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI") [redacted] b6 b7C BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH [redacted] THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI OFFICERS, [redacted] AND TWO NARCO-TRAFFICKERS [redacted] WERE INDICTED ON MAY 4, 1989.

[redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Seizure Form

Asset ID: 95-FBI-003535
Asset Description: BCCI Holdings (Round 4)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	L Claim Carlson Farm, Sherman, Connecticut FI	298825.60
2	1	L Claim BCCI New York Agency FI	292429.99
3	1	Worldwide Victims Fund FI	99696863.05
4	1	Amount Forfeited FI	99696863.06
5	1	Worldwide Victims Fund FI	12856667.22
6	1	Amount Forfeited FI	12856667.22
7	1	Balance of Account FI	96327584.23

Asset ID: 95-FBI-003535
Asset Description: BCCI Holdings (Round 4)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920950097
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

Seizure Form

Ass[redacted] 96-FBI-003688 | Date/Tim[redacted]4/01/99 14:50:06 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960097	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

b6
b7C

(9) Operation Name:

(10) Case Agent:

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
09/20/96				Indictment	11/24/91	

(18) Seizing Agent:

(19) Phone Number: (202) 324-9072

b6
b7C

(20) Seized From: BCCI

(21) Place/Address Where Seized: Not Given

(22) City: Not Given

(23) State: NY

Judicial (24) Seizure:	District (25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
211251056.69	Y		Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 5)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

VEHICLE

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):
(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES
(86) Airframe Flying Hours:	(87) # of Engines:	
(88) Air Worthiness Certificate?	(89) Log Books?	

(82) #	(83) Serial Number	(84) Size	(85) Flying Hours

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

Seizure Form

Asset Description: BCCI Holdings (Round 5)

(95) Name: (Party ID 395749) BCCI			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No. 1) NOT GIVEN				Owner
(99) City: NOT GIVEN	(100) State: DC	(101) Zip Code: 00000	(102) Country: USA	Lienholder
(103) Contact Name (if business): UNKNOWN UNKNOWN			(104) Phone Number:	Seized From X
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated? N	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No. 1)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No. 1)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(95) Name: (Party ID)			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No.)				Owner
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	Lienholder
(103) Contact Name (if business):			(104) Phone Number:	Seized From
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated?	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No.)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No.)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	U.S. V. BCCI HOLDINGS (ROUND 5)		
(128) AUSA Name: STEFF CASSELLA		(129) Judicial District: DC	(130) Phone Number: 202-514-1263
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name: US CUSTOMS HQ			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name: DRUG ENFORCEMENT ADMINISTRATION			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name:			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code:	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

b7E

Seizure Form

Asset ID: [redacted]6-FBI-003688	Date/Time: [redacted]/01/99 14:50:06
Asset Description: BCCI Holdings (Round 5)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	09/20/96

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate:	Per:
NEW YORK	NY	10007		

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	09/20/96
(163) Received By:	(164) Title:
Bob Johnson	AFU Chief

PREPARED BY

(165) Signature:	(166) Date:
	09/20/96
(167) Prepared By:	(168) Title:
	SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	09/20/96
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 96-FBI-003688
Asset Description: BCCI Holdings (Round 5)

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. ROBB EVANS, TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS.

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI" [redacted] b6 b7C

[redacted]

BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH [redacted]

[redacted]

[redacted]). THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI OFFICERS, [redacted] AND TWO NARCO-TRAFFICKERS, [redacted] WERE INDICTED ON MAY 4, 1989.

[redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Seizure Form

Asset ID: 96-FBI-003688
Asset Description: BCCI Holdings (Round 5)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	L Claim American Express Bank FI	570332.29
2	1	L Claim State of New York FI	400000.00
3	1	L Claim State of New York FI	13757.97
4	1	L Claim Bank of New York-Security Pacific FI	1208.00
5	1	L Claim Bank of New York-Security Pacific FI	35360.10
6	1	Worldwide Victims Fund FI	45102850.61
7	1	Amount Forfeited FI	45102850.60
8	1	Balance of Account FI	8237861.10

Asset ID: 96-FBI-003688
Asset Description: BCCI Holdings (Round 5)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960097
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

Seizure Form

Ass[redacted] 99-FBI-000970 | Date/Tim[redacted] 4/01/99 14:47:13 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920990092	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:

b6
b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
12/22/98				Indictment	11/24/91	

(18) Seizing Agent:	(19) Phone Number:
	(202) 324-9072

(20) Seized From: BCCI

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Given	Not Given	NY

(24) Judicial District Seizure:	(25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
158310927.71	Y		Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 6)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

VEHICLE

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):
(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

Seizure Form

Asset Description: BCCI Holdings (Round 6)

(95) Name: (Party ID 395752) BCCI			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No. 1) NOT GIVEN				Owner
(99) City: NOT GIVEN	(100) State: DC	(101) Zip Code: 00000	(102) Country: USA	Lienholder
(103) Contact Name (if business): UNKNOWN UNKNOWN			(104) Phone Number:	Seized From X
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated? N	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No. 1)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No. 1)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(95) Name: (Party ID)			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No.)				Owner
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	Lienholder
(103) Contact Name (if business):			(104) Phone Number:	Seized From
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated?	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No.)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No.)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

Seizure Form

Asset ID: [redacted]9-FBI-000970 | Date/Time: [redacted]4/01/99 14:47:13

Asset Description: BCCI Holdings (Round 6)

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	U.S. V. BCCI HOLDINGS (ROUND 6)		
(128) AUSA Name: STEFF CASSELLA		(129) Judicial District: DC	(130) Phone Number: 202-514-1263
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name: US CUSTOMS HQ			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible: N
(147) Contact Name:			(148) Contact Phone Number:	

(136) Agency Name: DRUG ENFORCEMENT ADMINISTRATION			(137) Agency Case ID:	
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible: N
(147) Contact Name:			(148) Contact Phone Number:	

(136) Agency Name:			(137) Agency Case ID:	b7E
(138) Adopted From: N			(139) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NC[redacted]	(146) Sharing Possible: N
(147) Contact Name:			(148) Contact Phone Number:	

Seizure Form

Asset ID: [redacted]9-FBI-000970	Date/Time: [redacted]/01/99 14:47:13
Asset Description: BCCI Holdings (Round 6)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	12/22/98

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate: Per:
NEW YORK	NY	10007	

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	12/22/98
(163) Received By:	(164) Title:
Bob Johnson	AFU Chief

PREPARED BY

(165) Signature:	(166) Date:
	12/22/98
(167) Prepared By: [redacted]	(168) Title: SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	12/22/98
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 99-FBI-000970
Asset Description: BCCI Holdings (Round 6)

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. ROBB EVANS, TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS.

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI") [redacted] b6 b7C BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH [redacted] THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI OFFICERS, [redacted] AND TWO NARCO-TRAFFICKERS, [redacted] WERE INDICTED ON MAY 4, 1989.

[redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Seizure Form

Asset ID: 99-FBI-000970
Asset Description: BCCI Holdings (Round 6)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	Balance of Account FI	151487578.58

Asset ID: 99-FBI-000970
Asset Description: BCCI Holdings (Round 6)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920990092
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON FIELD OFFICE
FORFEITURE ASSET SEIZURE TEAM
FACSIMILE COVERSHEET

DATE: 2/3/99 **TIME:** 2:05 pm

TO: NVRA - (703-917-9268)

ATTN: [redacted] b6 b7C

FROM: [redacted] WFO

4 PAGES (INCLUDING COVER SHEET)
(Please call if you did not receive all pages)

*NOTES: [redacted] Thanks for your help. b6 b7C
Attached are the minutes of the
2/1/99 meeting re BCCI.

[redacted]

601 4TH STREET, N.W., WASHINGTON, D.C. 20535
PHONE: (202) 278-2295 FAX: (202) 278-2598

4 pages sent
2/3/99 2:10 pm

TELEFAX TRANSMISSION

DEPARTMENT OF JUSTICE
ASSET FORFEITURE MANAGEMENT STAFF
Justice Management Division
901 E Street, N.W.
Suite 832
Washington, D.C. 20530
FAX Number (202)616-8100
Voice Verification (202)616-8000

b6
b7C

TO [redacted] FBI
NAME DIVISION/SECTION

FROM [redacted] AFMS
NAME

NUMBER OF PAGES (INCLUDING COVER SHEET) 4

DESTINATION'S FAX NUMBER: 202 324-9698

PRECEDENCE (PLEASE CIRCLE ONE): ROUTINE, (PRIORITY) IMMEDIATE

COMMENTS/MESSAGE: Please review the notes attached and see if they fairly represent what we discussed and what we agreed to yesterday. Any differences or additions should be directed to me ASAP.

Thanks

2548

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/06/1999

To: Washington Field

From: Washington Field
Squad C-1
Contact: SSA [redacted] Ext. 2295

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b7C

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. v. BCCI Holdings

Synopsis: CLOSING COMMUNICATION

Details: The purpose of this communication is to summarize recent events surrounding the 63 seizure files associated with the BCCI investigation. On 2/1/99, several members of DOJ, USMS, and FBI met to determine how to close out the BCCI seizures entered in the CATS database as the Sixth and Final Order of Forfeiture had been entered into as of 12/22/98. A summary of this meeting is attached as reference. In brief, it was decided that the 63 BCCI individual seizures entered into CATS would be deleted in exchange for 6 seizures entered into CATS corresponding to each of the six orders of forfeiture. The following CATS ID numbers and corresponding seizure numbers were utilized for the respective orders of forfeiture.

92-FBI-000460 (3920-92-F-0115; 1st Order - 1/24/92 & 1/31/92)
92-FBI-000461 (3920-92-F-0116; 2nd Order - 7/29/92)
92-FBI-000462 (3920-92-F-0117; 3rd Order - 8/19/93)
95-FBI-003535 (3920-95-F-0097; 4th Order - 12/21/94)
96-FBI-003688 (3920-96-F-0097; 5th Order - 9/20/96)
99-FBI-000970 (3920-99-F-0092; 6th Order - 12/22/98)

The USMS has taken the responsibility for associating each of the 63 individual seizures with the 6 seizures for each order of forfeiture. Attached for reference is a spreadsheet which correlates each of the 63 seizures with the appropriate order of forfeiture. The USMS will make entries to the itemized list in CATS which will detail the total amount received for each

117

L 990971.CC

1325015-000-11465

29B-WF-171994 FS

order of forfeiture and how such amount will be distributed (i.e., claims, Worldwide Victims Fund, etc.).

As WFO has only been involved with the BCCI forfeiture files in an administrative capacity and as WFO has no means other than relying on the CATS database of determining when income has been received and how income will be distributed for each of the orders of forfeiture, WFO is closing its seizure files associated with the BCCI investigation (specifically, 3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060, 3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097, 3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195, 3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075, and 3920-97-F-0126). Attached are printouts from the CATS database for each of the six seizures which reflect income and distribution of seized funds as of 4/1/99.

Attachments

CC: 13 - Bureau (Attn: [redacted] FSPU) b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126 (w/o attachments)
1 - WFO, 29B-WF-171994 SUB FS [with all six CATS forms]
13 - WFO, 29B-WF-171994 FF-21 (3920-95-F-0058),
FF-22 (3920-95-F-0059), FF-23 (3920-95-F-0060),
FF-24 (3920-95-F-0097), FF-26 (3920-96-F-0024),
FF-1 (3920-96-F-0097), FF-2 (3920-96-F-0134),
FF-3 (3920-96-F-0186), FF-4 (3920-96-F-0195) [each with CATS form for 4th Order of Forfeiture];
FF-5 (3920-97-F-0028), FF-6 (3920-97-F-0052),
FF-7 (3920-97-F-0075), and FF-8 (3920-97-F-0126) [each with CATS form for 5th Order of Forfeiture]

♦♦

1325015-000-11466

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED

SEP 20 1996

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of

29B-WF-171984 Sub F 10

[redacted] b6 b7C

1325015-000-11467

29B-WF-171994 Sub FS-63A

Searched [illegible]

Serialized BB

Indexed [illegible]

Filed BB

1325015-000-11479

[redacted]
Orlando, Florida 32854

VOID

BCCI

1993

b6
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Mr [redacted]
Federal Bureau of Investigation
9th & Pennsylvania Avenue
Washington, D.C. 20535

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1325015-000-11480

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 8
Page 6 ~ Duplicate;
Page 7 ~ Duplicate;
Page 9 ~ Duplicate;
Page 16 ~ b6; b7C;
Page 62 ~ Duplicate;
Page 63 ~ Duplicate;
Page 64 ~ Duplicate;
Page 65 ~ Duplicate;

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U1150

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/23/2010

To: Washington Field Office **Attn:** Records Management

From: Cleveland
FO
Contact: PS [redacted] b6 b7C

Approved By: [redacted] PFJ

Drafted By: [redacted] an

Case ID #: 29B-WF-171994 (Closed) -941
CV 190-0 (Pending) - 746

Title: Returning Office of Origin File

Synopsis: Cleveland Division is returning Washington Field Office file 29B-WF-171994.

Enclosure(s): 29B-WF-171994 (1 Volume)

Details: Cleveland Division has been maintaining Washington Field Office file 29B-WF-171994 in its closed files. Cleveland Division is now returning this file to be maintained at Washington Field Office.

♦♦

UNCLASSIFIED

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FBI/DOJ Checked
1325015-000-10438

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DE RUCNFB #0222 2080601

ZNR UUUUU

O 262243Z JUL 91

FM DIRECTOR FBI

TO ALL FBI FIELD OFFICES/IMMEDIATE/

ALL LEGATS/IMMEDIATE/

BT

UNCLAS

CITE: //0624//

PASS: PERSONAL ATTENTION.

[redacted] b6 b7C

SUBJECT: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD [redacted] AKA [redacted] b6 b7C

[redacted] AKA [redacted]

[redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; AGHA HASAN ABEDI; [redacted]; SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND

[redacted] b6 b7C

29B-WF-171994-1

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 27 1991
FBI — CLEVELAND

[redacted] b6 b7C

[redacted] advised

COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; OO: WMFO.

CAPTIONED MATTER INVOLVES INVESTIGATION OF FALSE STATEMENTS MADE OVER MORE THAN 10 YEARS TO THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (BGFRS), WASHINGTON, D.C. (WDC), BY SUBJECTS TO HIDE TRUE OWNERSHIP AND CONTROL OF CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. (CCAH), NETHERLANDS, ANTILLES, AND ITS SUBSIDIARIES, BY BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). IN 1982, BASED ON REPRESENTATIONS MADE BY CLARK MCADAMS CLIFFORD, [redacted] AND FOUR MIDDLE EASTERN "INVESTORS," THE BGFRS APPROVED CCAH AS A BANK HOLDING COMPANY TO OWN FIRST AMERICAN BANKSHARES (FABS), WDC. INVESTIGATION TO DATE INDICATES THAT THE "INVESTORS" WERE MERELY NOMINEES FOR BCCI, A LUXEMBOURG-BASED BANK WHICH WAS UNACCEPTABLE TO THE BGFRS FOR ANY OWNERSHIP OR CONTROL OF ANY AMERICAN BANK. YEARLY CCAH FILINGS TO BGFRS SINCE 1982 HAVE DENIED EXISTENCE OF ANY BCCI ROLE IN ITS OPERATIONS. SUBSEQUENTLY, BCCI HAS ALLEGEDLY USED SIMILAR NOMINEE TRANSACTIONS TO OBTAIN CONTROL OF BANKS IN GEORGIA AND CALIFORNIA.

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ON 2/7/91, WMFO INITIATED A FINANCIAL INSTITUTION FRAUD INVESTIGATION CONCERNING CAPTIONED MATTER BASED ON A

b6
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1. [redacted]
2. [redacted]
3. [redacted]
4. [redacted]
5. [redacted]
6. [redacted]

PRESENTLY RESIDING [redacted]

ALL RECIPIENTS ARE TO CONDUCT IMMEDIATE INDICES SEARCHES FOR COMPANIES AND INDIVIDUALS IDENTIFIED HEREIN. SUTEL RESULTS IMMEDIATELY BY TELETYPE NO LATER THAN COB 7/31/91 TO BOTH WMFO (29B-WF-171994) AND THE FINANCIAL INSTITUTION FRAUD UNIT, WHITE-COLLAR CRIMES SECTION, FBIHQ. REPORTS OF POSITIVE REFERENCES ARE TO INCLUDE A SYNOPSIS OF INFORMATION OBTAINED, SUMMARY OF ANY ACTION TAKEN IN RESPONSE, AND RESULTS OF ANY INVESTIGATION

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
[X] Teletype	[X] Immediate	[ ] TOP SECRET
[ ] Facsimile	[ ] Priority	[ ] SECRET
[ ] AIRTEL	[ ] Routine	[ ] CONFIDENTIAL
		[ ] UNCLAS E F T O
		[X] UNCLAS

Date 7/31/91

FM FBI CLEVELAND (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3170//

PASS: ATTN: FINANCIAL INSTITUTION FRAUD UNIT, FBIHQ.

SUBJECT: CLARK MCADAMS CLIFFORD, AKA ET AL; [redacted] b6 b7C

[redacted]

AKA; [redacted] CREDIT AND COMMERCE

AMERICAN HOLDINGS, NV NETHERLANDS, ANTILLES; AGHA HASAN ABEDI;

[redacted] SHAYKH ZAYID BIN SULTAN AL-NUNHAYYAN, AKA; DBA

BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON,

AKA DR GHAITH PHARAON; FIF; FAG; OO: WMFO.

RE BUREAU TELETYPE TO CLEVELAND DATED JULY 27, 1991.

SLO:dds
(3)

RUC 7/31/91

29B-WF-171994-2

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
AUG 0 1 1991
FBI CLEVELAND

[redacted] b6 b7C

Approved: WDB/MR Original filename: ____

Time Received: ____ Telprep filename: DDS00750.217

MRI/JULIAN DATE: 1863/217 ISN: 018

FOX DATE & TIME OF ACCEPTANCE: 20452 31 5414 9 1 PM

1325015-000-10445

SEARCHES OF CLEVELAND GENERAL INDICES (MANUAL AND AUTOMATED) FOR ABOVE NAMES LISTED IN REFERENCED TELETYPE, ALONG WITH COMPANIES, ALL MET WITH NEGATIVE RESULTS.

BT

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DE RUCNFB #0184 2272226

ZNY EEEEE

O 152103Z AUG 91

FM DIRECTOR FBI

TO ALL FBI FIELD OFFICES/IMMEDIATE/

ALL LEGATS/IMMEDIATE/

BT

UNCLAS E F T O

CITE: //1010//

29B-CV-171994
196B-CV-1786; 7P2

SUBJECT: BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).

REBUTEL TO ALL FIELD OFFICES AND LEGATS DATED JULY 26, 1991; ENTITLED, "CLARK MC ADAMS CLIFFORD, AKA ET AL.; FIF; FAG; OO: WMFO.

BY LETTER TO THE DIRECTOR, FBI, DATED AUGUST 5, 1991, SENATOR DAVID L. BOREN, OKLAHOMA, CHAIRMAN OF THE U.S. SENATE SELECT COMMITTEE ON INTELLIGENCE (SSCI), REQUESTED FBI COOPERATION IN PROVIDING THE COMMITTEE WITH ANY FBI DOCUMENTATION WHICH WOULD REFLECT THE NATURE AND EXTENT OF ANY INTELLIGENCE OR

29B-WF-171994-3

SEARCHED INDEXED
SERIALIZED FILED
AUG 15 1991
FBI — CLEVELAND

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Noted up [redacted] advised

1325015-000-10447

OPERATIONAL RELATIONSHIP BETWEEN THE FBI AND BCCI AND ITS PRINCIPALS.

ON AUGUST 13, 1991, [redacted], STAFF MEMBER, SSCI, ADVISED THAT THE COMMITTEE IS INTERESTED IN THE FBI'S RELATIONSHIP WITH BCCI ONLY AS IT PERTAINS TO FOREIGN COUNTERINTELLIGENCE (FCI) OR INTERNATIONAL TERRORISM (IT) MATTERS. OF PARTICULAR INTEREST WOULD BE ANY OCCASION WHEREIN BCCI OR ITS PRINCIPALS WERE USED IN AN UNDERCOVER CAPACITY OR IN ANY WAY TO FACILITATE AN FCI OR IT INVESTIGATION. IF ANY INTELLIGENCE OF AN FCI OR IT NATURE DEVELOPED FROM A CRIMINAL INVESTIGATION, THE COMMITTEE IS PARTICULARLY INTERESTED IN LEARNING WHAT INVESTIGATIVE ACTION OR DISSEMINATION WAS ACCOMPLISHED. b6 b7C

REFERENCED TELETYPE REQUESTED THE FIELD AND LEGATS TO CONDUCT INDICES SEARCHES ON A NUMBER OF SUBJECTS AND RELATED INDIVIDUALS OF WMFO'S FINANCIAL INSTITUTION FRAUD INVESTIGATION. MANY OF THESE NAMES WERE INCLUDED ON A *PRINCIPALS LIST* FURNISHED BY [redacted] ON AUGUST 13, 1991, AND INFORMATION FURNISHED BY THE FIELD AND LEGATS IS CURRENTLY BEING REVIEWED TO DETERMINE b6 b7C

RECIPIENTS ARE TO IMMEDIATELY CONDUCT INDICES SEARCHES ON THE ADDITIONAL INDIVIDUALS AND ORGANIZATIONS WHICH FOLLOW.

BUREAU AIRTEL TO ALL SACS, ENTITLED, *RIGHT TO FINANCIAL

PRIVACY ACT (RFPA) OF 1978, FOREIGN COUNTERINTELLIGENCE (FCI)/ INTERNATIONAL TERRORISM (IT),* DATED AUGUST 28, 1987, IDENTIFIED LEGISLATION AND A FORM LETTER TO BE USED BY SACS IN REQUESTING FINANCIAL INFORMATION FROM FINANCIAL INSTITUTIONS WILLING TO COOPERATE WITH THE FBI ON A VOLUNTARY BASIS.

RECIPIENTS ARE TO REVIEW ANY REQUESTS MADE BY THE SAC TO FINANCIAL INSTITUTIONS UNDER THIS FORMAT AND ADVISE IF ANY CONTACT WAS MADE WITH BCCI OR ITS PRINCIPALS UNDER PROVISIONS SET FORTH UNDER RFPA.

ADDITIONALLY, DETAILS OF ANY INSTANCE WHEREIN BCCI OR THE BELOW-LISTED INDIVIDUALS WERE USED IN ANY WAY TO FACILITATE AN FCI OR IT INVESTIGATION, I.E., OPENING AN ACCOUNT OR PROVIDING A BACKSTOP FOR AN INVESTIGATION, SHOULD ALSO BE FORWARDED.

ABU DHABI INVESTMENT AUTHORITY;

INTERNATIONAL CREDIT AND INVESTMENT COMPANY (ICIC);

[redacted]; AND

CENTRUST BANK - BCCI SUBSIDIARY IN MIAMI.

SUBMIT RESULTS BY TELETYPE TO THE OFFICE OF INSPECTIONS, INSPECTION DIVISION, ATTENTION: CHIEF INSPECTOR [redacted] AND WHITE-COLLAR CRIME SECTION, CRIMINAL INVESTIGATIVE

MANUAL CHOICES NEGATIVE. 9/11/91

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b7C

1325015-000-10449

PAGE FOUR DE RUCNFB 0184 UNCLAS E F T O

DIVISION, ATTENTION: SECTION CHIEF [redacted] b6 b7C

POSITIVE REFERENCES ARE TO INCLUDE A SYNOPSIS OF INFORMATION OBTAINED, SUMMARY OF ANY ACTION TAKEN IN RESPONSE, AND RESULTS OF ANY INVESTIGATION THAT HAS BEEN OR IS CURRENTLY BEING CONDUCTED BY THE FBI.

BT

#0184

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FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☒ Teletype
☐ Facsimile
☐ AIRTEL

PRECEDENCE:
☒ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

Date 8/16/91

FM FBI CLEVELAND (29B-WF-171994) (RUC) (P)

TO DIRECTOR FBI/IMMEDIATE/

FBI WMFO/IMMEDIATE/

BT

UNCLAS

CITE: //3170//

PASS: ATTN: CHIEF INSPECTOR [redacted], OFFICE OF INSPECTIONS, INSPECTION DIVISION; AND SECTION CHIEF [redacted] WHITE-COLLAR CRIME SECTION, CRIMINAL INVESTIGATIVE DIVISION.

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SUBJECT: BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).

REFERENCE BUREAU TELETYPE TO ALL FIELD OFFICES, DATED 8/15/91.

SEARCHES OF CLEVELAND GENERAL INDICES (MANUAL AND AUTOMATED) FOR THE NAMES OF INDIVIDUALS AND BUSINESSES LISTED

RUC
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8/19/91

29B-WF-171994-4

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted]
AUG 19 1991
[redacted]

b6
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LRS:dcg

Approved: WDB/GMS Original filename:

Time Received: Telprep filename:

MRI/JULIAN DATE: 1792/208 ISN: 820

FOX DATE & TIME OF ACCEPTANCE: 2049/16 Aug 91

1325015-000-10452

^PAGE 2 29B-WF-171994 UNCLAS

IN REFERENCED TELETYPE MET WITH NEGATIVE RESULTS.

BT

0002 MRI 01250

OO AFO FBICV ALO

DE RUCNFB #0071 2320206

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O 191939Z AUG 91

FM DIRECTOR FBI (62-12300)

TO ALL FBI FIELD OFFICES/IMMEDIATE/

ALL LEGATS/IMMEDIATE/

BT

UNCLAS E F T O

CITE: //1010//

29B-WF-171994

SUBJECT: BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).

REBUTEL TO ALL FIELD OFFICES AND LEGAL ATTACHES, DATED AUGUST 15, 1991, ENTITLED, "BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI)."

REFERENCED TELETYPE REQUESTED ALL FIELD OFFICES AND LEGAL ATTACHES TO*CONDUCT ADDITIONAL INDICES SEARCHES AND SUMMARIZE AND REPORT THE RESULTS VIA TELETYPE TO THE DIRECTOR.

THIS INQUIRY IS ASSIGNED BUREAU FILE NUMBER 62-12300, WHICH SHOULD BE USED IN RESPONDING TO REFERENCED TELETYPE.

SA [redacted] advised 10:25 P.M 8-19-91

29B-WF-171994-5

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SEARCHED INDEXED
SERIALIZED FILED
AUG 19 1991
FBI — CLEVELAND

1325015-000-10454

PAGE TWO DE RUCNFB 0071 UNCLAS E F T O

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FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☒ Teletype
☐ Facsimile
☐ AIRTEL

PRECEDENCE:
☒ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

Date 8/20/91

FM FBI CLEVELAND (29B-WF-171994) (RUC)

TO DIRECTOR FBI/IMMEDIATE/ (62-12300)

FBI WMFO/IMMEDIATE/ (29B-WF-171994)

BT

UNCLAS

CITE: //3170//

PASS: ATTN: CHIEF INSPECTOR [redacted] OFFICE OF

INSPECTIONS, INSPECTION DIVISION; AND SECTION [redacted]

[redacted] WHITE-COLLAR CRIME SECTION, CRIMINAL

INVESTIGATIVE DIVISION.

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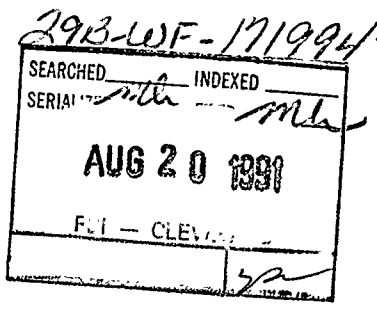
b7C

SUBJECT: BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI).

REFERENCE BUREAU TELETYPES TO ALL FIELD OFFICES, DATED 8/15/91 AND 8/19/91, AND CLEVELAND TELETYPE TO DIRECTOR, DATED 8/16/91.

THE FOLLOWING IS A RESUBMISSION OF INVESTIGATIVE RESULTS



MC:dcg

Approved: WDB/mpc Original filename:

Time Received: Telprep filename: D CG00250.232

MRI/JULIAN DATE: 1445/232 ISN: 011

FOX DATE & TIME OF ACCEPTANCE: 19572 9 AUG 91 PGP

CONTAINED IN REFERENCED CLEVELAND TELETYPE; WHICH TELETYPE DID NOT CONTAIN THE BUREAU FILE NUMBER, 62-12300, IDENTIFIED IN 8/19/91 BUREAU TELETYPE.

SEARCHES OF CLEVELAND GENERAL INDICES (MANUAL AND AUTOMATED) FOR THE NAMES OF INDIVIDUALS AND BUSINESSES LISTED IN 8/15/91 TELETYPE MET WITH NEGATIVE RESULTS.

BT

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PP AFO FBICV ALO

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P 282239Z AUG 91

FM DIRECTOR FBI

TO ALL FBI FIELD OFFICES/PRIORITY/

ALL LEGATS/PRIORITY/

BT

UNCLAS

CITE: //0624//

PASS: PERSONAL ATTENTION.

SUBJECT: CHANGED; HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO.

TITLE MARKED CHANGED TO REFLECT THE CODE NAME DESIGNATED FOR THIS INVESTIGATION, "HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO."

TITLE PREVIOUSLY CAPTIONED: CLARK MCADAMS CLIFFORD, AKA CLARK M. CLIFFORD, CLARK CLIFFORD; [redacted] AKA [redacted] [redacted] CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. NETHERLANDS, ANTILLES; [redacted]

29B-WF-171994

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29B-WF-171994-7

SEARCHED INDEXED
SERIALIZED FILED
AUG 28 1991
FBI — CLEVELAND

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1325015-000-10458

[redacted] SHAYKH ZAYID BIN SULTAN AL-NUHAYYAN, AKA SHEIK ZAYED BIN SULTAN AL-NAHAYAN, SHEIK ZAYED; DBA BANK OF CREDIT AND COMMERCE, INTERNATIONAL; GHAITH PHARAON, AKA DR. GHAITH PHARAON; FIF; FAG; b6 b7C

OO: WMFO.

RE DIRECTOR TELETYPE TO ALL FBI FIELD OFFICES AND ALL LEGATS DATED 7/26/91.

CAPTIONED MATTER INVOLVES INVESTIGATION OF ALLEGATIONS OF FALSE STATEMENTS MADE OVER MORE THAN 10 YEARS TO THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM (BGFRS), WASHINGTON, D.C., BY SUBJECTS TO HIDE TRUE OWNERSHIP AND CONTROL OF CREDIT AND COMMERCE AMERICAN HOLDINGS, N.V. (CCAH), NETHERLANDS, ANTILLES AND ITS SUBSIDIARIES, BY THE BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI). ON 2/7/91, WMFO INITIATED A FINANCIAL INSTITUTION FRAUD INVESTIGATION (29B-WF-171994) CONCERNING CAPTIONED MATTER BASED ON A CRIMINAL REFERRAL FROM THE BGFRS, ALLEGING THAT CLARK CLIFFORD AND [redacted] HAD MADE FALSE AND FRAUDULENT STATEMENTS CONCERNING BCCI'S OWNERSHIP AND CONTROL OF CCAH, THE PARENT HOLDING COMPANY OF FIRST AMERICAN BANK SHARES WHICH OWNS FIRST AMERICAN BANK, WASHINGTON, D.C. SUBSEQUENTLY, WMFO RECEIVED ADDITIONAL CRIMINAL REFERRALS FROM THE BGFRS b6 b7C

ALLEGING THAT GHAITH PHARAON ACTED AS A NOMINEE FOR BCCI IN THE PURCHASE OF TWO BANKS, ONE IN GEORGIA AND ONE IN CALIFORNIA.

ON 7/5/91, AS A RESULT OF ALLEGED FRAUDULENT CONDUCT BY BCCI, BANK REGULATORS IN BRITAIN AND SIX OTHER COUNTRIES CLOSED DOWN BRANCHES OF BCCI WITHIN THEIR RESPECTIVE JURISDICTIONS. INFORMATION DEVELOPED TO DATE INDICATES THAT FROM AT LEAST 1977 THROUGH 1990, BCCI, ITS PRINCIPALS AND ITS AFFILIATES, ORCHESTRATED A DELIBERATE SUSTAINED CRIMINAL ATTEMPT TO UNDERMINE THE STRUCTURE OF AMERICAN BANKING AND SECURITIES LAWS BY ACQUIRING CONTROL OF U.S. BANKS AND THRIFTS WITHOUT DISCLOSING BCCI'S CONTROLLING ROLE, AS REQUIRED BY STATE AND FEDERAL LAWS AND REGULATIONS. PRELIMINARY INVESTIGATION OF BCCI'S U.S. BANK TAKEOVERS INDICATES A COMMON SCHEME AND PRACTICE INVOLVING NUMEROUS, REPEATED AND CONSISTENT VIOLATION OF FEDERAL STATUTES INCLUDING THOSE WHICH ARE PREDICATE ACTS TO A RICO VIOLATION UNDER 18 U.S.C. 1962.

IN RECENT WEEKS, ACTIONS BY THE FEDERAL RESERVE BOARD, BY NEW YORK OFFICIALS AND CHARGES IN SENATE HEARINGS ALLEGE AN EXTRAORDINARY RANGE OF WORLDWIDE CRIMINAL VIOLATIONS BY BCCI AND ITS AFFILIATES INCLUDING: REPEATED UNLAWFUL ACQUISITIONS OF U.S. BANKS AND THRIFTS; PUBLIC CORRUPTION AND BRIBERY IN THE U.S. AND

ELSEWHERE; MONEY LAUNDERING AND FINANCING OTHER CRIMINAL ACTIVITY; SUPPORT FOR TERRORIST ACTIONS; AND HUGE FRAUDS AND FALSIFICATIONS ON THE BOOKS AND RECORDS OF BCCI AND ITS AFFILIATES. INVESTIGATION OF THESE ALLEGED ILLEGAL ACTIVITIES MAY HAVE FAR REACHING IMPACT INVOLVING INVESTIGATION THROUGHOUT THE UNITED STATES AND VARIOUS FOREIGN COUNTRIES. AS THIS INVESTIGATION DEVELOPS AND AS LEADS ARE ASSIGNED, IT IS ESSENTIAL THAT EACH OFFICE PROMPTLY ASSIGN SUFFICIENT RESOURCES TO ENSURE THAT ALL ASSIGNED CASE RESPONSIBILITIES ARE HANDLED IN AN EXPEDITIOUS MANNER. RESULTS OF ALL INVESTIGATION SHOULD BE REPORTED TO BOTH WMFO (29B-WF-171994) AND TO THE FINANCIAL INSTITUTION FRAUD UNIT, WHITE-COLLAR CRIMES SECTION, FBIHQ.

THIS INVESTIGATION HAS BEEN DESIGNATED AS MAJOR CASE NUMBER 38. ALL OFFICES INVOLVED IN THIS CASE SHOULD INSTRUCT THEIR AGENTS TO RECORD THEIR TIME TO MAJOR CASE 38 ON THEIR NUMBER 3 CARD, FOR TURK PURPOSES. PART II, SECTION 3-3.2, PAGES 360 AND 361 OF THE MANUAL OF ADMINISTRATIVE OPERATIONS AND PROCEDURES FURTHER EXPLAINS THE RECORDING OF TIME OF MAJOR CASES. ALL FIELD OFFICES INVOLVED IN CAPTIONED MATTER SHOULD UTILIZE THE CASE TITLE AS FOLLOWS: HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO.

PAGE FIVE DE RUCNFB 0176 UNCLAS

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FM DIRECTOR FBI

TO FBI CHICAGO/ROUTINE/

FBI CLEVELAND/ROUTINE/

FBI MIAMI/ROUTINE/

FBI OKLAHOMA CITY/ROUTINE/

FBI PHILADELPHIA/ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

BT

UNCLAS

CITE: //0620//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO.

REBUTELCALLS TO CLEVELAND, CHICAGO, OKLAHOMA CITY, PHILADELPHIA, AND MIAMI, 9/3/91 AND 9/4/91.

THIS IS TO CONFIRM THE SELECTION OF FINANCIAL ANALYSTS (FA) [redacted], CLEVELAND DIVISION; [redacted] CHICAGO DIVISION;

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29B-WF-171994-8

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SEARCHED INDEXED
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SEP 7 1991
FBI — CLEVELAND

1325015-000-10463

[redacted] OKLAHOMA CITY DIVISION; AND [redacted] b6 b7C

PHILADELPHIA DIVISION, FOR TEMPORARY ASSIGNMENT (TDY) TO MIAMI FOR 30 DAYS WITH THE UNDERSTANDING THAT THIS ASSIGNMENT MAY BE EXTENDED AN ADDITIONAL 30 DAYS.

FA[redacted]'S TDY ASSIGNMENT IS EFFECTIVE 9/9/91, WHICH WILL BE HER TRAVEL DAY. FA[redacted] WILL NEED TO RETURN TO THE CLEVELAND DIVISION ON 10/2/91, TO HANDLE WORK EXIGENCIES REQUIRING HER PRESENCE. FA[redacted] WILL RESUME HER TDY ASSIGNMENT IN THE MIAMI DIVISION ON 10/7/91, IF AN EXTENSION BECOMES NECESSARY. FA[redacted] WILL DEPART CLEVELAND AT 8:15 A.M. ABOARD US AIR FLIGHT NUMBER 452 WITH A STOP IN PITTSBURGH TO CHANGE TO US AIR FLIGHT NUMBER 459, ARRIVING MIAMI AT 12:20 P.M. b6 b7C

FA[redacted]'S TDY ASSIGNMENT IS EFFECTIVE 9/9/91, WHICH WILL ALSO BE HER TRAVEL DAY. FA[redacted] WILL DEPART CHICAGO AT 7:44 A.M. ABOARD UNITED FLIGHT NUMBER 394, ARRIVING MIAMI AT 11:39 A.M. FA[redacted]S INITIAL TDY ASSIGNMENT IS FOR 30 DAYS WITH THE POSSIBILITY OF AN EXTENSION FOR AN ADDITIONAL 30 DAYS. IF THIS BECOMES NECESSARY, FA[redacted] WILL NEED TO RETURN TO THE CHICAGO DIVISION TO HANDLE SOME WORK EXIGENCIES FOR A WEEK BEFORE CONTINUING WITH THIS ASSIGNMENT. b6 b7C

FA[redacted]'S TDY ASSIGNMENT IS EFFECTIVE 9/16/91, WHICH WILL b6 b7C

BE HIS TRAVEL DAY. FA [redacted] WILL DEPART OKLAHOMA CITY AT 9:10 A.M. ABOARD AMERICAN AIRLINES FLIGHT NUMBER 1614, ARRIVING MIAMI AT 3:00 P.M. AS WITH FA [redacted] IF IT BECOMES NECESSARY TO EXTEND THIS TDY ASSIGNMENT BEYOND THE INITIAL 30 DAYS, FA [redacted] WILL BE REQUIRED TO RETURN TO THE OKLAHOMA CITY DIVISION FOR A WEEK TO HANDLE SOME OF HIS WORK EXIGENCIES BEFORE CONTINUING WITH THIS ASSIGNMENT. b6 b7C

FA [redacted] S TDY ASSIGNMENT IS EFFECTIVE 9/16/91, WHICH WILL BE HIS TRAVEL DAY. SA [redacted] S ASSIGNMENT IS FOR 30 DAYS AND WILL NOT BE EXTENDED. HOWEVER, THE PHILADELPHIA DIVISION IS AGREEABLE TO REPLACING FA [redacted] WITH ANOTHER FA FROM THE PHILADELPHIA DIVISION SHOULD AN EXTENSION BECOME NECESSARY. FA [redacted] WILL DEPART PHILADELPHIA AT 9:50 A.M. ABOARD US AIR FLIGHT NUMBER 433, ARRIVING MIAMI AT 12:36 P.M. b6 b7C

IF AN EXTENSION BEYOND THE INITIAL 30 DAYS BECOMES NECESSARY, THE EXTENSION IS TO BE COORDINATED THROUGH THE PROGRAM MANAGER FOR THE FAS [redacted] WHITE-COLLAR CRIMES SECTION, CRIMINAL INVESTIGATIVE DIVISION. b6 b7C

THE CONTACT POINT IN THE MIAMI DIVISION FOR THE FAS WILL BE SPECIAL AGENT [redacted] PHONE NUMBER [redacted] (VOICE b6 b7C

MAIL) OR THE OFFSITE NUMBER WHICH IS [redacted]. THE ALTERNATE CONTACT POINT WILL BE SUPERVISORY SPECIAL AGENT [redacted] b6 b7C [redacted] PHONE NUMBER [redacted].

MIAMI IS INSTRUCTED TO OBTAIN SUITABLE LODGING.

FA [redacted] IS AUTHORIZED A RENTAL CAR AS IS FA [redacted] b6 b7C THESE RENTAL CARS WILL ALSO BE MADE AVAILABLE TO THE OTHER FAS ASSIGNED TO THIS SPECIAL.

EACH FA IS TO BE GIVEN THE FOLLOWING INFORMATION FOR VOUCHERING PURPOSES: "IT IS IMPERATIVE THAT AUTHORIZATION NUMBER TR15-SE9135 APPEAR ON THE FD-540, SF-1012, GTRS, AND PURCHASE ORDERS ASSOCIATED WITH THIS TRAVEL. IF THE FBIHQ AIRLINE TICKET OFFICE IS UTILIZED, THEY MUST BE ADVISED OF THE AUTHORIZATION NUMBER WHEN THE TICKET IS REQUESTED. THE USE OF THE AFOREMEN-TIONED AUTHORIZATION NUMBER WILL ENSURE THAT THE TRAVEL EXPENSES ASSOCIATED WITH THIS AGREEMENT ARE CHARGED TO BUDGET CATEGORY TR15 - BUREAU SPECIALS, RATHER THAN TO YOUR DIVISION'S TRAVEL BUDGET. TRAVEL EXPENSES THAT ARE SUBMITTED WITHOUT THE AUTHORIZATION NUMBER WILL BE CHARGED TO YOUR DIVISION'S TRAVEL BUDGET WITHOUT RECOURSE." ADDITIONALLY, EACH FA IS TO BE ADVISED TO CONTACT PROGRAM MANAGER [redacted] b6 b7C PHONE NUMBER [redacted] BEFORE VOUCHERING OCTOBER EXPENSES

TO OBTAIN A NEW AUTHORIZATION NUMBER. THIS IS NECESSARY DUE TO

THE BEGINNING OF A NEW FISCAL YEAR.

BT

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R.

BT
#0152

NNNN

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 9/9/91

TO : DIRECTOR, FBI
ATTN: [redacted] b6 b7C

FROM : SAC, CLEVELAND

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE 38;
OO: WMFO
(29B-WF-171994) (P)

[redacted] aka., b6 b7C

[redacted] aka.,

[redacted] aka.,

[redacted] aka.,

ACTS OF TERRORISM - INTERNATIONAL

3 - Bureau
(Attn: SSA [redacted]) b6 b7C
2 - New York (29B-WF-171994)
(Attn: SA [redacted])
1 - WMFO (29B-WF-171994)
(Attn: SSA [redacted])
(3) - Cleveland
(2-265C-CV-45545)
(1-29B-WF-171994)
RBR:dds
(9)

#6 Supv. [redacted] b6 b7C

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-10468

29B-WF-171994-9

CV 29B-WF-171994

TERRORISM (AL FATAH);
MONEY LAUNDERING;
OO: CLEVELAND
(265C-CV-45545) (P)

Reference phone conversation between SA [redacted] b6 b7C
[redacted] Cleveland Division, and SSA [redacted] WMFO, dated 9/6/91.

Cleveland Division is currently conducting an investigation into a money laundering scheme being run by captioned subjects with the funds being funneled to Foreign Bank Accounts (FBA) and into this country through various banks using wire transfers, bank drafts, and cashier's checks.

Source, who has provided information in the past, advised that [redacted] b6 b7C b7D

1325015-000-10469

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

On [redacted] provided information that [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

USCS reports that [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

At the time of [redacted]s arrest, he had in his possession seven bank checks drawn on the Ameritrust Bank, Cleveland, Ohio made payable to [redacted] and [redacted] all in the amount of $10,000.00 each. These checks were given back to [redacted] and have subsequently been cashed and returned to Ameritrust for payment. The checks have been stamped across the front "Jordan - Gulf Bank S.A., Mecca Street Branch". The checks were enclosed by printing the name of the payee and an illegible signature, which appears to be the same on each check, is written below each printed payee name. Machine printed across the back of each check are the number [redacted] b6 b7C

Additionally, [redacted] had in his possession Power of Attorney for [redacted], aka., [redacted] and [redacted] b6 b7C made out to [redacted]

All of the captioned individuals own more than one grocery store and are associated with or have some type of proprietary interest in many more. Each is involved in a

closely knit organization of Arab store owners who are currently purchasing U.S. Foodstamps issued by the Department of Agriculture, Food and Nutrition Services, for 20 to 50 cents on the dollar. These foodstamps are then exchanged for cash, making anywhere from 50 to 80 percent profit. Most, if not all, of the stores run through anywhere between $30,000.00 and $50,000.00 per month of foodstamps. [redacted] b6 b7C b7D

[redacted] Foodstamps come in $1.00, $5.00, and $10.00 denominations. The $1.00 denominations are wrapped in $100.00 bundles, the $5.00 denominations are wrapped in $500.00 bundles, and the $10.00 denominations are wrapped in $1,000.00 bundles. The bundles are then taken to the respective bank where they are again counted automatically and tallied for the bank. The amount is credited to the store's account and once that is done, the store is able to withdraw part or all of that money. The stamps then go to the Federal Reserve Bank where they are kept for a certain period of time, depending on the storage facility of the Federal Reserve. Unless the bank teller processing the foodstamps is observant, the counterfeit foodstamps go undetected. As long as the store owners withdraw less then $10,000.00 from their accounts at one time, no CTR is required. [redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] advised that [redacted] b6 b7C b7D

Source states that [redacted] b6 b7C b7D

[redacted] is described as follows: b6 b7C

Name:	[redacted]
Aliases:	
DOB:	
POB:	
Height:	
Weight:	185 pounds
Hair:	Black
Eyes:	Brown
Sex:	Male
Race:	White (Arab)
SSN:	
Current address:	[redacted]
Primary Place of Business:	

Cleveland Division requests that WMFO be advised of all investigation conducted in instant matter.

LEADS

NEW YORK DIVISION

At New York, New York

New York Office is requested to check the records of [redacted] b6 b7C b7D

CV 29B-WF-171994

New York Office is requested to provide any and all

[redacted]

b6
b7C
b7D

Will provide Cleveland Division with the required information for the accurate service of subpoenas.

1325015-000-10474

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 9/23/91

TO : DIRECTOR, FBI (29B-WF-171994)
ATTN: [redacted] b6 b7C

FROM : ADIC, NEW YORK (29B-WF-171994) (RUC)

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF(B); FAG;
OO: WMFO

Re: Cleveland Airtel to FBIHQ and New York, dated 9/9/91 and New York telcall to Cleveland, dated 9/23/91.

For information of Cleveland, in referenced Airtel, Cleveland noted that [redacted] advised that [redacted] b6 b7C b7D

[redacted]

Cleveland Division requested the NYO to request [redacted] b3

[redacted]

[redacted] over a years time is impossible without Cleveland providing additional information. In addition, a Federal Grand Jury subpoena from the US Attorney's Office in Cleveland is required to obtain [redacted] b3

2 - Bureau
(Attn: SSA [redacted]) b6 b7C
(4) - Cleveland
(2 - 265C-CV-45545)
(2) - 29B-WF-171994)
1 - New York
MTP/mtp
(8)

Per ASSA [redacted] lead being handled Sept 6, 1991 US/mac by SA [redacted] under 265C-CV-45545

29B-WF-171994-10

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 27 1991
FBI — CLEVELAND

Approved: _____ Transmitted _____
(Number) (Time)

1325015-000-10475

b3
b6
b7C

Inasmuch as there is no further investigation in the New York Division, this matter is being placed in an RUC status.

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 9/23/91

TO : DIRECTOR, FBI (29B-WF-171994)
ATTN: [redacted] b6 b7C

FROM : ADIC, NEW YORK (29B-WF-171994) (RUC)

SUBJECT: HIDDEN INTERESTS;
MAJOR CASE 38;
FIF(B); FAG;
OO: WMFO

Re: Cleveland Airtel to FBIHQ and New York, dated 9/9/91 and New York telcall to Cleveland, dated 9/23/91.

For information of Cleveland, in referenced Airtel, Cleveland noted that [redacted] advised that [redacted] b6 b7C b7D

[redacted]

Cleveland Division requested the NYO to request of FAB any and all wire transfers from FAB to the Cleveland banks noted above.

[redacted] b3

[redacted] over a years time is impossible without Cleveland providing additional information. In addition, a Federal Grand Jury subpoena from the US Attorney's Office in Cleveland is required to obtain [redacted]

2 - Bureau
(Attn: SSA [redacted]) b6 b7C
4 - Cleveland
(2 - 265C-CV-45545)
(2 - 29B-WF-171994)
1 - New York
MTP/mtp
(8)

29B-WF-171994
SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
SEP 27 1991
1 - CLEVELAND

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-10477

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RR FBIMM FBICV FBICG FBIDL FBILA FBIOC FBIPH FBIWMFO

DE RUCNFB #0209 2780344

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FM DIRECTOR FBI

TO FBI MIAMI/ROUTINE/

FBI CLEVELAND/ROUTINE/

FBI CHICAGO/ROUTINE/

FBI DALLAS/ROUTINE/

FBI LOS ANGELES/ROUTINE/

FBI OKLAHOMA CITY/ROUTINE/

FBI PHILADELPHIA/ROUTINE/

FBI WMFO (29B-WF-171994)/ROUTINE/

BT

UNCLAS

CITE: //0620//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; OO: WMFO.

RE CONFERENCE CALL BETWEEN SSA [redacted] b6 b7C

[redacted] WHITE-COLLAR CRIMES SECTION, CRIMINAL INVESTIGATIVE

(RUC)

[redacted] b6 b7C

WF- 29B-171994

SEARCHED INDEXED
SERIALIZED FILED

OCT 04 1991

FBI CLEVELAND

[redacted]

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DIVISION, AND SSA [redacted] WMFO; BUTELCALLS TO ASAC [redacted] b6 b7C

[redacted] CHICAGO AND SSA [redacted] CLEVELAND; TELETYPE DATED 9/5/91 TO FBI MIAMI, CLEVELAND, CHICAGO, OKLAHOMA CITY, PHILADELPHIA, AND WMFO AND TELETYPE DATED 8/21/91 TO DALLAS, LOS ANGELES, AND WMFO.

THIS CRS, CLEVELAND; TELETYPE DATED 9/5/91 TO FBI MIAMI, CLEVELAND, CHICAGO, OKLAHOMA CITY, PHILADELPHIA, AND WMFO AND TELETYPE DATED 8/21/91 TO DALLAS, LOS ANGELES, AND WMFO.

THIS COMMUNICATION IS TO PROVIDE ADDITIONAL INFORMATION REGARDING THE TEMPORARY DUTY ASSIGNMENTS OF FINANCIAL ANALYST (FA) [redacted] CHICAGO; [redacted] PHILADELPHIA; [redacted] b6 b7C

[redacted] CLEVELAND; [redacted] OKLAHOMA CITY; [redacted] LOS ANGELES; AND [redacted] DALLAS, TO THE WMFO AND THE MIAMI DIVISION.

FAS [redacted] WILL COMPLETE THEIR ASSIGNMENT ON b6 b7C 10/18/91, WITH THIS DATE BEING THEIR TRAVEL DATE.

FA [redacted] TEMPORARY DUTY (TD) ASSIGNMENT TO THE MIAMI b6 b7C DIVISION IS BEING EXTENDED TO 11/22/91. MIAMI IS REMINDED THAT FA [redacted] WILL BE REQUIRED TO RETURN TO THE CHICAGO DIVISION ON 10/11/91, TO HANDLE SOME WORK EXIGENCIES. FA [redacted] WILL RETURN TO MIAMI ON 10/21/91.

FA [redacted] S TDY ASSIGNMENT IS ALSO BEING EXTENDED TO THE MIAMI DIVISION TO 11/22/91.

FA [redacted] S ASSIGNMENT TO WMFO, NVMRA WILL REMAIN THE SAME b6 b7C

WITH THE ASSIGNMENT EXPECTED TO BE COMPLETED ON 12/9/91.

FA[redacted]S ASSIGNMENT TO WMFO, NVMRA WILL REMAIN THE SAME WITH THE ASSIGNMENT EXPECTED TO BE COMPLETED ON 12/20/91. b6 b7C

EACH FA IS TO BE GIVEN THE FOLLOWING INFORMATION FOR VOUCHERING PURPOSES: "IT IS IMPERATIVE THAT AUTHORIZATION NUMBER LISTED BELOW FOR EACH OF THE FAS APPEAR ON THE FD-540, SF-1012, GTRS, AND PURCHASE ORDERS ASSOCIATED WITH THIS TRAVEL.

[redacted] - TR15-SE-9201; b6 b7C

[redacted] - TR15-SE-9202;

TR15-SE-9204;

[redacted] - TR15-SE-9205;

[redacted] TR15-SE-9206; AND,

- TR15-SE-9207

IF THE FBIHQ AIRLINE TICKET OFFICE IS UTILIZED, THEY MUST BE ADVISED OF THE AUTHORIZATION NUMBER WHEN THE TICKET IS REQUESTED. THE USE OF THE AFOREMENTIONED AUTHORIZATION NUMBER WILL ENSURE THAT THE TRAVEL EXPENSES ASSOCIATED WITH THIS ASSIGNMENT ARE CHARGED TO BUDGET CATEGORY TR15 - BUREAU SPECIALS* RATHER THAN TO YOUR DIVISION'S TRAVEL BUDGET. TRAVEL EXPENSES THAT ARE SUBMITTED WITHOUT THE AUTHORIZATION NUMBER

WILL BE CHARGED TO YOUR DIVISION'S TRAVEL BUDGET WITHOUT

RECOURSE."

BT
#0209

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DE FBIWMFO #0017 3241324

ZNR UUUUU

O 201321Z NOV 91

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO DIRECTOR FBI/IMMEDIATE/

ALL FBI FIELD OFFICES/IMMEDIATE/

ALL LEGATS/IMMEDIATE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ. OLIA; CID, WCCS, FIFU, SSA [redacted] b6 b7C

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE WMFO TELETYPES TO FBIHQ, DATED 11/17/91 AND 11/18/91.

FOR INFORMATION OF RECEIVING OFFICES, REFERENCED TELS REPORTED THAT ON 11/15/91, THE U.S. GRAND JURY IN WASHINGTON, D.C., IN A THREE-COUNT INDICTMENT, CHARGED THE BELOW-LISTED INDIVIDUALS AND ENTITIES WITH RACKETEERING CONSPIRACY FOR SECRETLY TAKING OVER A CALIFORNIA BANK AND FOR FRAUDULENTLY

2 + 3 wcc

[redacted] b6 b7C

1 copy to Each SSA, SSRA + SRA

29B-WF-171994-12

UCFN 105

AUTOMATED SEARCH Rec

DATE: 11-20-91

SEARCHED INDEXED

SERIALIZED FILED

NOV 20 1991

FBI — CLEVELAND

1325015-000-10482

DEALING IN DEBENTURES OF A FLORIDA BANK. THOSE NAMED IN THE INDICTMENT WERE:

BCCI HOLDINGS (LUXEMBOURG) S.A.

BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.

BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS), LIMITED

INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS), LIMITED

AGHA HASAN ABEDI

[redacted] b6 b7C

GHAITH PHARAON

FOR INFORMATION OF ALL RECIPIENTS, ARREST WARRANTS BASED ON INDICTMENT WERE ISSUED 11/15/91, BY THE U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA FOR AGHA HASAN ABEDI, [redacted] b6 b7C [redacted] AND GHAITH R. PHARAON, AND ARE ON FILE WITH THE U.S. MARSHAL, WASHINGTON, D.C. NO BOND RECOMMENDATION. SUBJECTS ENTERED IN NCIC.

IDENTIFYING INFORMATION ON FUGITIVES FOLLOWS:

1. AGHA HASAN ABEDI, WHITE MALE, DOB: 1/1/21; POB: MAHMUDABAD, INDIAN, PAKISTANI CITIZENSHIP; ABOUT 5 FEET 6 INCHES TALL; WEIGHT: 160 POUNDS.

2. [redacted] AKA [redacted]; WHITE MALE; DOB: [redacted], CITIZENSHIP; 5 FEET 7 INCHES TALL; WEIGHT: 170 LBS. b6 b7C

3. GHAITH R. PHARAON, AKA DR. GHAITH RACHAD PHARAON, GHAITH RASHAD PHARAON; WHITE MALE, DOB: 9/7/41, POB: RIYADH, SAUDI ARABIA, SAUDI CITIZEN; 5 FEET 9 INCHES; WEIGHT: 250 LBS.

BALTIMORE DIVISION SOURCE, CONTACTED [redacted], WHO IS b6 b7C b7D

[redacted]

[redacted] SOURCE HAS BEEN TASKED TO OBTAIN MORE SPECIFIC INFORMATION. ALL SUBJECTS ARE FOREIGN NATIONALS.

WMFO REQUESTS ALL OFFICES CONTACT LOGICAL SOURCES AND REPORT ANY POSITIVE INFORMATION RE FUGITIVES.

BT

#0017

NNNN

WF-171994-12 1325015-000-10484

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☒ UNCLAS

Date 3/17/92

TO : SAC, ALBANY

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO:WMFO

For the information of receiving offices, captioned matter is a wide ranging investigation into the involvement of the Bank of Credit and Commerce International (BCCI), along with several of BCCI's entities, with the U.S. banking industry.

The following entities are the defendants who have agreed to a forfeiture of $550 million in assets, cash and other; however this amount can be exceeded if it is determined that BCCI and its entities possesses more than that amount in the United States:

1. BCCI HOLDINGS (LUXEMBOURG), S.A.
2. BCCI, S.A.
3. BCCI (OVERSEAS)[(O)] LIMITED
4. INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED [(ICIC)(O)]

1, 2+3

There is a 50/50 split, of the assets, between the US and a fund that was set up in England (for foreign loses).

BCCI had banking branches in approximately 43 different countries, through BCCI, S.A. and BCCI (O). It

2 - ALBANY
(2) - Cleveland
1 - WMFO (SUB A)
RHM:rhm
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AUTOMATED SEARCH
DATE: 3/23/92 DB

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SERIALIZED FILED
MAR 2 1992
FBI — CLEVELAND

b6
b7C

29B-WF-171994-13

Approved: Transmitted (Number) (Time) Per

1325015-000-10485

also had consolidated and unconsolidated subsidiaries and affiliates in approximately 29 different countries. These branches, subsidiaries and affiliates may have accounts with banks, brokerage houses or other financial institutions in the US, consisting of cash, stocks, bonds, or they may also hold real property in their names. Examples of how accounts could appear are:

1. BCCI (Overseas) Togo
2. BCCI S.A. - Abu Dhabi
3. BCC (Zambia) LTD

Other BCCI subsidiaries and affiliates, or associated companies with names dissimilar from BCCI, are:

1. Banca D'Americaz E D'Italia
2. Banco De Credito E Comercio De Investimento S.A.
3. Banco De Credito Y Comercio De Columbia
4. Banco De Decusnto
5. Banco Finamerica
6. Banco Mercantil
7. Bank of Commerce and Placements
8. Bank of Credit and Commerce (MISR) SAE
9. Banque De Commerce Et De Placements SA
10. BCC Credit and Finance (Uruguay) SA
11. BCC Finance and Securities Limited
12. BCC Investment Holding Company
13. BCCI Finance Corporation Limited
14. BCCI Finance NV
15. BCCI Leasing (Malaysia) SDN BHD
16. BCP Switzerland
17. Credit and Commerce Insurance Company (CCIC)
18. Credit and Finance Corporation, Ltd (CFC, LTD)
19. Finance and Investment International Ltd (FIIL)
20. Italfinance International SPA
21. Kuwait International Finance Company SAK (KIFCO)
22. National Bank of Oman Limited (SAO)
23. PT BCC Pratama Leasing Indonesia
24. Stock Investment Holding Company

ICIC (O) is part of the ICIC Group, which contains the following entities:

1. ICIC Apex Ltd (the ultimate holding company of the ICIC Group)
2. ICIC Holdings Ltd
3. ICIC Investments Ltd
4. ICIC (Overseas)

1325015-000-10486

5. ICIC Foundation
6. ICIC Staff Benefit Fund
7. ICIC Staff Benefit Trust
8. ICIC Portfolios Ltd
9. ICIC Prince International Holdings Ltd
10. Credit and Commerce Insurance (CCI)
11. CCL Financial Group
    a. CCL Assurance Ltd
    b. CCL Unit Trusts Ltd
    c. CCL Mortgage and Finance Ltd
    d. CCL Trustees Ltd
12. ICAC (Not known what the initials stand for)
13. ITC (Not known what the initials stand for)

The above lists are not all inclusive, as there could be any variation of the above companies (i.e. BCC Ghana Ltd) or yet to be determined subsidiaries and/or affiliates of BCCI or ICIC.

The assets are divided into the four following categories:

1. Known Cash Assets: There is currently $340 million, known cash assets, held in US banks. Currently the US Marshals are collecting these funds. There is no further work needed on these assets.

2. Assets in Liquidation: There is currently $170 million of known assets which are currently in liquidation proceedings. These assets are held in the BCCI agencies of New York and California. There is no further work needed on these assets.

3. Assets belonging to BCCI, ICIC, their affiliates or subsidiaries: The total amount of these assets is unknown at this time. Of immediate concern are assets in the International Credit and Investment Company (Overseas), LTD (ICIC), ICIC Investment, LTD, ICIC Holdings, LTD, and ICIC Investment. On 1/31/92, $47 million in cash assets, currently held in the US by Oppenheimer & Co., New York, New York (NY); Bear Stearns & Co., NY, NY; Bank of New York, NY, NY, were frozen by the US government to allow the investigation to determine the ties with BCCI (the freeze on these assets has been extended for an additional 60 days and will expire on May 1, 1992).

4. Unknown Assets. These assets no one knows about, as of this date, and just appear one way or another. One example is that of a computer software company in California: BCCI apparently held a note against the company,

1325015-000-10487

the company went bankrupt and then BCCI took the assets of the company. These assets were turned over to the US government. Another example is a piece of property in Alexandria, Virginia which BCCI currently holds a note to, the property is an old Church, with an estimated value of $4 - $5 million.

LEADS:

All receiving offices are to note the above and index the four defendants, the listed subsidiaries and the listed associated entities. Should any investigation determine that there are assets (cash/stocks/bonds/real estate) being held in any of the above named entities, advise WMFO so it can be determined if any of the assets are forfeitable.

1325015-000-10488

Memorandum

To : SAC, CLEVELAND (29B-WF-171994) (RUC) Date 3/26/92

From : SSA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Re WMFO airtel to Albany, 3/17/92.

Cleveland indices search on defendant companies, subsidiaries and associated entities identified in referenced airtel reveals no pertinent hits.

Without positive information to report to OO, case is considered RUC.

MC:dcg (1)

29B-WF-171994-14

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
MAR 26 1992
FBI — CLEVELAND

b6 b7C

1325015-000-10489

0002 MMI 0173

RR FBICG FBIJA FBICV FBISA FBIMM FBIWMFO

DE RUCNFB #0106 0950155

ZNR UUUUU

R 0321257 APR 92

FM DIRECTOR FBI

TO FBI CHICAGO/ROUTINE/

FBI LOS ANGELES/ROUTINE/

FBI CLEVELAND/ROUTINE/

FBI SAN ANTONIO/ROUTINE/

FBI MIAMI/ROUTINE/

FBI WMFO ([redacted])/ROUTINE/

BT

UNCLAS

CITE: //0624/

PASS: PERSONAL ATTENTION; C-5 WMFO.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; OO: **WMFO.**

REFERENCE WITH WMFO, CHICAGO, LOS ANGELES, **CLEVELAND, SAN** ANTONIO, AND MIAMI ON 4/1/92; DIRECTOR, FBI **TELETYPE FROM WMFO** 3/6/92, MEMORANDUM FROM [redacted] TO [redacted] **DATED 3/23/92, AND**

b6
b7C

29B-WF-171994-15

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
APR 3 1992
FBI — CLEVELAND

b6
b7C

Departure
IFA [redacted] 4/6/92, b6 WEH/d

1325015-000-10490

IFA [redacted]

TELETYPE FROM WMFO TO DIRECTOR DATED 3/28/92.

ON 3/6/92, WMFO REQUESTED FBIHQ TO ASSIGN SIX FINANCIAL ANALYSTS (FAS) FOR 90 DAYS TEMPORARY DUTY (TDY) TO EITHER WMFO OR MIAMI WITH A PROBABLE EFFECTIVE DATE OF EITHER LATE MARCH OR EARLY APRIL. EXACT EFFECTIVE DATE WOULD BE DETERMINED BY EFFECTIVE DATE OF ANTICIPATED SEARCH WARRANT. LOCATION OF TDY WOULD BE DETERMINED BASED ON THE LOCATION OF WHERE SEIZED RECORDS WOULD BE STORED.

WMFO IDENTIFIED SEVEN POSSIBLE CANDIDATES FOR THIS ASSIGNMENT BASED ON THEIR PRIOR PARTICIPATION IN MAJOR CASE 38. FOUR OF THE SEVEN ARE AVAILABLE FOR THIS TDY ASSIGNMENT AND THIS TELETYPE CONFIRMS THOSE FAS WHO HAVE BEEN CHOSEN FOR THIS ASSIGNMENT.

FA [redacted] CHICAGO DIVISION, IS TO TRAVEL TO MIAMI ON 4/6/92, AND WILL BE ASSIGNED FOR 30 DAYS. FA [redacted] WILL DEPART CHICAGO ABOARD AMERICAN AIRLINES (AA) FLIGHT NUMBER 469 AT 10:20 AM ARRIVING IN MIAMI AT 2:16 PM. DUE TO FA [redacted] S WORK EXIGENCE IN THE CHICAGO DIVISION, SHE WILL ONLY BE AVAILABLE FOR THIS ASSIGNMENT FOR 30 DAYS. ANOTHER FA WILL BE SELECTED TO REPLACE FA [redacted] AT THE END OF THIS 30-DAY ASSIGNMENT. b6 b7C

FA [redacted] CLEVELAND DIVISION, IS TO TRAVEL TO MIAMI ON b6 b7C

4/6/92 AND WILL BE ASSIGNED FOR 90 DAYS. FA [redacted] IS AUTHORIZED A RENTAL CAR. FA [redacted] WILL DEPART CLEVELAND ABOARD U.S. AIR (USA) FLIGHT NUMBER 763 AT 10:20 AM ARRIVING CHARLOTTE AT 11:48 AM. FA [redacted] WILL DEPART CHARLOTTE ABOARD USA FLIGHT NUMBER 781 AT 12:30 PM AND ARRIVE MIAMI AT 2:22 PM ON 4/5/92. FA [redacted] WILL BE AUTHORIZED RETURN TRAVEL TO THE CLEVELAND DIVISION FOR TWO TO THREE DAYS EACH MONTH TO MAINTAIN HER WORK EXIGENCIES. b6 b7C

FA [redacted] LOS ANGELES DIVISION, ARE TO TRAVEL TO MIAMI ON 4/6/92 AND WILL BE ASSIGNED FOR 90 DAYS. FA [redacted] IS AUTHORIZED A RENTAL CAR. FA [redacted] IS CURRENTLY A PART-TIME EMPLOYEE IN THE LOS ANGELES DIVISION AND WILL BE CONVERTED TO FULL-TIME EMPLOYEE FOR THE DURATION OF THIS ASSIGNMENT TO BECOME EFFECTIVE 4/6/92. BOTH FAS [redacted] WILL DEPART LOS ANGLES ABOARD AA FLIGHT NUMBER 915 AT 7:45 AM ARRIVING MIAMI AT 3:29 PM. b6 b7C

WMFO, AT A MEETING IN THE WHITE-COLLAR CRIMES SECTION, CRIMINAL INVESTIGATIVE DIVISION, ON 4/1/92, ADVISED THAT TWO OF THE FAS WOULD NEED TO BE ABLE TO READ AND TRANSLATE SPANISH INTO ENGLISH FROM THE FINANCIAL RECORDS. FA [redacted] SAN ANTONIO DIVISION, HAS BEEN SELECTED FOR THIS ASSIGNMENT. THE b6 b7C

PAGE FOUR DE RUCMFB 0106 UNCLAS

EFFECTIVE DATE OF FBI TDY TO MIAMI FOR 90 DAYS WILL BECOME EFFECTIVE ON 4/13/92. THIS WILL BE HER TRAVEL DAY. SHE WILL DEPART SAN ANTONIO ON 4/13/92, ABOARD AA 1140 AT 10:07 AM ARRIVING CHICAGO AT 12:38 PM. FA [redacted] WILL DEPART CHICAGO FOR MIAMI ABOARD AA 1142 AT 1:20 PM ARRIVING IN MIAMI AT 5:15 PM ON 4/13/92. FA [redacted] IS AUTHORIZED A RENTAL CAR. b6 b7C

THE FOLLOWING INFORMATION IS TO BE PROVIDED TO THE ABOVE-MENTIONED FAS FOR VOUCHERING PURPOSES. "IT IS IMPERATIVE THAT AUTHORIZATION NUMBER TR15-SE-9236 APPEAR ON THE FD-540, SF-1012, GTRS, AND PURCHASE ORDERS ASSOCIATED WITH THIS TRAVEL. IF THE FBIHQ AIRLINE TICKET OFFICE IS UTILIZED, THEY MUST BE ADVISED OF THE AUTHORIZATION NUMBER WHEN THE TICKET IS REQUESTED. THE USE OF THE AFOREMENTIONED AUTHORIZATION NUMBER WILL ENSURE THAT THE TRAVEL EXPENSES ASSOCIATED WITH THIS ASSIGNMENT ARE CHARGED TO BUDGET CATEGORY TR15 - BUREAU SPECIALS, RATHER THAN TO YOUR DIVISION'S TRAVEL BUDGET. TRAVEL EXPENSES THAT ARE SUBMITTED WITHOUT THE AUTHORIZATION NUMBER WILL BE CHARGED TO YOUR DIVISION'S TRAVEL BUDGET WITHOUT RECOURSE."

CONTACT FOR THE FAS WHILE IN THE MIAMI DIVISION WILL BE SUPERVISORY SPECIAL AGENT [redacted] FTS [redacted] b6 b7C

AT THE COMPLETION OF THIS ASSIGNMENT, A NARRATIVE

PERFORMANCE APPRAISAL SHOULD BE PREPARED AND SUBMITTED TO THE FAS RESPECTIVE SUPERVISORS. COPIES OF THESE PERFORMANCE APPRAISALS SHOULD ALSO BE SUBMITTED TO THE PROGRAM MANAGER [redacted] b6 b7C ROOM 3835 FBIHQ.

BT

#0106

NNNN

0002 MRI 01733

RR FBICG FBILA FBICV FBISA FBIMM FBIWMFO

DE RUCNFB #0106 0950155

ZNR UUUUU

R 032125Z APR 92

FM DIRECTOR FBI

TO FBI CHICAGO/ROUTINE/

FBI LOS ANGELES/ROUTINE/

FBI CLEVELAND/ROUTINE/

FBI SAN ANTONIO/ROUTINE/

FBI MIAMI/ROUTINE/

FBI WMFO (298-WF-171994)/ROUTINE/

BT

UNCLAS

CITE: //0624//

PASS: PERSONAL ATTENTION; C-5 WMFO.

298-WF-171994

SUBJECT: HILDRN INTERESTS; MAJOR CASE 38; OO: WMFO.

REBUTELCALLS WITH WMFO, CHICAGO, LOS ANGELES, CLEVELAND, SAN ANTONIO, AND MIAMI ON 4/1/92; DIRECTOR, FBI TELETYPE FROM WMFO 3/6/92, MEMORANDUM FROM [redacted] TO [redacted] DATED 3/23/92, AND

b6
b7C

298-WF-171994-15

SEARCHED SERIALIZED INDEXED FILED

APR 3 1992

FBI — CLEVELAND

b6
b7C

AUTOMATED SYSTEM
DATE 4-4-92

Departure
IFA [redacted]
4/5/92, to MM.

IFA [redacted]

COPY SENT 4/7/92

1325015-000-10495

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
X ☐ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 3/26/92

TO : SAC, CHARLOTTE Leads

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5)

SUBJECT : HIDDEN INTERESTS; 29B-WF-171994 *
MAJOR CASE # 38;
FIF;FAG;
OO:WMFO

RE: Bureau-wide Airtel dated 3/17/92.

On 3/26/92, WMFO received a copy of an anonymous letter (copies enclosed), post marked 13 March 92 Cleveland, Ohio. The letter references BCCI (Bank of Credit and Commerce International) and an individual named [redacted] b6 b7C is not known to this investigation to date.

LEADS:

Charlotte Division at Salisbury, NC

Charlotte will conduct, and provide WMFO, all logical investigation (indices checks, credit checks, police records, real estate checks, telephone verification) on [redacted] b6 b7C to determine employment, criminal history, and address verification.

Cleveland Division at Cleveland, Ohio

Cleveland will conduct lead as set above.

2-CHARLOTTE (ENCL.)
2-CLEVELAND (ENCL.)
1-WMFO (SUB S)
RHM:rhm
(5)

RE O+A Record ck to [redacted] w/ltr'd b6 b7C

UCFN MM

AUTOMATED SEARCH CC

4-10-92

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
APR 2 1992
FBI — CHARLOTTE

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
APR 07 1992
FBI — CLEVELAND

Approved: _____ Transmitted _____ (Number) _____ (Time) Per 29B-WF-R-171994-1 b6

AGENT COPY

1325015-000-1050 b7C

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- X ☐ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 3/26/92

TO : SAC, CHARLOTTE

FROM : SAC, WMFO (29B-WF-171994)(P)(C-5)

SUBJECT : HIDDEN INTERESTS; 29B-WF-171994 *
MAJOR CASE # 38;
FIF;FAG;
OO:WMFO

RE: Bureau-wide Airtel dated 3/17/92.

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Charlotte Division at Salisbury, NC

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Cleveland Division at Cleveland, Ohio

Cleveland will conduct lead as set above.

2-CHARLOTTE (ENCL.)
2-CLEVELAND (ENCL.)
1-WMFO (SUB S)
RHM:rhm
(5)

[redacted] b6 b7C

UCFN neg.
AUTOMATED SEARCH
DATE: 4-6-92

SEARCHED INDEXED
SERIALIZED FILED
APR 2 1992

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

FBI — CLEVELAND

29B-WF-171994-11
b6 b7C
1325015-000-10501

November 1, 1991

Department of Justice
U. S. Attorney's Office
U.S. National Central Bureau Interpol
Shorham Building Room 800
Washington, D.C. 20530

Gentlemen:

The following individual is fronting for B.C.C.I. connected narco-bankers in Zurich and Milan:

[redacted] b6 b7C

SEARCHED INDEXED
SERIALIZED FILED
APR 2 1992
FBI — CHARLOTTE

1325015-000-10502
89B-R-WF-171994-17

November 1, 1991

Department of Justice
U. S. Attorney's Office
U.S. National Central Bureau Interpol
Shorham Building Room 800
Washington, D.C. 20530

Gentlemen:

The following individual is fronting for B.C.C.I. connected narco-bankers in Zurich and Milan:

[redacted]

b6
b7C

AGENT COPY

SEARCHED INDEXED
SERIALIZED FILED
APR 2 1992
FBI — CHARLOTTE

1325015-000-10503
293-R-WF-171994-17

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

Cleveland, Ohio 44199

File Number 29-171994

RECORD REQUEST
By FBI Cleveland

Subject: [redacted] b6 b7C

AKA: _____

_____

Residence: _____

_____

Race: Sex: MALE Age:

Date of Birth: / / POB:

SSAN: - - FBI:

HGT: WGT: Hair:

Eye color: SMT:

NO RECORD

SHERIFF'S OFFICE
CUYAHOGA COUNTY
BY [redacted] 4/10/92 b6 b7C

1325015-000-10504

29B-WF-171994-18

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 4/24/92

TO : SAC, WMFO (29B-WF-171994)(C-5)

FROM : SAC, CLEVELAND (29B-WF-171994) (RUC)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE # 38
FIF;
FAG;
OO: WMFO

Re WMFO airtel to Charlotte, with copy for Cleveland, dated 3/26/92.

Records of the Cleveland, Ohio Police Department, Identification Division and the Record and Warrant Unit were reviewed for any identifiable information re [redacted]. and met with negative results. b6 b7C

The files of the Cuyahoga County, Ohio Sheriff's Office were also searched [redacted] and met with negative results. b6 b7C

The Cleveland Indices conducted a automated and hand search for any identifiable information re above individuals and found two references for [redacted]. Both were references with no pertinent information. b6 b7C

2 - WMFO
1 - Cleveland
SLO:so
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Searched
Ser. tm
Ind.
Filed tm

Approved: _____ Transmitted _____ Per _____
(Number) (Time)

1325015-000-10505
29B-WF-171994-19

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DE FBIWMFO #0028 1981533

ZNR UUUUU

R 161528Z JUL 92

FM FBI WMFO (29B-WF-171994) (P) (BCCI)

TO DIRECTOR FBI/ROUTINE/

FBI CLEVELAND/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ: CID, WCCS, FIFU, SSA [redacted]; FA b6 b7C

PROGRAM MANAGER [redacted]

SUBJECT: HIDDEN INTERESTS; MC #38; FIF; FAG; OO: WMFO.

RE FBIHQ TEL TO CLEVELAND, DATED APRIL 3, 1992.

THE PURPOSE OF THIS COMMUNICATION IS TO PROVIDE A NARRATIVE PERFORMANCE APPRAISAL FOR THE SUPERVISOR OF FINANCIAL ANALYST (FA) [redacted], WHO, IN RELATION TO THE b6 b7C CAPTIONED MATTER, RECENTLY COMPLETED A TEMPORARY DUTY (TDY) ASSIGNMENT IN MIAMI, FLORIDA.

1 - FA [redacted] sP/F

0- 29B-WF-171994

UCFN Los

DATE 7/16 INITIALS Sar

FOIMS _____

DATE _____ INITIALS _____

Lucy 29B-WF-171994 - 20

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JUL 16 1992

FBI CLEVELAND

[redacted] b6 b7C

[redacted]

DURING THE RATING PERIOD, FA [redacted] WAS PART OF A GROUP OF FAS WHO ASSISTED WMFO IN THE CAPTIONED MATTER BY PARTICIPATING IN A TDY ASSIGNMENT IN MIAMI, FLORIDA, REVIEWING THE CONTENTS OF APPROXIMATELY 3,500 BOXES OF BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) RECORDS, SEIZED DURING THE EXECUTION OF SEARCH WARRANTS. THE CAPTIONED MATTER IS A VERY COMPLEX, INTERNATIONAL FRAUD CASE INVOLVING A NUMBER OF SUBJECTS AND ISSUES, AND EXTREMELY LARGE GROUPS OF RECORDS, LOCATED THROUGHOUT THE WORLD. DUE TO CIRCUMSTANCES PRESENT IN THE CASE, FA [redacted] ALONG WITH THE OTHER FAS WHO WERE BROUGHT TO MIAMI, WAS GIVEN GUIDELINES FOR THE REVIEW (CONSISTING OF LISTS OF PERTINENT PERSONS AND COMPANIES; ALLEGATIONS BEING INVESTIGATED, AND EXISTING INDICTMENTS) AND, WITH MINIMAL SUPERVISION PROVIDED BY WMFO AND/OR MIAMI SAS, WAS EXPECTED TO REVIEW AND SUFFICIENTLY ANALYZE THE RECORDS TO SELECT FROM AMONG THEM DOCUMENTS HAVING POTENTIAL AS EVIDENCE. b6 b7C

FA [redacted] SHOWED LEADERSHIP ABILITIES AND A GOOD WORK ETHIC, SETTING EXAMPLES FOR THE OTHER FAS TO FOLLOW. ALTHOUGH THERE WERE A FEW OCCASIONS WHEN, APPARENTLY DUE TO ILLNESS, SHE WAS ABSENT FROM THE WORKPLACE, SHE WAS A DILIGENT, PRODUCTIVE WORKER WHEN PRESENT, PROVIDING GUIDANCE FOR THE b6 b7C

OTHER FAS WHILE EFFECTIVELY AND EFFICIENTLY ACCOMPLISHING HER OWN TASKS.

WMFO APPRECIATES THE VALUABLE WORK DONE BY FA [redacted] IN MIAMI AND WOULD GLADLY CALL ON HER AGAIN FOR ASSISTANCE SHOULD THE NEED ARISE.

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DE RUCNFB #0115 1892128

ZNR UUUUU

O 072034Z JUL 92

FM DIRECTOR FBI

TO ALL FBI FIELD OFFICES/IMMEDIATE/

BT

UNCLAS

CITE: //0624// 29B-WF-171994

PASS: PERSONAL ATTENTION.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FINANCIAL ASSISTANTS/ FINANCIAL ANALYSTS (FA); OO: WMFO.

ON 6/26/92, EXECUTIVE MANAGEMENT AT FBIHQ AUTHORIZED 90-DAY TEMPORARY DUTY (TDY) ASSIGNMENTS FOR EIGHT FAS TO BE ASSIGNED TO THE WMFO IN SUPPORT OF THE ABOVE-MENTIONED MAJOR CASE.

THE FAS SELECTED FOR THIS ASSIGNMENT WILL BE BASED AT WMFO. THIS TDY ASSIGNMENT MAY INVOLVE INTERNATIONAL TRAVEL. ALL COSTS INCURRED WITH THIS TDY ASSIGNMENT WILL BE PAID FOR FROM THE HEADQUARTERS "SPECIAL FUND."

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Per discussion w/FAs [redacted] Per discussion w/ASAC-C [redacted] none volunteered, SSA [redacted], FA [redacted] would not be recommended even if she volunteered, due to her 2 recent 3-month TDYs to Miami and the matters which she must rectify + catch up on in the CV division. Per further discussion w/ASAC-C due to a shortage of necessary Financial Assistants Analysts & auditors in CV, CV would not assign an FA to this TDY assignment even if one volunteered; unless FBIHQ mandated such an assignment. O/A 7/8/92, SSA [redacted] left a message with [redacted] at WCCS, FBIHQ for [redacted] that CV had no candidates for instant assignment

AUTOMATED SEARCH DATE 7-7-92

29B-WF-171994-21

SEARCHED INDEXED
SERIALIZED FILED
JUL 07 1992
FBI — CLEVELAND

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1325015-000-10509 7/8/92

FBIHQ IS SEEKING FAS WHO ARE WILLING TO VOLUNTEER AND REMAIN IN THE WASHINGTON, D.C. AREA FOR A MINIMUM OF 90 DAYS WITH NO RETURN TRAVEL TO THEIR PERMANENT DUTY STATION. CANDIDATES SHOULD HAVE A GOVERNMENT CREDIT CARD AND A GOVERNMENT DRIVER'S LICENSE OR BE WILLING TO OBTAIN THESE ITEMS. CANDIDATES SHOULD BE AVAILABLE FOR TRAVEL NO LATER THAN 7/20/92.

FBIHQ IS REQUESTING THAT EACH DIVISION CANVASS THEIR FAS FOR POSSIBLE CANDIDATES. CANDIDATES' NAMES SHOULD BE FURNISHED TO THE FA PROGRAM MANAGER, [redacted] BY PHONE [redacted] b6 b7C OR FACSIMILE (202) 324-6492 NO LATER THAN CLOSE OF BUSINESS 7/8/92.

CANDIDATES SELECTED FOR THIS ASSIGNMENT WILL BE NOTIFIED BY PHONE ON 7/10/92. IT SHOULD BE NOTED THAT THOSE FA CANDIDATES WHO HAD PREVIOUSLY ASSISTED IN THIS INVESTIGATION WILL BE GIVEN PREFERENCE.

ANY QUESTIONS REGARDING THIS ASSIGNMENT SHOULD BE DIRECTED TO THE FA PROGRAM MANAGER OR UNIT CHIEF [redacted] FINANCIAL b6 b7C INSTITUTION FRAUD UNIT, WHITE-COLLAR CRIMES SECTION, CRIMINAL INVESTIGATIVE DIVISION, PHONE [redacted]

BT

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OO AFO FBICV

DE RUCNFB #0115 1892128

ZNR UUUUU

O 072034Z JUL 92

FM DIRECTOR FBI

TO ALL FBI FIELD OFFICES/IMMEDIATE/

BT

UNCLAS

CITE: //0624//

PASS: PERSONAL ATTENTION.

SUBJECT: HIDDEN INTERESTS; MAJOR CASE 38; FINANCIAL ASSISTANTS/ FINANCIAL ANALYSTS (FA); OO: WMFO.

ON 6/26/92, EXECUTIVE MANAGEMENT AT FBIHQ AUTHORIZED 90-DAY TEMPORARY DUTY (TDY) ASSIGNMENTS FOR EIGHT FAS TO BE ASSIGNED TO THE WMFO IN SUPPORT OF THE ABOVE-MENTIONED MAJOR CASE.

THE FAS SELECTED FOR THIS ASSIGNMENT WILL BE BASED AT WMFO. THIS TDY ASSIGNMENT MAY INVOLVE INTERNATIONAL TRAVEL. ALL COSTS INCURRED WITH THIS TDY ASSIGNMENT WILL BE PAID FOR FROM THE HEADQUARTERS "SPECIAL FUND."

29B-WF-171994-21
SEARCHED INDEXED
SERIALIZED FILED
JUL 07 1992
FBI — CLEVELAND

0026 MRI 01620

RR RUCNFB AFO FBICV ALO FBIWMFO

DE FBIWMFO #0019 1902222

ZNR UUUUU

R 082123Z JUL 92

FM FBI WMFO (OO-000)

TO DIRECTOR FBI/ROUTINE/

ALL FBI FIELD OFFICES/ROUTINE/

ALL LEGATS/ROUTINE/

BT

UNCLAS

CITE: //3920//

BCCI 29B-WF-171994*

PASS: FBIHQ TO ALL DIVISIONS.

SUBJECT: BCCI; MAJOR CASE 38; OO:WMFO.

WMFO HAS BEEN INCURRING A PROBLEM IN THE ROUTING OF BCCI MAIL TO INAPPROPRIATE OFFICES, WHICH IS CAUSING A SEVERE DELAY IN THE PROCESSING OF MAIL.

ALL OFFICES ARE REQUESTED TO CLEARLY MARK AND DIRECT ANY BCCI MAIL TO: BCCI SQUAD, WMFO.

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29B-WF-171994-22

SEARCHED INDEXED

SERIALIZED FILED

JUL 08 1992

FBI — CLEVELAND

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b7C

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AUTOMATED SEARCH

DATE 1-8-92

1325015-000-10512

0026 MRI 01620

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DE FBIWMFO #0019 1902222

ZNR UUUUU

R 082123Z JUL 92

FM FBI WMFO (OO-000)

TO DIRECTOR FBI/ROUTINE/

ALL FBI FIELD OFFICES/ROUTINE/

ALL LEGATS/ROUTINE/

BT

UNCLAS

CITE: //3920//

PASS: FBIHQ TO ALL DIVISIONS.

SUBJECT: BCCI; MAJOR CASE 38; OO:WMFO.

WMFO HAS BEEN INCURRING A PROBLEM IN THE ROUTING OF BCCI MAIL TO INAPPROPRIATE OFFICES, WHICH IS CAUSING A SEVERE DELAY IN THE PROCESSING OF MAIL.

ALL OFFICES ARE REQUESTED TO CLEARLY MARK AND DIRECT ANY BCCI MAIL TO: BCCI SQUAD, WMFO.

BT

#0019

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29B-WF171994-22
SEARCHED INDEXED
SERIALIZED FILED
JUL 08 1992
FBI — CLEVELAND

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- X ☐ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 11/03/92

TO : SAC, ALBANY

FROM : SAC, WMFO (29B-WF-171994) (P) (BCCI)

SUBJECT : HIDDEN INTERESTS; *29B-WF-171994
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: BUREAU WIDE AIRTEL FROM WMFO DATED 3/17/92.

RE Airtel advised the receiving offices about the plea agreement, dealing with the forfeiture of assets, between the Bank of Credit and Commerce International (BCCI) and the United States (US) government. The offices were provided with the four defendants in the case and a list of consolidated and unconsolidated subsidiaries and affiliates of the defendants.

Along with determining assets held by BCCI, WMFO is looking into assets held by either BCCI shareholders or BCCI front-men, along with assets held in the names of companies associated with the shareholders or front-men.

The following is a list of the individuals who are of a concern: ALMAHAYAN, SHEIK, ZAYED BIN SULTAN *29B-WF-171994

1. SHEIKH ZAYED BIN SULTAN AL-NAHATAN (SHEIKH ZAYED)
2. [redacted]
3. [redacted] 29B-WF-171994
4. [redacted] *29B-WF-171994
5. [redacted]
6. [redacted]
7. [redacted]
8. [redacted]

b6
b7C

(2) - ALL SACs
1 - WMFO (29B-WF-171994 SUB A)

RHM:rhm
(111)

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29B-WF-171994-23

Approved: _____ Transmitted _____ (Number) _____ (Time) Per _____

- Unable to locate 194c-CV-45545-149
- 66A-5784-A-24 regards captioned matter
- No positive info to report to OO.

1325015-000-10514

9. [redacted] b6
10. [redacted] b7C
11. [redacted]
12. GHAITH PHARAON
13. AGHA HASAN ABEDI
14. [redacted]

The following is a list of some of the companies that can be tied in with some of the above listed individuals. These companies will also be looked at for assets held in the United States:

1. Interedec (PHARAON company)
2. Attock Oil (PHARAON company)
3. Abu Dhabi Investment Authority (ADIA)
4. Adham Corporation [redacted] company) b6
5. Mashriq Holdings Co. [redacted] company) b7C
6. Linden Investments [redacted] company)
7. Investrade, Inc. [redacted] company)
8. Carlson Farms, Inc. [redacted] company)
9. Middle East Credit and Investment Co. [redacted] co.)
10. Fulda
11. North American Investment and Finance Company
12. Gruma Establishment
13. General Commerce Company International Limited
14. Lydd Consultants Limited
15. Queensberry Investment Company Limited
16. Castle Holdings Limited

The two lists are not all inclusive, as more information is received by WMFO, WMFO will provide same to the receiving offices.

LEADS:

All receiving offices are to note the above and index the listed individuals and companies. Provide WMFO with results of indices checks and if there are any positve hits provide appropriate information.

1325015-000-10515

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
- ☐ Teletype
- ☐ Facsimile
- ☒ AIRTEL

PRECEDENCE:
- ☐ Immediate
- ☐ Priority
- ☐ Routine

CLASSIFICATION:
- ☐ TOP SECRET
- ☐ SECRET
- ☐ CONFIDENTIAL
- ☐ UNCLAS E F T O
- ☐ UNCLAS

Date 12/11/92

TO : SAC, WMFO (29B-WF-171994)
ATTN: SSRA [redacted] b6 b7C

FROM : SAC, CLEVELAND (29B-WF-171994)(CMRA)(RUC)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
OO: WMFO

Reference telephone call from SA [redacted] b6 b7C Cleveland Division, Canton RA to SSRA [redacted] WMFO, 12/10/92.

For information of WMFO, Cleveland Division has initiated an investigation in Cleveland file 196A-CV-48456 captioned [redacted], b6 b7C Marine Life and Casualty Insurance Company, International Insurance Services Gulf, Ltd., Ross Goldman and Associates; FRAUD BY WIRE - MAIL FRAUD; OO: CLEVELAND". This investigation was initiated after the following information was received:

In [redacted] a Cooperating Witness (CW) was contacted by [redacted] with regards to [redacted] b6 b7C b7D

[redacted]

3 - WMFO (29B-WF-171994)
1 - New York (196B-CV-48456)(Info)
1 - New Orleans (196B-CV-48456)(Info)
2 - Cleveland (1 - 29B-WF-171994)
(1 - 196A-CV-48456)
PAC:jse
(7)

29B-WF-171994 - 24
Searched
Serialized
Indexed
Filed
KAm

Approved: _____ **Transmitted** _____ (Number) (Time) **Per** _____

1325015-000-10516

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

[redacted] b6 b7C b7D

CW is cooperative [redacted] b6 b7C b7D A search of FOIMS determined that the Houston, New Orleans and New York Divisions have numerous references regarding some of the individuals listed above.

Cleveland indices reflect that [redacted] was a subject in a prior 29A matter and in fact could have been indicted in that matter. However, the statute of limitations passed and in 1985 U.S. Attorney, NDO, Cleveland, Ohio had to decline prosecution in that matter. b6 b7C

FBI Houston has advised that [redacted] has been a subject of numerous Houston White Collar Crime cases and that there are also numerous references regarding [redacted] has been arrested by FBI Houston on two different occasions and he is described as "a definite con man". In addition, Marine Life and Casualty Insurance Company, 11310 North Freeway, Suite 191, Houston, Texas is described as a "bogus company". b6 b7C

1325015-000-10517

[redacted] is described as follows: b6 b7C

Name:	[redacted]
Race:	White
Sex:	Male
DOB:	[redacted]
Height:	5'10" tall
Weight:	190 lbs.
Hair:	Brown
Eyes:	Green
SSAN:	
Home address:	[redacted]

[redacted] is described as follows: b6 b7C

Name:	[redacted]
Race:	White
Sex:	Male
DOB:	
POB:	[redacted]
Height:	6'1"
Weight:	240 lbs.
Hair:	Brown
Eyes:	Green
SSAN:	
FBI Number:	
Louisiana driver's license number:	[redacted]
Wife:	

Above is being provided for information of WMFO>

WMFO is also requested to search the following through WMFO indices and also through the Hidden Interests file to determine if any of these appear:

[redacted] b6 b7C

Marine Life and Casualty Insurance Company
International Insurance Services Gulf, Ltd.
Ross Goldman and Associates.

1325015-000-10518

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 67
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Page 40 ~ Duplicate;
Page 41 ~ Duplicate;
Page 42 ~ Duplicate;
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b6
b7C

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 2/23/93

TO : SAC, WMFO (29B-WF-171994)

FROM : SAC, MIAMI (29B-WF-171994) (D-9) (P)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG
OO: WMFO

Re WMFO airtel to Miami dated 1/19/93 and telcal between PS [redacted] and SA [redacted] WMFO, 2/23/93. b6 b7C

Miami Division conducted property searches on all properties listed in referenced airtel. Per SA [redacted] request, Miami is forwarding computer printouts regarding referenced properties. b6 b7C

The below listed addresses show Bank of Credit and Commerce International (BCCI) as the mortgage company:

1) 12385 SW 73rd Avenue
Miami, Florida
2) 935 Malaga Avenue
Coral Gables, Florida
3) 12970 SW 117th Street
Miami, Florida

Per referenced telcal, Miami will not conduct any additional investigation until requested by WMFO.

Please direct further inquiries to PS [redacted] 305/787-6309.

[redacted]

29B-WF-171994 Sub FS 85 120

(2) - WMFO (29B-WF-17[illegible] Attn: SA [redacted])
2 - Miami (1 - 29B-WF-171994)
(1 - 29B-WF-171994 Sub S)

MDO/mdo
(4)

SEARCHED ____ INDEXED ____
SERIALIZED Su FILED Su
MAR 11 1993
FBI - WASH. METRO FIELD OFFICE
Su JR

b6 b7C

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-10519

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 2/23/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: ASSET FORFEITURE

On 2/23/93 SSA [redacted] advised the writer that [redacted] First American Bank (FAB) had information and questions concerning the FAB building in New York at 350 Park Avenue. b6 b7C

The writer spoke with [redacted] on 2/23/93 and obtained a brief history of the ownership and possible sale of FAB building at 350 Park Avenue, New York, New York. [redacted] immediate concern was who actually owns the building. b6 b7C

[redacted] (ph), the court appointed trustee for FAB. [redacted] advised that the owners of the building "Who ever they are?" are currently represented by the law firm of SHERMAN & STERLING. [redacted] added that the law firm of CLEARY, GOTTLIEB, STEIN & HAMILTON had previously represented the owners. b6 b7C

A Partnership, '350 PARK AVENUE ASSOCIATION', was set up to purchase the building in September of 1981, which it did and the partnership is still the "on paper" owners of 350 Park Avenue. The original partners were: Solomon Brothers Holding Company (SBHC) (Limited Partner) and Republic New York Corporation (RNYC) (General Partner). [redacted] has learned that when the partnership purchased the property there was an agreement signed with a third party for debt financing [redacted] did not know the name of the third party in the agreement. [redacted] stated that RNYC also had an option to sell its interest in the partnership at the original cost, thus assuring them they had a risk free investment. b6 b7C

29B-WF-171994 SUB FS 86 121

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 24 1993
FBI — [redacted]

(2) - WMFO
(1 - 29B-WF-171994)
(1) - 29B-WF-171994 SUB FS)
1 - DOJ-AFO [redacted] b6 b7C

RHM:rhm
(3)

1325015-000-10520

Eight days after the building was purchased SBHC, which it self was a partnership, filed to dissolve and stop doing business. In early 1983 RNYC sold its share in the partnership to '51st and Park Investment Corp' (51st) a company incorporated in Delaware. Then, in March of 1983 SBHC claimed they had changed their name to 'SBHC Liquidation Partnership' and got out of the partnership by "with drawing" in favor of another Delaware corporation named 'Park and 52nd Lenders Corporation' (52nd). The '350 Park Avenue Association' partnership continued with 51st acting as the General Partner and 52nd acting as the Limited Partner. [redacted] discovered that the two corporations, 51st and 52nd, were incorporated the day before the building was originally purchased in 1981 and that the two corporations were then activated in early 1983. b6 b7C

[redacted] believes that Kuwaiti Investment Authority (KIA), [redacted] in London, is and has been involved in the ownership of the property since 1981. Some of the KIA shareholders were also owners of CCAH shares. Some of the companies involved with KIA were; Real Estate Development Co. (or Real Estate Investment Co.); Gulf Investment and Real Estate, which is a possible [redacted] company; and I.Z. Commerce and Exchange, which possibly is 74% owned by BCCI. b6 b7C

The partnership purchased the property for $ 161 million in 1981 and in May of 1987 the mortgage was rewritten for $ 160 million from Prudential. The tax bills are currently being paid by Chase Manhattan. The owners of the building are believed to be trying to fetch about $ 52 million for the sale. The owners are also trying to get this issued settled very quickly, with in the next 2 weeks.

[redacted] stated that [redacted] for FAB [redacted] had spoken to him concerning some FAB accounts which were still being held in the name of some BCCI entities. When FAB-New York was sold to Key Corporation (Key Bank) these accounts were not sold. [redacted] further believes that BCCI owes FAB money from previous lending deals between the two banks. He believes that BCCI Hong Kong, which is also in liquidation, owes the money and that the liquidators are paying off the depositors and creditors, however FAB has not received any funds to his knowledge. b6 b7C

1325015-000-10521

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 2/25/93

[redacted] b6 b7C
[redacted] New York, [redacted] Bank of Credit and Commerce International (BCCI), New York Agency (NYA) was advised the identity of the interviewing agent and the purpose of the interview. He then provided the following information:

[redacted] began his employment with BCCI-NYA on the day the NYA opened in March of 1984 and stayed with the NYA until the office was closed. He was going to be working as the Head of Corporate Banking Group, however he ended up working in the Correspondent Banking Division. [redacted] stayed in that department all the time he was employed with BCCI-NYA. His duties were to contact banks up and down the east coast in an attempt to set up correspondent banking relationships. However, most of his time was spent working in the Private Correspondent Banking section of the Correspondent Banking Division. [redacted] was responsible for making contact with Middle Eastern companies. b6 b7C

[redacted] came to know about the opening of the BCCI-NYA while he was employed at Citibank in New York, where he also worked in the Correspondent Banking Division of Citibank. A friend of his, [redacted] was working in the New York Rep Office of BCCI and advised that BCCI was going to open an office in New York and that [redacted] should speak with BCCI. [redacted] interviewed with [redacted] He was offered the position and made the switch because his salary would be doubling. b6 b7C

[redacted] first came to know of Real Estate Operations, Inc. (REO) when BCCI-NYA extended a loan to the 330 Madison Company. [redacted] REO and also employed with the Abu Dhabi Investment Authority (ADIA), spoke with [redacted] regarding the loan. At that time [redacted] inquired about other accounts which might have been associated with REO. [redacted] to contact [redacted] both of them were employed with Patton, Boggs and Blow. Patton, Boggs and Blow were the counsel for REO and would handle any other accounts associated with REO, [redacted] believes Patton, Boggs and Blow are still counsel for REO. b6 b7C

Other individuals [redacted] knew to be involved with REO in some manner were: [redacted] REO; [redacted] b6 b7C

Investigation on 2/25/93 at WASHINGTON, D.C. File # 29B-WF-171994 Sub ES

by SA [redacted] Date dictated 2/25/93 b6 b7C

SEARCHED ___ INDEXED ___
SERIALIZED Su FILED Su
MAR 8 [illegible]

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

FBI - WASH. [illegible]

b6
b7C

[redacted] ADIA [redacted] believes [redacted] ADIA) [redacted] Department of Private Affairs (DPA) for SHEIK ZAYED; and [redacted] (ph), [redacted] ADIA.

b6
b7C

[redacted] understood REO to be a Holding Company for a number of different companies, he did not know the specific number of companies nor did he initially remember any specific company names. When asked if he recalled the following company names [redacted] did acknowledge they were companies associated with REO: Miretta Management Co.; Marten Management Co.; Mano Management Co.; Martinet Management Co.; Marmot Management Co.; Magister Management Co.; Chandon Investment Co.; Chariot Investment Co.; and Chadison Investment Co. [redacted] then recalled three additional company names he believed were also associated with REO: Chesterfield; Tandom; and Calbert. [redacted] thought REO was a Delaware corporation as well as all the companies for which REO was the Holding Company. However, originally some of the companies may have been set up as off-shore companies, possibly in the Netherlands Antilles.

b6
b7C

[redacted] involvement with REO was setting up and monitoring the accounts of REO and the various companies associated with REO. The accounts of the companies already existed at other banks in New York. The C accounts came from Chase Manhattan, the M accounts came from Morgan Guaranty, and the T accounts came from Citibank. [redacted] would manage the funds which were placed into the accounts, he did not recall the nature of the fund transfers. He knew that some of the funds came form rental and property management accounts. [redacted] did not work on any other loans regarding REO or its companies, other than the 330 Madison loan. [redacted] recalls that there were subsidiary accounts also set up, which could have been related to the credit given to the various companies, but he could add no other information.

b6
b7C

[redacted] believed REO was controlled by Abu Dhabi, possibly through ADIA. [redacted] stated that the records of REO and the associated companies were kept at the NYA and are now in the possession of the New York State Banking Department (NYSBD) and that [redacted] of the NYSBD should know where the records are kept. The records would include each subsidiary of REO, notes and correspondences of [redacted] The accounts were transferred to BCCI in Grand Cayman Islands, when the BCCI-NYA was shut down, and any further records regarding transactions would be in the Grand Cayman Islands office of BCCI. The accounts were transferred to Grand Cayman in order to keep the accounts with the bank (BCCI) instead of having them go to another competitor. There was some consideration in giving the

b6 b7C

accounts to BCCI in Canada; however, Grand Cayman was better equipped to handle the accounts, they were in the same time zone and the NYA was able to retain some of the profit from the accounts.

[redacted](ph) of Chase Investors travelled to Grand Cayman to initiate the transfer over of the accounts. Chase Investors were the managing agents for REO and the subsidiary

b6 b7C

and as far as [redacted] knew the accounts were still being handled by UBS. [redacted] believed that [redacted] is still with UBS and that an individual by the name of [redacted] at UBS would have knowledge of REO. [redacted] would have knowledge of the properties which were purchased for REO, as he was the individual who would make the property purchases on behalf of REO.

b6 b7C

[redacted] did not recall any specific dates or time frames of any of the above occurrences. He did not know when REO was originally set up. He did not have any records/notes/diaries or anything else in his possession regarding REO. [redacted] did not know of any assets being held in the United States, in the name of REO, except that of 330 Madison Avenue. [redacted] had heard of International Credit and Investment Company (ICIC), however he never had any dealings with ICIC nor did he know if REO had any dealings with ICIC.

b6 b7C

[redacted] had heard of both MOHAMMED HAMMOUD and GHAITH PHARAON, however he has never met them nor has he ever dealt with them or any of their companies to his knowledge. [redacted] has met [redacted] but he never dealt with any of his companies to his knowledge.

b6 b7C

[redacted] advised that he is moving to Saudi Arabia in March of 1993 to work at a bank. He provided his future work and home telephone numbers, which will be activated starting March 15, 1993: [redacted](home).

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 3/25/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 30 - FORFEITURE
REAL ESTATE OPERATIONS, INC. (REO)

On 3/22/93 the writer traveled to New York to search and review BCCI documents concerning REO.

A May 20, 1992 'Wall Street Journal' article indicated that there possibly was a tie between BCCI and REO. The article further stated that REO had real estate holdings of about $ 1 billion in the United States (U.S.).

There was no indication from the documents, which were reviewed, that BCCI had any ownership ties to REO. There were two organizational charts located (see attachments) which indicate that ADIA (Abu Dhabi Investment Authority) was the eventual owner of REO through RENA Trust # 2, a Grand Cayman Holding Co.

REO, a Delaware Holding Co., had several accounts managed by Chase Investors and Citicorp Management (see attachments). Copies of the Certificate of Incorporation documents were located for REO and several of the subsidiary companies. In all cases the companies were incorporated in Delaware and the name/mailing address of the incorporator is:

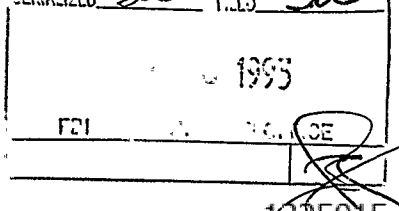
[redacted] b6 b7C

Patton, Boggs & Blow
2550 M Street, N.W.
Washington, D.C. 20037

2 - WMFO
(1 - 29B-WF-171994) (ATTACHMENTS)
(1) - 29B-WF-171994 SUB FS) (ATTACHMENTS)
1 - DOJ-AFO [redacted] (ATTACHMENTS)

RHM:rhm
(3)

29B-WF-171994 Sub FS -88
123



b6 b7C

1325015-000-10525

Also located were: balance sheets of REO and RENA Trust # 2 for December 31, 1988 and 1987; a listing of properties, with valuations, of the subsidiaries; and a listing of the checking and money market accounts of the subsidiaries (see attachments).

REO letterhead has an address as follows:

Real Estate Operations, Inc.
2550 M Street, N.W. Suite 800
Washington, D.C.

The writer was unable to make copies of all the documents reviewed, however documents which appeared to be of importance were copied. A number of the documents (memos) generated by BCCI concerning REO were from [redacted] (previously interviewed) and were sent to [redacted] Abu Dhabi. b6 b7C

As stated previously there is no indication in the documents reviewed that REO or any of its subsidiaries were owned by BCCI. Its possible that documents at Chase Investors, Citicorp Management and REO may have more detailed information concerning the ownership of REO and its subsidiaries. However, unless advised otherwise, by DOJ-AFO, the writer considers the matter of REO complete.

1325015-000-10526

320 PARK AVENUE NEW YORK NY 10022

DATE: October 11, 1900

FROM: [redacted] Marketing Department

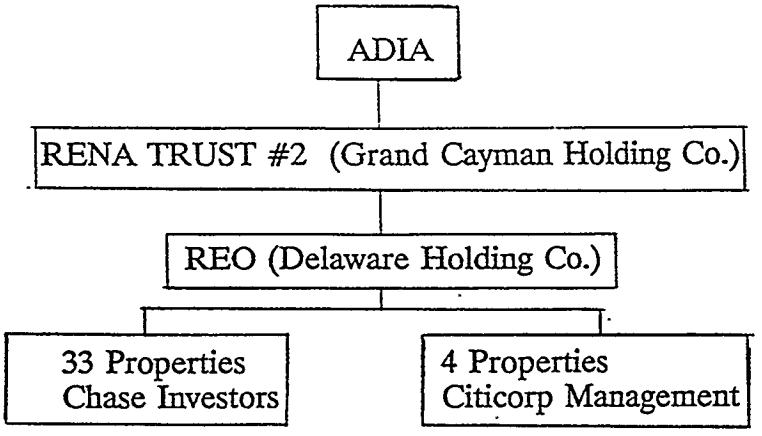
TO: [redacted] BCC Canada

b6
b7C

SUBJECT: Property Accounts related to Real Estate Operations

Thank you for time and consideration during my visit to Toronto. It was a pleasure to meet with you both and discuss the operational mechanics of the property accounts. However, in order to formalize our conversation I have detailed below the services and compensation we discussed.

A. Organization Chart



B. Services

Thirty seven properties maintain accounts at BCC New York. Out of these, 34 are managed by Chase Investors and 4 are managed by Citicorp Investments. Each property has two accounts (1) Operating account (2) Investment/Call account. A copy of the operating procedure was given to Anjum. Average balances in operating account are between $400,000 - 600,000, and average balances in call accounts vary between $25-35 million. We will on a monthly basis provide you with a rate on the investment/call account balances. (last month's rate was 5.75).

1/1/88

RENA Trust No. 2 (Caymans)
RENA Trust Company Limited (Caymans; Trustee)

1 Delaware Corporation

1. Chariot Investment Co., Inc. owns 25.125% of 330 Madison Co.

Real Estate Operations, Inc. (Delaware)

1 Netherlands Antilles Shell Corporation

Chippendale Investment Co. N.V.

3 Delaware Shell Corporations

1. Champion Invest. Co., Inc.
2. Mullen Management Co., Inc.
3. Trapez Operations, Inc.

NY 0005292
CONFIDENTIAL

4 Delaware Partnership Interest Corporations

1. Chandon Investment Co., Inc. owns 40.50% of CVM
2. Madeira Management Co., Inc. owns 20.30% of Madeira-RMC
3. Michaelson Management Co., Inc. owns 20.30% of Michaelson - RMC
4. Moder Management Co., Inc. owns 50.40% of 1100-17th Assoc.

6 Delaware Partnership Interest Corporations

1. Chadison Investment Co., Inc. owns 49.875 % of 330 Madison Co.
2. Crabtree Investment Co., Inc. owns 49.50% of CVM Assoc.
3. Merlot Management Co., Inc. owns 49.70% of Madeira-RMC
4. Michelin Management Co., Inc. owns 49.70% of Michaelson-RMC
5. Martinet Management Co., Inc. owns 29.60% of 1100-17th Assoc.
6. Marmot Management Co., Inc. owns 20% of 1100-17th Assoc.

22 Delaware Real Estate Investing Corporations

1. Madonna Management Co., Inc.
2. Magister Management Co., Inc.
3. Mano Management Co., Inc.
4. Marconi Management Co., Inc.
5. Marina Management Co., Inc.
6. Marten Management Co., Inc.
7. Merin Management Co., Inc.
8. Minstrel Management Co., Inc.
9. Minos Management Co., Inc.
10. Miretta Management Co., Inc.
11. Morton Management Co., Inc.
12. Mosten Management Co., Inc.
13. Chaddley Investment Co., Inc.
14. Chancery Investment Co., Inc.
15. Charisma Investment Co., Inc.
16. Chartwell Investment Co., Inc.
17. Cherner Investment Co., Inc.
18. Cherry Investment Co., Inc.
19. Chesterfield Investment Co., Inc.
20. Tatem Operations, Inc.
21. Tatem Operations, Inc.
22. Talbot Operations, Inc.

1325015-000-10528

THE INVESTMENT PORTFOLIO OF REAL ESTATE OPERATIONS, INC. AND
RENA TRUST NUMBER 2 MANAGED BY
CHASE INVESTORS MANAGEMENT CORPORATION NEW YORK

COMBINED BALANCE SHEETS

December 31, 1988 and 1987

	1988	1987
ASSETS		
Rental properties (Notes 1, 3 and 6):		
Land	$ 97,351,897	$ 97,351,897
Buildings and improvements	496,528,047	483,205,595
Construction in progress	405,499	716,677
Accumulated depreciation	(118,831,809)	(99,610,786)
Rental properties, net	475,453,634	481,663,383
Cash and cash equivalents (Note 1)	52,083,268	21,804,843
Notes receivable (Note 7)	15,225,000	15,225,000
Accounts receivable net of allowance for doubtful accounts of $162,067 and $323,269 as of December 31, 1988 and 1987, respectively (Notes 7 and 13)	9,451,954	8,289,644
Due from affiliates	35,146	27,704
Investments in affiliate (Note 2)	23,377,154	23,377,154
Other assets (Notes 1, 9 and 13)	16,897,756	17,245,085
Total assets	$ 592,523,912	$ 567,632,813
LIABILITIES AND EQUITY		
Notes payable (Notes 6 and 12)	$ 135,700,412	$ 154,360,412
Mortgage notes payable (Note 6)	319,840,000	288,320,179
Accounts payable and accrued expenses (Notes 9, 12 and 13)	20,570,823	19,099,039
Distributions payable	567,500	520,425
Deferred income taxes (Note 8)	501,290	922,800
Due to affiliates	64,050	81,746
Security deposits	1,249,757	1,072,063
Total liabilities	478,493,832	464,376,664
Minority interest in capital of combined partnerships (Notes 1, 6 and 7)	4,839,108	8,703,510
Commitments and contingencies (Note 11)		
Equity (Notes 2 and 6):		
Common stock	198,000	198,000
Additional paid-in capital (Note 12)	277,559,977	229,532,317
Accumulated deficit (Note 12)	(168,567,005)	(135,177,678)
Total equity	109,190,972	94,552,639
Total liabilities and equity	$ 592,523,912	$ 567,632,813

The accompanying notes are an integral part of these combined financial statements.

1325015-000-10529

THE INVESTMENT PORTFOLIO OF REAL ESTATE OPERATIONS, INC.
AND RENA TRUST NUMBER 2 MANAGED BY CITIBANK, N.A.

COMBINED BALANCE SHEETS

December 31, 1988 and 1987

	1988	1987
Assets:		
Rental properties (Notes 1, 3, 4, 7 and 10):		
Land	$10,045,637	$10,045,637
Buildings and improvements	56,554,923	53,438,295
Accumulated depreciation	(7,405,948)	(5,228,258)
Rental properties, net	59,194,612	58,255,674
Cash and cash equivalents (Note 1)	2,352,086	616,003
Accounts receivable, net of allowance for doubtful accounts of $184,892 as of December 31, 1988 and 1987	801,334	351,068
Other assets (Notes 1 and 9)	2,332,385	1,045,890
Total assets	$64,680,417	$60,268,635
Liabilities:		
Mortgage notes payable (Note 7)	$37,350,000	$ 9,000,000
Notes payable (Note 7)	-	32,360,000
Accounts payable and accrued expenses (Note 9)	341,559	1,448,775
Security deposits	53,196	50,536
Total liabilities	37,744,755	42,859,311
Equity (Note 2):		
Common stock	24,000	24,000
Additional paid-in capital	43,900,886	30,869,633
Accumulated deficit	(16,989,224)	(13,484,309)
Total equity	26,935,662	17,409,324
Total liabilities and equity	$64,680,417	$60,268,635

The accompanying notes are an integral part of these combined financial statements.

1325015-000-10530

May 26, 1988

REVISED PROPERTY VALUATION SUMMARY
AS PER PROPERTY APPRAISALS PREPARED
DECEMBER 31, 1987 AND FEBRUARY 24, 1988

PROPERTY	VALUATION	
Chariot		
330 Madison Avenue	153,800,000	(Chariot & Chadigon's 75% only)
Chartwell		
7030 E. Slauson Avenue	8,000,000	
Chesterfield		
Dansher Industrial Park	18,000,000	
Chancery		
Lincoln Center Building	21,000,000	
Chaddley		
100 Davidson Avenue	5,700,000	
Charisma		
Americas' Gateway Park	11,000,000	
Cherner		
Nothwest Business Park	17,000,000	
Chandon		
Crabtree Valley Mall	126,000,000	(Chandon & Crab-tree's 90% only)
Cherry		
Beltway Business Center	26,000,000	
Madonna		
130 Benigno Boulevard	1,600,000	
103-105 Gaither Drive	2,700,000	
110 Gaither Drive	1,650,000	
112 Gaither Drive	1,500,000	
9020 Pennsauken Highway	875,000	
9040 Pennsauken Highway	950,000	
9160 Pennsauken Highway	800,000	
9255 Commerce Highway	1,400,000	
2994 Samuel Drive	6,150,000	
361 Bellevue Road	1,475,000	
Michaelson		
3 Skyline Drive	16,200,000	(REO's interest only)
Minos		
Sente 9	5,000,000	
Sente 10	5,000,000	
Minstrel		
12201 Merit Drive	16,500,000	
Miretta		
Country Club Plaza	28,000,000	

1100-17th Associates		
	1100-17th Street	27,000,000
Morton		
	Seven Century Drive	7,300,000
Mosten		
	475 Sansome Street	71,000,000
Magister		
	Hancock Plaza	6,550,000
Mano		
	Inland Center Mall	52,000,000
Merin		
	Ashford V	9,400,000*
Marconi		
	Harris Department Store	13,400,000
Marina		
	Twin City Federal Towers	44,200,000
Marten		
	P.I. Towers	34,400,000
Madeira		
	5 Skyline Drive	9,800,000 (Red's Interest Only)
	6 Skyline Drive	4,200,000
Tatem		
	1215 Borregas	10,200,000
	1265 Borregas	4,250,000
	1272 Borregas	6,250,000
	1320 Bordeaux	5,100,000
Twain		
	East Brook Mall	14,500,000
Talbot		
	60, 100, 110 Fordham Road	20,700,000
	TOTAL	$ 816,550,000

[redacted] b6 b7C

*Reported in the December 31, 1987 appraisal at $8,000,000

CHASE INVESTORS
MANAGEMENT CORPORATION, NY
1211 AVENUE OF THE AMERICAS
NEW YORK, NY 10036

Following are the Balances as on 11/30/90 for accounts below

Account Name	Checking Account Account No.	Balance	Money Market Account Account No.	Balance
Mosten Mgt. Co.	01002058	15,725.78 CR	07009251	3,041,031.29 CR
Marina Mgt. Co.	01002069	18,234.10 CR	07009273	1,022,747.06 CR
Martinet Mgt. Co.	01002070	10,818.01 CR	07009295	5,875.50 CR
Moder Mgt. Co.	01002081	22,854.42 CR	07009319	6,779.11 CR
Marmot Mgt. Co.	01002092	10,004.38 CR	07009331	809.99 CR
Marconi Mgt. Co.	01002105	13,610.34 CR	07009353	754,357.41 CR
Magister Mgt. Co.	01002116	13,192.82 CR	07009375	214,793.28 CR
Merin Mgt. Co.	01002127	14,420.09 CR	07009397	573,293.71 CR
Morton Mgt. Co.	01002138	16,137.93 CR	07009411	487,818.56 CR
Minstrel Mgt. Co.	01002149	12,447.99 CR	07009433	312,634.77 CR
Michelin Mgt. Co.	01002150	19,376.24 CR	07009455	575,753.15 CR
Madonna Mgt. Co.	01002161	13,875.87 CR	07009477	797,389.54 CR
Mano Mgt. Co.	01002172	16,495.84 CR	07009262	1,006,259.20 CR
Miretta Mgt. Co.	01002183	17,203.12 CR	07009284	470,284.31 CR
Minos Mgt. Co.	01002194	14,213.89 CR	07009308	905,695.33 CR
1100-17th Assoc.	01002207	118,602.62 CR	07009320	35,323.30 CR
Madham Mgt. Co.	01002218	- - -	07009342	- - -
Marten Mgt. Co.	01002229	15,832.83 CR	07009364	1,106,526.36 CR
Merlot Mgt. Co.	01002230	14,922.86 CR	07009386	100,719.49 CR
Madeira Mgt. Co.	01002241	13,700.63 CR	07009400	73,680.35 CR
Michaelson Mgt. Co.	01002252	10,238.36 CR	07009422	254,112.13 CR
Mullen Mgt. Co.	01002263	7,784.60 CR	07009444	2,215.00 CR
Madeira RMC	01002274	- - -	07009466	- - -
Michaelson RMC	01002285	- - -	07009488	- - -
	Sub-Total	409,692.72		11,748,098.84

Following are the Balances as on 11/30/90 for accounts below

Account Name	Checking Account Account No.	Balance	Money Market Account Account No.	Balance
Chaddley Invest.	01002605	19,819.05 CR	07011777	494,424.04 CR
Chadison Invest.	01002616	13,320.69 CR	07011788	628,425.75 CR
Chancery Invest.	01002627	17,001.10 CR	07011799	139,787.18 CR
Chandon Invest.	01002638	11,967.05 CR	07011802	173,046.98 CR
Chariot Invest.	01002649	103,966.00 CR	07011813	692,630.47 CR
Charisma Invest.	01002650	13,856.20 CR	07011824	425,407.94 CR
Chartwell Invest.	01002661	14,549.68 CR	07011835	515,774.76 CR
Cherner Invest.	01002672	19,045.02 CR	07011846	77,666.33 CR
Cherry Invest.	01002683	12,934.65 CR	07011857	951,132.59 CR
Chesterfield Inv.	01002694	17,051.03 CR	07011868	589,604.75 CR
Crabtree Invest.	01002707	11,415.01 CR	07011879	218,031.28 CR
Chippendale Inv.	01002718	- - -	07011880	- - -
Challis Inv.(closed)	01002729	- - -	07011891	- - -
Champion Invst.	01002730	8,285.00 CR	07011904	1,715.00 CR
	Total	672,903.20	Total	16,655,745.91

GRAND TOTAL 17,328,649.11

[redacted]

b6
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CITICORP CITIBANK
REAL ESTATE INVESTMENT MANAGEMENT
599 LEXINGTON AVE. (21ST FLOOR)
NEW YORK, NY 10043

Following are the Balances as on **11/01/90** for accounts below

Account Name	Checking Account Account No.	Balance	Money Market Account Account No.	Balance
Twain Operations	01002843	13,766.03 CR	07012392	295,773.15 CR
Tatem Operations	01002854	10,201.08 CR	07012381	482,018.81 CR
Talbot Operations	01002865	17,928.33 CR	07012370	538,000.88 CR
Trapez Operations	01002876	580.20 CR	07012369	1,352.03 CR
	Total	43,816.41 42475.64	Total	1,235,286.48 317 144
			Grand Total	1,279,102.89

1359 87
620,51

263. 210-48
409-962-72
673,173.20

4907, 642-07
11478, 098-84
16,385,745-91
673,173-20
17,058,919-11

320 PARK AVENUE NEW YORK NY10022

DATE: November 2, 1989

FROM: [redacted]

b6
b7C

SUBJECT: COMPLETION OF ACCOUNT OPENING FORMS FOR THE CHASE MANAGEMENT ACCOUNTS

Enclosed please find the original Account Opening Forms for the following clients:

Account No.	Name
01002092	Marmot Management Company Inc.
01002105	Marconi Management Company Inc.
01002116	Magister Management Company Inc.
01002127	Merin Management Company Inc.
01002138	Morton Management Company Inc.
01002149	Minstrel Management Company Inc.
01002150	Michelin Management Company Inc.
01002161	Madonna Management Company Inc.
01002058	Mosten Management Company Inc.
01002069	Marina Management Company Inc.
01002070	Martinet Management Company Inc.
01002081	Moder Management Company Inc.
01002172	Mano Management Company Inc.
01002183	Miretta Management Company Inc.
01002194	Minos Management Company Inc.
01002207	1100 17th Associates
01002229	Marten Management Company Inc.
01002230	Merlot Management Company Inc.
01002241	Madeira Management Company Inc.
01002252	Michaelson Management Company Inc.
01002263	Mullen Management Company Inc.
01002605	Chaddley Inv. Co. NV.
01002616	Chadison Inv Co. NV
01002627	Chancery Inv. Co. NV
01002638	Chandor Inv. Co. NV
01002649	Chariot Inv. Co. NV
01002650	Charisma Inv. Co. NV
01002661	Chartwell Inv. Co. NV
01002672	Cherner Inv. Co. NV
01002683	Cherry Inv. Co. NV

Contd...

320 PARK AVENUE NEW YORK NY10022

DATE: November 2, 1989

FROM: [redacted] b6 b7C

SUBJECT: COMPLETION OF ACCOUNT OPENING FORMS FOR THE CHASE MANAGEMENT ACCOUNTS
Page Two

Account No.	Name
01002694	Chesterfield Inv. Co. NV
01002707	Crabtree Inv. Co. NV
01002730	Champion Inv. Co. NV

Please arrange for the completion of the following information on Part A of the AOF:

1) Bank Reference Section
2) Nature of Business Section
3) Duly signed at the botton

Thank you in advance for your cooperation.

Kindest regards,

[redacted] b6 b7C

cc: [redacted]

Memorandum

To : SAC, WMFO (29B-WF-171994) Date 4/20/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 30 - ASSET FORFEITURE

On 4/20/93, SA [redacted] contacted [redacted] New York State Banking Commission, [redacted] regarding possible assets of BCCI. b6 b7C

[redacted] advised that he had located, in BCCI records in New York, documents which indicated BCCI money transferring into the United States through BCCI - Panama. It appears to [redacted] that the money would transfer into some shell company's account, which a BCCI Officer had signatory authority over, the money was then used to pay property taxes, which appears to have been paid by a BCCI employee. b6 b7C

A review of the documents should reveal the tax information which would then allow for a search of the ownership of the particular properties. The resulting information, especially if there is any indication that BCCI has any interest in the properties, should then be provided to [redacted] Department of Justice, Asset Forfeiture Office (DOJ-AFO). b6 b7C

3 - WMFO
(1 - 29B-WF-171994)
(1 - 29B-WF-171994 SUB FS)
(1 - SSA [redacted]) b6 b7C

RHM:rhm
(3)

29B-WF-171994/ Sub FS -89
124

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
APR 21 1993
FBI — WASH. FIELD OFFICE

1325015-000-10538

ZGB-WF-171994 Sub FS.

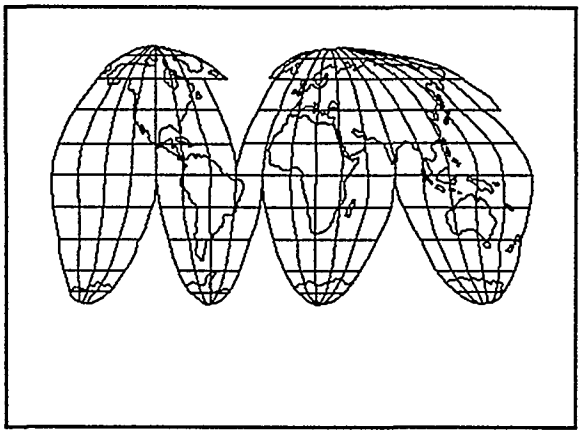
SEARCHED Sw INDEXED Sw
SERIALIZED Sw FILED Sw
APR 2 1993
FBI — WASH. METRO FIELD OFFICE

~~90~~
125

F.B.I.

KTW
Sent 4/21/93
3:10 pm

Washington Metropolitan Field Office
Washington, D.C.



BCCI Squad

Fax : 202/324-9335
Voice: 202/324-9300

Date: 4/21/93 Page 1 of 4

To : BITC

Attention : Analysts

Fax Number: 406-782-9504

From: SA [redacted] C-2 Telephone Number: (202) 324-6398

b6
b7C

Special Instructions: _____

Approved: _____

FBI, Butte Information Technology Center (BITC)

PUBLIC INFORMATION REQUEST FORM

400 North Main Street, Room 115
Butte, Montana 59701
▹ Commercial Telephone: (406) 782-2304, Exts. 44 thru 48
▹ FTS: 700-585-2391 ▹ FAX: (406) 782-9504 & (406) 782-9507
▹ Off-Hour Duty Analyst Pager: (406) 496-8736

Butte ITC Use Only:
Record #: _____
Date/Time In: _____
Date/Time Out: _____
Database(s) Used:
1. _____ 4. _____
2. _____ 5. _____
3. _____ 6. _____
Handled By: _____
Request/Response Type: _____

TO: FBI, BUTTE INFORMATION TECHNOLOGY CENTER

Date: 4/21/93 Drug Related: Yes ☐ No ☒

Requestor: SA [redacted] Phone #: 202-324-6398 Office: WMFO / NVMRA UCFN: 29B-WF-171984 (Mandatory)

b6 b7C b7E

SEARCH CRITERIA

Name - Last: _____ First: _____ Middle: _____

Alias: _____ Sex: __ DOB1: __/__/__ DOB2: __/__/__ SSAN: _____

Residence - Street Address: _____ City/State: _____ Zip: _____ Phone: (__) _____

Business Name: _____ Street Address: _____

City/State: _____ Zip: _____ Phone: (__) _____ Business ID#: _____

CHECK DESIRED SEARCH PARAMETERS (Please check only those that are needed.):

- ☐ 1. Locate Business/Person (__ U.S. ___, ___, ___ State(s))
- ☐ 2. Determine All Individuals Associated with Social Security Number
- ☐ 3. Determine Who is Associated with Telephone Number(s)
- ☒ 4. Determine Address of Business/~~Person~~ (__ U.S. ___, ___, ___ State(s))
- ☒ 5. Determine Property Owned by ~~Individual~~ Business (__ U.S. ___, ___, ___ State(s))
- ☐ 6. Determine Who Owns Property Listed Above
- ☐ 7. Determine Who Resides at Address Listed Above
- ☐ 8. Uniform Commercial Code (__ U.S. ___, ___, ___ State(s))
- ☒ 9. Corporate/Limited Partnership Records (__ U.S. ___, ___, ___ State(s))
- ☐ 10. Bankruptcy (___, ___, ___ State(s) - Areas of Availability are Limited)
- ☐ 11. Judgements (___, ___, ___ State(s) - Areas of Availability are Limited)
- ☐ 12. Lawsuits (___, ___, ___ State(s) - Areas of Availability are Limited)
- ☐ 13. Liens (___, ___, ___, State(s) - Areas of Availability are Limited)
- ☐ 14. Notice of Loan Default
- ☐ 15. Security & Exchange Commission Filings

Send Reply Via: ☐ FAX ☒ BUMAIL **This Request Is:** ☒ ROUTINE ☐ PRIORITY

FBI, Butte Information Technology Center Reply

Return Reply To:
SAC, WMFO / NVMRA -
Attention: SA [redacted] C-2

b6 b7C

Based on search criteria, marked records are attached:
- ☐ Possible Identifiable Records
- ☐ Other Peripheral Information
- ☐ No Information Found

The following are companies which may have real estate holdings in the United States. All the companies are believed to be incorporated in Delaware, except where noted. It is known that some of the companies have holdings in: California; Colorado; New York; North Carolina; and Washington, D.C. The properties owned would be major properties (i.e. shopping centers, major buildings).

FBI Butte Information Technology Center is requested to determine the following for all the listed companies:

A. Property owned, in part and in whole, in all possible states. For all the entities which are in bold print.
B. Corporate/partnership records.
C. Address of the businesses.

The following is believed to be the organizational make up and relationships between the companies.

A. ADIA (ABU DHABI INVESTMENT AUTHORITY) - It is believed that ADIA is the company (entity) which ultimately controls the various companies. Not incorporated in the United States.

B. RENA TRUST #2 - This is a Grand Cayman Holding Company which may control 'Real Estate Operations, Inc.'

C. REAL ESTATE OPERATIONS, INC. (REO INC.) - This is a Delaware Holding Company which handled the accounts of the following listed companies.

*	1.	**CHADDLEY INVESTMENT COMPANY, INC.**
**	2.	**CHADISON INVESTMENT COMPANY, INC.**
*	3.	**CHANCERY INVESTMENT COMPANY, INC.**
**	4.	**CHANDON INVESTMENT COMPANY, INC.**
****	5.	**CHARIOT INVESTMENT COMPANY, INC.**
*	6.	**CHARISMA INVESTMENT COMPANY, INC.**
*	7.	**CHARTWELL INVESTMENT COMPANY, INC.**
*	8.	**CHERNER INVESTMENT COMPANY, INC.**
*	9.	**CHERRY INVESTMENT COMPANY, INC.**
*	10.	**CHESTERFIELD INVESTMENT COMPANY, INC.**
**	11.	**CRABTREE INVESTMENT COMPANY, INC.**
*****	12.	**CHIPPENDALE INVESTMENT COMPANY, INC.**
	13.	**CHALLIS INVESTMENT COMPANY, INC.**
***	14.	**CHAMPION INVESTMENT COMPANY, INC.**
*	15.	**MOSTEN MANAGEMENT COMPANY, INC.**
*	16.	**MARINA MANAGEMENT COMPANY, INC.**
**	17.	**MARTINET MANAGEMENT COMPANY, INC.**
**	18.	**MODER MANAGEMENT COMPANY, INC.**
**	19.	**MARMOT MANAGEMENT COMPANY, INC.**
*	20.	**MARCONI MANAGEMENT COMPANY, INC.**

*	21.	MAGISTER MANAGEMENT COMPANY, INC.
*	22.	MERIN MANAGEMENT COMPANY, INC.
*	23.	MORTON MANAGEMENT COMPANY, INC.
*	24.	MINSTREL MANAGEMENT COMPANY, INC.
**	25.	MICHELIN MANAGEMENT COMPANY, INC.
*	26.	MADONNA MANAGEMENT COMPANY, INC.
*	27.	MANO MANAGEMENT COMPANY, INC.
*	28.	MIRETTA MANAGEMENT COMPANY, INC.
*	29.	MINOS MANAGEMENT COMPANY, INC.
	30.	MADHAM MANAGEMENT COMPANY, INC.
*	31.	MARTEN MANAGEMENT COMPANY, INC.
**	32.	MERLOT MANAGEMENT COMPANY, INC.
**	33.	MADEIRA MANAGEMENT COMPANY, INC.
**	34.	MICHAELSON MANAGEMENT COMPANY, INC.
***	35.	MULLEN MANAGEMENT COMPANY, INC.
	36.	MADEIRA RMC
	37.	MICHAELSON RMC
*	38.	TWAIN OPERATIONS, INC.
*	39.	TATEM OPERATIONS, INC.
*	40.	TALBOT OPERATIONS, INC.
***	41.	TRAPEZ OPERATIONS, INC.
	42.	1100 - 17TH ASSOCIATES

*	-	Delaware Real Estate Investing Corporations
**	-	Delaware Partnership Interest Corporations
***	-	Delaware Shell Corporations
****	-	Delaware Corporation
*****	-	Netherlands Antilles Shell Corporation

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 5/26/93

TO : SAC, WMFO (BCCI)

FROM : SAC, MIAMI (29B-WF-171994) (WCC-3) (P)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG
OO: WMFO

Reference WMFO airtel to Miami, dated May 6, 1993, and telephone call between Special Agent [redacted] WMFO, and Special Agent [redacted] Miami Division, on May 6, 1993. b6 b7C

Computer equipment sent by WMFO was released to [redacted] General Services Administration (GSA) on May 26, 1993 for delivery to the U. S. Marshal's Service. b6 b7C

Inasmuch as the investigation into this matter continues in the Miami, Florida area, the case will remain in a pending status until otherwise advised by WMFO.

2 - WMFO
1 - Miami
KM:pi
(3)

29B-WF-171994 Sub-FS

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUN [redacted]
FBI - WASH. METRO FIELD OFFICE

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126

1*

Approved: [redacted] Transmitted [redacted] (Number) (Time) Per [redacted]

1325015-000-10544

Memorandum

To : SAC, WMFO (29B-WF-171994)(BCCI)(P) Date 5/27/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: Lead # 30 - Asset Forfeiture

On 5/18/93 the writer received from the Butte Information Technology Center (BITC) provided information concerning Real Estate Operations, Inc. (REO) and associated companies. The information has been placed in a 1-A.

REO is associated with the Bank of Credit and Commerce International (BCCI) and there is the possibility that some of the assets are forfeitable. REO is a holding company which manages approximately 42 companies.

A quick review of the BITC information reveals that there is some real estate held by some of the companies which REO manages.

A copy of the results of the BITC search will be provided to [redacted] Attorney, Department of Justice, Asset Forfeiture Office (DOJ-AFO) to allow the DOJ-AFO to determine if there is an interest in any forfeiture of assets. b6 b7C

2 - WMFO
(1 - 29B-WF-171994)
(1) - 29B-WF-171994 SUB FS)

RHM:rhm
(2)

29B-WF-171994 Sub-FS

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FBI - WASH. METRO FIELD OFFICE

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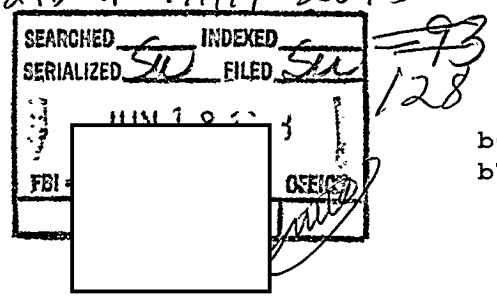
132501S-000-10545

29B-WF-171994 Sub FS



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b6
b7C

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

FROM: [redacted]

TO: [redacted] FBI

b6
b7C

DATE: 6/17/93

FAX NUMBER: 324-6426

NUMBER OF PAGES INCLUDING THIS SHEET: 7

NAME OF PERSON TO CONT[redacted]EIPT:

SPECIAL INSTRUCTIONS: [redacted] the attached is self-explanatory. No excitement, unless you have a real reason for us not to do this. We just want to get it to you as we're saying in the memo.

I'll be at 6/17 --

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL 202 514-5522

U.S. Department of Justice

Washington, D.C. 20530

MEMORANDUM

TO: Laurence A. Urgenson
Deputy Assistant Attorney General (Acting)

FROM: Lee J. Radek
Director
Asset Forfeiture Office

SUBJECT: **BCCI Overseas Debtors**

On May 5, 1993, [redacted] Nussbaum & Wald wrote to advise us that the Court-Appointed Fiduciaries intended to initiate debt collection actions against several individuals. Because the individuals were all subjects of criminal investigations or prosecutions, [redacted] asked 1) for assurance that the debt collection actions would not interfere with any law enforcement activity, and 2) whether the United States possessed any information regarding the location of assets held by any individual that might assist the Fiduciaries in collecting the debts. A copy of [redacted] letter is attached. b6 b7C

We sent a copy of the letter to the Fraud Section and to the FBI. As of this date, no one has advised us of any reason why the Fiduciaries should not proceed with the debt collection actions, nor has anyone provided us with any information that might be helpful to the Fiduciaries. Accordingly, we have prepared the attached letter for your signature providing a negative response to Nussbaum & Wald.

cc: [redacted] b6 b7C

June 17, 1993

[redacted] b6 b7C

Nussbaum & Wald
One Thomas Circle
Washington, D.C. 20005

Dear [redacted] b6 b7C

Recently you wrote to advise the Asset Forfeiture Office that the Court-Appointed Fiduciaries anticipated initiating debt collection actions against several individuals who owed debts to BCCI. The individuals included [redacted] In each case, you asked whether the debt collection action would interfere with any on-going or anticipated law enforcement activity, and whether the United States had any information regarding the location of any assets held by these individuals that might assist the Fiduciaries in collecting the debts.

At this time, we have no reason to believe that any debt collection actions directed against the above individuals would have any adverse impact on any on-going or anticipated law enforcement activity by the United States. We have also forwarded your letter to the FBI to ask whether the Bureau has any information regarding the location of assets that might assist the Fiduciaries. If we receive any positive response, we will forward the information to you as soon as possible, provided disclosure is not barred by grand jury secrecy rules.

Sincerely,

LAURENCE A. URGENSON
Acting Deputy Assistant Attorney General
Criminal Division

1325015-000-10549

Nussbaum&Wald

One Thomas Circle
Washington, D.C. 20005-5802
(202)833-8900
Telecopier (202)466-5738
Telex 754771

[redacted] b6 b7C

May 5, 1993

BY HAND

[redacted] Esquire b6 b7C
[redacted] Esquire
U.S. DEPARTMENT OF JUSTICE
Asset Forfeiture Office
Bond Building -- Room 10100
1400 New York Avenue, N.W.
Washington D.C. 20530

Re: BCCI Overseas Debtors

Dear [redacted] and Bob: b6 b7C

In advance of our meeting next week, we write to provide you with information concerning certain actions under consideration by the Liquidators. The Liquidators of BCCI Overseas are considering instituting civil collection actions against the following debtors:

1. [redacted] several BCCI Overseas' offices
2. [redacted] BCCI's Washington Representative Office
3. [redacted]
4. [redacted]
5. [redacted]
6. [redacted]
7. [redacted]

We have discussed certain of these debtors in our numerous meetings and telephone conferences, but for the sake of efficiency and ease of comprehension, we thought it best to write an omnibus letter as well. With respect to each of the debtors, the Liquidators seek to confirm that the Department of Justice has no objection to the planned course of action and, in addition, the Liquidators seek any assistance DOJ can provide in identifying and locating any assets of the debtors.

[redacted] has several loans outstanding from his tenure as any employee with BCCI Overseas. [redacted] b6 b7C b7D

[redacted]

[redacted]

Nussbaum&Wald

[redacted] Esq.

[redacted] Esq.

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May 5, 1993

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[redacted] obtained a $400,000 loan from BCCI Overseas to finance the purchase of a home in the Washington D.C. area. The loan was booked as an asset of BCCI Overseas and may be secured by U.S. property. The loan is currently in default; the outstanding balance is approximately $552,000. The Liquidators understand that [redacted] was taken into custody in January 1992 and may still be in the United States.

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As with [redacted] we write to inform you of the Liquidators' intention to proceed with a civil collection action against [redacted] and to ascertain that DOJ has no objection to this course of action. In addition, the Liquidators seek any assistance that DOJ can provide concerning [redacted] location or the location of any assets he may possess.

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[redacted] BCCI Overseas who owes approximately $500,000 to the liquidation estate and is believed to have assets in the United States. The Liquidators intend to hire a private investigator to locate assets of the debtor. The Liquidators request confirmation that DOJ has no objection to the Liquidators investigating and instituting a recovery action against this debtor.

In addition, the Liquidators are requesting the assistance of DOJ in their efforts to locate assets of this debtor.

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[redacted] President Jimmy Carter and Prince Bandar bin Sultan of Saudi Arabia. (Criminal Indictment 1:92-Cr-297; Northern District of Georgia, Atlanta Division). Accordingly, DOJ may possess information concerning [redacted] assets and location; any assistance that your office can render would be greatly appreciated.

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[redacted] with approximately $50,000 outstanding on a BCCI Overseas loan. The Liquidators again seek confirmation from the Department of Justice that DOJ does not object to the Liquidators' pursuing recovery of this loan. In addition, as with [redacted] above, the Liquidators seek any assistance that DOJ can provide with respect to the loca-

Nussbaum&Wald

[redacted] Esq.
[redacted] Esq.
- Page 3 -

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May 5, 1993

tion of assets of this debtor. [redacted] b6 b7C First American Bank of Georgia, was recently convicted in Atlanta for federal tax crimes and conspiracy.

[redacted] obtained a loan in the amount of $100,000 from BCCI Overseas to purchase a home in Atlanta during his employment at National Bank of Georgia/First American Bank of Georgia. The loan is in default [redacted] contests its genuineness), and the Liquidators are seeking to recover this loan. To date, the Liquidators have been unable to locate any property of [redacted] in the United States (though the Liquidators are aware of certain property in England). While the Liquidators may hire an investigator to locate any property that may be subject to attachment or foreclosure, they are also seeking information from other sources, and would appreciate any information that DOJ could provide. In addition, the Liquidators seek confirmation that DOJ does not object to their taking collection action with respect to [redacted] loans.

[redacted] These borrowers represent themselves as willing and able to make payments on their loans; each refuses to pay the Liquidators due to a professed fear of paying the wrong entity, and accordingly, being forced to pay twice. It is the Liquidators' view that it is in the interest of neither DOJ nor the Liquidators for these debtors to avoid payment obligations and accordingly seek DOJ's assistance in providing assurances to the debtors that they may make payments on their loans without violating any court order or incurring the risk of double liability.

[redacted] In 1982-1983, [redacted] borrowed approximately $50,000 from ICIC Overseas. An additional loan was obtained in 1987, and [redacted] current debt is approximately $94,000. It appears to have been the intent of both parties to secure at least the 1987 loan with a mortgage on two properties in Marion, Ohio. The two loans are booked as assets in Grand Cayman, where the notes are located. They are currently in default.

In November 1991, The Liquidators sent a standard demand letter to [redacted] requesting repayment of the loan. There was some correspondence between the Liquidators and [redacted] lawyer, which culminated in January 1992 with a letter from [redacted] counsel stating, "we are advised that the U.S. Bankruptcy Court for the Southern District of New York has entered an order prohibiting the transfer of any U.S. funds to overseas BCCI entities. Were we to send funds at this time, we would be in violation of that order." The Liquidators submit that this

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Nussbaum&Wald

[redacted] Esq.
[redacted] Esq.
- Page 4 -

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May 5, 1993

statement is incorrect -- as you can see from the attached bankruptcy order, the bankruptcy court restrained actions against the BCCI Liquidators and the creation of liens or encumbrances with respect to BCCI property. No mention is made of any restriction on payments to the BCCI Liquidators on outstanding loans. (We attach the background correspondence for your information.)

We seek now to provide a comfort letter to this borrower with the information that 1) the bankruptcy court's order does not, in the view of the Department of Justice, prohibit the payment of loan obligations to the Liquidators and 2) that the order of forfeiture of January 24, 1992 does not prohibit the payment of [redacted] loan obligations to the Liquidators. We attach a suggested draft.

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[redacted] In 1988, [redacted] borrowed $250,000 from BCCI Overseas, secured by a first mortgage o[redacted]ollowing correspondence with the Liquidators, the [redacted] have represented to the Liquidators that they wish to continue making payments on their loans, but given the existence of the Plea Agreement, are uncertain to whom such payments should be made. See attached letter of October 22, 1992. We seek now to provide the debtor with a letter from the Department of Justice that the Liquidators remain empowered to collect payments on outstanding notes located abroad. We attach a suggested draft.

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We note that this issue is arising with some frequency and it may be convenient for both the Liquidators and DOJ to have a form letter that can be provided to debtors seeking to make regular payment on their loans. We look forward to discussing this with you next week.

As always, do not hesitate to call if you ha[redacted] any questions or concerns.

Very truly yours,

[redacted]

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AKT/jdc
Attachments

U.S. Department of Justice

Washington, D.C. 20530

July 23, 1993

MEMORANDUM

TO: [redacted] b6 b7C
Federal Bureau of Investigation

FROM: [redacted]
Asset Forfeiture Office
Criminal Division

SUBJECT: Orders of Forfeiture

Enclosed per your request are five orders of forfeiture dated:

January 24, 1992
January 31, 1992
March 24, 1992
April 15, 1992
July 29, 1992

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129
29B-WF-171994 Sub FS

[redacted] b6 b7C

SEARCHED Sec INDEXED Sec
SERIALIZED Sec FILED Sec
JUL 26 1993
FBI — Washington Field Office
Sec

1325815-000-10554

FD-350 (Rev. 5-8-81)

(Mount Clipping in Space Below)

**First Interstate Bank Int'l, New York		
21046	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,169.75
**Foley & Lardner, Tampa, FL		
	Escrow Account	100,000.00
**Habib Bank Limited, New York		
21020	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	57,546.00
20298	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	20,927.00
Subtotal		78,473.00
**Holland & Knight, Miami, FL		
	Escrow Account	220,500.00
**Janis Schuelke & Wechsler, Washington		
	Escrow Account	63,454.22
**Korea First Bank, New York Agency		
21017	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	40,000.00
**Metro Bank, Houston, TX		
MBD900158	BCI (Overseas) Dhaka, Bangladesh	30,800.00
**Oppenheimer & Co., New York		
033-35263	North American Investment & Finance, Ltd U.S. Treasury notes	5,090,650.00
033-35263	North American Investment & Finance, Ltd	1,032,315.17
Subtotal		6,122,965.17
**Trustee for BCCI S.A. Los Angeles		
	Real property Coimbra Property, Kissimmee, FL Emerald Place Apts, Bermuda Dunes, CA Francor Property, Kissimmee, FL Int'l Industrial Park, Dade Co., FL	13,894,680.00
	Cash Assets	34,379,641.99
	Loans Receivable	20,245,040.68
	Miscellaneous property	31,445.00
Subtotal		68,550,807.67
Total		$101,135,749.15

The Order of Forfeiture having been entered, the United States hereby gives notice of its intention to dispose of each of the forfeited properties in such manner as the Attorney General of the United States may direct, consistent with the plea agreement entered into by the defendants and the United States on December 19, 1991. Any persons or entities having or claiming a legal right, title or interest in any of the aforementioned properties must, within thirty (30) days of the final publication of this notice or actual receipt thereof, whichever is earlier, petition the United States District Court for the District of Columbia for a hearing to adjudicate the validity of his/her alleged interesting the property pursuant to Title 18, United States Code, Section 1963(1). If a hearing is requested, it shall be held before the Court alone, without a jury. Claimants will bear the burden of proof in all such cases. Petitions that fail to allege an interest sufficient to maintain a claim under § 1963 (1) shall be subject to dismissal without a hearing.

The petition shall be signed by the petitioner under penalty of perjury and shall identify the particular property or properties in which the petitioner claims a legal right, title or interest; the nature and extent of the such right, title or interest in each property; the time and circumstances of the petitioner's acquisition of the right, title and interest in each property; and any additional facts and documents supporting the petitioner's claim and the relief sought.

A hearing on the petition shall, to the extent practicable and consistent with the interests of justice, be held within thirty (30) days of the filing of the petition. The Court may consolidate the hearing on the petition with a hearing on any other petition filed by a person other than any of the defendants named above. The petitioner may testify and present evidence and witnesses on his own behalf and cross-examine witnesses who appear at the hearing.

Your petition must be filed with the United States District Court for the District of Columbia in Criminal No. 91-0655 (JHG) at the following address:

3rd and Constitution Ave., N.W.
Washington, D.C. 20001

Furthermore, you must serve the United States Department of Justice with your petition at the following address:

Asset Forfeiture Office
P.O. Box 27322, Central Station
Washington, D.C. 20038
Attn: Stefan D. Cassella, Esq.

And you should mail a copy of the petition to counsel for the court-appointed fiduciaries as follows:

Michael Nussbaum, Esq.
Nussbaum & Wald
Suite 200
One Thomas Circle
Washington, D.C. 20005

IF YOU FAIL TO FILE A PETITION TO ASSERT YOUR RIGHT, TITLE OR INTEREST IN THE ABOVE-DESCRIBED PROPERTY, WITHIN THIRTY (30) DAYS OF THIS NOTICE, YOUR RIGHT, TITLE AND INTEREST IN THIS PROPERTY SHALL BE LOST AND FORFEITED TO THE UNITED STATES. THE UNITED STATES THEN SHALL HAVE CLEAR TITLE TO THE PROPERTY HEREIN DESCRIBED AND MAY WARRANT GOOD TITLE TO ANY SUBSEQUENT PURCHASER OR TRANSFEREE.

(Indicate page, name of newspaper, city and state.)

The Washington Post

Date: 9/13/93
Edition: P. D-10

Title:

Character:
or
Classification:
Submitting Office:

Indexing:

(K)

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29B-WF-171994 SubFS 98

SW SW

1325015-000-10622

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA
v.
BCCI HOLDINGS (LUXEMBOURG), S.A.
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED
Defendants

CRIMINAL NUMBER 91-0655 (JHG)

NOTICE OF FORFEITURE

Notice is hereby given that on August 19, 1993, in the above-captioned case, the Honorable Joyce Hens Green, United States District Judge for the District of Columbia, entered an Order condemning and forfeiting the following properties to the United States of America:

Third Supplemental List of Forfeited Property

Account No.	Description	Approx. Value
**American Express Bank, New York		
	BCC S.A. Espanola	$1,238,712.54
**Banco Bilbao Vizcaya, New York		
21018	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	58,000.00
**Bank of Tokyo Trust Co., New York		
01-75111-5	BCCI (Overseas) Dhaka, Bangladesh	1,464.86
**Bankers Trust Co., New York		
21001	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50
21003	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	18,894.05
Subtotal		54,781.55
**Capital Bank, Miami		
0902205153	BCC Credit & Finance (Uruguay) S.A.	375,728.87
0902205080	BCCI S.A. Sao Paulo (Brazil)	160,788.30
0920013341	BCCI S.A. Sao Paulo (Brazil)	12,178.60
0902205129	BCCI Trinidad & Tobago Merchant Bankers	197,499.20
Subtotal		746,194.97
**Chase Manhattan Bank, New York		
21041	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	13,527.00
**Citibank, New York		
20949	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	74,250.00
**Commercial Bank of Korea, New York		
21026	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	44,550.00
20964	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50
20989	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	38,115.00
Subtotal		118,552.50
**Court Registry Investment System		
86052	BCC Emirates, Abu Dhabi	17,763,910.10
**Court-Appointed Liquidators of BCCI		
	1200 Reading Drive, Orlando, FL	300,000.00
	Canal Place Bankruptcy	3,015,813.13
	M/V Aeolian	95,121.88
Subtotal		3,410,935.01
**First American Bank of N.Y.		
10300015	BCC Emirates, Abu Dhabi	10,255.80
11801008	BCC Ghana Ltd.	470,526.70
11278002	BCC S.A. Espanola	7,190.00
21304009	BCCI (Overseas) Barbados	9,466.74
10884000	BCCI (Overseas) Bombay	43,650.66
21301002	BCCI (Overseas) Cameroon	325.00
11439008	BCCI (Overseas) Dhaka, Bangladesh	500.00
10001026	BCCI (Overseas) Freetown, Sierrra Leone	1,747.44
20451002	BCCI (Overseas) Istanbul, Turkey	6,218.81
550547877	BCCI (Overseas) Kingston, Jamaica	165,965.63
11386001	BCCI (Overseas) Lahore, Pakistan	283,010.40
20413009	BCCI (Overseas) Paris	30,581.69
10753008	BCCI (Overseas) Sri Lanka	44,845.00
11901007	BCCI S.A. Sao Paulo (Brazil)	22,875.22
11900017	BCCI Trinidad & Tobago Merchant Bankers	5,047.40
00023012	Banque de Commerce et de Placements S.A.	887,396.25
10838007	National Bank of Oman	483,647.97
Subtotal		2,413,250.81

1325015-000-10623

today and tomorrow, unusual for the beginning of the week. At the Madison, a front desk clerk reported that "arrivals have increased tremendously." And things are undoubtedly buzzing at the ANA Westin, where Arafat is staying.

Christopher is holding a luncheon at the State Department for foreign ministers. The Israeli Embassy will host a reception at 5 p.m. for 800 people in honor of American Jewish leaders, which Rabin and Peres will attend before flying back tonight to meet with Knesset members in Israel.

A light Middle Eastern buffet—humus, pita, ground chickpea delicacies, sesame sauces, eggplant relishes—seems to be the diplomatically correct meal of choice. But no alcohol (forbidden by Muslim law) at the reception sponsored by the American Jewish Congress and the National Association of Arab Americans at the Hotel Washington. Arafat is expected to drop by.

"Hysteria" is how Gene Burger, director of special projects at Project Nishma, described the organizing efforts. Among the invited were major regional and national Jewish and Arab organizations, members of the bilateral negotiating teams, and top U.S. personnel instrumental in Middle East di-

tive, said: "I have no idea how were drawn up for the signing mony. There's a fair amount of tery to it." But his Saturday was fielding calls from colleagues "t to see who-all is invited and if th room for one more person."

One person who'll be watchin ceremony on television is Rayn Tawil, the Palestinian author o Home, My Prison," whose dau Souha is married to Arafat. Taw in Paris now, but is visiting wi son Gabi in Northern Virginia not going to the White House said. "I prefer to keep a low pro

Arafat's plans for the rest of it are unknown. His wife is repo not accompanying him to Washi but maybe he'll stop by for a cha his mother-in-law. Or maybe fond of strong coffee and 3 a.m. tiating sessions, will try a mi tour of the monuments.

But Reggie Tymus, presid Capital City Limousine, said h nothing booked. "As a matter I'm hoping we don't get too more business, because we ha Hispanic Designers gala and th gressional Black Caucus meetin ing Monday."

Ah, Washington.

SHOWTIMES AND PRICES LISTED ARE FOR TODAY ONLY

G ALL AGES ADMITTED. General audience. **PG** ALL AGES ADMITTED. Parental Guida

MARYLAND

AMC ACADEMY 14 Beltway Plaza
Beltway Exit 23, W. on Greenbelt Rd.
TeleTicket/Movie Info. 703-683-4AMC
No Children Under 6 After 6 p.m.
! Denotes No Pass Engagements

AMC ACADEMY 6 West Court
JURASSIC PARK (PG-13)
(5:30 @ $3.00) 8:00
HARD TARGET (R) (5:50 @ $3.00) 8:15
THE MAN WITHOUT A FACE (PG-13)
(5:40 @ $3.00) 8:10
KALIFORNIA (R)
(5:40 @ $3.00) 8:10
THE FIRM (R) (6:00 @ $3.00)
RISING SUN (R) (5:30 @ $3.00) 8:15

AMC ACADEMY 8 Center Court
CALENDAR GIRL (PG-13) 1:30
NEEDFUL THINGS (R)
(5:30 @ $3.00) 8:05, 10:35
MONEY FOR NOTHING (R)
(1) 1:50, 5:50, 8:00, 10:00

APEX CINEMAS

ASPEN HILL 13729 Conn. Ave.
301-460-3010 Wheaton
ALL SEATS $1.75
SNOW WHITE (G) 2:45
INDECENT PROPOSAL (R) 8:55
SLIVER (R) 8:50
ROOKIE OF THE YEAR (PG)
2:10, 4:25, 6:40
SO I MARRIED AN AXE MURDERER
(PG-13) 4:50, 7:00
DAVE (PG-13) 2:25, 5:10, 7:30
MENACE II SOCIETY (R) 9:50
CLIFFHANGER (R) 6:20, 8:45
ALADDIN (G) 2:15, 4:20

ANNAPOLIS MALL and HARBOUR CENTER
For Showtimes Call 410-224-1145

CALVERT VILLAGE Prince Frederick
For Showtimes Call 410-535-0776

CINEPLEX ODEON BOWIE 6 Market Place Mall
3203 Superior Lane 301-464-5708
WHY PAY MORE?
Adults $5.25

CINEPLEX ODEON WHEATON PLAZA
Inside Wheaton Plaza next to
***ALL SHOWS before 6:0
THE REAL MCCOY (PG-13)
2:10, 4:40, 7:10, 9:
TRUE ROMANCE (R)
No Passes
2:05, 4:35, 7:05, 9:
SLEEPLESS IN SEATTLE (
7:00, 9:30
THE SECRET GARDEN (G)
JURASSIC PARK (PG-13) 7:
CALENDAR GIRL (PG-13) 4:
FREE WILLY (PG) 2:15

CINEPLEX ODEON WHITE FLINT 5 No
***ALL SHOWS before 6:0
THE REAL MCCOY (PG-13)
DIGITAL 2:00, 4:15, 7:3
UNDERCOVER BLUES (PG-
2:00, 3:45, 5:40, 7:30,
IN THE LINE OF THE FIRE (
Last Show (R) 10:
BOXING HELENA (R) 1:45, 7
FORTRESS (R) 4:15, 9:45

November 1, 1993

To: [redacted] FBI

From: [redacted] DOJ

Re: BCCI 302s

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[redacted] provided me with a list of the available 302s. I would like to get a copy of these:

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[redacted] (10/22-23/91; 7/8/92; 8/5/92)

Bank of New York Document Review (10/2-4/91)

[redacted] (5/9/91)

Confidential Informant (5/2/91)

[redacted] (3/11/92)

[redacted] (9/5/91; 11/12/91; 7/10/92)

[redacted] (5/1/91; 6/27/91; 3/13/92)

New York Grand Jury Transcripts (7/15/92)

[redacted] (7/12/91; 8/9/91)

[redacted] (9/17/92; 9/18/92)

Also, in case the list I have is not the most recent, I would like to see the 302s of these people, if they have been interviewed:

[redacted]

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29B-WF-171994 Sub FS ~~100~~ 133

[redacted] NOV 1ST 1993 FBI

1325015-000-10625

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Memorandum

To : ADIC, WMFO (29B-WF-171994) (FS) Date 3/13/95

From : SA [redacted] (C-1) b6 (Per FBI) b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF-FAG;
00:WMFO

b7C (Per USMS)

b7C (Per USMS) On 3/2/95, [redacted], United States Marshal, One Saint Andrews Plaza New York, New York 10007, telephone number [redacted] furnished SA [redacted] FBI with the following attached document. The document is a computer generated spread sheet listing the forfeiture activity of the BCCI investigation to date. The last page of the report shows the assets seized pursuant to the fourth court order issued by Judge JOYCE GREEN. b6 (Per FBI) b7C

29B-WF-171994 Sub FS -75

SEARCHED INDEXED
SERIALIZED FILED
MAR 15 1995
FBI — WASH. METRO FIELD OFFICE

1 - 29B-WF-171994 (FS)

AC:ac

1325015-000-11111

DEPARTMENT OF JUSTICE

UNITED STATES MARSHALS SERVICE

Report Date 2/27/1995 08:30

DISTRICT 54 , SOUTHERN NEW YORK

USM-286

DETAIL RECEIPT AND DISBURSEMENT REPORT FOR CASES WITH OUTSTANDING AMOUNTS

Reference	Date	Charge Amount	Receipt Amount	Disbursement Amount	Transfer Amount	Class	Write-off Amount	Running Totals per Case: Deposit Fund Amount	Uncollected Amount
E 91876	12/13/94	0.00	3,035,594.31	0.00	0.00		0.00	489,773,646.65	0.00
E 91877	12/20/94	0.00	17,102.80	0.00	0.00		0.00	489,790,749.45	0.00
E 91882	01/12/95	0.00	156,371.07	0.00	0.00		0.00	489,947,120.52	0.00
E 91887	01/24/95	0.00	82,156.99	0.00	0.00		0.00	490,029,277.51	0.00
E 91891	02/13/95	0.00	17,000,000.00	0.00	0.00		0.00	507,029,277.51	0.00
E 91894	02/22/95	0.00	10,430.00	0.00	0.00		0.00	507,039,707.51	0.00
E 91893	02/22/95	0.00	4,545.47	0.00	0.00		0.00	507,044,252.98	0.00
E 918892	02/24/95	0.00	49,684.85	0.00	0.00		0.00	507,093,937.83	0.00
Totals:		0.00	540,839,729.54	33,745,791.71	33,698,649.43		0.00	507,093,937.83	0.00

1325015-000-11125

REPORT OF COLLECTIONS: U.S.A. v. BCCI HOLDINGS (LUXEMBOURG), S.A. et al.
Crim. No. 91-0655 (JHG), District of Columbia

ACTIVITY SINCE DECEMBER 13, 1993

Bank/ Account No.	Account Name	Approx. Balance	Amt. Recd.	Date	Comments	Date of Forf. Order
American Express Bank Ltd.						
3/52977	BCCI Nigeria	82,156.99	82,156.99	01/24/95		12/21/94
Bank of America National Trust and Savings Ass'n						
6599-09995	BCCI (Overseas) Bombay	4,545.47	4,545.47	02/22/95		12/21/94
6599-09995	BCCI (Overseas) Sri Lanka	10,430.00	10,430.00	02/22/95		12/21/94
Court Registry Investment System						
2044100105 & 2044100207	BCCI (Overseas) Bombay	45,163.04	45,942.16	02/21/95		12/21/94
n/a	BCCI, S.A. (Dubai) at Bank of New York	3,600.00	3,742.69	02/21/95		12/21/94
Bankruptcy Distributions to BCCI						
	American Mills	7,000.00	7,000.00	06/07/94	Received prior to forfeiture order.	12/21/94
	Domino Investments	23,673.14	23,673.14	02/14/94	Received prior to forfeiture order.	12/21/94
	Fastrax, Inc.	197,500.00	156,371.07	01/12/95		12/21/94
Court-Appointed Liquidators of BCCI (Nussbaum & Wald)						
n/a	1200 Reading Drive, Orlando FL	300,000.00	154,714.41	10/19/94	Property sold for $181,000.00	08/19/93
First American Bank of New York						
17 accounts	See Dec. 13, 1993 listing	n/a	39,849.34	01/11/94	Interest on accounts held by Clerk of Court was allocated to 17 accounts received 11/30/93.	08/19/93
Holland & Knight						
n/a	Escrow account	220,500.00	220,651.68	12/20/93	$203,548.88 recd 12/17/93; $17,102.80 recd 12/20/93	08/19/93
Oppenheimer & Co., Inc.						
033-35263	North American Investment & Finance, Ltd.	5,090,650.00 }	6,232,315.17	11/18/94		08/19/93
033-35263	North American Investment & Finance, Ltd.	1,032,315.17 }				08/19/93
Paine Webber						
DN-R5056-01	BCCI (Overseas) 1,500 shares Hilton Hotels }	73,000.00	126,382.39	03/24/94		01/24/92
DN-R5056-01	BCCI (Overseas) 493 shares General Cinema }					

As of 27-Feb-95

1325015-000-11113

Bank/ Account No.	Account Name	Approx. Balance	Amt. Recd.	Date	Comments	Date of Forf. Order
Trustee for BCCI S.A. Los Angeles						
n/a	Various assets	137,101,615.34	35,035,594.31		Distributions totalled $36,964,405.69 as of 12/13/93. Distributions as of 2/27/95 total $72,000,000.00	
Total as of 12/13/93			498,696,360.72			
Amounts received since 12/13/93			42,143,368.82			
SUBTOTAL			540,839,729.54			
	Disbursements:		(33,240,886.43)	12/23/93	Disbursement Order	12/08/93
			(3,420.46)	04/07/94	Settlement Order	03/07/94
			(131,566.13)	04/07/94	Settlement Order	03/07/94
			(328,120.96)	04/05/94	Settlement Order	03/07/94
			(41,797.73)	05/23/94	Order Approving Settlement Agreement	05/13/94
	Total disbursements		(33,745,791.71)			
**** GRAND TOTAL ****			507,093,937.83			

1325015-000-11114

REPORT OF COLLECTIONS: U.S.A. v BCCI HOLDINGS (LUXEMBOURG), S.A., et al.
Crim. No. 91-0655 (JHG), District of Columbia

Account No.	Account Name	Approx. Balance	Amt. Rec'd	Date	Comments	Date of Forf. Order
American Express Bank Ltd.		**S.D. New York**				01/31/92
1509800	Union National Bank	30,832,640.32	30,943,187.38	03/10/92		01/31/92
1605800	BCCI Grand Cayman	61,629,475.21	61,737,266.36	02/14/92		01/31/92
703876	BCCI S.A. – Abu Dhabi	8,818,703.73	8,818,703.73	02/14/92		01/31/92
703876 (AEB setoff)	BCCI S.A. – Abu Dhabi	23,037,303.36	23,537,303.36	02/14/92	Includes $500,000 setoff.	01/31/92
Brokerage Deposit	BCCI (Overseas) Grand Cayman	12,681,119.10	12,201,072.80	02/14/92		01/31/92
3/53066	BCCI (Overseas) Chittigong	610,940.61	611,440.61	02/14/92		01/31/92
3/53165	BCCI (Overseas) Dhaka	4,305,427.70	4,309,622.51	02/14/92		01/31/92
3/53173	BCCI (Overseas) Dakar	734,692.31	735,282.59	02/14/92		01/31/92
698316	BCCI (Overseas) Karachi	353,870.68	334,948.68	02/14/92		01/31/92
[redacted]/705517	BCCI (Overseas) Lahore	4,222,444.79	4,314,682.57	02/14/92		01/31/92
714758	BCCI (Overseas) Macau	247,751.59	247,751.59	02/14/92		01/31/92
Suspense Deposit	BCCI (Overseas) Macau	1,336,863.84	1,339,202.71	02/14/92		01/31/92
3/52977	BCCI (Overseas) Nairobi	606,571.81	607,221.11	02/14/92		01/31/92
53116	BCCI (Overseas) Seoul	335,246.63	335,246.63	02/14/92		01/31/92
3/711036	BCCI (Overseas) Seychelles	358,297.24	358,297.24	02/14/92		01/31/92
00704189	BCC S.A.E. [BCC S.A. Espanola]	1,238,712.54	1,238,712.54	01/06/93		08/19/93
** Subtotal **		151,350,061.46	151,669,942.41			
Banco Bilbao Vizcaya		**S.D. New York**				
21018	BCCI (Overseas) Pakistan [FDBP]	58,000.00	0.00		Forfeiture order served 9/9/93.	08/19/93
Bank of California Corp.		**S.D. New York**				
91212381	BCCI Mali	1,283,092.84	1,283,092.84	02/14/92		01/31/92
91-212373-1121	BCCI (Overseas) Chittigong	398,724.15	398,724.15	08/05/92		07/29/92
91-209411-1121	BCCI (Overseas) Dhaka	3,155,691.38	3,155,691.38	08/05/92		07/29/92
91-212399-1121	BCCI (Overseas) Sri Lanka	84,930.45	84,930.45	08/05/92		07/29/92
91-209407-1121	BCCI (Overseas) Sri Lanka	420,947.93	420,947.93	08/05/92		07/29/92
** Subtotal **		5,343,386.75	5,343,386.75			
[redacted]**ank of New York**		**S.D. New York**				
018872-500	BCCI (Overseas) Barbados	202,708.55	203,600.46	02/11/92		01/24/92
8109803821	BCCI (Overseas) Barbados	101,108.90	101,108.90	02/11/92		01/24/92
019054-500	BCCI (Overseas) Bombay	3,245,017.16	3,268,126.32	02/11/92		01/24/92
8109803155	BCCI (Overseas) Bombay	851,642.06	882,766.95	02/11/92		01/24/92
8900054840	BCCI (Overseas) Bombay	159,383.66	159,383.66	02/11/92		01/24/92
018856-500	BCCI (Overseas) Cayman	1,834,405.29	1,847,468.88	02/11/92		01/24/92
8109292983	BCCI (Overseas) Cayman	50,919.08	50,919.08	02/11/92		01/24/92
8900051531	BCCI (Overseas) Cayman	745.86	916.57	02/11/92		01/24/92
8900053658	BCCI (Overseas) Cayman	0.00	n/a	02/11/92	Forf. order indicates zero balance.	01/24/92

Account No.	Account Name	Approx. Balance	Amt. Rec'd	Date	Comments	Date of Forf. Order
Bank of New York (cont'd)		**S.D. New York**				
8900054301	BCCI (Overseas) Cayman	300,027.55	300,027.55	02/11/92		01/24/92
8900054328	BCCI (Overseas) Cayman	310,849.60	310,849.60	02/11/92		01/24/92
8900054794	BCCI (Overseas) Cayman	33,057.60	33,057.60	02/11/92		01/24/92
8900054921	BCCI (Overseas) Cayman	152,093.70	152,093.70	02/11/92		01/24/92
019089-500	BCCI (Overseas) Panama	8,016,979.39	8,078,042.51	02/11/92		01/24/92
8109298752	BCCI (Overseas) Panama	144,240.44	787,041.90	02/11/92		01/24/92
8900053399	BCCI (Overseas) Panama	386,467.59	386,467.59	02/11/92		01/24/92
Suspense acct.	BCCI (Overseas) Kenya	30,238.40	30,238.40	02/11/92		07/29/92
Custody Acct. 180676	ICIC (Overseas)	527,592.32	527,592.32	02/11/92		07/29/92
Custody Acct. 180676	ICIC (Overseas)	72,248.81	76,311.03	11/18/93	GINNIE MAE (Liquidation order served 9/9/93) (Book Value orig. est.@ $118,708.66)	07/29/92
Custody Acct. 180676	ICIC (Overseas)	n/a	68,904.24	11/18/93	GINNIE MAE distributions (through 10/93)	
Custody Acct. 180650	ICIC Investments Ltd.	14,534,639.16	15,189,893.62	08/13/92		07/29/92
** Subtotal **		30,954,365.12	32,454,810.88			
Bank of Tokyo Trust Co.		**S.D. New York**				
01-75111-5	BCCI (Overseas) Dhaka, Bangladesh	1,464.86	1,474.70	09/14/93	Forfeiture order served 9/13/93.	08/19/93
Bankers Trust Co..		**S.D. New York**				
21001	BCCI (Overseas) Pakistan [FDBP]	35,887.50	0.00		Forfeiture order served 9/9/93.	08/19/93
21003	BCCI (Overseas) Pakistan [FDBP]	18,894.05	0.00		Forfeiture order served 9/9/93.	08/19/93
** Subtotal **		54,781.55	0.00			
Bear Stearns & Co.		**S.D. New York**				
055-69205	ICIC Investments Ltd.	34,376,678.00	38,037,184.08	12/07/93	Partial proceeds recd. 4/28/93	07/29/92
089-69205	ICIC Investments Ltd.	514,845.00	n/a		Remainder of both accts. recd. 12/7/93	07/29/92
** Subtotal **		34,891,523.00	38,037,184.08			
Capital Bank		**S.D. Florida**				
850053580		3,053,641.00	3,053,641.08	02/21/92	$1,853,641.08 plus $1.2 m on 2/27/92	01/31/92
850053580		n/a	81,454.12	04/22/92	Additional interest received on above C.D.	
902204122	BCCI Paraguay	1.00	0.00		Written off.	01/31/92
902205102		24,215.00	24,215.69	02/21/92		01/31/92
902205110		946,485.00	950,853.73	02/21/92		01/31/92
0902205099	BCCI (Overseas) Jamaica	351,769.41	351,769.41	09/24/92		07/29/92
0902204203	BCCI (Overseas) Paraguay	639,404.78	643,412.27	09/24/92		07/29/92
0902205153	BCC Credit & Finance (Uruguay) S.A.	375,728.87	375,728.87	10/27/93		08/19/93
0902205080	BCCI S.A. Sao Paulo (Brazil)	160,788.30	161,939.48	10/27/93		08/19/93
0920013341	BCCI S.A. Sao Paulo (Brazil)	12,178.60	12,663.32	10/27/93		08/19/93
0902205129	BCCI Trinidad & Tobago Merchant Bankers	197,499.20	197,349.20	10/27/93		08/19/93
** Subtotal **		5,761,711.16	5,853,027.17			

Account No.	Account Name	Approx. Balance	Amt. Rec'd	Date	Comments	Date of Forf. Order
Chase Manhattan Bank		**S.D. New York**				
21041	BCCI (Overseas) Pakistan [FDBP]	13,527.00	0.00		Forfeiture order served 9/10/93.	08/19/93
Citibank		**S.D. New York**				
36054705	BCCI (Overseas) Grand Cayman	11,064,150.00	11,367,952.14	02/19/92		01/24/92
36060398	BCCI (Overseas) Grand Cayman	4,402.00	30,817.42	02/19/92		01/24/92
Custody Acct.	BCCI (Overseas)	1,181,398.00	1,181,397.68	02/20/92		01/24/92
Custody Acct. 089543	BCCI (Overseas)	537,000.00	230,198.82	11/01/93		01/24/92
n/a	BCCI (Overseas) Grand Cayman	n/a	0.00	02/21/92	"SPROUT IV CAPITAL ... certificate in custody	n/a
20949	BCCI (Overseas) Pakistan [FDBP]	74,250.00	0.00		Forfeiture order served 9/9/93.	08/19/93
** Subtotal **		12,861,200.00	12,810,366.06			
Commercial Bank of Korea		**S.D. New York**				
21026	BCCI (Overseas) Pakistan [FDBP]	44,550.00	0.00		Forfeiture order served 9/9/93.	08/19/93
20964	BCCI (Overseas) Pakistan [FDBP]	35,887.50	0.00		Forfeiture order served 9/9/93.	08/19/93
20989	BCCI (Overseas) Pakistan [FDBP]	38,115.00	0.00		Forfeiture order served 9/9/93.	08/19/93
** Subtotal **		118,552.50	0.00			
Court Registry Investment System		**S.D. New York**				
86052	BCCI Emirates, Abu Dhabi	17,763,910.10	17,947,169.28	10/04/93		08/19/93
Court Registry Investment System		**S.D. Texas**				
86078	BCCI (Overseas) Macau	109,112.75	112,087.51	03/26/92	Check dated 3/25/92 from U.S. District	01/24/92
86047	BCCI (Overseas) Muscat	4,339,738.83	4,458,054.07		Court/SDNY for $66,867,673.08	01/24/92
86052	BCCI S.A. – Abu Dhabi	60,563,405.50	62,214,558.72		($65,093,027.79 plus interest, which	01/24/92
86041	BCCI (Overseas) Seoul	80,770.71	82,972.78		was apportioned among the accounts).	01/24/92
** Subtotal **		65,093,027.79	66,867,673.08		NOTE: Subtotal in order = $81,709,103.07	
Court–Appointed Liquidators of BCCI (Nussbaum & Wald)		**D.C.**				
n/a	1200 Reading Drive, Orlando, FL	300,000.00	0.00			08/19/93
n/a	Canal Place Bankruptcy	3,015,813.13	3,045,904.84	10/05/93		08/19/93
n/a	Net proceeds, sale of MV Aeolian	95,121.88	95,121.88	04/16/93		08/19/93
** Subtotal **		3,410,935.01	3,141,026.72		NOTE: Subtotal in order = $3,414,077.28	
Doha Bank Ltd.		**S.D. New York**				
55804511	BCCI (Overseas)	500,308.00	500,307.58	02/14/92		01/24/92
Esanu Katsky Korins & Siger		**S.D. New York**				
n/a	General Coffee Corp.	4,925,000.00	246,250.00	09/21/92	Bankruptcy claim. 5% distr. rec'd.	07/29/92

REPORT OF COLLECTIONS: U.S.A. v. BCCI HOLDINGS (LUXEMBOURG), S.A., et al.
Crim. No. 91-0655 (JHG), District of Columbia

Account No.	Account Name	Approx. Balance	Amt. Rec'd	Date	Comments	Date of Forf. Order
First American Bank, N.A.						
3-446-611	BCCI Legal Fund (admin. by Skadden Arps)	68,919.87	68,919.87	09/17/92		07/29/92
First American Bank of New York		**S.D. New York**				
10300015	BCC Emirates, Abu Dhabi	10,255.80	10,255.80	11/30/93	Unable to serve --	08/19/93
11801008	BCC Ghana, Ltd.	470,526.70	470,526.70	11/30/93	FAB NY out of business.	08/19/93
11278002	BCC S.A. Espanola	7,190.00	7,190.00	11/30/93	[As of 11/15/93: funds are w/clerk of D.C. court]	08/19/93
21304009	BCCI (Overseas) Barbados	9,466.74	9,466.74	11/30/93		08/19/93
10884000	BCCI (Overseas) Bombay	43,650.66	43,650.66	11/30/93	**Check received from Clerk, U.S. District Cou**	08/19/93
21301002	BCCI (Overseas) Cameroon	325.00	325.00	11/30/93	**for the District of Columbia on 11/30/93**	08/19/93
11439008	BCCI (Overseas) Dhaka, Bangladesh	500.00	500.00	11/30/93		08/19/93
10001026	BCCI (Overseas) Freetown, Sierra Leone	1,747.44	1,747.44	11/30/93		08/19/93
20451002	BCCI (Overseas) Istanbul, Turdey	6,218.81	6,218.81	11/30/93		08/19/93
550547877	BCCI (Overseas) Kingston, Jamaica	165,965.63	166,998.19	11/30/93		08/19/93
11386001	BCCI (Overseas) Lahore, Pakistan	283,010.40	283,010.40	11/30/93		08/19/93
20413009	BCCI (Overseas) Paris	30,581.69	30,581.69	11/30/93		08/19/93
10753008	BCCI (Overseas) Sri Lanka	44,845.00	44,845.00	11/30/93		08/19/93
11901017	BCCI S.A. Sao Paulo (Brazil)	22,875.22	22,875.22	11/30/93		08/19/93
11900017	BCCI Trinidad & Tobago Merchant Bankers	5,047.40	5,047.40	11/30/93		08/19/93
00023012	Banque de Commerce et de Placements S.A.	827,396.35	827,396.35	11/30/93		08/19/93
10838007	National Bank of Oman	483,647.97	484,192.84	11/30/93		08/19/93
** Subtotal **		2,413,250.81	2,414,828.24		NOTE: Subtotal in order = $2,576,824.93	
First American Title Ins. Co.						
Escrow Account	Amjad Awan (proceeds, sale of condo)	140,478.46	140,478.46	10/01/92	Forfeiture order served 7/31/92.	07/29/92
First Florida		**M.D. Florida**				
440-757-7116	Capital Equiv. Dep.	15,299,703.58	15,338,629.19	01/28/92		01/24/92
First Interstate Bank Int'l		**S.D. New York**				
21046	BCCI (Overseas) Pakistan [FDBP]	35,169.75	0.00		Letter rec'd 10/1/93 fr. First Interstate Bank.	08/19/93
First National Bank of Louisville		**W.D. Kentucky**				
70328615	BCCI (Overseas)	3,727,520.97	3,727,520.97	01/30/92		01/24/92
Foley & Lardner		**M.D. Florida**				
n/a	Escrow Account	100,000.00	0.00			08/19/93

Account No.	Account Name	Approx. Balance	Amt. Rec'd	Date	Comments	Date of Forf. Order
Goldman, Sachs & Co.		**S.D. New York**				
001-37937-9-911	ICIC Investments Ltd.	0.00	n/a		Forfeiture order identifies zero balance.	07/29/92
032-34066-3	ICIC Investments Ltd.	360,602.60	350,602.60	08/14/92		07/29/92
** Subtotal **		360,602.60	350,602.60			
Habib Bank Limited		**S.D. New York**				
21020	BCCI (Overseas) Pakistan [FDBP]	57,546.00	0.00		Forfeiture order served 9/9/93.	08/19/93
20298	BCCI (Overseas) Pakistan [FDBP]	20,927.00	0.00		Forfeiture order served 9/9/93.	08/19/93
** Subtotal **		78,473.00	0.00			
Holland & Knight		**S.D. Florida**				
n/a	Escrow Account	220,500.00	0.00			08/19/93
Hufstedler, Kaus & Ettinger		**C.D. California**				
n/a	Intermagnetics Trust Acct.	487,448.84	487,448.84	01/30/92	Received check dated 1/28/92	01/24/92
Janis Schuelke & Wechsler		**D. C.**				
n/a	Escrow Account	63,454.22	63,454.22	09/27/93	Received check dated 9/21/93	08/19/93
Kemper Securities		**N.D. Illinois**				
1278-4388	BCCI (Overseas)	583,305.00	591,361.11	02/11/92		01/24/92
Korea First Bank, New York Agency		**S.D. New York**				
21017	BCCI (Overseas) Pakistan [FDBP]	40,000.00	40,000.00	11/17/93	Forfeiture order served 9/16/93.	08/19/93
Mabon Securities		**S.D. New York**				
04-4050	BCCI (Overseas)	2,661,808.53	2,669,830.92	01/29/92		01/24/92
04-4051	ICIC Investments Ltd.	20,240,717.09	20,513,733.28	10/29/92		07/29/92
46-0305	ICIC Investments Ltd.	452.50	0.00		According to Mabon, no such account.	07/29/92
46-2633	ICIC Investments Ltd.	0.00	458.57	10/29/92		07/29/92
48-2633	ICIC Investments Ltd.	0.00	0.00		According to Mabon, not an ICIC account.	07/29/92
** Subtotal **		22,902,978.12	23,184,022.77			
Manufacturers Hanover Trust Co.		**S.D. New York**				
n/a	BCCI (Overseas)	40,240.00	40,240.00	02/05/92	Non-interest bearing account	01/24/92
Metro Bank		**S.D. Texas**				
MBD900158	BCCI (Overseas) Dhaka, Bangladesh	30,800.00	30,800.00	10/01/93	Rec'd chk. dated 9/27/93 on 9/29 (post closeout).	08/19/93
Morgan Stanley & Co.		**S.D. New York**				
0424245	ICIC Investments Ltd.	128,392.89	5.54	08/13/92		07/29/92
737-0120128947	ICIC Investments Ltd.	128,726.20	130,426.69	08/13/92		07/29/92
** Subtotal **		257,119.09	130,432.23			

Account No.	Account Name	Approx. Balance	Amt. Rec'd	Date	Comments	Date of Forf. Order
Oppenheimer & Co., Inc.		**S.D. New York**				
05391180	ICIC Investments Ltd.	6,907,935.00 }	26,044,311.89	11/17/93	{Treasury securities. Forf. order served 7/31/92.	07/29/92
05391180	ICIC Investments Ltd.	16,421,620.00 }	n/a		{Liquidation order served 9/10/93.	07/29/92
05391184	BCCI (Overseas)	2,991,107.70	2,991,107.00	02/14/92		01/31/92
033-35263	North American Investment & Finance, Ltd.	5,090,650.00	0.00		Treasury Notes. Forfeiture order served 9/10/93.	08/19/93
033-35263	North American Investment & Finance, Ltd.	1,032,315.17	0.00			08/19/93
** Subtotal **		32,443,627.87	29,035,418.89			
Paine Webber		**S.D. New York**				
DN-R5056-01	BCCI (Overseas) 1,500 shares Hilton Hotels }	73,000.00	0.00		{Total est. value = $73,000.00	01/24/92
DN-R5056-01	BCCI (Overseas) 493 shares General Cinema }		0.00		{Liquidation order served 9/10/93.	01/24/92
DN-R5056-01	BCCI (Overseas)	unk.	1,008.35	02/14/92		01/24/92
** Subtotal **			1,008.35			
Prudential Securities, Inc.		**S.D. New York**				
TNT880170-85	ICIC Investments Ltd.	151.39	153.36	09/14/92	Check received.	07/29/92
Security Pacific Intl.		**S.D. New York**				
05007001	BCCI (Overseas) Abidjan	3,305,447.05	3,305,447.05	02/13/92		01/24/92
07012001	BCCI (Overseas) Cayman	4,124,193.31	4,124,193.31	02/13/92		01/24/92
04020101	BCCI (Overseas) Istanbul	1,723,590.57	1,723,590.57	02/13/92		01/24/92
04020023	BCCI (Overseas) Izmir, Turkey	308,079.19	308,079.19	02/13/92		01/24/92
04011002	BCCI (Overseas) Karachi	3,056,794.59	3,056,794.59	02/13/92		01/24/92
05011001	BCCI (Overseas) Khartoum	701,251.94	701,251.94	02/13/92		01/24/92
04012039	BCCI (Overseas) Manila	783,178.47	783,178.47	02/13/92		01/24/92
04020030	BCCI (Overseas) Mersin, Turkey	116,667.53	116,667.53	02/13/92		01/24/92
05008001	BCCI (Overseas) Monrovia	103,500.48	103,500.48	02/13/92		01/24/92
03005016	BCCI (Overseas) Paris, France	857,082.72	857,082.72	02/13/92		01/24/92
04018017	BCCI (Overseas) Seoul, Korea	5,714,329.75	5,714,329.75	02/13/92		01/24/92
04031016	BCCI (Overseas) Shenzhen, China	589,044.22	589,044.22	02/13/92		01/24/92
05009001	BCCI (Overseas) Sierra Leone	2,056,883.83	2,056,883.83	02/13/92		01/24/92
04027001	BCCI (Overseas) Sri Lanka	1,818,758.32	1,818,973.32	02/13/92		01/24/92
05012001	BCCI (Overseas) Togo	104,511.45	104,511.45	02/13/92		01/24/92
04012039	BCCI (Overseas) Manila	443.00	443.00	08/18/92		07/29/92
03005016	BCCI (Overseas) Paris	1,225.00	1,225.00	08/18/92		07/29/92
** Subtotal **		25,364,981.42	25,365,196.42			

REPORT OF COLLECTIONS: U.S.A. v. BCCI HOLDINGS (LUXEMBOURG), S.A., et al.
Crim. No. 91-0655 (JHG), District of Columbia

Account No.	Account Name	Approx. Balance	Amt. Rec'd	Date	Comments	Date of Forf. Order
Security Pacific National		**S.D. New York**				
607750471	BCCI (Overseas) Abu Dhabi	1,785,845.00	1,798,749.29	03/06/92		01/24/92
"	"		2,031.41	09/16/93	Add'l receipts.	01/24/92
607750491	BCCI (Overseas) Grand Cayman	44,500,000.00	24,048,040.10	09/16/93	U.S. Treasury STRIPS (face value $44.5 m)	01/24/92
** Subtotal **		46,285,845.00	25,848,820.80			
Trustee for BCCI S.A. Los Angeles		**C.D. California**				
n/a	Coimbra Property, Kissimmee, FL}	13,894,680.00	0.00		{Total est. value = $13,894,680.00	08/19/93
n/a	Emerald Place Apts, Bermuda Dunes, CA}				{	
n/a	Francor Property, Kissimmee, FL}				{	
n/a	Int'l Industrial Park, Dade Co., FL}				{	
n/a	Cash Assets	34,379,641.99	36,964,405.69	08/26/93	Add'l $1m rcd. 10/22/93	08/19/93
n/a	Loans Receivable	20,245,040.68	0.00			08/19/93
n/a	Miscellaneous property	31,445.00	0.00			08/19/93
** Subtotal **		68,550,807.67	36,964,405.69			
**** GRAND TOTAL ****		**552,597,131.96**	**498,696,360.72**			

1325015-000-11121

DEPARTMENT OF JUSTICE

UNITED STATES MARSHALS SERVICE

Report Date: 2/27/1995 08:30

DISTRICT 54 , SOUTHERN NEW YORK

USM-286

DETAIL RECEIPT AND DISBURSEMENT REPORT FOR CASES WITH OUTSTANDING AMOUNTS

Case Type: CRIMINAL

Case: OBCCI D.C. CRIM # 91-0655

Account: 15X6874 Account: 5042

Reference	Date	Charge Amount	Receipt Amount	Disbursement Amount	Transfer Amount	Class	Write-off Amount	Running Totals per Case: Deposit Fund Amount	Running Totals per Case: Uncollected Amount
E 94317	01/28/92	0.00	15,338,629.19	0.00	0.00		0.00	15,338,629.19	0.00
E 94319	01/29/92	0.00	2,669,830.92	0.00	0.00		0.00	18,008,460.11	0.00
E 94321	01/30/92	0.00	487,448.84	0.00	0.00		0.00	18,495,908.95	0.00
E 94320	01/30/92	0.00	3,727,520.97	0.00	0.00		0.00	22,223,429.92	0.00
E 94322	02/05/92	0.00	40,240.00	0.00	0.00		0.00	22,263,669.92	0.00
E 94324	02/11/92	0.00	3,268,126.32	0.00	0.00		0.00	25,531,796.24	0.00
E 94325	02/11/92	0.00	527,592.32	0.00	0.00		0.00	26,059,388.56	0.00
E 94401	02/11/92	0.00	8,078,042.51	0.00	0.00		0.00	34,137,431.07	0.00
E 94402	02/11/92	0.00	1,847,468.88	0.00	0.00		0.00	35,984,899.95	0.00
E 94403	02/11/92	0.00	203,600.46	0.00	0.00		0.00	36,188,500.41	0.00
E 94404	02/11/92	0.00	30,238.40	0.00	0.00		0.00	36,218,738.81	0.00
E 94405	02/11/92	0.00	882,766.95	0.00	0.00		0.00	37,101,505.76	0.00
E 94323	02/11/92	0.00	591,361.11	0.00	0.00		0.00	37,692,866.87	0.00
E 94414	02/11/92	0.00	386,467.59	0.00	0.00		0.00	38,079,334.46	0.00
E 94413	02/11/92	0.00	787,041.90	0.00	0.00		0.00	38,866,376.36	0.00
E 94412	02/11/92	0.00	152,093.70	0.00	0.00		0.00	39,018,470.06	0.00
E 94411	02/11/92	0.00	33,057.60	0.00	0.00		0.00	39,051,527.66	0.00
E 94409	02/11/92	0.00	300,027.55	0.00	0.00		0.00	39,351,555.21	0.00
E 94408	02/11/92	0.00	916.57	0.00	0.00		0.00	39,352,471.78	0.00
E 94400	02/11/92	0.00	101,108.90	0.00	0.00		0.00	39,453,580.68	0.00
E 94410	02/11/92	0.00	310,849.60	0.00	0.00		0.00	39,764,430.28	0.00
E 94406	02/11/92	0.00	159,383.66	0.00	0.00		0.00	39,923,813.94	0.00
E 94407	02/11/92	0.00	50,919.08	0.00	0.00		0.00	39,974,733.02	0.00
E 94423	02/13/92	0.00	103,500.48	0.00	0.00		0.00	40,078,233.50	0.00
E 94425	02/13/92	0.00	5,714,329.75	0.00	0.00		0.00	45,792,563.25	0.00
E 94424	02/13/92	0.00	857,082.72	0.00	0.00		0.00	46,649,645.97	0.00
E 94422	02/13/92	0.00	116,667.53	0.00	0.00		0.00	46,766,313.50	0.00
E 94421	02/13/92	0.00	783,178.47	0.00	0.00		0.00	47,549,491.97	0.00
E 94420	02/13/92	0.00	701,251.94	0.00	0.00		0.00	48,250,743.91	0.00
E 94419	02/13/92	0.00	3,056,794.59	0.00	0.00		0.00	51,307,538.50	0.00
E 94418	02/13/92	0.00	308,079.19	0.00	0.00		0.00	51,615,617.69	0.00
E 94417	02/13/92	0.00	1,723,590.57	0.00	0.00		0.00	53,339,208.26	0.00
E 94416	02/13/92	0.00	4,124,193.31	0.00	0.00		0.00	57,463,401.57	0.00
E 94415	02/13/92	0.00	3,305,447.05	0.00	0.00		0.00	60,768,848.62	0.00
E 94454	02/13/92	0.00	104,511.45	0.00	0.00		0.00	60,873,360.07	0.00
E 94453	02/13/92	0.00	1,818,973.32	0.00	0.00		0.00	62,692,333.39	0.00
E 94452	02/13/92	0.00	2,056,883.83	0.00	0.00		0.00	64,749,217.22	0.00
E 94451	02/13/92	0.00	589,044.22	0.00	0.00		0.00	65,338,261.44	0.00
E 94455	02/14/92	0.00	61,737,266.36	0.00	0.00		0.00	127,075,527.80	0.00
E 94456	02/14/92	0.00	8,818,703.73	0.00	0.00		0.00	135,894,231.53	0.00
E 94457	02/14/92	0.00	23,537,303.36	0.00	0.00		0.00	159,431,534.89	0.00
E 94458	02/14/92	0.00	12,201,072.80	0.00	0.00		0.00	171,632,607.69	0.00
E 94459	02/14/92	0.00	611,440.61	0.00	0.00		0.00	172,244,048.30	0.00
E 94460	02/14/92	0.00	4,309,622.51	0.00	0.00		0.00	176,553,670.81	0.00
E 94461	02/14/92	0.00	735,282.59	0.00	0.00		0.00	177,288,953.40	0.00

DEPARTMENT OF JUSTICE

UNITED STATES MARSHALS SERVICE

Report Date

2/27/1995

08:30

DISTRICT 54 , SOUTHERN NEW YORK

USM-286

DETAIL RECEIPT AND DISBURSEMENT REPORT FOR CASES WITH OUTSTANDING AMOUNTS

Reference	Date	Charge Amount	Receipt Amount	Disbursement Amount	Transfer Amount	Transfer Class	Write-off Amount	Running Totals per Case: Deposit Fund Amount	Running Totals per Case: Uncollected Amount
E 94462	02/14/92	0.00	334,948.68	0.00	0.00		0.00	177,623,902.08	0.00
E 94463	02/14/92	0.00	4,314,682.57	0.00	0.00		0.00	181,938,584.65	0.00
E 94464	02/14/92	0.00	247,751.59	0.00	0.00		0.00	182,186,336.24	0.00
E 94465	02/14/92	0.00	1,339,202.71	0.00	0.00		0.00	183,525,538.95	0.00
E 94466	02/14/92	0.00	607,221.11	0.00	0.00		0.00	184,132,760.06	0.00
E 94467	02/14/92	0.00	335,246.63	0.00	0.00		0.00	184,468,006.69	0.00
E 94468	02/14/92	0.00	358,297.24	0.00	0.00		0.00	184,826,303.93	0.00
D 81001	02/14/92	0.00	1,283,092.84	0.00	0.00		0.00	186,109,396.77	0.00
D 81002	02/14/92	0.00	2,991,107.00	0.00	0.00		0.00	189,100,503.77	0.00
D 81003	02/18/92	0.00	1,008.35	0.00	0.00		0.00	189,101,512.12	0.00
D 94469	02/18/92	0.00	500,307.58	0.00	0.00		0.00	189,601,819.70	0.00
D 81004	02/19/92	0.00	11,367,952.14	0.00	0.00		0.00	200,969,771.84	0.00
D 81005	02/19/92	0.00	30,817.42	0.00	0.00		0.00	201,000,589.26	0.00
D 81006	02/20/92	0.00	1,181,397.68	0.00	0.00		0.00	202,181,986.94	0.00
D 81007	02/21/92	0.00	950,853.73	0.00	0.00		0.00	203,132,840.67	0.00
D 81008	02/21/92	0.00	24,215.69	0.00	0.00		0.00	203,157,056.36	0.00
D 81009	02/21/92	0.00	1,853,641.08	0.00	0.00		0.00	205,010,697.44	0.00
D 81010	03/02/92	0.00	1,200,000.00	0.00	0.00		0.00	206,210,697.44	0.00
D 81011	03/06/92	0.00	1,798,749.29	0.00	0.00		0.00	208,009,446.73	0.00
D 81012	03/10/92	0.00	30,943,187.38	0.00	0.00		0.00	238,952,634.11	0.00
D 81013	03/15/92	0.00	4,288.30	0.00	0.00		0.00	238,956,922.41	0.00
D 81014	03/26/92	0.00	66,867,673.08	0.00	0.00		0.00	305,824,595.49	0.00
D 81016	04/15/92	0.00	1,053.36	0.00	0.00		0.00	305,825,648.85	0.00
D 81017	04/22/92	0.00	81,454.12	0.00	0.00		0.00	305,907,102.97	0.00
D 81020	05/19/92	0.00	1,044.34	0.00	0.00		0.00	305,908,147.31	0.00
D 81089	06/16/92	0.00	3,103.09	0.00	0.00		0.00	305,911,250.40	0.00
2 272606	07/30/92	0.00	0.00	0.00	130,000.00	2573	0.00	305,911,250.40	0.00
E 94476	08/05/92	0.00	4,060,293.91	0.00	0.00		0.00	309,971,544.31	0.00
E 94477	08/13/92	0.00	2,918.53	0.00	0.00		0.00	309,974,462.84	0.00
E 94478	08/13/92	0.00	15,189,893.62	0.00	0.00		0.00	325,164,356.46	0.00
E 94480	08/13/92	0.00	2,929.28	0.00	0.00		0.00	325,167,285.74	0.00
E 94483	08/13/92	0.00	5.54	0.00	0.00		0.00	325,167,291.28	0.00
E 94482	08/13/92	0.00	130,426.69	0.00	0.00		0.00	325,297,717.97	0.00
2 272762	08/14/92	0.00	0.00	0.00	260,000.00	2599	0.00	325,297,717.97	0.00
E 94484	08/14/92	0.00	350,602.60	0.00	0.00		0.00	325,648,320.57	0.00
E 94485	08/18/92	0.00	443.00	0.00	0.00		0.00	325,648,763.57	0.00
E 94485	08/18/92	0.00	1,225.00	0.00	0.00		0.00	325,649,988.57	0.00
2 272941	08/28/92	0.00	1,009.06	0.00	0.00		0.00	325,650,997.63	0.00
E 94492	09/15/92	0.00	2,456.85	0.00	0.00		0.00	325,653,454.48	0.00
E 94491	09/15/92	0.00	153.36	0.00	0.00		0.00	325,653,607.84	0.00
E 94493	09/17/92	0.00	68,919.87	0.00	0.00		0.00	325,722,527.71	0.00
E 94495	09/22/92	0.00	246,250.00	0.00	0.00		0.00	325,968,777.71	0.00
E 94497	09/24/92	0.00	351,769.41	0.00	0.00		0.00	326,320,547.12	0.00
E 94499	09/24/92	0.00	643,412.27	0.00	0.00		0.00	326,963,959.39	0.00
D 82176	10/05/92	0.00	140,478.46	0.00	0.00		0.00	327,104,437.85	0.00
D 82177	10/15/92	0.00	3,098.07	0.00	0.00		0.00	327,107,535.92	0.00
D 82180	10/29/92	0.00	20,514,191.85	0.00	0.00		0.00	347,621,727.77	0.00
D 82182	11/17/92	0.00	9,520.11	0.00	0.00		0.00	347,631,247.88	0.00
3 000969	12/03/92	0.00	0.00	0.00	57,719.00	2599	0.00	347,631,247.88	0.00
3 000995	12/07/92	0.00	0.00	0.00	10,044.00	2503	0.00	347,631,247.88	0.00
D 82186	12/15/92	0.00	2,705.16	0.00	0.00		0.00	347,633,953.04	0.00

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DEPARTMENT OF JUSTICE

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DISTRICT 54 , SOUTHERN NEW YORK

USM-286

DETAIL RECEIPT AND DISBURSEMENT REPORT FOR CASES WITH OUTSTANDING AMOUNTS

Reference	Date	Charge Amount	Receipt Amount	Disbursement Amount	Transfer Amount	Class	Write-off Amount	Running Totals per Case: Deposit Fund Amount	Uncollected Amount
D 82194	01/06/93	0.00	1,238,712.54	0.00	0.00		0.00	348,872,665.58	0.00
E 82189	01/21/93	0.00	892.27	0.00	0.00		0.00	348,873,557.85	0.00
E 2601	02/18/93	0.00	3,426.78	0.00	0.00		0.00	348,876,984.63	0.00
E 2609	03/17/93	0.00	864.97	0.00	0.00		0.00	348,877,849.60	0.00
E 2617	04/20/93	0.00	95,121.88	0.00	0.00		0.00	348,972,971.48	0.00
E 2615	04/20/93	0.00	4,930.07	0.00	0.00		0.00	348,977,901.55	0.00
E 2621	04/28/93	0.00	18,223,631.40	0.00	0.00		0.00	367,201,532.95	0.00
E 2624	05/18/93	0.00	2,899.25	0.00	0.00		0.00	367,204,432.20	0.00
E 2880	06/15/93	0.00	7,093.31	0.00	0.00		0.00	367,211,525.51	0.00
E 2886	07/15/93	0.00	6,473.33	0.00	0.00		0.00	367,217,998.84	0.00
E 2896	08/24/93	0.00	3,196.43	0.00	0.00		0.00	367,221,195.27	0.00
E 2897	08/26/93	0.00	35,964,405.69	0.00	0.00		0.00	403,185,600.96	0.00
E 2900	09/14/93	0.00	1,474.70	0.00	0.00		0.00	403,187,075.66	0.00
E 2899	09/16/93	0.00	2,355.81	0.00	0.00		0.00	403,189,431.47	0.00
E 13767	09/16/93	0.00	24,048,040.10	0.00	0.00		0.00	427,237,471.57	0.00
E 13767	09/16/93	0.00	2,031.41	0.00	0.00		0.00	427,239,502.98	0.00
E 13901	09/29/93	0.00	63,454.22	0.00	0.00		0.00	427,302,957.20	0.00
E 13934	10/04/93	0.00	17,947,169.28	0.00	0.00		0.00	445,250,126.48	0.00
E 13907	10/05/93	0.00	3,045,904.84	0.00	0.00		0.00	448,296,031.32	0.00
E 13902	10/06/93	0.00	30,800.00	0.00	0.00		0.00	448,326,831.32	0.00
E 13908	10/21/93	0.00	653.53	0.00	0.00		0.00	448,327,484.85	0.00
E 13910	10/22/93	0.00	1,000,000.00	0.00	0.00		0.00	449,327,484.85	0.00
E 13911	10/27/93	0.00	375,728.87	0.00	0.00		0.00	449,703,213.72	0.00
E 13911	10/27/93	0.00	161,939.48	0.00	0.00		0.00	449,865,153.20	0.00
E 13911	10/27/93	0.00	12,663.32	0.00	0.00		0.00	449,877,816.52	0.00
E 13911	10/27/93	0.00	197,349.20	0.00	0.00		0.00	450,075,165.72	0.00
E 13913	11/01/93	0.00	230,198.82	0.00	0.00		0.00	450,305,364.54	0.00
E 13915	11/17/93	0.00	26,044,311.89	0.00	0.00		0.00	476,349,676.43	0.00
E 13920	11/17/93	0.00	40,000.00	0.00	0.00		0.00	476,389,676.43	0.00
E 13917	11/18/93	0.00	76,311.03	0.00	0.00		0.00	476,465,987.46	0.00
E 13916	11/24/93	0.00	1,992.34	0.00	0.00		0.00	476,467,979.80	0.00
E 13921	12/06/93	0.00	2,414,828.24	0.00	0.00		0.00	478,882,808.04	0.00
E -13922	12/07/93	0.00	19,813,552.68	0.00	0.00		0.00	498,696,360.72	0.00
E 13924	12/17/93	0.00	203,548.88	0.00	0.00		0.00	498,899,909.60	0.00
E 13925	12/22/93	0.00	250,000.00	0.00	0.00		0.00	499,149,909.60	0.00
4 001223	12/23/93	0.00	0.00	33,240,886.43	0.00		0.00	465,909,023.17	0.00
4 001223	12/23/93	0.00	0.00	0.00	33,240,886.43	9022	0.00	465,909,023.17	0.00
E 14328	01/12/94	0.00	39,849.34	0.00	0.00		0.00	465,948,872.51	0.00
E 14339	02/14/94	0.00	23,673.14	0.00	0.00		0.00	465,972,545.65	0.00
E 14341	02/18/94	0.00	4,250,000.00	0.00	0.00		0.00	470,222,545.65	0.00
E 14342	03/24/94	0.00	126,382.39	0.00	0.00		0.00	470,348,928.04	0.00
4 002553	04/07/94	0.00	0.00	328,120.96	0.00		0.00	470,020,807.08	0.00
4 002596	04/11/94	0.00	0.00	134,986.59	0.00		0.00	469,885,820.49	0.00
E 14345	04/19/94	0.00	150,000.00	0.00	0.00		0.00	470,035,820.49	0.00
4 003214	05/31/94	0.00	0.00	41,797.73	0.00		0.00	469,994,022.76	0.00
E 14348	06/07/94	0.00	7,000.00	0.00	0.00		0.00	470,001,022.76	0.00
E 14350	06/17/94	0.00	1,300,000.00	0.00	0.00		0.00	471,301,022.76	0.00
E 91275	08/18/94	0.00	8,850,000.00	0.00	0.00		0.00	480,151,022.76	0.00
E 14474	10/14/94	0.00	200,000.00	0.00	0.00		0.00	480,351,022.76	0.00
E 91755	10/19/94	0.00	154,714.41	0.00	0.00		0.00	480,505,737.17	0.00
E 91822	11/18/94	0.00	6,232,315.17	0.00	0.00		0.00	486,738,052.34	0.00

1325015-000-11124

U.S. Department of Justice

United States Marshals Service

One Saint Andrews Plaza
New York, New York 10007

[redacted]

b6 (Per FBI)
b7C

As promised.

(1) spreadsheet w/ activity up to 12/13/93

(2) Activity since 12/13/93

(3) summary report from accounting system

b7C (Per USMS) [redacted]

US Dept of Justice
US Marshals Service
Southern District of NY
US Courthouse Annex
1 St. Andrews Plaza
NY, NY 10007

[redacted]

1525015-000-11112

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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AIRTEL

Date 4/8/92

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: SAC, WMFO (29B-171994)

Entry (Check One)
[ ] New Case
[X] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-92-F-0115-0131 HIDDEN INTERESTS;
MC#38;FIF;FAG
18 U.S.C. Section 981

[ ] FD-635 Record of Seized Property	[ ] Warrant of Arrest in Rem
[ ] FD-302	[ ] Complaint for Forfeiture
[ ] In Forma Pauperis	[ ] Search Warrant
[ ] Quick Release	[ ] Affidavit
[ ] Indemnity Agreement	[ ] Seizure Warrant
[ ] Final Decree	[ ] Plea Agreement
[ ] Receipt for Transfer/ Disposition of Funds/Property	[ ] Sharing Request [ ] Dag-71 [ ] Dag-72
[ ] Newspaper Clippings	[ ] Petition
[ ] Lab Reports	[ ] Claim & Cost Bond
[ ] Police Reports	[ ] Petition Investigation
[ ] Settlement Statement	[ ] Civil Forfeiture Report
[ ] Title Documentation	[ ] Notice of Seizure of a Conveyance for a Drug-Related Offence
[ ] Appraisal Report	

[X] Other Subsequent Materials
INDICTMENT AND RELATED DOCUMENTS

1-Bureau, FSPU
1-WMFO (29B-WF-171994)

KML/kml
(2)

29B-WF-171994-24

APR 0 8 1992

b6
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325015-000-9939

FD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 2/12/92

TO : DIRECTOR, FBI
Attn: ASD/PPMS/Forfeiture and Seized Property Unit

FROM : SAC, WMFO (FAST) (29B-WF-171994)(P)

SUBJECT : FORFEITURE MATTER;
HIDDEN INTERESTS;
MC # 8;
FIF; FAG;
OO: WMFO

WMFO/FAST requests that FBIHQ/FSPU advise WMFO/FAST as to the proper procedure for reporting the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI) court ordered forfeiture of $550,000,000.

1) On or about 11/15/91 a United States federal grand jury in the District of Columbia returned a multi-count Indictment against four BCCI related entities and three individuals. **(A copy of this Indictment is enclosed.)** The Indictment contains a Forfeiture Count at page 51.

2) A superseding Information was subsequently filed on or about 12/15/91. **(A copy is enclosed.)**

3) These four entities, collectively called "BCCI", had their guilty pleas accepted by U.S. District Court, District of Columbia, Judge Joyce Hens Green, on or about 1/24/92. **(A copy of the plea is enclosed.)**

2-FBIHQ
(2-FSPU, Attn: [redacted] enc.)
2-WMFO
(1-BCCI Squad, Attn: SA [redacted])
(1-FAST, 29B-WF-171994 Sub FS)

EPG:epg
(4)

29B-WF-171994 Sub FS — 2

b6
b7C

Searched
Serialized
Indexed
Filed

Approved: _____ Transmitted _____ (Number) (Time) Per _____

1325015-000-9940

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	CRIMINAL NUMBER 91-0655 (JHG)

FILED

FEB 28 1992

Clerk, U.S. District Court
District of Columbia

ORDER SEALING DOCUMENTS

This matter came before the Court on the Motion of the United States to seal documents relating to its Motion for Extension of Restraining Order and for Production of Documents relating to the assets held in the name ICIC Investments Ltd.

Having considered the government's Motion and the Declaration submitted in support thereof, it is hereby ORDERED that the government's Motion for Extension of Restraining Order and for Production of Bank Records, including the exhibits attached thereto, and the Declaration of Stefan D. Cassella supporting the Motion to Seal, be sealed until further Order of this Court.

The United States is to advise the Court at the earliest time when these matters can be unsealed.

February 25, 1992

Judge Hen Lee
UNITED STATES DISTRICT JUDGE

1325015-000-10030

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

FEB 28 1992

Clerk, U.S. District Court
District of Columbia

ORDER EXTENDING RESTRAINING ORDERS OF JANUARY 31, 1992 AND FEBRUARY 20, 1992

On January 31, 1992 and February 20, 1992, pursuant to 18 U.S.C. § 1963(d)(1)(A) and upon unopposed motions of the United States of America, the Court issued Restraining Orders restraining and enjoining the following through March 2, 1992 at 12:00 noon or until further Order: Oppenheimer & Co., Inc.; Bear Stearns & Co., Inc.; the Bank of New York; Dean Witter Reynolds, Inc.; Merrill Lynch, Pierce Fenner & Smith; and Mabon Securities Corp.; all of New York, New York, from interfering with, moving, transferring, disposing, altering, or otherwise changing the status quo of any assets those institutions may hold in the name of ICIC Investments Ltd.

The government filed this date a Motion for Extension of Restraining Order and For Production of Bank Records seeking, inter alia, an extension of sixty additional days for the expiration of both Restraining Orders. The government represents that it

1325015-000-10031

requires additional time to review documents, interview witnesses, and otherwise more fully investigate whether or not funds held in the name of ICIC Investments Ltd. are subject to forfeiture in this proceeding. Upon good cause shown, for the reasons noted in the earlier Orders, and in accordance with 18 U.S.C. § 1963(d)(1)(A), it is hereby ORDERED that:

Oppenheimer & Co., Inc., New York, New York;

Bear Stearns & Co., Inc., New York, New York;

Bank of New York, New York, New York;

Dean Witter Reynolds, Inc., New York, New York;

Merrill Lynch, Pierce Fenner & Smith, New York, New York;

Mabon Securities Corp., New York, New York

are restrained and enjoined through May 1, 1992 at 12:00 noon or until further Order of the Court, whichever is sooner, from interfering with, moving, transferring, disposing, altering, or otherwise changing the status quo of any assets held in the name of ICIC Investments Ltd. at those above-named companies.

It is FURTHER ORDERED that service of this Order on those above-named companies shall be made promptly by the United States of America.

No bond is required.

IT IS SO ORDERED.
February 28, 1992
5:15 p.m.

JOYCE HENS GREEN
United States District Judge

1325015-000-10032

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	
BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED,	)	CRIMINAL NUMBER 91-0655 (JHG)
	)	
Defendants	)	
	)	

GOVERNMENT'S MOTION FOR RESTRAINING ORDER

The United States of America, by its counsel, hereby moves for a restraining order pursuant to Title 18, United States Code, Section 1963(d)(1)(A), to preserve the availability of property for forfeiture. In support of this motion, the government says the following.

1. ICIC (Overseas), Ltd. is a defendant in this criminal case. Pursuant to paragraph 1(e) of this Court's Order of Forfeiture of January 24, 1992 ("Order of Forfeiture"), all assets of ICIC (Overseas), Ltd. are subject to forfeiture to the United States.

2. ICIC Investment, Ltd. is described in documents available to the government as a "sister company" to ICIC (Overseas) Ltd. These documents describe ICIC Investment and ICIC (Overseas) as having a common parent, ICIC Holdings, Ltd., and they describe ICIC (Overseas) as deriving "indirect economic benefit" from ICIC Investment through said parent company. (See Exhibit A.)

1325015-000-10033

3. Other documents reveal that ICIC (Overseas) has guaranteed the obligations of ICIC Investments in corporate resolutions and correspondence with third parties. (See Exhibits A and B.)

4. These documents also reveal that at least one of the directors of ICIC Investment, Mr. W.M. Jafree, also is, or has been, a director of ICIC (Overseas). (Compare Exhibit B with Exhibits C and D.)

5. ICIC Investment, Ltd. has assets at at least three financial institutions in the United States including Oppenheimer & Co., Inc., Bear Stearns & Co., Inc., and the Bank of New York.

6. The government infers from this information that there has been a transfer of funds between ICIC Investment and ICIC (Overseas), that there may be no real distinction between these two entities, that assets held in the name ICIC Investment are the assets of ICIC (Overseas), and that the assets held in the name of ICIC Investment, Ltd. are therefore subject to forfeiture under Title 18, United States Code, Section 1963(a) and paragraph 1(e) of the Order of Forfeiture.

WHEREFORE, the United States prays that this Court enter an order, pursuant to Title 18, United States Code, Section 1963(d)(1)(A) restraining the movement or other disposition of any assets held in the name of ICIC Investment, Ltd. at the following financial institutions for 30 days or until further Order of the Court, whichever is sooner:

Oppenheimer & Co., New York, New York

1325015-000-10034

Bear Stearns & Co., New York, New York

Bank of New York, New York, New York

Respectfully Submitted,

GEORGE W. PROCTOR
Director
Asset Forfeiture Office
Criminal Division
U.S. Department of Justice

by: _____

STEFAN D. CASSELLA
Trial Attorney
1400 New York Ave., N.W.
10th Floor
Washington, D.C. 20005
(202) 514-1263

1325015-000-10035

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED, INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	Criminal No. 91-0655 (JHG)

FILED

FEB 28 1992

Clerk, U.S. District Court
District of Columbia

RESTRAINING ORDER

On January 31, 1992 and February 19, 1992, pursuant to 18 U.S.C. § 1963(d)(1)(A), the United States of America filed motions requesting that the Court restrain Oppenheimer & Co., Inc.; Bear Stearns & Co., Inc.; the Bank of New York; Dean Witter Reynolds, Inc.; Merrill Lynch, Pierce Fenner & Smith; and Mabon Securities Corp.; all of New York, New York, from interfering with, moving, transferring, disposing, altering, or otherwise changing the status quo of any assets those institutions may hold in the name of ICIC Investments Ltd. The government alleged that ICIC Investments Ltd., though not a named defendant in this action, is a "sister company" to the named defendant ICIC (Overseas) Ltd. and that "indirect economic benefits" flow from ICIC Investments Ltd. to ICIC (Overseas) Ltd. through a common parent, ICIC Holdings Ltd., also not a named corporate defendant in this action. The United States requested time to investigate whether or not it is entitled,

1325015-000-10036

through forfeiture, to funds in the name of ICIC Investments Ltd. and sought to preserve the status quo of assets held in the name of ICIC Investments Ltd. pending judicial determination of the property's forfeitability. Without conceding the merit of the government's position regarding the forfeitability of assets held in the name of ICIC Investments Ltd., court-appointed fiduciaries for the four corporate defendants, through counsel, agreed that the investigation was appropriate and urged the Court to grant the motions for Restraining Orders.

After concluding the action requested by the government was appropriate, prudent, and in the public interest, and in accordance with 18 U.S.C. § 1963(d)(1)(A), the Court entered an Order on January 31, 1992 restraining assets held in the name of ICIC Investments Ltd. at Oppenheimer & Co., Inc.; Bear Stearns & Co., Inc.; and the Bank of New York through March 2, 1992 at 12:00 noon or until further Order of the Court, and entered a similar Order on February 20, 1992 restraining assets held in the name of ICIC Investments Ltd. at Dean Witter Reynolds, Inc.; Merrill Lynch, Pierce Fenner & Smith; and Mabon Securities Corp. also through March 2, 1992 at 12:00 noon or until further Order of the Court. Pursuant to a motion filed this date by the United States, the Court issued an Order this date extending the expiration of both Restraining Orders until May 1, 1992 at 12:00 noon or until further Order.

In its Motion for Extension of Restraining Order and for Production of Bank Records filed this date, the United States of

1325015-000-10037

America asks the Court to issue a similar Restraining Order against six additional financial institutions not subject to the Restraining Orders of January 31, 1992 or February 20, 1992 which currently hold, have held, or may be holding additional assets in the name of ICIC Investments Ltd. Those institutions are Morgan Stanley & Co.; Shearson Lehman Bros.; Prudential Securities, Inc; Goldman, Sachs & Co.; Thomson McKinnon Securities Inc.; and Balfour Maclaine International Ltd., all of New York, New York.

In consideration of the arguments made in support of the January 31, 1992, February 19, 1992, and February 28, 1992 motions, the Court concludes the action requested and taken here is appropriate, prudent, and in the public interest. Therefore, in accordance with 18 U.S.C. § 1963(d)(1)(A) and the requisites for injunctive relief having been satisfied, and to preserve, as appropriate, the availability of property for forfeiture, it is hereby

ORDERED that:

Morgan Stanley & Co., New York, New York;

Shearson Lehman Bros., New York, New York;

Prudential Securities, Inc., New York, New York;

Goldman, Sachs & Co., New York, New York;

Thomson McKinnon Securities Inc., New York, New York; and

Balfour Maclaine International Ltd., New York, New York

are restrained and enjoined through May 1, 1992 at 12:00 noon or until further Order of the Court, whichever is sooner, from interfering with, moving, transferring, disposing, altering, or

1325015-000-10038

otherwise changing the status quo of any assets held in the name of ICIC Investments Ltd. at those above-named companies.

It is FURTHER ORDERED that service of this Order on those above-named companies shall be made promptly by the United States of America.

No bond is required.

IT IS SO ORDERED.
February 28, 1992
5:20 p.m.

JOYCE HENS GREEN
United States District Judge

1325015-000-10039

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED,

Defendants

CRIMINAL NUMBER
91-0655 (JHG)

FILED

FEB 28 1992

Clerk, U.S. District Court
District of Columbia

ORDER FOR PRODUCTION OF BANK RECORDS

Pursuant to Title 18, United States Code, Section 1963(k), it is hereby ORDERED that the Custodians of Records of all financial institutions that held, at any time during the year 1991, any assets subject to restraint under this Court's Restraining Order of January 31, 1992, as amended on February 20, 1992, and February 28, 1992, shall produce the following records not later than ~~14 days from the date of this Order~~ March 16, 1992 JHL at the Department of Justice, Asset Forfeiture Office, 1400 New York Ave. N.W., 10th Floor, Washington, D.C. 20005.

That is, with respect to the following accounts and any other account or asset held in the name ICIC Investments, Ltd. during the year 1991, each of the financial institutions respectively, shall produce the following records for the period January 1, 1991, through the date of this Order:

1325015-000-10040

Accounts and Assets

Oppenheimer & Co., Inc.	#05391180
Bear Stearns & Co. Inc.	#055-69205 #089-69205
Bank of New York	#180650
Dean Witter Reynolds, Inc.	#032-011104
Merrill Lynch, Pierce Fenner & Smith	
Mabon Securities	#04-4051
Morgan Stanley & Co.	#04-24245
Shearson Lehman Bros.	
Prudential Securities, Inc.	#TNT880170-85
Goldman, Sachs & Co.	#032-34066-3-660
Thomson McKinnon Securities Inc.	
Balfour Maclaine International Ltd.	

Records to be provided

1. Monthly, quarterly, and/or yearly account statements;

2. Deposit tickets, deposited items, credit memos, debit memos, cancelled checks, wire transfers and other documentation of credits and debits;

3. Records relating to any loan, cash advance or repurchase agreement related to the account or asset, or to the holder of the account or asset;

4. Records relating to bank drafts, cashier's checks, or foreign drafts (including applications and copies of cancelled checks) relating to the account or to the holder of the account.

5. Signature cards and other "account opening" documents indicating the time and place the account was opened, the name of

the person(s) opening the account, the names and addresses of the persons exercising control over the account, and the source of the initial deposit.

6. Any and all correspondence relating to the account.

7. Records relating to any time deposit relating to the account or to the holder of the account.

IT IS SO ORDERED.
February 28, 1992
5:25 p.m.

Joyce Hens Green *
JOYCE HENS GREEN
United States District Judge

* It is FURTHER ORDERED that it shall be the responsibility of the United States of America to promptly effectuate service of this Order on the Custodians of Records of all financial institutions subject to this Order.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
- v -	:	Crim. No. 91-0655 (JHG)
	:	
BCCI HOLDINGS (LUXEMBOURG), S.A.	:	Violations:
BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A.	:	18 USC §1962(d) (Racketeering Conspiracy);
BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED	:	18 USC §2 (Aiding and Abetting)
INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED	:	
	:	
Defendants	:	

JOYCE WHITE SMALLEY, Jr.

DEC 19 1991

SUPERSEDING INFORMATION

The United States of America, through its attorneys, the Assistant Attorney General, Criminal Division, Department of Justice, and the United States Attorney for the District of Columbia, respectfully informs the Court:

COUNT ONE

Introduction

At all times material to this Count:

1. The Federal Reserve System ("FRS") was an agency of the United States. The Board of Governors of the FRS ("the Board") had primary responsibility for supervising and regulating activities of bank holding companies and had residual responsibility for United States Offices of foreign banks.

2. The Federal Deposit Insurance Corporation ("FDIC") was an agency of the United States. The FDIC supervised FDIC-insured, state-chartered savings banks which were not members of the FRS. The FDIC examined and supervised those banks under its

SUPERSEDING

1325015-000-10049

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 4/13/92

[redacted] b6 b7C
India, [redacted] Bank of Credit and Commerce International (BCCI), was interviewed at the New York City's District Attorneys Office, 1 Hogan Place, New York, New York. Present and participating in the interview was [redacted] U. S. Department of Justice Trial Attorney. Sitting in on the interview, upon the request of [redacted] New York City Assistant District Attorney. After being advised the identity of the interviewing agent and the purpose of the interview [redacted] provided the following information.

[redacted] began his employment with BCCI in March of 1974, b6 b7C
holding the position of [redacted] AGHA HASAN ABEDI, founder of BCCI, at the United Bank in Pakistan. Because of his position, [redacted] BCCI banks and he would report to ABEDI and the "Supreme Board". [redacted] added that at times he would also report to [redacted] ABEDI. [redacted] stated that the General Managers of the BCCI banks would report directly to ABEDI [redacted] except the accounting and tax audits would go to him directly.

[redacted] was then asked to provide information on b6 b7C
International Credit and Investment Company Holdings [ICIC (H)] and its subsidiaries. [redacted] stated that ICIC (H) was initially set up in 1975 to hold BCCI stock for the founders of BCCI and other high employees of BCCI. In the early 1980's, [redacted] had heard that ICIC purchased approximately 32% of BCCI's stock, which was held by Bank of America, and that the ICIC Staff Benefit Trust was set up to hold 10% of the stock, 10% of the stock was set up for charitable purposes, however [redacted] did not know what was to be done with the last 12% of the stock.

[redacted] stated that in 1990 he found out that ICIC had b6 b7C
started banking activities through ICIC (Overseas), however he did not know when the banking activities initiated. Price Waterhouse (PW) were the auditors for ICIC (O) and the BCC Group,

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Investigation on 4/2/92 at New York, New York File # 29B-WF-171994 S/b F/S-25

by S[redacted] Date dictated 4/7/92 b6 b7C

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b6 b7C

[redacted] stated PW was trying to hide the banking activities from himself and that ABEDI told the auditors that the money was to be held privately. [redacted] indicated that ABEDI needed money, to cover losses at ICIC (O), and that ICIC (O) would receive money diverted from BCC Group depositors. The depositors would not necessarily know about the transfer of funds, according to [redacted] stated [redacted] PW, would have more information on the relationships between ICIC and BCCI.

b6 b7C

[redacted] never saw any documentation regarding the relationships between any ICIC entity and any BCCI entity. [redacted] believed ABEDI [redacted] made the decisions regarding money matters with ICIC (O) and that ABEDI definitely was controlling ICIC Holdings, along with [redacted]

b6 b7C

[redacted] knew very little on ICIC Investment's relationship with the other ICIC entities and BCCI entities. However, he did state that [redacted] BCCI and ICIC, did advise [redacted] had a portfolio of investments to manage for ICIC. [redacted] did not indicate who he was managing this portfolio for nor did he indicate that it was ICIC Investment. [redacted] handled ICIC Investment, however [redacted] believed BCCI, through ABEDI [redacted] was the ultimate controller of ICIC Investment.

b6 b7C

[redacted] knew that ICIC would receive deposits from unlisted sources adding that account # 20071 could be that of SHEIKH ZAYED, ruler of Abu Dhabi. [redacted] stated that if the money going into account # 20071 was not recorded, it would most likely be ZAYED's money going into the account. The money would have to transfer in through someone else's name so ZAYED's name would not be associated with the money.

b6 b7C

[redacted] provided the following names of individuals he felt would have a working knowledge of ICIC Holdings and its subsidiaries: [redacted] All these individuals worked at ICIC.

b6 b7C

[redacted] concluded by stating that not only did money transfer in from BCCI to ICIC, but ICIC would also transfer money to BCCI to cover losses.

29B-WF-171994 **MAINTAIN AS TOP SERIAL** 4/8/92

EPG:epg

This matter is commonly referred to as the BCCI Investigation.

The following seizures are being processed through the United States Attorneys Office, Washington, D.C., pursuant to a criminal plea agreement (criminal forfeitures):

1.	3920-92-F-0115	Bank Account	$ 4,024,342	3/92
2.	3920-92-F-0116	Bank Account	$ 1,283.092.84	3/92
3.	3920-92-F-0117	Bank Account	$ 500,308	3/92
4.	3920-92-F-0118	Bank Account	$ 15,789,646.43	3/92
5.	3920-92-F-0119	Bank Account	$ 583,305	3/92
6.	3920-92-F-0120	Bank Account	$ 12,786,950	3/92
7.	3920-92-F-0121	Bank Account	$ 2,922,107.70	3/92
8.	3920-92-F-0122	Bank Account	$ 65,093,027.79	3/92
9.	3920-92-F-0123	Bank Account	$ 40,240	3/92
10.	3920-92-F-0124	Bank Account	$150,111,348.92	3/92
11.	3920-92-F-0125	Bank Account	$ 25,363,313.42	3/92
12.	3920-92-F-0126	Bank Account	$ 2,662,808.53	3/92
13.	3920-92-F-0127	Bank Account	$ 3,727,520.97	3/92
14.	3920-92-F-0128	Bank Account	$ 15,299,703	3/92
15.	3920-92-F-0129	Bank Account	$ 487,448.84	3/92
16.	3920-92-F-0130	Bank Account	$ 46,285,845	3/92
17.	3920-92-F-0131	Bank Account	$ 73,000	3/92

-36 (Rev. 11-17-88)

C-5

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 4/14/92

TO : SAC, WMFO (29B-WF-171994)

FROM : ADIC, NEW YORK (29B-WF-171994) (RUC)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE 38;
FIF(B); FAG;
OO: WMFO

Re: WMFO Airtel to NYO, dated 3/17/92 and telcall between SA [redacted] NYO and SA [redacted] on 4/2/92. b6 b7C

In referenced communication, WMFO requested the NYO to conduct investigations to determine if there are any assets (cash/stocks/bonds/real estate) being held in the New York area that are in the name of any of the approximately 40 BCCI business entities listed in the referenced communication.

On 4/2/92, SA [redacted] NYO contacted SA [redacted] WMFO, to obtain clarification of WMFO's request. SA [redacted] advised that WMFO was only looking for any information concerning assets that the NYO might be aware of based on previous investigations on the matter. SA [redacted] was advised that NYO was not aware of any BCCI related assets that WMFO was not already apprised of. b6 b7C

Inasmuch as the NYO has completed all the requested investigation, NYO will be placing this matter in an RUC status.

2 - WMFO
1 - New York

MTP/mtp
(4)

SUB

29B-WF-171994-FS-37

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
APR 20 1992
[redacted] TRO FIELD OFFICE

b6 b7C

Approved: [redacted] Transmitted _____ (Number) (Time) Per _____

1325015-000-10104

FD-36 (Rev. 11-17-88)

FBI

TRANSMIT VIA:
☐ Teletype
☐ Facsimile
☒ AIRTEL

PRECEDENCE:
☐ Immediate
☐ Priority
☐ Routine

CLASSIFICATION:
☐ TOP SECRET
☐ SECRET
☐ CONFIDENTIAL
☐ UNCLAS E F T O
☐ UNCLAS

Date 4/28/92

TO : SAC, WMFO (C-5)

FROM : SAC, DENVER (29B-WF-171994) (RUC)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG
OO: WMFO

Re WMFO airtel to Denver, dated 3/17/92.

Denver has noted and indexed the four defendants, the lists of subsidiaries and the list of the associated entities provided in the referenced airtel. Denver will contact WMFO if it is determined that there are any assets being held in any of the above named entities. Denver considers this matter RUC.

(2) - WMFO
2 - Denver
GHN/tls
(4)

29B-WF-171994

Sub-FS-28

DENVER
☐ Admin
WF: ☐

Approved: ☐ [illegible] Transmitted _____ (Number) (Time) Per MAY [illegible] 1992

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b7C

015-000-[illegible]

29B-WF-171994 **MAINTAIN AS TOP SERIAL** 4/8/92
EPG:epg

This matter is commonly referred to as the BCCI Investigation.

The following seizures are being processed through the United States Attorneys Office, Washington, D.C., pursuant to a criminal plea agreement (criminal forfeitures):

1.	3920-92-F-0115	Bank Account	$ 4,024,342	3/92
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3.	3920-92-F-0117	Bank Account	$ 500,308	3/92
4.	3920-92-F-0118	Bank Account	$ 15,789,646.43	3/92
5.	3920-92-F-0119	Bank Account	$ 583,305	3/92
6.	3920-92-F-0120	Bank Account	$ 12,786,950	3/92
7.	3920-92-F-0121	Bank Account	$ 2,922,107.70	3/92
8.	3920-92-F-0122	Bank Account	$ 65,093,027.79	3/92
9.	3920-92-F-0123	Bank Account	$ 40,240	3/92
10.	3920-92-F-0124	Bank Account	$150,111,348.92	3/92
11.	3920-92-F-0125	Bank Account	$ 25,363,313.42	3/92
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14.	3920-92-F-0128	Bank Account	$ 15,299,703	3/92
15.	3920-92-F-0129	Bank Account	$ 487,448.84	3/92
16.	3920-92-F-0130	Bank Account	$ 46,285,845	3/92
17.	3920-92-F-0131	Bank Account	$ 73,000	3/92

29B-WF-171994-29

[redacted]

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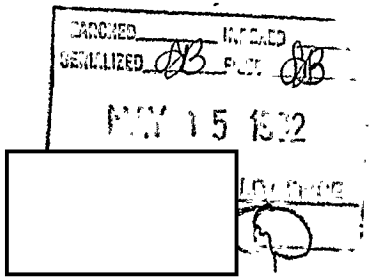
29B-WF-171994 Sub FS - 29A



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b7C

-448 (Rev 5-23-90)

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- ___ Immediate
- ___ Priority
- ✓ Routine

- ___ Top Secret
- ___ Secret
- ___ Confidential
- ___ Sensitive
- ✓ Unclassified

Time Transmitted: _____
Sender's Initials: _____
Number of Pages: 1

To: FBIHQ - Economic Crimes Date: 5/14/92
(Name of Office)

Facsimile number: 202-178-9[illegible]

Attn: SA [redacted] 4-5660
(Name) (No.)

From: WMFO - Forfeiture Team
(Name of Office)

Subject: BCCI Forfeiture

Special Handling Instructions: Fax to SA [redacted] immediately

Originator's Name: SA [redacted] FAST Telephone: 7118/7223

Originator's Facsimile Number: 202-252-7649

Approved: _____

FBI/DOJ

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b7C

1325015-000-10108

29B-WF-171994 Sub FS-29A

Searched
Serialized SAB
Indexed
Filed SAB

1325015-000-10109

******** UF-250 ********** -JOURNAL- ********** DATE JUN-07-1900 ***** TIME 22:30 ********

NO.	COM	DOC	DURATION	X/R	IDENTIFICATION	DATE	TIME	DIAGNOSTIC
28	OK	02	00:00'59	XMT	1	48492	JUN-07	22:29	840450AC7820

MAY 14 10:54 AM '92

1325015-000-10110

29B-WF-171994 Sub FS-30

Searched
Serialized
Indexed
Filed

29B-WF-171994 Sub FS-34

Searched
Serialized
Indexed
Filed

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription May 14, 1992

On April 30, 1992 [redacted] b6 b7C
Bear Stearns and Co., Inc, 245 Park Avenue, New York, New York, [redacted] was interviewed at his place of employment. Sitting in on the interview were [redacted] Attorney, Bear Stearns. After being advised of the purpose of the interview and the identity of the interviewing agent [redacted] provided the following.

[redacted] advised he handled account numbers: 055-69205, 055-20611 and 089-69205 for International Credit and Investment Company (Investments) LTD [ICIC (Inv)]. He further stated that 055-69205 was a cash and commodity account, 089-69205 was a T-bill account which was utilized as collateral for future margin positions and account number 055-20611 was a 'Repo Account'. b6 b7C

A 'repo account' was explained as a contract between a 'Seller' and a 'Buyer'. The seller agrees to buy back a security, which was sold to the buyer from the seller, at some point in time in the future. The time frame can be one day, a set number of days or a call account, where the seller or buyer can call the contract due at any time. If the contract is up, or called, and the seller can not buy back the security, the buyer can sell the security to recoup any losses. If there are any profits for the buyer (more than what the contract called for) the excess goes to the seller.

[redacted] opened the accounts in 1987, the first account being 055-69205 and the others opening up shortly there after. [redacted] directly solicited [redacted] of ICIC (Inv) for the accounts [redacted] Prudential Bache, at that point in time [redacted] ICIC (O). [redacted] advised he only dealt with [redacted] at ICIC (Inv) on any of the investment issues. b6 b7C

[redacted] stated that ICIC (Overseas) [ICIC (O)] was the guarantor on the accounts for ICIC (Inv) and this was done because ICIC (Inv) was not large enough to cover all their accounts. [redacted] stated this was normal practice for institutions to have guarantors and he did not see any relationship between b6 b7C

Investigation on April 30, 1992 at New York, New York File # 29B-WF-171994 SUB F/S

by SA [redacted] Date dictated May 5, 1992 b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 20 1992
FBI - WASH. FIELD OFFICE

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b6 b7C

ICIC (O) and ICIC (Inv) except that ICIC (O) acted as the guarantor for ICIC (Inv). [redacted] added that the investor, in this case ICIC (Inv) can choose any institution to act as their guarantor and that it could have just as easily been almost any bank, if approved by Bear Stearns.

b6 b7C

[redacted] was then asked to identify the following individuals:

[redacted] advised he knew of [redacted] but he never dealt with [redacted] believes [redacted] acted as an outside investment advisor for [redacted] would at times refer to [redacted] advise. [redacted] worked for the Bank of Credit and Commerce (BCCI).

b6 b7C

[redacted] in the Grand Cayman Islands, possibly at the ICIC House (office). [redacted] believes [redacted] was in some sort of management capacity, however [redacted] did not recall if it was with ICIC (O) or ICIC (Inv). [redacted] knew that [redacted] did sign some documents, which were needed for Bear Stearns.

[redacted] stated [redacted] was the [redacted] ICIC (Inv), but his only dealings with [redacted] were with the signing of some documents.

b6 b7C

[redacted] recalled the name but does not recall ever having met [redacted] knew he never dealt with [redacted]

b6 b7C

[redacted] at the ICIC Foundation in London, which is in the same building as BCCI. [redacted] believes [redacted] ICIC (Inv) [redacted]

b6 b7C

[redacted] on a couple occasions and [redacted] impression was that [redacted] was an accountant at ICIC (Inv).

b6 b7C

[redacted] was not familiar with the names AGHA HASAN ABEDI [redacted] He was not familiar with Sheik ZAYED, except that he recalls the name from the newspapers as being some ruler of some Arab country.

b6 b7C

[redacted] reiterated the fact that he only dealt with [redacted] on the ICIC (Inv) accounts and that he was only using ICIC (Inv) money. The money which transferred into the accounts would come from Security Pacific Bank, he did not recall the account number from which the money transferred in from, and the money which transferred out of the ICIC (Inv) accounts would (95% of the time) transfer to Bank of New York (account number 180650).

[redacted] advised that he did handle a very small account, which was very inactive, for BCCI (Luxembourg) [redacted] BCCI (Lux), which [redacted] dealt with, was [redacted] stated he was referred to [redacted] There was never any transfer of money between the BCCI (Lux) account and the ICIC (Inv) accounts.

Regarding the 'repo account' there was*p1689Xanytime execthat Bear Stearns had to a sale of securities because of an ICIC (Inv) failure to repay on the loan. [redacted] stated the ICIC (Inv) accounts were always handled on a very professional basis. [redacted] believed ICIC (O) and ICIC (Inv) were two different entities, based on the fact there were separate financial statements and there was never any indication by anyone at ICIC (Inv) that the two entities were similar. [redacted] advised the other two ICIC (Inv) accounts were handled by [redacted] who is currently in Pakistan setting up a Bear Stearns office.

Finall[redacted] was asked to identify and explain some documents.

[redacted] stated document number 1 is an application for a DVP account (Dealing versus Payment account) between ICIC (Inv) and Bear Stearns.

Document number 2 is also an application for a new account for ICIC (Inv) [redacted] however it was not [redacted] account, it was [redacted] account. [redacted] did state that there is no cash or securities in the account and the signature at the bottom would have been a Bear Stearns Senior Manager.

Document number 5 was identified as a 'Guarantee Agreement' between ICIC (O) and Bear Stearns, in that ICIC (O) guarantees Bear Stearns that should ICIC (Inv) fail to make a payment on an account ICIC (O) will make the payment. [redacted] advised that only the guarantor signs the agreement, so there

will be no ICIC (Inv) signature on the document.

[redacted] stated that document number 6 is a 'Master Repurchase Agreement' between Bear Stearns and ICIC (Inv). [redacted] added that there would have been only one of these agreements signed and it would have covered any and all of the ICIC (Inv) repurchase accounts. [redacted] is generally the individual at Bear Stearns who signs the repurchase agreements, [redacted] worked in Bear Stearns credit department.

[redacted] advised that document number 8 is part of the 'Commodity Customer Agreement Corporate Resolution', which is account number 055-69205. The document indicates to Bear Stearns who at ICIC (Inv) are officers and who can act on ICIC (Inv) behalf.

[redacted] stated that document number 9 is an internal Bear Stearns document which is taken for credit purposes.

Finally [redacted] did not know what document number 11 was, however [redacted] advised it was part of the 'Corporate Resolution' that authorizes the guarantee between ICIC (O) and ICIC (Inv). [redacted] did not know whose form it was, ICIC (O) or ICIC (Inv).

29B-WF-171994 SubFS-35

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Serialized
Indexed
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FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 05/17/92

[redacted] Oppenheimer & Co., Inc., Oppenheimer Tower, World Financial Center, New York, [redacted] was contacted at his place of employment. Sitting in on the interview were [redacted] Oppenheimer & Co., Inc., and [redacted] Attorney, Weil, Gotshal and Manges, 767 Fifth Avenue, New York, New York. [redacted] advised he mainly represents Oppenheimer. After being advised the identity of the interviewing agent and the purpose of the interview [redacted] provided the following. b6 b7C

[redacted] stated that the account 053-91180, which was the International Credit and Investment Company (Investment) Ltd [ICIC (Inv)] account, was mainly handled by himself, however [redacted] (who has moved to England) and [redacted] (who left Oppenheimer in 1990) also were account executives on the account. [redacted] reiterated that he was the main account executive. b6 b7C

[redacted] originally opened the account in 1984, while employed at E.F. Hutton, the account was opened in the name of ICIC (Overseas) [ICIC(O)]. The account was opened by [redacted] and it was a Credit Line (Repurchase Line) account. This type of account is referred to as a 'Repo account' and was explained in simple terms as follows: It is a contract between a 'seller' and a 'buyer', the seller agrees to buy back a security, which was sold to the buyer from the seller, at some point in the future. The time frame can be one day, a set number of days or a call account, where the seller or buyer can call the contract due at any time. If the contract is up, or called, and the seller can not buy back the security, the buyer can sell the security to recoup any losses. If there are any profits for the buyer (more than what the contract called for) the excess profit goes to the seller. b6 b7C

After working at E.F. Hutton [redacted] went to work at Thomson McKinnon Securities, Inc., he brought along the ICIC account and finally [redacted] moved to Oppenheimer again bringing the account along with him. While the account was at Oppenheimer [redacted] wanted the money in the ICIC (O) account moved out and put b6 b7C

Investigation on 04/30/92 at New York, New York File # 29B-WF-171994

by SA [redacted] Date dictated 05/05/92 b6 b7C

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b6 b7C

into a new account with the name ICIC (Inv), [redacted] stated it would be a way to distinguish between the private accounts. Originally all the money was in the ICIC (O) account and over a short period of time ICIC (O) was emptied and ICIC (Inv) ended up with the Credit Line (Repurchase) account. [redacted] could not recall the time frame of the switch nor could he recall the manner in which the money transferred over to ICIC (Inv). He did not know if the money from ICIC (O) transferred out of the investment firm and then back into the ICIC (Inv) account or if the money just transferred directly over to ICIC (Inv).

b6 b7C

When the account transferred to ICIC (Inv) [redacted] dealt with [redacted] understood that all three worked for ICIC (O).

b6 b7C

[redacted] advised when the account first opened up under ICIC (O) it was his understanding, as well as others at E.F. Hutton, that ICIC (O) was owned by the Bank of Credit and Commerce International (BCCI), however there was never any written documentation.

b6 b7C

[redacted] stated that money would transfer into and out of the account mainly through Security Pacific Bank, [redacted] did not recall the account number at Security Pacific, but would try and provide it later. Bank of New York was also used on some occasions to transfer money in and out of the ICIC (Inv) account.

b6 b7C

[redacted] advised that while he was at Thomson McKinnon he also handled a BCCI (Overseas) [BCCI (O)] account. He dealt with [redacted] stated that at Thomson McKinnon there were very strict instructions not to transfer money between BCCI (O) and the ICIC accounts. Oppenheimer, for credit purposes, treated BCCI (O), ICIC (O) and ICIC (Inv) as the same entity.

b6 b7C

There was never a large cash movement on the account, just a few million. [redacted] never had to execute a 'repo' on the account with ICIC (Inv) (i.e. selling the security because ICIC (Inv) failed to bay back the money/loan).

b6 b7C

[redacted] was then asked if he knew of the following individuals.

b6 b7C

[redacted] BCCI and he also knew [redacted] lived in London. [redacted] advised

b6 b7C

[redacted] had some role in the ICIC (Inv) account, possibly as an advisor, however [redacted] took no orders from [redacted] when it came to the investments.

[redacted] for twenty years, prior to BCCI and ICIC, he also knew [redacted] ICIC (O) as [redacted] to the best of his knowledge, had no dealing with [redacted] except for one letter.

[redacted] had some dealings with [redacted] and he believed [redacted] ICIC (O). [redacted] initially signed on some of the documents for the opening of the ICIC (Inv) account.

[redacted] stated he knew of [redacted] but he had no dealings with [redacted]

[redacted] only remembered dealing with [redacted] on one occasion and it had nothing to do with the account. [redacted] thought [redacted] out of London, but [redacted] never was told what specific duties [redacted] performed.

[redacted] at BCCI. [redacted] never had any contact with [redacted] regarding the ICIC (Inv) account.

AGHA HASAN ABEDI - [redacted] knew ABEDI as being the number one man at BCCI, but he never had any dealings with ABEDI.

SHEIK ZAYED - [redacted] thought ZAYED owned everything in regards to BCCI.

Finally [redacted] was asked to identify and explain some documents.

[redacted] advised that document number 1 was a new account application and he called it a DVP (dealing versus payment). In this instance the security would go to the Bank of New York and the cash would go to Oppenheimer. [redacted] stated that document 1a he had not seen before, but [redacted] theorized that possibly the account was opened as just ICIC and not ICIC (Inv).

Document numbers 2 and 2a-2e are pages from an account statement from account number 053-91180. The social security/tax

 b6 b7C

I.D. number is just an internal identification code for Oppenheimer in order to prevent a 20% tax withholding, all overseas companies would have the same I.D. number. The 'BUY' in the transaction column means Oppenheimer is purchasing the security from ICIC (Inv) (i.e. Oppenheimer is lending money to ICIC (Inv)). The 'SELL' means that ICIC (Inv) is reselling the security back to Oppenheimer. The 'JRL', 'REC' and 'DEL' are in house identifications of movement.

Document number 3 is also a page from an account statement, the 'WIR' in the transaction column indicates that funds are being moved.

Document number 4, which is a letter dated September 4, 1991 and was regarding the cash and securities held for ICIC (Inv). [redacted] never saw the letter, however [redacted] to whom the letter was addressed, stated he recalled the letter and had no idea why the money in the ICIC (Inv) account was requested by the Joint Provisional Liquidators of ICIC (O) to be transferred to ICIC (O). b6 b7C

Document number 5, also a letter regarding the ICIC (Inv) account and requesting that the cash and securities held by ICIC (Inv) be transferred to ICIC (O). [redacted] does not recall seeing the letter, however [redacted] does recall receiving some telephone calls from the Cayman Islands. These calls were regarding the ICIC (Inv) account and were from the liquidators, ICIC and Attorneys, he did not recall and specific names. b6 b7C

Document number 6 is a Grand Cayman Court Order regarding ICIC (O). [redacted] never saw the document, however [redacted] does remember receiving the document but does not recall of any specific action taken on the Court Order, mainly because he did not know to what account it referred. b6 b7C

Document number 7 is a letter from [redacted] an Attorney at Hunter and Hunter, addressed t[redacted] dated September 23, 1991 regarding the ICIC (Inv) account. [redacted] never saw the letter before. [redacted] stated that the letter refers to Oppenheimer not transferring the cash and securities to ICIC (O) from the ICIC (Inv) account. Oppenheimer did not transfer the assets because Oppenheimer viewed the two entities as two different accounts and until there was clarification Oppenheimer was not going to follow the instructions. b6 b7C

b6
b7C

Document number 12 is entitled 'Master Repurchase Agreement' and it is between Oppenheimer and BCCI (O). [redacted] stated there should have been a similar signed agreement between Oppenheimer and ICIC (Inv). This document gives the terms of the repurchase accounts.

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29B-LV-171994 Serials -37

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1325015-000-10156

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 6/6/92

[redacted] Bank of Credit and Commerce International (BCCI) and International Credit and Investment Company, Holdings (ICIC Holdings), contacted the writer, via telephone, and advised he was currently in Pakistan and would be there until at least some time in July. After being advised the identity of the interviewing agent and the purpose of the interview, [redacted] provided the following. b6 b7C

[redacted] advised he had worked for ICIC Holdings until 1979 at which time he then started working for BCCI. b6 b7C

[redacted] stated ICIC (Investments) Ltd was set up because in 1985 BCCI had a large loss in option trading. ICIC (Investments) invested in government bonds and was an off shoot of ICIC (Overseas) Ltd, both ICIC (Investments) and ICIC (Overseas) were 100% owned by ICIC Holdings. [redacted] advised that ICIC (Overseas) was in the business of Merchant Banking, but prior to ICIC (Investment) being formed, ICIC (Overseas) would also conduct option trading. b6 b7C

[redacted] ICIC (Investments), but gave no instructions on the actual investing of ICIC (Investments) funds. [redacted] at ICIC (Investments), would seek advise from [redacted] stated [redacted] ICIC (Investments). [redacted] advised that there were "many clients" of ICIC (Investments) and the trading was in futures and bonds. b6 b7C

[redacted] stated AGHA HASAN ABEDI [redacted] had direct say over both ICIC (Overseas) and ICIC (Investments), however [redacted] did not know if either ABEDI [redacted] had any personal funds in ICIC (Investments). b6 b7C

[redacted] did not know the where [redacted] was currently living. He also did not know where [redacted] was currently living, however he did know that [redacted] had worked on the financial books of BCCI and ICIC. b6 b7C

Investigation on 6/6/92 at WASHINGTON, D.C. File # 29B-WF-171994 Sub F/S

by SA [redacted] Date dictated 6/6/92 b6 b7C

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29B-WF-171994 Sub FS-38

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 6/18/92

[redacted] b6 b7C
[redacted] TN, [redacted] was telephonically contacted along with his attorney [redacted] Chadwater, Wickersham & Taft, 440 Will Palm Way, Palm Beach, Florida. After being advised the identity of the interviewing agent and the purpose of the interview, [redacted] provided the following.

[redacted] Shearson, a brokerage firm, he was introduced to [redacted] International Credit and Investment Company (Investments) Ltd [redacted] (Inv)], [redacted] could not recall who introduced him to [redacted] Later while working at Paine Webber, [redacted] called ICIC (Inv) to solicit their business. b6 b7C

[redacted] advised he had made several calls to ICIC (Inv), speaking with [redacted] before getting the account. [redacted] also had received financial statements from ICIC which indicated that ICIC held an option on stock in the Bank of Credit and Commerce International (BCCI). [redacted] was told, by [redacted] that the option on stock in BCCI was not the banks (ICIC), they were holding it for a client. They never stated the clients name. [redacted] advised there was an ongoing concern, early on in the relationship between Paine Webber and ICIC, that ICIC and BCCI were related. Once Paine Webber was satisfied that there were no ties between ICIC and BCCI, Paine Webber took the ICIC (Inv) account. [redacted] stated the concern was that the credit report and financial statements of ICIC were accurately reported. b6 b7C

[redacted] stated all the accounts he handled for ICIC (Inv) were repurchase accounts. [redacted] had no specific knowledge as to where the money, in the ICIC (Inv) accounts, came from; he believed the money came from different brokerage houses which ICIC (Inv) was no longer using. [redacted] did not know if the money in the accounts belonged to any particular individual. [redacted] stated the money which went in and out of the accounts, he managed for ICIC (Inv), cleared through the Bank of New York. b6 b7C

[redacted] was then asked about his knowledge of the following individuals. b6 b7C

Investigation on 6/15/92 at Washington, D.C. File # 29B-WF-171994 SJ, F/S

by SA [redacted] Date dictated 6/17/92 b6 b7C

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1325015-000-10159

 b6 b7C

[redacted] to be the [redacted] ICIC (Inv), he did not speak with [redacted] often, but [redacted] would fax to [redacted] the transactions which occurred on the ICIC (Inv) account. b6 b7C

[redacted] stated he knew [redacted] name was on the account, but [redacted] could not recall if he ever dealt personally with [redacted] on anything. b6 b7C

[redacted] explained he met [redacted] near the end of the relationship with ICIC (Inv). He met [redacted] in the Cayman Islands and they went over the numbers on the accounts. [redacted] concluded the $ 700 was owed to ICIC (Inv). b6 b7C

[redacted] advised he met [redacted] on one occasion. [redacted] took [redacted] to London to meet [redacted] they met at a restaurant. The meeting occurred early in the relationship between [redacted] and ICIC. They met to discuss the possibility of [redacted] getting more business from ICIC (Inv). b6 b7C

[redacted] had no knowledge about [redacted] AGHA HASAN ABEDI and SHEIK ZAYED. b6 b7C

[redacted] advised that [redacted] Canada and is willing to speak with the FBI. [redacted] provided [redacted] b6 b7C

ZAIB-WF-171914 SUBFS -40

SEARCHED INDEXED
SERIALIZED FILED
JUN 18 1992
FBI

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b7C

FD-302 (Rev. 3-10-82)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 6/6/92

[redacted] Oppenheimer & Co., Inc, Oppenheimer Tower, World Financial Center, New York, New York, [redacted] was contacted telephonically at his employment in a follow-up to an interview conducted on April 30, 1992, also sitting in on the telephone call was [redacted] Oppenheimer & Co., Inc. [redacted] provided the following information.

[redacted] provided the present living locations of the following. [redacted] is in some type of private business in Canada. [redacted] stated he would try and get a number for [redacted] is living in Pakistan. [redacted] is also living in Pakistan. [redacted] is living in the Grand Cayman Islands. [redacted] travels all over the United Kingdom and possibly the United States, however [redacted] stated [redacted] may be working for the Cromwell Hospital in London, England. [redacted] is unemployed and living in England.

[redacted] stated ICIC (Inv) had no money on the books at Oppenheimer just a line of credit which was based on a balance sheet of ICIC (Inv). The collateral used for the accounts of ICIC (Inv) were government notes and bonds. [redacted] personal belief was all the money was SHEIK ZAYED.

Investigation on 6/2/92 at WASHINGTON, D.C. File # 29B-WF-171994 SUB F/S

by SA [redacted] Date dictated 6/6/92

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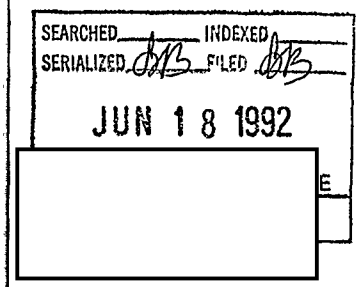
298-WA-1719945ubFS -41



b6
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1325015-000-10164

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 6/6/92

[redacted] Bear Stearns and Co., Inc, 245 Park Avenue, New York, New York, [redacted] was contacted telephonically, in a follow-up to an interview which was conducted on April 30, 1992. Present on the telephone call was [redacted] Bear Stearns. [redacted] provided the following information. b6 b7C

[redacted] did not know where [redacted] was presently living, but he knew that [redacted] had family living in Toronto Canada. [redacted] last contact with [redacted] was in July of 1991. b6 b7C

[redacted] did not know where [redacted] was currently living. b6 b7C

Investigation on 6/4/92 at WASHINGTON, D.C. File # 29B-WF-171994 SJ F/S

by SA [redacted] Date dictated 6/6/92 b6 b7C

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Z93-CHF-171994 Sub F-42

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SERIALIZED FILED
JUN 18 1992

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 6/6/92

[redacted] Goldman Sachs, 85 Broad Street, New York, New York and [redacted] by Merrill Lynch at their London Trading Desk telephone number [redacted] was contacted telephonically. After being advised the identity of the interviewing agent and the purpose of the interview, he provided the following information. b6 b7C

[redacted] Goldman Sachs where he handled the account of International Credit and Investment Company (Investments) Ltd [ICIC (Inv)]. He recalled ICIC (Inv) dealt strictly with government securities and mortgage backed securities and that ICIC (Inv) was very active in 1985 and 1986. b6 b7C

[redacted] advised that Goldman Sachs also handled accounts in the name of the Bank of Credit and Commerce International (BCCI) and even though BCCI and ICIC appeared to be similar, to Goldman Sachs, ICIC (Inv) officials insisted that everything be completely separate. b6 b7C

[redacted] stated that in 1986 there were rumors that parts of BCCI and ICIC had lost a large amount of money so Goldman Sachs curtailed their dealings with ICIC (Inv). [redacted] always knew the accounts as being held in the name of ICIC (Inv) and never in the name of ICIC (Overseas). b6 b7C

[redacted] was visiting BCCI/ICIC in London. [redacted] believed that [redacted] was the [redacted] ICIC, [redacted] BCCI. When asked again about [redacted] association with both BCCI and ICIC, [redacted] stated again he believed that [redacted] worked for ICIC and was in an advisor to BCCI, however added he only met [redacted] twice and the associations as he believes could be reversed. b6 b7C

[redacted] once in the Grand Cayman Islands. [redacted] ICIC (Inv), as far a [redacted] could remember, and [redacted] most often dealt with [redacted] one time in order to receive credit information on ICIC (Inv). [redacted] knew of [redacted] b6 b7C

Investigation on 6/1/92 at WASHINGTON, D.C. File # 29B-WF-171994 Sub F/S

by SA [redacted] Date dictated 6/6/92 b6 b7C

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[redacted] ICIC (Inv). [redacted] but never dealt with [redacted] believed [redacted] dealt with foreign accounts at ICIC (Inv).

b6
b7C

[redacted] advised that all the transactions he dealt with were conducted through ICIC (Inv). [redacted] also believed that all the funds used for or received from a transaction belong to ICIC (Inv) and that no funds would cross over to or from BCCI.

I-35 (Rev. 8-28-86)

C-5

b6
b7C

FBI

TRANSMIT VIA:
[X] Teletype
[ ] Facsimile
[ ] AIRTEL

PRECEDENCE:
[X] Immediate
[ ] Priority
[ ] Routine

CLASSIFICATION:
[ ] TOP SECRET
[ ] SECRET
[ ] CONFIDENTIAL
[ ] UNCLAS E F T O
[X] UNCLAS

Date 7/2/92

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO FBI DALLAS/IMMEDIATE/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO:WMFO.

RE WMFO AIRTEL TO DALLAS, DATED 3/17/92.

RE AIRTEL ADVISED DALLAS OF THE FORFEITURE AGREEMENT BETWEEN THE BANK OF CREDIT AND COMMERCE (BCCI) AND THE INTERNATIONAL CREDIT AND INVESTMENT COMPANY (ICIC).

[redacted] ICIC [redacted] WHO IS IN HIS FIFTIES. WMFO HAS RECEIVED INFORMATION THAT [redacted] IS POSSIBLY LIVING IN THE DALLAS AREA.

b6
b7C

LEADS. DALLAS; AT DALLAS, TEXAS.

DALLAS WILL CONDUCT ALL LOGICAL INVESTIGATION (INDICES CHECKS, CREDIT CHECKS, POLICE RECORDS, TELEPHONE DIRECTORIES)

29B-WF-171994
Searched
Serialized
Indexed
Filed
Sub FS-43

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[redacted]

Approved: [redacted] SL Original filename:

Time Received: Telprep filename: SEF00150.188

MRI/JULIAN DATE: 1150/188 ISN: 028

FOX DATE & TIME OF ACCEPTANCE: 6 July 1992

89250015000-10169

TO DETERMINE IF [redacted] IS LIVING IN THE DALLAS AREA. [redacted]

b6
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BT

1150/188

UNKNOWN command of:

/READ 1150/188
0000 MRI 01150

OO FBIDL

DE FBIWMFO #0028 1882040

ZNR UUUUU

O 062034Z JUL 92

FM FBI WMFO (29B-WF-171994) (P) (C-5)

TO FBI DALLAS/IMMEDIATE/

BT

UNCLAS

CITE: //3920//

SUBJECT: HIDDEN INTERESTS; MAJOR CASE #38; FIF; FAG; OO:WMFO.

RE WMFO AIRTEL TO DALLAS, DATED 3/17/92.

RE AIRTEL ADVISED DALLAS OF THE FORFEITURE AGREEMENT BETWEEN THE BANK OF CREDIT AND COMMERCE (BCCI) AND THE INTERNATIONAL CREDIT AND INVESTMENT COMPANY (ICIC).

[redacted] ICIC [redacted] WHO IS IN HIS FIFTIES. WMFO HAS RECEIVED INFORMATION THAT [redacted] IS POSSIBLY LIVING IN THE DALLAS AREA.

b6
b7C

LEADS. DALLAS; AT DALLAS, TEXAS.

DALLAS WILL CONDUCT ALL LOGICAL INVESTIGATION (INDICES

29B-WF-171994 SWB FS-43

DECODED ENCODED
SERIALIZED FILED

JUL 15 1992

[redacted]

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1325015-000-10171

CHECKS, CREDIT CHECKS, POLICE RECORDS, TELEPHONE DIRECTORIES)

TO DETERMINE IF [redacted]HEM/ABYE
NI IS LIVING IN THE DALLAS

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AREA. [redacted]

BT

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29B-WF-171994 Sub FS-44

Searched
Serialized
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DJB-HF-171994 Sub FS - 46

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FBI - BOSTON

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Serialize
Attachments

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FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE

- ___ Immediate
- ___ Priority
- ✓ Routine

- ___ Top Secret
- ___ Secret
- ___ Confidential
- ___ Sensitive
- ✓ Unclassified

Time Transmitted: _____

Sender's Initials: _____

Number of Pages: 2

To: FBIHQ FSPU Date: 9/21/92
(Name of Office)

Facsimile number: 202-324-9720

Attn: FSPU [redacted] 4-9700
(Name) (Phone No.)

b6
b7C

From: FSPU
(Name of Office)

Subject: BCCI

Special Handling Instructions: _____

Originator's Name: SA [redacted] FAST (A-6) Telephone: 202-252-7223

b6
b7C

Originator's Facsimile Number: 202-252-7649

Approved: [signature]

FBI/DOJ

1325015-000-10177

29B-WF-171994 SubFS-46A

Searched
Serialized AB
Indexed
Filed AB

1325015-000-10178

******* UF-250 ********** -JOURNAL- ********** DATE SEP-02-1992 ***** TIME 02:20 ********

NO.	COM	DOC	DURATION	X/R	IDENTIFICATION	DATE	TIME	DIAGNOSTIC
26	OK	02	00:01'38	XMT	T 49720	SEP-02	02:18	840440AC0800

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SEP. 2. 2 PM '92

********** -PANASONIC- **********

1325015-000-10179

29B-WF-171994 Sub FS -48

Searched
Serialized JB
Indexed
Filed JB

Memorandum

To : SAC, WMFO (29B-WF-171994)(P)(BCCI) Date 12/11/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

On 12/10/92 SA [redacted] met with [redacted] b6 b7C Attorney, Department of Justice (DOJ), Asset Forfeiture Office (AFO), to discuss forfeiture matters as they relate to [redacted] who has previously been convicted of fraud but not yet sentenced, had provided DOJ-AFO with eight volumes of properties which he claims BCCI has some interest in, thus there is forfeitable assets. b6 b7C

The writer did a quick review (a copy of which is attached) of the provided documents and determined that [redacted] had information on about $ 49 million worth of loans/mortgages that BCCI had written. However, $ 43.7 million of these loans/mortgages have previously been satisfied or released by BCCI, so the remaining outstanding balances (based on the original values of the loans/mortgages) is about $ 5.4 million. b6 b7C

The DOJ-AFO will determine what type of actions can and will be taken against the information which [redacted] provided. b6 b7C

The writer also provided [redacted] with the information concerning the CAPCOM loans in order for the DOJ-AFO to begin possible forfeiture proceedings. b6 b7C

1 - WMFO (29B-WF-171994 SUB FS)

RHM;rhm

29B-WF-171994 Sub FS -50

[redacted] b6 b7C

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 14 1992
[redacted] OFFICE

1325015-000-10185

The following lists are a quick review of the eight volumes of documents which were provided by [redacted] There has been no additional research conducted on the loans/mortgages. b6 b7C

The first list is simply the main information from the loans/mortgages as they appear in the volumes.

The second list consists of loans/mortgages in which BCCI(O) may still have some interest, thus there may be some way to recover for forfeiture (property/receivables).

The third list consists of loans/mortgages which have either been satisfied or released by BCCI(O), assigned to BCCI SA (which the NY or CA liquidators would handle) or another bank.

The fourth list consists of loans/mortgages which there is no indication that BCCI or any of its entities had any say in the deals.

The fifth list consists of UCC-1 FILINGS which appear not to be associated with any other loan/mortgage. This list is broken down into two sections: The first are UCC-1 FILINGS which appear to still be opened. The second are UCC-1 FILINGS which appear to be closed.

The following is a key to the headings of the lists:

PROPERTY - Real estate or UCC-1 Filings

BORROWER - Individual or Company

VALUE - Value of the original loan/mortgage (YR)

O/SA - O(YR) - BCCI(O) SA(YR) - BCCI SA

R/T/S/A - R(YR) - Released T(YR) - Terminated
S(YR) - Satisfied A(YR) - Assigned
If this column is empty that indicates the loan may still be opened.

The quick review indicates that at the most there is a possibility of a total of $ 5,423,000 worth of loans/mortgages, using the original value of the loans/mortgages. Given the time some of these loans/mortgages were written at, the outstanding balances are more likely significantly less than the $ 5.4 million.

BCCI(O) wrote a significant number of balloon payment loans/mortgages, which is why many of the loans/mortgages have been paid off in a few years.

The liquidators should and will be provided the list of borrowers to see if they have or will process some of the loans/mortgages. There are some BCCI SA loans/mortgages listed already.

There was approximately $ 43,766,600 worth of BCCI(O) loans/mortgages which were either released, satisfied, terminated or assigned to either BCCI SA or other banks.

The following is a list of the main information regarding the loans/mortgages as they appear in the volumes. Every listed loan/mortgage should appear in the order which they appear in the volumes which were provided by [redacted] b6 b7C

VOLUME 1 - BEGINS

PROPERTY	BORROWER	VALUE	O/SA	R/T/S/A
GROVE ISLE CLUB CONDO PARCELS				
C1201	SELTON CO. N.V.			
C502	INVERSIONES GURALCA C.A.			
C1502	CHANDLER CORP			
C803	INMOBILIARIA VEPAR			
C903	INTER-AMERICAN GEMCO, LTD			
C905	DELITE INTERNATIONAL, S.A.			
C906	MOORFIELDS LTD			
C806	MOUNTAIN TOP INVESTMENTS, N.V.			
C1206	[redacted] b6 b7C			
C605 & C607	AKOLA INVESTMENTS, N.V. (CURACAO CORP CO N.V.)			
C907	MARMUT INVESTMENT CORP			
C1008	[redacted]			
C1108	ST STEPHENS INVESTMENT LTD			
C1109	ATTEMPT CORPORATION			
C1509	A.B.I. COMPANY N.V.			
C1809	INVERSIONS LA FLORESTA			
C810	ROCIOMAR CORP, S.A.			
C1010	MYLENE CORP, N.V.			
C1710	[redacted]			
C1810	INVERSIONS LA FLORESTA			

VOLUME 1 - CONT.

C1702 & C1704 [redacted] b6 b7C

None of the above listed borrowers/buyers appear to be associated with BCCI or any of its entities, known to this date (12/2/92). None of the documents provided by [redacted] indicate that BCCI or its entities had a say in the deals. b6 b7C

GROVE ISLE CONDO B1010	[redacted]	300,000(84)	O(84)	b6 b7C
UCC-1 FILING	" "		O(84)	R(85)
A904	" "	100,000(86)	SA(86)	R(91)
REAL ESTATE	[redacted]	190,000(85)	O(85)	
REAL ESTATE			SA(86)	
[redacted]	FORECLOSURE ACTION		SA(90)	
	[redacted]	190,000(88)	SA(88)	
(RE: KIDOKO, INC.)	[redacted] [NY LIQ.]			

GROVE ISLE CONDO B1409	[redacted]		SA(86)	

An individual by the name of [redacted] acted as 'a trustee, a mortgagee' on behalf of BCCI SA. [NY LIQ.]

REAL ESTATE	[redacted]	200,000(85)	O(85)	R(87)
UCC-I FILING	" "		O(83)	R(85)
REAL ESTATE	[redacted]	150,000(88)	O(88)	
REAL ESTATE	[redacted]	180,000(85)	O(85)	

BCCI(O) then sells the property to [redacted] [redacted] Its not clear whether BCCI has a current mortgage on the property.

ARLEN KING COLE CONDOS UNIT # 903	[redacted]		O(87)	
903			O(88)	
UCC-1 FILING	MARINE TRAILERS ENTERPRISES		O(87)	R(88)
UCC-1 FILING	SAMCO ENTERPRISES ASSIGNED TO SA 12/21/90		O(84)	R(91) A(90)

VOLUME 1 - CONT.

REAL ESTATE	[redacted] 1.2 MIL(88) ON BEHALF OF SAMCO GLOBAL ARMS (2ND MORTGAGE) ASSIGNED TO SA 12/21/90		O(88)	R(91) A(90)
REAL ESTATE	[redacted] 1.2 MIL(88) ON BEHALF OF SAMCO GLOBAL ARMS ASSIGNED TO SA 12/21/90		O(88)	R(91) A(90)
UCC-1 FILING	SAMCO GLOBAL ARMS ASSIGNED TO SA 12/21/90		O(90)	R(91) A(90)
UCC-1 FILING	ABC PARTY RENTALS		O(87)	
UCC-1 FILING	AVANTI, USA, FURNITURE		O(84)	
UCC-1 FILING	BENTOR INDUSTRIES		O(88)	R(88)
UCC-1 FILING	CALUMET TOBACCO & GIFT		O(90)	
UCC-1 FILING	COMPUTOWER CORP (CALIFORNIA LIQ. ARE HANDLING)		O(SA)	
UCC-1 FILING	DIAMOND KNITWEAR INC.		O(82)	R(82)
UCC-1 FILING	EXPRESS PREMIUM FINANCE CHANGED TO ZAMINCO FREEDOM TOWER, INC. (88) [PART OF NY INFO SENT TO FBI/DOJ]		O(86)	
UCC-1 FILING	EZCONY INTL. CORP		O(88)	R(88)
UCC-1 FILING	FAR EAST SUPPLIERS, INC.		O(SA)[90]	
UCC-1 FILING	FERTILIZER CORPORATION OF AMERICA		O(88)	T(89)
UCC-1 FILING	FIDDLES AT THE BAKERY CENTER INC.		O(86)	
UCC-1 FILING	FT MYERS RAMADA INN, INC		O(84)	T(87)
UCC-1 FILING	INTERWORLD ELECTRONICS		O(84)	T(87)
UCC-1 FILING	KIDCO INC. [NY LIQ]		O(86)	
UCC-1 FILING	KIRPALANIS LTD (USA) INC		O(86)	
UCC-1 FILING	LA MONTRE, INC		O(88)	T(90)

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VOLUME 1 - CONT.

UCC-1 FILING	LUXURY WATCH CO.		O(89)	T(90)
UCC-1 FILING	MCENEARNAY ALSTONS FL.		O(87)	T(88)
UCC-1 FILING	MICROSUMM, INC.		O(83)	
UCC-1 FILING	MIAMI AUTO TAG AGENCY		O(86)	T(90)
UCC-1 FILING	MICROSUMM, INC.		O(84)	
UCC-1 FILING	MOONBELT DEV. CORP. BCCI(O) ASSIGNED RIGHTS TO: J & D FINANCIAL CORP [IN 87]		O(86)	
UCC-1 FILING	ROS INTERNATIONAL, INC		O(88)	
UCC-1 FILING	RUBY INTERNATIONAL INC.		O(86)	T(90)
UCC-1 FILING	SWEET DONNY'S INC		O(90)	
UCC-1 FILING	VENDEX INTERNATIONAL, INC		O(84)	
UCC-1 FILING	VENDEX INTERNATIONAL, INC		O(89)	T(90)
UCC-1 FILING	ZAMINCO FREEDOM TOWER [OURS FROM NY LIQ]		O(89)	
UCC-1 FILING	KNONOVN INC. UCC-3 FILING KNONOVN - AMENDMENT		O(86) O(86)	
UCC-1 FILING	ZEUS DISTRIBUTOR, INC.		O(88)	T(90)
REAL ESTATE	SKIP PROPERTIES, N.V. AMENDED TO	1.5MIL (88) 1.97MIL(90)	O(88)	S(90) S(90)
UCC-1 FILING	SKIP PROPERTIES, N.V.		O(88)	
UCC-1 FILING	SASSON MANAGEMENT CORP		O(88)	T(90)
REAL ESTATE	LITTLE ARCH CREEK PROPERTIES [CALIFORNIA LIQ] ASSIGNED TO SA 12/21/90	8 MIL (89)	SA(89)	A(90)
UCC-1 FILING	LITTLE ARCH CREEK ASSIGNED TO SA 12/21/90		SA(89)	A(90)

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VOLUME 1 - CONT.

REAL ESTATE	AMENDMENT TO LITTLE ARCH CREEK TO INCLUDE 'MODERN HEALTH CARE SERVICES' LOAN [3 MIL] TOTAL IS NOW 11 MIL (90) MATURITY WAS 8/90 BCCI(SA) ASSIGNED ITS RIGHTS TO BCCI(O) FOR LITTLE ARCH IN 12/89 BCCI(O) ASSIGNED ITS RIGHTS TO SA 12/21/90		SA(90)	A(90)
	THE 'MHCS' MORTGAGE WAS PAID IN FULL PRIOR TO 6/90			
REAL ESTATE	[redacted]	400,000(84)	O(84)	S(86)
	ASSIGNED TO SA 12/21/90			A(90)
GUARANTY	[redacted]	570,000(86)	O(86)	S(91)
	[BCP ZURICH WAS INVOLVED] ASSIGNED TO SA 12/21/90			A(90)
UCC-1 FILING	MODERN HEALTH CARE SER.		O(90)	T(91)
REAL ESTATE	NARVA PROPERTIES N.V. 1 MIL (88) PARTIAL RELEASE IN 5/89 [THIS IS THE SAME LOAN WHICH APPEARS IN VOLUME 6. IT WAS SATISFIED IN 90]		O(88)	
UCC-1 FILING	NARVA PROPERTIES N.V.		O(89)	R(89)

b6
b7C

VOLUME 2 - BEGINS

PROMISSORY NOTE	INTERDESIGNCORP N.V. [redacted]	150,000(86)	O(86)	S(89)
MORTGAGE	INTERDESIGNCORP N.V. [redacted]	150,000(88)	O(88)	S(89)
REAL ESTATE	[redacted] [FINAL PAYMENT WAS TO BE DUE ON 7/31/90]	75,000(90)	O(90)	
UCC-1 FILING	[redacted]		O(90)	
REAL ESTATE		108,000(84)	O(84)	S(85)
UCC-1 FILING			O(84)	R(85)
UCC-3 FILING			O(84)	R(85)
ASSIG. OF PROCEEDS			O(84)	S(84)
REAL ESTATE SECOND MORTGAGE	[redacted] [ON BEHALF OF INTERWORLD ELECTRONICS]	300,000(84)	O(84)	S(87)
REAL ESTATE	[redacted] [DUE ON 5/25/85] MODIFIED IN 85 TO DUE ON 11/1/86	70,000(84) 80,000	O(84)	R(88)
	LIS PENDING FILED 87 BY BCCI(O)			
	BCCI(O) ASSIGNED THE MORTGAGE TO [redacted] IN 88			
	RELEASED FILED BY BCCI(O) RE [redacted]			
REAL ESTATE SECOND MORTGAGE	[redacted] [DUE ON 12/5/86]	150,000(85)	O(85)	S(87)
PROMISSORY NOTE	[redacted]	47,000(85)	O(85)	S(87)
OVERDRAFT FACILITY		103,000(85)	O(85)	S(87)
REAL ESTATE	[redacted] [DUE ON 11/17/89]	358,190(87)	O(87)	S(88)

b6
b7C

VOLUME 2 - CONT.

REAL ESTATE	CONSTRUCTORA LICEN CA [DUE ON 11/17/89]	389,200(87)	O(87)	S(88)	
REAL ESTATE	[redacted] [MAIMI TAG AGENCY]	20,000(86)	O(86)	S(90)	b6 b7C
REAL ESTATE	[redacted] [LOAN BY BCC EMIRATES]	150,000(91)			
REAL ESTATE	[redacted]	185,000(86)	O(86)	S(89)	
REAL ESTATE	[redacted] ASSIGNED TO SA 12/21/90	50,000(85)	O(85)	A(90)	
UCC-1 FILING	[redacted] ASSIGNED TO SA 12/21/90		O(85)	A(90)	
REAL ESTATE	[redacted] [redacted]WAS CONVICTED ON $ LAUNDERING]	175,000(86)	O(86)		
REAL ESTATE	[redacted] [DUE 4/30/09 DIVIDED INTO 2 NOTES]	175,000(89)	O(89)		
UCC-1 FILING	[redacted]		O(89)		
REAL ESTATE		120,000(86)	O(86)		
REAL ESTATE	[DUE 4/1/01]	170,000(86)	O(86)		
UCC-1 FILING	[redacted] [SEC. ON TWO BOATS]		O(86)		
REAL ESTATE	[redacted] [DUE 11/30/98 - 3 NOTES] ASSIGNED TO SA 12/21/90 [CA LIQ. FOR 147,701]	240,000(87)	O(87)	A(90)	
REAL ESTATE	[redacted] [DUE 6/30/06 - 3 NOTES]	211,000(89)	O(89)		
UCC-1 FILING	[redacted]		O(89)		

VOLUME 2 - CONT.

REAL ESTATE	[redacted]	184,500(87)	O(87)	b6 b7C
	[DUE 8/31/04 - 2 NOTES]			
REAL ESTATE	[redacted]	21,500(88)	O(88)	
	[DUE 8/31/04 - 2 NOTES]			
REAL ESTATE	[redacted]	161,339(81)	SA(81)	S(90)
UCC-3 FILING			SA(81)	T(90)
REAL ESTATE		150,000(83)	O(83)	S(88)
REAL ESTATE		250,000(88)	O(88)	
	[DUE 2/1/01]			
REAL ESTATE	[redacted]	103,000(88)	O(88)	
	[DUE 10/31/08 - 2 NOTES]			

VOLUME 3 - BEGINS

REAL ESTATE [redacted] 145,000(85) O(85) A(90) b6 b7C

AN ADDITIONAL LOAN 10,000(85) O(85)
[DUE 4/18/06 - 2 NOTES]
ASSIGNED TO SA 12/21/90
[CA LIQ.]

UCC-1 FILING [redacted] O(86) A(90)
ASSIGNED TO SA 12/21/90

REAL ESTATE [redacted] 104,400(86) O(86) A(90)

[DUE 4/30/03]
A SECOND LOAN FOR 12,000
WAS MADE TO JEFFERSON NAT. BANK
ON 6/8/90.
ASSIGNED TO SA 12/21/90

REAL ESTATE [redacted] 300,000(84) O(84) A(88)

[ASSIGNED TO GOLD COAST
SAVINGS AND LOAN ASSOC. IN 1988
MORTGAGE MODIFIED WITH GOLD COAST
IN 90 WITH UNPAID PRINCIPAL OF 237,221
RTC TOOK OVER IN 91 AND ASSIGNED LOAN
TO UNION BANK OF FLORIDA]

REAL ESTATE [redacted] 150,000(84) O(84)

[DUE 7/22/99]

REAL ESTATE [redacted] 455,000 NOT A BCCI LOAN

REAL ESTATE [redacted] 170,000(87) O(87) A(90)

[DUE 12/07]
ASSIGNED TO SA 12/21/90

REAL ESTATE [redacted] 297,000(86) O(86) S(90)

[DUE 10/30/06]
[redacted] SOLD THE PROP IN 90]

REAL ESTATE [redacted] 275,500(87) O(87) S(91)

[SOLD HOME IN 91]

REAL ESTATE [redacted] 178,000(88) O(88) S(90)

[DUE 6/30/98 - 2 NOTES]

VOLUME 3 - CONT.

REAL ESTATE [redacted] 150,000(83) O(83) S(84) b6 b7C

[MODIFIED IN 84 TO 153,419
A BALLOON PAYMENT DUE 4/20/85]
THE 1ST MORTGAGE WAS SATISFIED IN 84
2 UCC-3 FILINGS (BOTH IN 85) TERMINATING
2 UCC-1 FILINGS (83 & 84)

REAL ESTATE [redacted] 100,000(88) O(88)

[SECURED ON AN OVERDRAFT AGREEMENT
SECOND MORTGAGE - POSSIBLY SOLD]

REAL ESTATE [redacted] 188,000(88) O(88)

[DUE 6/30/00 - 2 NOTES
POSSIBLY SOLD]

VOLUME 4 - BEGINS

REAL ESTATE	INTERNATIONAL INDUSTRIAL PARK (IIP) [CALIF. LIQ. - ASSIGNED TO SA IN 12/21/90]	12.5MIL(87)	O(87)	A(90)
REAL ESTATE	FREE ZONE INDUSTRIAL PARK, LTD [THIS PROPERTY WAS SOLD IN COURT TO BCCI(O) IN 86, VALUE IS ABOUT 7 MIL. THIS APPEARS TO BE PART OF IIP (ABOVE PROP)]			
REAL ESTATE	[redacted] [DUE 2003]	150,000(83)	O(83)	
REAL ESTATE	[redacted] [BALLOON PAYMENT] 27 CONDO UNITS UCC-3 FILING FOR ADDITINAL 4 CONDO UNITS PARTIAL RELEASES FOR 13 UNITS MORTGAGE EXT. FOR 18 UNITS (86)	320,000(84)	O(84)	

b6
b7C

VOLUME 5 - BEGINS

REAL ESTATE	[redacted]	50,000(85)	O(85)		b6 b7C
	[DUE 11/1/05 - 1 NOTE]				
UCC-1 FILING	COFFEE INC.		O(84)		
REAL ESTATE	[redacted]	300,000(87)	O(87)	S(87)	
	[DUE 9/30/88 -1 NOTE]				
REAL ESTATE	[redacted]	200,000(88)	O(88)	S(90)	
	[DUE 10/31/89 - 1 NOTE REVOLVING PROMISSORY NOTE] AMENDMENT EXTENDING NOTE NOW DUE 10/31/90.				
REAL ESTATE	ASPEN INVESTMENTS LTD	2 MIL (86)	O(86)	S(89)	
	UCC-3 FILING		O(86)	T(90)	
REAL ESTATE	KAYBEL CORP. N.V.	2 MIL (85)	SA(85)	S(86)	
UCC-1 FILING	KAYBEL CORP. N.V.		SA(85)	S(86)	
REAL ESTATE	2790 ASSOCIATES LTD [PARTNERSHIP - PALM BEACH CRUISES SA]	750,000(86)	O(86)	S(88)	
REAL ESTATE	BOCA INVESTORS, INC.	600,000(85)	O(85)		
FUTURE ADV.	BOCA INVESTORS, INC.	600,000(85)	O(85)		
UCC-1 FILING	BOCA INVESTORS, INC. ASSUMPTION AGREEMENT DATED 7/29/86 BETWEEN BCCI(O), BOCA INV. (SELLER) AND SPANISH RIVER VILLAS, INC (PURCHASER) - SRV ASSUMED THE NOTE, MORTGAGE, AND THE COLLATERAL SEC. DOCS. BUT REDUCED THE OUTSTANDING TO 950,000 THERE ARE PARTIAL RELEASES TOTALING 798,000 ALL DATED IN 88		O(85)	S(88)	
REAL ESTATE	HOUSTON ENTERPRISES [DUE 6/30/84]	2 MIL (83)	O(83)	S(84)	
UCC-1 FILING	HOUSTON ENTERPRISES		O(83)	T(84)	
REAL ESTATE	[redacted]	140,000(87)	O(87)	S(87)	b6 b7C
	[DUE 7/31/88]				
REAL ESTATE	[redacted]	45,000(85)	O(85)	S(87)	

VOLUME 5 - CONT.

REAL ESTATE [redacted] 145,000(86) O(86) S(90) b6 b7C

[redacted] [DUE 7/31/06]

[redacted] SOLD PROP. IN

88 TO [redacted]

VOLUME 6 - BEGINS

REAL ESTATE	[redacted]	1.5 MIL(88)	O(88)	S(90)	b6 b7C
	[DUE 7/31/08] FUTURE ADVANCE NOTE [DUE 1/8/90]	500,000(88)	O(88)		
REAL ESTATE	ISIPI PROPERTIES N.V.	1.4 MIL(86)	O(86)		
UCC-1 FILING	ISIPI PROPERTIES N.V.		O(86)		
REAL ESTATE	NARVA PROPERTIES N.V	1 MIL (88)	O(88)	S(90)	
UCC-1 FILING	NARVA PROPERTIES N.V.		O(88)	S(90)	
UCC-1 FILING	THE APPAREL GROUP		O(88)		
UCC-1 FILING	VIKING TECHNICAL SERVICES & SUPPLY		O(88)		
REAL ESTATE	[redacted]	130,000(87)	SA(87)		
REAL ESTATE	[redacted] ASSIGNMENT OF MORTGAGE [THIS TIES IN WITH THE [redacted] MORTGAGE]		SA(87)		

VOLUME 7 - BEGINS

This volume contained information concerning several lawsuits.

There is nothing by my determination which would be forfeitable.

Most of this deals with BILBEISI, BCCI(O), MURA INTERNATIONAL and THE COFFEE CO. and the law suit. There is no indication that any entity owes BCCI any money.

WASHINGTON D.C. PROP. - BEGINS

REAL ESTATE	[redacted] [DUE 3/1/07]	255,000(87)	O(87)	S(91)	b6 b7C
REAL ESTATE	[redacted]	350,000(88)	O(88)		
REAL ESTATE	[redacted]	350,000(86)	O(86)		

The following is a list of loans/mortgages in which there may still be some BCCI(O) interest, according to the documents which were provided by [redacted] b6 b7C

PROPERTY	BORROWER	VALUE	O/SA	R/T/S/A
REAL ESTATE	[redacted]	150,000(83)	O(83)	b6 b7C
	[DUE 2003]			
REAL ESTATE	[redacted]	320,000(84)	O(84)	
	[BALLOON PAYMENT] 27 CONDO UNITS UCC-3 FILING FOR ADDITINAL 4 CONDO UNITS PARTIAL RELEASES FOR 13 UNITS MORTGAGE EXT. FOR 18 UNITS(86)			
REAL ESTATE	[redacted]	300,000(84)	O(84)	
REAL ESTATE	[redacted]	150,000(84)	O(84)	
	[DUE 7/22/99]			
REAL ESTATE	[redacted]	180,000(85)	O(85)	
	[BCCI(O) then sells the property to [redacted] Its not clear whether BCCI has a current mortgage on the property.]			
REAL ESTATE	[redacted]	150,000(85)	O(85)	
	[DUE 11/1/05 - 1 NOTE]			
REAL ESTATE	[redacted]	350,000(86)	O(86)	
REAL ESTATE	[redacted]	175,000(86)	O(86)	
	[redacted] WAS CONVICTED ON $ LAUNDERING]			
REAL ESTATE	[redacted]	120,000(86)	O(86)	
REAL ESTATE	[redacted]	170,000(86)	O(86)	
	[DUE 4/1/01]			
UCC-1 FILING	[redacted]		O(86)	
	[SEC. ON TWO BOATS]			

REAL ESTATE	ISIPI PROPERTIES N.V.	1.4 MIL(86)	O(86)
UCC-1 FILING	ISIPI PROPERTIES N.V.		O(86)
REAL ESTATE	[redacted]	184,500(87)	O(87)
	[DUE 8/31/04 - 2 NOTES]		
REAL ESTATE	[redacted]	21,500(88)	O(88)
	[DUE 8/31/04 - 2 NOTES]		
ARLEN KING COLE CONDOS UNIT #			
903	[redacted]		O(87)
903			O(88)
REAL ESTATE	[redacted]	150,000(88)	O(88)
REAL ESTATE		250,000(88)	O(88)
	[DUE 2/1/01]		
REAL ESTATE	[redacted]	103,000(88)	O(88)
	[DUE 10/31/08 - 2 NOTES]		
REAL ESTATE	[redacted]	100,000(88)	O(88)
	[SECURED ON AN OVERDRAFT AGREEMENT SECOND MORTGAGE - POSSIBLY SOLD]		
REAL ESTATE	[redacted]	188,000(88)	O(88)
	[DUE 6/30/00 - 2 NOTES POSSIBLY SOLD]		
REAL ESTATE	[redacted]	350,000(88)	O(88)
REAL ESTATE	[redacted]	175,000(89)	O(89)
	[DUE 4/30/09 DIVIDED INTO 2 NOTES]		
UCC-1 FILING	[redacted]		O(89)
REAL ESTATE	[redacted]	211,000(89)	O(89)
	[DUE 6/30/06 - 3 NOTES]		
UCC-1 FILING	[redacted]		O(89)

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b7C

REAL ESTATE	[redacted]	75,000(90)	O(90)
	[FINAL PAYMENT WAS TO BE DUE ON 7/31/90]		
UCC-1 FILING	[redacted]		O(90)
REAL ESTATE	[redacted]	150,000(91)	
	[LOAN BY BCC EMIRATES]		

b6
b7C

The following is a list of loans/mortgages which appear to have been either satisfied, released or assigned to another bank other than BCCI(O).

PROPERTY	BORROWER	VALUE	O/SA	R/T/S/A
REAL ESTATE	HOUSTON ENTERPRISES [DUE 6/30/84]	2 MIL (83)	O(83)	S(84)
UCC-1 FILING	HOUSTON ENTERPRISES		O(83)	T(84)
ASSIG. OF PROCEEDS	[redacted]		O(84)	S(84)
REAL ESTATE	[redacted]	150,000(83)	O(83)	S(84)
	[MODIFIED IN 84 TO 153,419 A BALLOON PAYMENT DUE 4/20/85] THE 1ST MORTGAGE WAS SATISFIED IN 84 2 UCC-3 FILINGS (BOTH IN 85) TERMINATING 2 UCC-1 FILINGS (83 & 84)			
REAL ESTATE	[redacted]	108,000(84)	O(84)	S(85)
UCC-1 FILING			O(84)	R(85)
UCC-3 FILING			O(84)	R(85)
REAL ESTATE		2 MIL (85)	SA(85)	S(86)
UCC-1 FILING			SA(85)	S(86)
REAL ESTATE	[redacted] [DUE 7/31/88]	140,000(87)	O(87)	S(87)
REAL ESTATE	[redacted]	45,000(85)	O(85)	S(87)
REAL ESTATE	[redacted]	200,000(85)	O(85)	R(87)
UCC-I FILING	" "		O(83)	R(85)
REAL ESTATE SECOND MORTGAGE	[redacted] [DUE ON 12/5/86]	150,000(85)	O(85)	S(87)
PROMISSORY NOTE	[redacted]	47,000(85)	O(85)	S(87)
OVERDRAFT FACILITY		103,000(85)	O(85)	S(87)
REAL ESTATE SECOND MORTGAGE	[redacted] [ON BEHALF OF INTERWORLD ELECTRONICS]	300,000(84)	O(84)	S(87)

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b7C

REAL ESTATE	[redacted]	300,000(87)	O(87)	S(87)
	[DUE 9/30/88 -1 NOTE]			
REAL ESTATE	[redacted]	358,190(87)	O(87)	S(88)
	[DUE ON 11/17/89]			
REAL ESTATE	[redacted]	389,200(87)	O(87)	S(88)
	[DUE ON 11/17/89]			
REAL ESTATE	2790 ASSOCIATES LTD [PARTNERSHIP - PALM BEACH CRUISES SA]	750,000(86)	O(86)	S(88)
REAL ESTATE	BOCA INVESTORS, INC.	600,000(85)	O(85)	
FUTURE ADV.	BOCA INVESTORS, INC.	600,000(85)	O(85)	
UCC-1 FILING	BOCA INVESTORS, INC. ASSUMPTION AGREEMENT DATED 7/29/86 BETWEEN BCCI(O), BOCA INV. (SELLER) AND SPANISH RIVER VILLAS, INC (PURCHASER) - SRV ASSUMED THE NOTE, MORTGAGE, AND THE COLLATERAL SEC. DOCS. BUT REDUCED THE OUTSTANDING TO 950,000 THERE ARE PARTIAL RELEASES TOTALING 798,000 ALL DATED IN 88		O(85)	S(88)
REAL ESTATE	[redacted] [DUE ON 5/25/85]	70,000(84)	O(84)	R(88)
	MODIFIED IN 85 TO DUE ON 11/1/86	80,000		
	LIS PENDING FILED 87 BY BCCI(O)			
	BCCI(O) ASSIGNED THE MORTGAGE TO [redacted] IN 88			
	RELEASED FILED BY BCCI(O) RE [redacted]			R(88)
REAL ESTATE	[redacted] [ASSIGNED TO GOLD COAST SAVINGS AND LOAN ASSOC. IN 1988 MORTGAGE MODIFIED WITH GOLD COAST IN 90 WITH UNPAID PRINCIPAL OF 237,221 RTC TOOK OVER IN 91 AND ASSIGNED LOAN TO UNION BANK OF FLORIDA]	300,000(84)	O(84)	A(88)
REAL ESTATE	[redacted]	185,000(86)	O(86)	S(89)

PROMISSORY NOTE	INTERDESIGNCORP N.V. [redacted]	150,000(86)	O(86)	S(89)
MORTGAGE	INTERDESIGNCORP N.V. [redacted]	150,000(88)	O(88)	S(89)
REAL ESTATE	ASPEN INVESTMENTS LTD UCC-3 FILING	2 MIL (86)	O(86) O(86)	S(89) T(90)
REAL ESTATE	NARVA PROPERTIES N.V. PARTIAL RELEASE IN 5/89 [THIS IS THE SAME LOAN AS LISTED BELOW]	1 MIL (88)	O(88)	S(90)
UCC-1 FILING	NARVA PROPERTIES N.V.		O(89)	R(89)
REAL ESTATE	NARVA PROPERTIES N.V	1 MIL (88)	O(88)	S(90)
UCC-1 FILING	NARVA PROPERTIES N.V.		O(88)	S(90)
REAL ESTATE	[redacted] [MAIMI TAG AGENCY]	20,000(86)	O(86)	S(90)
REAL ESTATE	[redacted] ASSIGNED TO SA 12/21/90	50,000(85)	O(85)	A(90)
UCC-1 FILING	[redacted] ASSIGNED TO SA 12/21/90		O(85)	A(90)
REAL ESTATE	[redacted] [DUE 11/30/98 - 3 NOTES] ASSIGNED TO SA 12/21/90 [CA LIQ. FOR 147,701]	240,000(87)	O(87)	A(90)
REAL ESTATE	[redacted]	161,339(81)	SA(81)	S(90)
UCC-3 FILING			SA(81)	T(90)
REAL ESTATE		150,000(83)	O(83)	S(88)
REAL ESTATE	[redacted]	145,000(85)	O(85)	A(90)
	AN ADDITIONAL LOAN [DUE 4/18/06 - 2 NOTES] ASSIGNED TO SA 12/21/90 [CA LIQ.]	10,000(85)	O(85)	
UCC-1 FILING	[redacted] ASSIGNED TO SA 12/21/90		O(86)	A(90)

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b7C

REAL ESTATE	[redacted]	104,400(86)	O(86)	A(90)	b6 b7C
	[DUE 4/30/03] A SECOND LOAN FOR 12,000 WAS MADE TO JEFFERSON NAT. BANK ON 6/8/90. ASSIGNED TO SA 12/21/90				
REAL ESTATE	[redacted]	170,000(87)	O(87)	A(90)	
	[DUE 12/07] ASSIGNED TO SA 12/21/90				
REAL ESTATE	[redacted]	297,000(86)	O(86)	S(90)	
	[DUE 10/30/06] [redacted] SOLD THE PROP IN 90]				
REAL ESTATE	[redacted]	178,000(88)	O(88)	S(90)	
	[DUE 6/30/98 - 2 NOTES]				
REAL ESTATE	INTERNATIONAL INDUSTRIAL PARK (IIP) [CALIF. LIQ. - ASSIGNED TO SA IN 12/21/90]	12.5MIL(87)	O(87)	A(90)	
REAL ESTATE	FREE ZONE INDUSTRIAL PARK, LTD [THIS PROPERTY WAS SOLD IN COURT TO BCCI(O) IN 86, VALUE IS ABOUT 7 MIL. THIS APPEARS TO BE PART OF IIP (ABOVE PROP)]				
REAL ESTATE	[redacted]	200,000(88)	O(88)	S(90)	
	[DUE 10/31/89 - 1 NOTE REVOLVING PROMISSORY NOTE] AMENDMENT EXTENDING NOTE NOW DUE 10/31/90.				
REAL ESTATE	[redacted]	145,000(86)	O(86)	S(90)	
	[DUE 7/31/06] [redacted] SOLD PROP. IN 88 TO [redacted]				
REAL ESTATE	[redacted]	1.5 MIL(88)	O(88)	S(90)	
	[DUE 7/31/08]				
	FUTURE ADVANCE NOTE [DUE 1/8/90]	500,000(88)	O(88)		
REAL ESTATE	SKIP PROPERTIES, N.V.	1.5MIL (88)	O(88)	S(90)	
	AMENDED TO	1.97MIL(90)		S(90)	
UCC-1 FILING	SKIP PROPERTIES, N.V.		O(88)		

REAL ESTATE	LITTLE ARCH CREEK PROPERTIES [CALIFORNIA LIQ] ASSIGNED TO SA 12/21/90	8 MIL (89)	SA(89)	A(90)
UCC-1 FILING	LITTLE ARCH CREEK ASSIGNED TO SA 12/21/90		SA(89)	A(90)
REAL ESTATE	AMENDMENT TO LITTLE ARCH CREEK TO INCLUDE 'MODERN HEALTH CARE SERVICES' LOAN [3 MIL] TOTAL IS NOW 11 MIL (90) MATURITY WAS 8/90 BCCI(SA) ASSIGNED ITS RIGHTS TO BCCI(O) FOR LITTLE ARCH IN 12/89 BCCI(O) ASSIGNED ITS RIGHTS TO SA 12/21/90 THE 'MHCS' MORTGAGE WAS PAID IN FULL PRIOR TO 6/90		SA(90)	A(90)
UCC-1 FILING	MODERN HEALTH CARE SER.		O(90)	T(91)
REAL ESTATE	[redacted] ASSIGNED TO SA 12/21/90	400,000(84)	O(84)	S(86) A(90)
GUARANTY	[redacted] [BCP ZURICH WAS INVOLVED] ASSIGNED TO SA 12/21/90	570,000(86)	O(86)	S(91) A(90)
REAL ESTATE	[redacted] [DUE 3/1/07]	255,000(87)	O(87)	S(91)
REAL ESTATE	[redacted] [SOLD HOME IN 91]	275,500(87)	O(87)	S(91)
REAL ESTATE	[redacted] ON BEHALF OF SAMCO GLOBAL ARMS (2ND MORTGAGE) ASSIGNED TO SA 12/21/90	1.2 MIL(88)	O(88)	R(91) A(90)
REAL ESTATE	[redacted] ON BEHALF OF SAMCO GLOBAL ARMS ASSIGNED TO SA 12/21/90	1.2 MIL(88)	O(88)	R(91) A(90)
UCC-1 FILING	SAMCO GLOBAL ARMS ASSIGNED TO SA 12/21/90		O(90)	R(91) A(90)

b6
b7C

GROVE ISLE CONDO A904	[redacted]	100,000(86)	O(86)	R(91)	b6 b7C
UCC-1 FILING	" "		O(84)	R(85)	

The following is a list of loans/mortgages which appear to have been established by BCCI SA.

PROPERTY	BORROWER	VALUE	O/SA	R/T/S/A	
GROVE ISLE CONDO B1409	[redacted]		SA(86)		
REAL ESTATE			SA(86)		
REAL ESTATE		130,000(87)	SA(87)		
REAL ESTATE	[redacted]		SA(87)		
	ASSIGNMENT OF MORTGAGE [THIS TIES IN WITH THE HAROLD ARVIV MORTGAGE]				
[redacted]		190,000(88)	SA(88)		b6 b7C
(RE: KIDOKO, INC.)	[redacted] [NY LIQ.]				
[redacted]	FORECLOSURE ACTION		SA(90)		

The following is a list of loans/mortgages in which there is no indication that BCCI or any of its entities had any say in the deals. [This is based only on the information which was provided by [redacted] b6 b7C

PROPERTY	BORROWER	VALUE	O/SA	R/T/S/A
GROVE ISLE CLUB CONDO PARCELS				
C1201	SELTON CO. N.V.			
C502	INVERSIONES GURALCA C.A.			
C1502	CHANDLER CORP			
C803	INMOBILIARIA VEPAR			
C903	INTER-AMERICAN GEMCO, LTD			
C905	DELITE INTERNATIONAL, S.A.			
C906	MOORFIELDS LTD			
C806	MOUNTAIN TOP INVESTMENTS, N.V.			
C1206	[redacted] b6 b7C			
C605 & C607	AKOLA INVESTMENTS, N.V. (CURACAO CORP CO N.V.)			
C907	MARMUT INVESTMENT CORP			
C1008	[redacted]			
C1108	ST STEPHENS INVESTMENT LTD			
C1109	ATTEMPT CORPORATION			
C1509	A.B.I. COMPANY N.V.			
C1809	INVERSIONS LA FLORESTA			
C810	ROCIOMAR CORP, S.A.			
C1010	MYLENE CORP, N.V.			
C1710	KELO, S.A.			
C1810	INVERSIONS LA FLORESTA			
C1702 & C1704	[redacted]			
REAL ESTATE	[redacted]	455,000	NOT A BCCI LOAN	

The following is a list of UCC-1 FILINGS which appear not to be associated with any other loan/mortgage, according to the documents which were provided by [redacted] b6 b7C

The first section is a list of UCC-1 FILINGS which appear to still be opened. The second section is a list of UCC-1 FILINGS which appear to be closed.

PROPERTY	BORROWER	VALUE	O/SA	R/T/S/A
UCC-1 FILING	MICROSUMM, INC.		O(83)	
UCC-1 FILING	MICROSUMM, INC.		O(84)	
UCC-1 FILING	AVANTI, USA, FURNITURE		O(84)	
UCC-1 FILING	COFFEE INC.		O(84)	
UCC-1 FILING	VENDEX INTERNATIONAL, INC		O(84)	
UCC-1 FILING	KNONOVN INC. UCC-3 FILING KNONOVN - AMEND.		O(86) O(86)	
UCC-1 FILING	EXPRESS PREMIUM FINANCE CHANGED TO ZAMINCO FREEDOM TOWER, INC. (88) [PART OF NY INFO SENT TO FBI/DOJ]		O(86)	
UCC-1 FILING	FIDDLES AT THE BAKERY CENTER INC.		O(86)	
UCC-1 FILING	KIRPALANIS LTD (USA) INC		O(86)	
UCC-1 FILING	ABC PARTY RENTALS		O(87)	
UCC-1 FILING	ROS INTERNATIONAL, INC		O(88)	
UCC-1 FILING	THE APPAREL GROUP		O(88)	
UCC-1 FILING	VIKING TECHNICAL SERVICES & SUPPLY		O(88)	
UCC-1 FILING	ZAMINCO FREEDOM TOWER [OURS FROM NY LIQ]		O(89)	
UCC-1 FILING	SWEET DONNY'S INC		O(90)	
UCC-1 FILING	CALUMET TOBACCO & GIFT		O(90)	

PROPERTY	BORROWER	VALUE	O/SA	R/T/S/A
UCC-1 FILING	DIAMOND KNITWEAR INC.		O(82)	R(82)
UCC-1 FILING	KIDCO INC. [NY LIQ]		O(86)	
UCC-1 FILING	COMPUTOWER CORP (CALIFORNIA LIQ. ARE HANDLING)		O(SA)	
UCC-1 FILING	FT MYERS RAMADA INN, INC		O(84)	T(87)
UCC-1 FILING	INTERWORLD ELECTRONICS		O(84)	T(87)
UCC-1 FILING	MOONBELT DEV. CORP. BCCI(O) ASSIGNED RIGHTS TO: J & D FINANCIAL CORP [IN 87]		O(86)	A(87)
UCC-1 FILING	EZCONY INTL. CORP		O(88)	R(88)
UCC-1 FILING	MARINE TRAILERS ENTERPRISES		O(87)	R(88)
UCC-1 FILING	BENTOR INDUSTRIES		O(88)	R(88)
UCC-1 FILING	MCENEARNAY ALSTONS FL.		O(87)	T(88)
UCC-1 FILING	FERTILIZER CORPORATION OF AMERICA		O(88)	T(89)
UCC-1 FILING	FAR EAST SUPPLIERS, INC. ASSIGNED TO SA (90)		O()	A(90)
UCC-1 FILING	LA MONTRE, INC		O(88)	T(90)
UCC-1 FILING	LUXURY WATCH CO.		O(89)	T(90)
UCC-1 FILING	MIAMI AUTO TAG AGENCY		O(86)	T(90)
UCC-1 FILING	RUBY INTERNATIONAL INC.		O(86)	T(90)
UCC-1 FILING	VENDEX INTERNATIONAL, INC		O(89)	T(90)
UCC-1 FILING	ZEUS DISTRIBUTOR, INC.		O(88)	T(90)
UCC-1 FILING	SASSON MANAGEMENT CORP.		O(88)	T(90)

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) Date 12/29/92

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MC #38;
FIF; FAG;
(OO:WMFO)

Reference lead #41-SCREENING

A review of claims filed with the New York Superintendent of Banks provided the following information.

Individuals with a claim greater than $100,000.

CLAIMANT	AMOUNT OF CLAIM	IDX DATE	FILE NUMBER
[redacted]	$136,370.00	3/25/92	029B-WF-0171994-D
Bank of New York	946,897.33	Many 29 cases	
[redacted]	164,345.74	*Insufficient identification data	
	138,822.76	*Insufficient identification data	

b6 b7C

* Many hits with several variations to the named person. More information is needed in order to narrow the search.

Individuals with an Account Payable balance greater than $100,000.

ACCOUNT PAYABLE	AMOUNT OF AP
New York State Banking Dept.....	$225,000.00

As all investigation is complete, this lead is being closed.

No further work — funds already paid out, they claim gross amount due.

29B-WF-171994-Sub FS -5

1 - WMFO (29B-WF-171994 SUB FS)
DBS:srd
(1)

1 - [redacted]
1 - CCS
1 -

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
DEC 3 0 1992
FBI/DOJ

b6 b7C

[redacted]

FBI/29B-WF-171994-000E10216

29B-WF-171994 Sub FS-52

Searched
Serialized
Indexed
Filed

1325015-000-10217

FD-36 (ev. 8-29-85)

FBI

TRANSMIT VIA:	PRECEDENCE:	CLASSIFICATION:
☐ Teletype	☐ Immediate	☐ TOP SECRET
☐ Facsimile	☐ Priority	☐ SECRET
☒ AIRTEL	☐ Routine	☐ CONFIDENTIAL
		☐ UNCLAS E F T O
		☐ UNCLAS

Date 1/19/93

TO : SAC, MIAMI

FROM : SAC, WMFO (29B-WF-171994) (P) (BCCI)

SUBJECT : HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: BUREAU WIDE AIRTEL FROM WMFO DATED 3/17/92.

RE Airtel advised the receiving offices about the plea agreement, dealing with the forfeiture of assets, between the Bank of Credit and Commerce International (BCCI) and the United States (US) government.

WMFO has determined that several real estate properties in the Miami area may still have BCCI mortgages and or BCCI ties which would allow for some forfeiture proceedings.

WMFO is interested in determining the following information (on the listed properties which follow):

1. Current Mortgage note holder (BCCI/other bank).
2. Borrowers name on the note.
3. Title holders name on the real estate.
4. Taxes (current/past and who paid the taxes).
5. Charges/liens/levies on the property.
6. Assessment value, if available.

2 - MIAMI
2 - WMFO
(1 - 29B-WF-171994 SUB S)
(1) - 29B-WF-171994 SUB F/S)
RHM:rhm
(4)

Sub FS
29B-WF-171994
-54

Searched
Serialized
Indexed
Filed

SEARCHED INDEXED
SERIALIZED FILED
1993
D OFFICE

b6
b7C

Approved: _____ Transmitted _____ (Number) (Time)

1325015-000-10223

7. Any bankruptcy proceedings regarding the property/borrower.
8. All the sale transactions and refinances (if any) from the listed date for each property.
9. Any other mortgages on the property (first, second or third mortgages).
10. Any other information Miami deems relevant to the properties.

The following is the list of properties in which WMFO believes BCCI may still have some interest. The names which are provided are the individuals who owned the property at the time BCCI had a note on the listed property.

Borrower 1 : [redacted] b6 b7C

Date : August 22, 1983 Mortgage value : $ 150,000

Description: Condominium Units Nos. A701, A707, A907 and A909, Greenwich, a Condominium, according to the Declaration of Condominium, recorded May 29, 1981, in Official Records Book 11115, at Page 2, of the Public Records of Dade County, Florida, as amended and as may be amended; Together with parking spaces 1, 2, 7, 14, 300, 421, 422 and 423, and all of the mortgagee's right, title and interest in all common areas, of said condominium.

Borrower 2 : [redacted] b6 b7C

Date : April 3, 1984 Mortgage Value : $ 320,000

Description: Condominium Parcel Nos. A101, A102, A115, A115, A201, A202, A207, A209, A213, A215, A216, A307, A309, A401, A407, A409, A416, A516, A602, A616, A702, A716, A802, A816, A916, A1116 and A1416, of Greenwich, a Condominium, according to the Declaration of Condominium, recorded May 29, 1981, in Official Records Book 11115, at Page 2, of the Public Records of Dade County, Florida, as amended.

1325015-000-10224

29B-WF-171994

Borrower 3 : [redacted] b6 b7C

Date : July 26, 1984 Mortgage Value : $ 300,000

Description: Condominium Parcel No. B 1010, Grove Isle, a condominium, according to the Declaration of Condominium recorded January 23, 1979, in Official Records Book 10279, at page 195, Public Records on Dade County, Florida, as amended.

Borrower 4 : [redacted] b6 b7C

Date : July 23, 1984 Mortgage value : $ 150,000

Description: Lot 2, in Block 2, of Kendall Lane Estates Section A, according to the Plat thereof, as recorded in Plat Book 86, at Page 89, of the Public Records of Dade County, Florida.

Borrower 5 : [redacted] b6 b7C

Date : October 18, 1985 Mortgage value : $ 150,000

Description: Lot 12, Thornhill Estates, according to the Plat thereof as recorded in Plat Book 36 at Pages 171 and 172 in the Public Records of Palm Beach County, Florida.

Borrower 6 : ISIPI PROPERTIES N.V.

Date : January 22, 1986 Mortgage value : $ 1.4 mil.

Description: Lots 8 and 9 in Block 2 of Boulevard Shoppes No. 2, according to the Plat thereof, as recorded in Plat Book 106, Page 37, of public Records of Broward County, Florida.

Borrower 7 : [redacted] b6 b7C

Date : January 30, 1986 Mortgage value : $ 175,000

Description: Condominium Parcel No. 6A of the Coconut Grove Bayshore, a Condominium, according to the Declaration of Condominium thereof, recorded in Official Records Book 11587 at Page 1123 through 1206 inclusive, of the Public Records of Dade County, Florida.

1325015-000-10225

Borrower 8 : [redacted] b6 b7C

Date : March 27, 1986 Mortgage value : $ 170,000

Description: Lot 2, Block 2, Grove Park Subdivision, according to the Plat thereof, as recorded in Plat Book 5, at Page 66, of the Public Records of Dade County, Florida.

Borrower 9 : [redacted] b6 b7C

Date : August 3, 1987 Mortgage value : $ 184,500 (2 notes)

Date : March 17, 1988 Mortgage value : $ 21,500 (2 notes)

Description: Lot 10, in Block 20, of Hallmark Heights Estates Addition No. 7, according to the Plat thereof, as recorded in Plat Book 68, at Page 42, of the Public Records of Dade County, Florida.

Borrower 10: [redacted] b6 b7C

Date : April 1, 1988 Mortgage value : $ 150,000

Description: Lot 5, Block 8 of La Gorce Golf Subdivision according to the Plat thereof, recorded in Plat Book 14 at Page 43, of the Public Records of Dade County, Florida.

Borrower 11: [redacted] b6 b7C

Date : February 29, 1988 Mortgage value : $ 250,000

Description: Lot 20, Block 24 of Second Revised Plat of Coral Gables Country Club Section, part 2, according to the Plat thereof, as recorded in Plat Book 32, Page 63 of the Public Records of Dade County, Florida.

Borrower 12: [redacted] b6 b7C

Date : October 7, 1988 Mortgage value : $ 103,000 (2 notes)

Description: Lot 24, Block 5, Lindgren West, according to the plat thereof, recorded in Plat Book 106, Page 58, of the Public Records of Dade County, Florida.

Borrower 13: [redacted] b6 b7C

Date : June 15, 1988 Mortgage value : $ 188,000 (2 notes)

Description: Lot 1, Block 6, Fairmont Acres Section 3, according to the Plat thereof as recorded in Plat Book 80, Page 21, of the Public Records of Dade County, Florida.

Borrower 14: [redacted] b6 b7C

Date : April 25, 1989 Mortgage value : $ 175,000

Description: Lot 1, Block 1, Las Villas of La Mancha Sub., according to the Plat thereof, as recorded in Plat Book 98, at Page 75, of the Public Records of Dade County, Florida.

Borrower 15: [redacted] b6 b7C

Date : February 28, 1990 Mortgage value : $ 75,000

Description: Unit No. A-1102, of Grove Isle, a condominium thereof, recorded in Official Records Book 10279, at page 195, of the Public Records of Dade County, Florida, together with all appurtenances thereto, including all interest in the common elements of said condominium as set forth in the Declaration together with all the exhibits thereto and amendments thereof.

LEADS: Miami Division, at Miami, Florida:

Miami will search county land records and provide WMFO with the information requested above. Miami will make sure that any and all sales, refinances, releases, assignment of rights are listed form the date of the original listed purchase. Send responses to the attention of SA [redacted] b6 b7C

[redacted]

Memorandum

To : SAC, WMFO (29B-WF-171994) (P) (BCCI) Date 1/13/93

From : SA [redacted] b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE # 38;
FIF; FAG;
OO:WMFO

RE: LEAD # 30 - ASSET FORFEITURE
STATUS REPORT

The forfeiture of assets of BCCI/ICIC continues. Areas of immediate concern are as follows:

1. ICIC (Inv)

   a. Documents in London
   b. Interviews of [redacted]

2. [redacted] PROPERTIES b6 b7C

   a [redacted] dentified 18 properties in the U.S. which may have some forfeitable aspects. An airtel to the local field office should be sent by 1/30/93.

3. CAPCOM

   a. The documents concerning the loans which CAPCOM had with BCCI have been presented to the DOJ-AFO for forfeiture action.

4. CARLSON FARMS

   a. The London search of documents produced information which presents a strong case that Carlson Farms is forfeitable. [redacted] b6 b7C Attorney, DOJ, Civil Division, is the Attorney the writer is working with on this property.

1 - WMFO (29B-WF-171994)

RHM:rhm
(1)

29B-WF-171994 Sub FS -55

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JAN 15 1993
FBI/DOJ FIELD OFFICE

[redacted] b6 b7C

1325015-000-10228

Rec'd 2/2/93 BB IMC

5. OTHER HAPPENINGS

a. Currently the writer is assisting in putting together a list of companies which have strong ties to BCCI/ICIC in order for DOJ-AFO to present to the Court to get a freeze order on any assets which may be in the U.S.

1325015-000-10229

Memorandum

To : SAC, WMFO

Date 7/20/93

From : SA [redacted] A-6 (FAST)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38
FIF; FAG;
OO: WMFO
(BCCI)

This to request that the following seizure files be closed:

3920-92-F-0115 through and including 3920-92-F-0131;
3920-92-F-0231 through and including 3920-92-F-0243.

All money, totalling approximately $500,000,000, has been forfeited judicially.

The main subfile, 29B-WF-171994 should remain open pending additional criminal forfeitures.

30-WMFO

(1-3920-92-F-0115)	(1-3920-92-F-231)
(1-3920-92-F-0116)	(1-3920-92-F-232)
(1-3920-92-F-0117)	(1-3920-92-F-233)
(1-3920-92-F-0118)	(1-3920-92-F-234)
(1-3920-92-F-0119)	(1-3920-92-F-235)
(1-3920-92-F-0120)	(1-3920-92-F-236)
(1-3920-92-F-0121)	(1-3920-92-F-237)
(1-3920-92-F-0122)	(1-3920-92-F-238)
(1-3920-92-F-0123)	(1-3920-92-F-239)
(1-3920-92-F-0124)	(1-3920-92-F-240)
(1-3920-92-F-0125)	(1-3920-92-F-241)
(1-3920-92-F-0126)	(1-3920-92-F-242)
(1-3920-92-F-0127)	(1-3920-92-F-243)
(1-3920-92-F-0128)	
(1-3920-92-F-0129)	(1-29B-WF-171994 SUB FS)
(1-3920-92-F-0130)	
(1-3920-92-F-0131)	

EPG:epg
(30)

29B-WF-171994 Sub FS-56

SEARCHED [redacted] INDEXED
SERIALIZED [redacted] FILED
JUL 21 1993
[redacted]

1325015-000-10230

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 2 ~ b7A - Per Interpol;
Page 3 ~ b5 - Per Interpol;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
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DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
INTERNAL ROUTING/ACTION SLIP

(Rev. 7/10/91)

TO	TL#	ROOM	NAME/TITLE	TO	TL#	ROOM	NAME/TITLE
	214	7176	Director		245	7452	Mrs. Campbell
					245	7446	Mr. A. Finch
	235	7142	Deputy Director		245	7446	Mr. Flynn
	235	7110	ADD - Administration		245	7432	Mr. D. Johnson
	235	7116	ADD - Investigations		245	7446	Mrs. Muller
					245	7446	Mr. Rodriguez
	Assistant Directors:				245	7452	Mr. York
	234	6012	Administrative Services				
	233	5012	Criminal Investigative		245	7458	Mrs. Anderson
	342	11255	Identification		245	7449	Miss Ballard
	213	7125	Inspection		245	7458	Mrs. Carter
	232	4026	Intelligence		245	7458	Miss Collins
	241	3090	Laboratory		245	7458	Mrs. Faith
	245	7427	Legal Counsel		245	7452	Mr. C. Finch
	211	5829	Information Management		245	7446	Mr. M. Johnson
	213	7159	Technical Services		245	7449	Mr. Leach
	152	Academy	Training		245	7452	Mr. Murray
	245	7240	Congressional Affairs		245	7458	Mr. Nova
	213	7901	EEO Affairs		245	7449	Mrs. Valliere
	245	7222	Public Affairs		245	7449	Mrs. Virtue
	245	7443	Mr. Guido		245	7150	Career Board
	245	7443	Mr. Giaquinto		244		
	245	7449	Mr. Dalton		152		rk)
	245	7452	Mr. Dickson		135		
	245	7458	Mr. Fitzgerald		244		
	245	7446	Mr. Pimentel		111		
	245	7458	Mr. Staver		234	6076	Staffing
					153	1396	Voucher Unit
	245	7443	Mrs. Viageris-Leech	✓			Financial
	245	7443	Miss Bilicz				Crimes
	245	7449	Miss Bonan				
	245	7446	Miss Jenkins				Rm. 3841
	245	7452	Miss Mazgar				
	245	7458	Mr. Zuschlag				

b6
b7C

☐ Call Me ☐ For Your Info.
☐ See Me ☐ Note & Return
☐ Approp. Action ☐ Record & Return
☐ Initial ☐ See Reverse Side
☐ Per Inquiry

Remarks: The attached is for your information and whatever action you deem appropriate.

FROM: John E. Guido
Office of Liaison and International Affairs

b6
b7C

Room	TL#	Phone	Date
7458	245	4717	3/25/92

FBI/DOJ

1325015-000-10928

FD-448 (Rev. 5-23-90)

rec'd 3/26
KLH 830

FBI FACSIMILE COVERSHEET

CLASSIFICATION

PRECEDENCE
- ☐ Immediate
- ☐ Priority
- ☒ Routine

- ☐ Top Secret
- ☐ Secret
- ☐ Confidential
- ☐ Sensitive
- ☒ Unclassified

Time Transmitted: 0900
Sender's Initials: [redacted]
Number of Pages: 4

(3)

To: SAC, WMFO (Name of Office) Date: 3/26/92

Facsimile number: 324-6426

Attn: SSA [redacted] SQUAD C-5 b6 b7C
(Name) (Room) (Telephone No.)

From: DIRECTOR, FBI (FIFU, WCCS)
(Name of Office)

Subject: HIDDEN INTERESTS
MAJOR CASE 38
OO:WMFO

Special Handling Instructions: ~~PLEASE HAND CARRY TO SSA~~ [redacted] (Squad C-5) b6 b7C

Originator's Name: ~~SSA~~ [redacted] Telephone: ~~324-5595~~ b6 b7C

Originator's Facsimile Number: ~~324-6492~~ 29B-WF-171994 Sub FS

Approved: LAP/OR [redacted] RNM

FBI/DOJ

1325015-000-10925

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
Page 4 ~ Duplicate;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;

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ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

b6
b7C

Sub F
Sub-9-1

12/2/93

O+A
Sub-9

29B-WF-171994

Searched
Serialized
Indexed
Filed

Recd 12/2/93 BB

15-00009491

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

BB 5/5/94
C-4
3920-93-F-0197
5/5/94

3920-93-F-0197
29B-WF-171994 SubFS Sub-9 -2

SEARCHED INDEXED
SERIALIZED FILED
MAY 05 1994
FBI — WASH. METRO FIELD OFFICE

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	11/29/93	118. Award Recommended

b6
b7C

1325015-000-9494

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-93-F-1977	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 1,464.86	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	BANK OF TOKYO TRUST CO. NEW YORK $ 1,464.86

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9493

FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
Page 4 ~ Duplicate;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;

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X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[_] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195 U.S. VS BCCI
~~0196~~ HIDDEN INTERESTS;
0197 MAJOR CASE 38;
0198 FIF;FAG;
0199 OO: WMFO
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0216

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

b6
b7C

Sub FS
Sub-8

12/2/93

29B-WF-171994 -1

[redacted]

Indexed

[redacted]

EPG:amm
(41)

FOIMS

12/2/93

Recd 12/2/93

25015-000-9477

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

5/5/94

C-4
3920-93-F-0196-
5/5/94

29B-WF-171994 Sub FS Sub-8-2
3920-93-F-0196-

SEARCHED SERIALIZED INDEXED FILED
MAY 05 1994
FBI — WASH. METRO FIELD OFFICE

1325015-000-9490

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

b6
b7C

117. Sharing ☐ Yes ☐ No

11/24/93

118. Award Recommended

1325015-000-9480

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
120-93-F-196	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS ; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 58,000.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	BANCO BILBAO VIZCAYA, NEW YORK $ 58,000.00

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WFO			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9479

FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
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Page 16 ~ Duplicate;

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X No Duplication Fee X
X For this Page X
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Newspapers publishing Notice of August 19, 1993
Order of Forfeiture

Newspaper	Dates of Publication		
New York Times	Sept. 3,	Sept. 10,	Sept. 17
International Herald Tribune	Sept. 9,	Sept. 15,	Sept. 22
Miami Herald	Sept. 13,	Sept. 20,	Sept. 27
Los Angeles Times	Sept. 9,	Sept. 16,	Sept. 23
Wall Street Journal	Sept. 13,	Sept. 17,	Sept. 24
Washington Post	Aug. 27,	Sept. 4,	Sept. 10
Newsday	Sept. 1,	Sept. 8,	Sept. 15
San Francisco Daily Journal	Sept. 3,	Sept. 7,	Sept. 10
Philadelphia Inquirer	Sept. 7,	Sept. 14,	Sept. 21
Manhattan Post	Aug. 30,	Sept. 6,	Sept. 13
The Daily	Sept. 13,	Sept. 20,	Sept. 27

1325015-000-9476

12/7/95 - Airtel + attached info re-sent to [redacted] RSPU, per her request. K.H.

b6
b7C

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-93-F-195	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS ; FIF ; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 1,238,712.54	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	AMERICAN EXPRESS BANK, NEW YORK $1,238,712.54

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9454

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

b6
b7C

117. Sharing ☐ Yes ☐ No

11/29/93

118. Award Recommended

1325015-000-9455

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

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29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg

5/5/94
C-4
3920-93-F-0195
5/5/94

3920-93-F-0195
29B-WF-171994 Sub FS Sub-7-2

SEARCHED INDEXED
SERIALIZED FILED
MAY 05 1994
FBI — WASH. METRO FIELD OFFICE

1325015-000-9465

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/28/1995

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: SSA [redacted] b6 b7C

Approved By [redacted]

Drafted By [redacted] :lh

File Number(s): 66-6019

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 10/01/95 requesting status updates for the following seizures:

3920-94-F-0083

Forfeited. The petition ruling is still pending at AFO. On 11/27/95, the USAO-EDVA advised that they have not yet received a response from AFO.

3920-94-F-0087

Same as above.

3920-94-F-0088

Same as above.

3920-94-F-0089

Same as above.

3920-94-F-0090

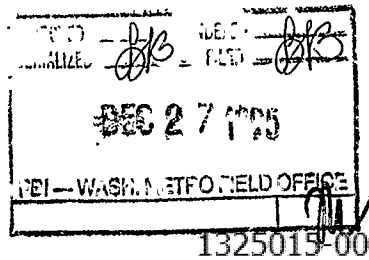
Same as above.

3920-94-F-0179

Same as above.

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
7-WFO (1-EACH SEIZURE FILE)
(8)

29B-WF-171994 Sub FS Sub-7-3
~~65A-WF-186433 Sub FS —111~~



1325015-000-9466

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: DIRECTOR, FBI From: ADIC, Washington Field Office
Re: 66-6019, 11/27/95

3920-93-F-0195

Forfeited (Criminal Order of Forfeiture entered 8/19/93).
FAST's responsibility in this matter was limited to informing FSPU that seizures occurred and that orders were entered. This matter is closed out at WFO.

Questions concerning the above may be directed to A/SS [redacted] or Legal Technician [redacted]

b6
b7C

1325015-000-9467

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/07/1996

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: A/SSA [redacted] b6 b7C

Approved By: [redacted]

Drafted By: [redacted] lh

File Number(s): 66-6019

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 01/26/96 requesting status updates for the following seizures:

3920-94-F-0083 Forfeited. The petition ruling is still pending at AFO. On 02/06/96, the USAO-EDVA advised that they have not yet received a response from AFO.

3920-94-F-0087 Same as above.

3920-94-F-0088 Same as above.

3920-94-F-0089 Same as above.

3920-94-F-0090 Same as above.

3920-94-F-0179 Same as above.

3920-93-F-0195 Forfeited (Criminal Order of Forfeiture entered 8/19/93). FAST's responsibility in this matter was limited to informing FSPU that seizures occurred and that orders were entered. This matter is closed out at WFO.

Questions concerning the above may be directed to A/SSA [redacted] or Legal Technician [redacted] b6 b7C

29B-WF-171994 Sub FS Sub-7-4

CC: 1-BUREAU, FSPU (ATTN: [redacted]
7-WFO (1-EACH SEIZURE FILE)
(8)

SEARCHED INDEXED
SERIALIZED FILED
FEB 08 1996
FBI — WASH. METRO FIELD OFFICE
1325013 0000 9468

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/12/1996

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: A/SSA [redacted] b6 b7C

Approved By: [redacted]

Drafted By [redacted] lh

File Number(s): 66-6019

Title: FORFEITURE MATTERS - STATUS UPDATE

Details: Reference FSPU communication dated 04/01/96 requesting status updates for the following seizures:

3920-94-F-0083 Forfeited. The petition ruling is still pending at AFO. On 04/12/96, the USAO-EDVA advised that they have not yet received a response from AFO.

3920-94-F-0087 Same as above.

3920-94-F-0088 Same as above.

3920-94-F-0089 Same as above.

3920-94-F-0090 Same as above.

3920-94-F-0179 Same as above.

3920-94-F-0091 Same as above.

3920-94-F-0131 Same as above.

3920-94-F-0158 Same as above.

3920-95-F-0055 Same as above.

3920-93-F-0146 Petition is still pending at AFO.

3920-93-F-0195 Forfeited; Criminal Order of Forfeiture entered 8/19/93. DOJ is handling the BCCI matters. FAST's responsibility in this matter was limited to informing FSPU that seizures occurred and that orders were entered. WFO is attempting to contact AFO to obtain copy of proof of publication. Upon receipt, proof of publication will be forwarded to FSPU.

29B-WF-171994-FS Sub-7 5

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 0 1 1996
FBI — WASH. METRO FIELD OFFICE

CC: 1-BUREAU, FSPU (ATTN: [redacted]) b6 b7C
16-WFO (1-EACH SEIZURE FILE)

1325015-000-9469

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

3920-94-F-0117 Forfeited 11/15/94. Documentation in file indicates that petition from Franklin Accept. Corp. was granted. The USPP received the vehicle after paying off the lien. Documentation will be forwarded to FSPU under separate cover.

3920-94-F-170 Per the USAO-DC 4/12/96, litigation is still pending with regard to this matter.

3920-94-F-172 Per the USAO-DC 4/12/96, litigation is still pending with regard to this matter.

3920-95-F-0017 Case is administrative, not judicial. On 3/26/96, WMFO requested that LFU provide the status of the petition ruling in this case. To date, no response has been received.

Questions concerning the above may be directed to A/SSA [redacted] or Legal Technician [redacted]

b6
b7C

4/1/96

[redacted]

b6
b7C

Please provide status updates for each of the below listed seizure numbers. Response is requested by COB 4/15/96

3920-93-F-146 - Need Judicial petition ruling for American Security Bank (victim) (Was bank paid $19,075?)

3920-93-F-195 - Need copy of proof of publication [redacted]

3920-94-F-091 - Need Judicial petition rulin [redacted]

3920-94-F-117 - Forfeited 11/15/94. Franklin Acceptance Corp. petition received 8/94. Was this petition grant [redacted] Have the U.S. Park Police received the Nissan for official use?

3920-94-F-131 - Need Judicial petition ruling. AMES

3920-94-F-158 - Need Judicial Petition ruling and copy of order dated 9/15/94. [redacted]

3920-94-F-170 CLEAR AS

3920-94-F-172 CLEAR AS

3920-95-F-017 - Need Judicial petition ruling for A&M Auto Sales.

3920-95-F-055 - Need Judicial petition ruling. AMES

~~3920-96-F-031 - Need copy of proof of publication.~~

[redacted]

* (Actual information requested on copy of letter to USA's office requesting an update.

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/30/1996

To: Director, FBI **Attn:** Finance Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
Squad C-1/FAST
Contact: A/SSA [redacted] b6 b7C

Approved By: A/SSA [redacted]

Drafted By: A/SSA [redacted] h

File Number(s): 3920-93-F-0195
29B-WF-171994

Title: U.S. V. BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form

[ ] Complaint for Forfeiture

[ ] FD-302

[ ] Search Warrant

[ ] Investigative Insert

[ ] Request for Adoption

[ ] Affidavit

[ ] Indemnity Agreement

[ ] Seizure Warrant

[ ] Final Decree

[ ] FD-597 (Receipt)

[ ] Sharing Request
[ ] Dag 71 [ ] Dag 72

[ ] Settlement Statement

[ ] Petition

[ ] Claim & Cost Bond

[ ] Petition Investigation

[ ] Title Documentation

[ ] Civil Forfeiture Report

[ ] Appraisal Report

[ ] FD-783 (Expedited Release)

[ ] Order of Forfeiture

[ ] Police Reports

[X] Other Subsequent Materials:

29B-WF-171994-FS SUB-7-6

Reference FSPU communication dated 04/01/96 requesting information for this seizure.
Enclosed is PROOF OF PUBLICATION, as requested.

INDEXED Kat FILED Kat

CC: 1- BUREAU, FSPU (ATTN [redacted]
1- WMFO (29B-WF-171994)
ATTACHMENTS (2)

MAY 0 1 199[illegible] b6 b7C

1—WASH. METRO FIELD OFFICE

1325015-000-9472

Asset Forfeiture and Money Laundering Section
United States Department of Justice
Washington, DC 20005

b6
b7C

From:

To:

FAX Number: Date:

Number of Pages Including This Sheet: 4

Name of Person to Contact Upon Receipt:

Special Instructions:

Phone Numbers:
(202) 514-1263
(202) 514-5522 / 10th Floor
(202) 616-9348 / 8th Floor

1325015-000-9473

RECEIVED
SEP 21 1993
U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED,

Defendants

CRIMINAL NUMBER
91-0655 (JHG)
Defendants 01-04

NOTICE TO THE COURT

The United States of America, by its counsel, files this Notice to advise the Court of the government's compliance with 18 U.S.C. § 1963(l)(2) regarding the publication of notice of the Order of Forfeiture issued by this Court on August 19, 1993.

Between September 2 and September 21, 1993, the Asset Forfeiture Office of the United States Department of Justice mailed a Notice of the Order of Forfeiture to 297 individuals and entities. An alphabetical list of the persons to whom the Notice was mailed is attached as Exhibit 1. A sample copy of the Notice and related documents mailed to each person is attached as Exhibit 2.

Also, the government, through the United States Marshals Service has caused a copy of the same Notice to be published in nine newspapers of general circulation. The newspapers and dates of publication are listed on a schedule attached as Exhibit 3. The last publication date is September 27, 1993. As this date falls [illegible] after all claims and petitions will have been received, the [illegible] will be filed in response to the August 19, 1993

1325015-000-9474

Order of Forfeiture will occur 30 days after the date of final publication, i.e., on October 27, 1993.

Respectfully Submitted,

LEE RADEK
Director
Asset Forfeiture Office
Criminal Division
U.S. Department of Justice

By: _____
STEPHEN O. CASSELLA
Trial Attorney
P.O. Box 27322
Central Station
Washington, D.C. 20038
(202) 514-1263

1325015-000-9475

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
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0211
0212
0213
0214
0209
0215

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

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b7C
Sub-7

29B-WF-171994

Searched
Serialized
Indexed
File

FOIMS

015-000-9451

Recd 12/2/93 BB Note - document only

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
Page 4 ~ Duplicate;
Page 7 ~ Duplicate;
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ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[_] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
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0200
0201
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0213
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HIDDEN INTERESTS;
MAJOR CASE 38;
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20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

[redacted]

FOIMS

12/2/93

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Sub FS
Sub-6
29B-WF-171994-1

Serialized
Indexed
Filed

[redacted]

5015-000-8953

Recd 12/2/93

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-93-F-214 09	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption	9. Associated Action Code	10. Administrative or Judicial	11. Property Code
11/16/93	BCCI HIDDEN INTERESTS ;FIF; FAG	C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 6,122,965.17	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	NORTH AMERICAN INVESTMENT & FINANCE, LTD $ 6,122,965.17

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-8955

FBI/DOJ

1/3/97

[redacted]

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b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 3/3/97.

3920-92-F-115 - 131 - Need final order - BCCI - ~~ED Cth~~
3920-92-F-231 - 243 - Need final order - BCCI - ~~ED Gibson~~
3920-93-F-209 - Need final order
3920-93-F-215 - Need final [redacted]
3920-94-F-185 - 84 Simms [redacted]
3920-95-F-135 - 7118 9th St NW - Fern St [redacted]
~~3920-96-F-007~~
3920-96-F-008 - 92 MPV
3920-96-F-119 - 92 MPV
3920-96-F-123 - Range Rover
3920-96-F-125 - $40,000
3920-96-F-194 - $ 8,622
96-037 [redacted] verify Dated Sept 24

Awaiting judge to sign [illegible] order
Deposition scheduled for 4/24/97 at AUSA's
Awaiting settlement figures

Thank you,

[redacted]

b6
b7C

b6
b7C

Set 1 Apr 3/15/97

Copy to each file

b6
b7C

1325015-000-8968

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

5/5/94
C-4
3920-93-F-0209

29B-WF-171994 Sub FS Sub-6-2
3920-93-F-0209-

SEARCHED SERIALIZED FILED
NOV 01 1994
FBI — WASH. METRO FIELD OFFICE

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 3/7/1997

To: ADIC, WFO **Attn:** [redacted]

From: (PS) [redacted] b6 b7C
C-1 FORFEITURE
Contact: X7488

Approved By: SSA [redacted]

Drafted By: PS [redacted] set

Title: STATUS UPDATE

Details: STATUS OF THE ABOVE REFERENCED CASES ARE AS FOLLOWS:

1. 3920-92-F-0115-0131 and 92-F-231-243 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
2. 3920-93-F-0209&0215 - (BCCI Cases) Final Order of Forfeiture has not been received by this office.
3. 3920-94-F-0185 (Abandonment file #3920-96-A-0033) - Forfeiture file closed in lieu of Abandonment. Abandonment letter was sent by certified mail to FCI-Petersburg on 3/7/97.
4. 3920-95-F-0135 - Judicial forfeiture is "stayed" pending criminal case.
5. 3920-96-F-0007 - Depositions scheduled for 4/21/97.
6. 3920-96-F-0008 - Awaiting Judge to sign default judgment.
6. 3920-96-F-0119 - This case was closed upon receipt of a settlement agreement and Order of Forfeiture from the MD USA's Office dated 10/23/96.
7. 3920-96-F-0123 - Pending settlement agreement.
8. 3920-96-F-0125 - Pending settlement agreement.
9. 3920-96-F-0194 - This case was judicially forfeited on 11/18/96 upon the issuance of an Order of Forfeiture (attached for your records).

1-Bureau
FSPU ATTN: [redacted] b6 b7C
37-WFO (1-each file) (3920-93-F-0209)

29B-WF-171994 Sub FF-6

SEARCHED INDEXED
SERIALIZED FILED
MAR 14 1997
FBI - WASH. METRO FIELD OFFICE

B

[redacted] b6 b7C

325015-000-8967

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	William D. Chase 11/29/93	118. Award Recommended

1325015-000-8956

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 12
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3029-93-F-210	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption	9. Associated Action Code	10. Administrative or Judicial	11. Property Code
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG	C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 220,500.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	HOLLAND & KNIGHT, MIAMI FL $220,500.00

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

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b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-8152

FBI/DOJ

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
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U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

Sub-5
~~0199~~
210

This matter is commonly referred to as the BCCI case.

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This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

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(41)

[redacted] (forms) N

Sub b6 b7C Sub-5

OK 12/2/93 Sub-5 29B-WF-171994-1

to [redacted]

WDC 12/2/93

Serialized Indexed Filed

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Recd 12/2/93 [redacted] Natn'l Security Section

1325015-000-8150

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 12
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 90 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-F-211	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16.93	BCCI HIDDEN INTERESTS ; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	¢ $ 63,454.22	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	JANIS SCHUELKE & WECHSLER, WASHINGTON $ 63,454.22

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-8138

FBI/DOJ

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
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U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

Sub-4
~~0198~~
211

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21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

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29B-WF-171994

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Serialized
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[redacted]

015-000-8136

Recd 12/2/93 DB Return to ... when ...

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/06/1995

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] x 9073

Approved By: [redacted]

Drafted By: [redacted] AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS:
MAJOR CASE #38;
00:WMFO

Synopsis: BCCI Investigation.

Details: The writer respectfully requests the BCCI forfeiture sub file previously assigned to SA [redacted] be reopened and assigned to SA [redacted] b6 b7C Trial Attorney Department of Justice has requested SA [redacted] over the past several months to pursue leads and handle administrative tasks involving BCCI.

Although millions of dollars of forfeited assets have been seized and deposited into the U.S. Marshals holding account, investigators are still awaiting the court to issue final orders of forfeiture. Department of Justice Attorneys have advised investigators that final orders of forfeiture are not anticipated until all forfeitable assets are identified and seized.

29-WF-171994 (Sub FS-1)
1-SA [redacted] b6 b7C

AC:ac

10/24/95 Sub FS-25

O&A 10/[illegible]/95 [redacted]

INDEXED FILED

[illegible] 12 1995

FBI — WASH. METRO FIELD OFFICE

29B-WF-171994 Sub FS Sub-25-1

1325015-000-11832

29B-WF-171994(FS)-2

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
JUN 26 1996
FBI-WASH. METROPOLITAN FIELD OFFICE

[redacted]

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	Criminal Number 91-0655(JHG) Defendants 01-04

RECEIVED
MAY 10 1993
CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

DECLARATION OF ROBERT C. DALTON

1. I am a Trial Attorney in the Litigation Unit of the Asset Forfeiture Office, Criminal Division, United States Department of Justice. Since September 4, 1991, I have been assigned to United States v. BCCI Holdings (Luxembourg) S.A. et al. Since the Court's Order of Forfeiture of January 24, 1992, I have been assigned to assist in the collection of the defendants' assets for forfeiture and to defend against claims made by third parties against the defendants' forfeited assets.

2. In particular, I was primarily responsible for the review of the assets held in the United States by BCC S.A. Espanola (referred to in various pleadings as "BCC S.A.E." or "BCC Spain"). In that case, the question presented was whether the BCCI group had exercised such dominion and control over BCC Spain as to warrant disregarding the corporate structure for purposes of forfeiture. I concluded that sufficient evidence existed to seek forfeiture of BCC Spain's assets in the United States ("U.S. assets"). This evidence included, inter alia,

1325015-000 11834

internal BCCI documents reflecting BCCI's operational and administrative control over the BCC Spain; bank records documenting numerous transfers of millions of dollars among the defendants through BCC Spain on an almost daily basis; and the financial and ownership arrangements between BCC Spain and its corporate parent, BCCI Holdings (Luxembourg) S.A. See Government's Motion to Amend Order of Forfeiture of December 23, 1992. After consideration of this evidence, and in order to avoid the costs and consequences of the forfeiture process, the United States and BCC Spain reached a compromise settlement resulting in the forfeiture of a portion of BCC Spain's U.S. assets. The Court approved the proposed settlement, and declared one-third of BCC Spain's U.S. assets forfeited by an Order entered on January 4, 1993.

3. I have conducted similar reviews of other BCCI subsidiaries and affiliates including those whose assets at First American Bank of New York ("FABNY") were transferred to the custody of the Court pursuant to its Order of March 18, 1993 ("March 18 Order"). As directed by the Court in its March 18 Order, the government is now seeking either forfeiture or alternate disposition of these accounts, as well as other related accounts. I submit this declaration to support the government's proposed disposition of each of these assets.

4. BCCI's explosive growth in the 1970s reflected its intention to establish itself worldwide. By September 1983, it had approximately 351 offices operating in 63 countries. See

1325015-000-11835

BCCI Holdings (Luxembourg) S.A. prospectus dated November 22, 1983, at p. 12 (at TAB 1). The historical record indicates that constant expansion and market penetration, often without regard to expense or regulation, was a priority. For example, BCCI acquired a 55% interest in Banque de Commerce et de Placements S.A., Geneva in 1976, which was increased to 70% in 1979; this was found to be contrary to Swiss banking laws regarding foreign ownership, however, and had to be reduced to 20%. Id. Similarly, BCCI's efforts to establish a bank in Spain were frustrated by the fixed number of banking licenses issued by Spanish authorities. BCC Spain was established by BCCI only through the purchase of a Spanish bank with price bid that was about twice market value, based on the other bids on the same bank. See Excerpt of Statement of Alvaro Lozano of June 26, 1992 at TAB 2. The corporate goal of establishing BCCI in every possible market culminated in the offenses for which the defendants were convicted in this case: the illegal purchases of American banks using nominees and secret shareholder agreements to deceive bank regulators as to the true owners. In all cases, once BCCI acquired or established a bank, it was fully integrated into BCCI's operations. It was this network of BCCI branches, subsidiaries, and affiliates that supported the enormous routing transactions that masked the massive fraud within BCCI, ultimately causing BCCI's financial failure. This enormous fraud was detailed by the government in its proffer at the defendants' guilty plea on January 9, 1992.

1325015-000-11836

5. In the course of BCCI's operations, the corporate defendants did little to distinguish its subsidiaries and affiliates from its larger corporate entities. The corporate defendants held themselves out as a single worldwide bank capable of meeting any client's need on a global basis. As examples of BCCI's representation as a single entity are substantial excerpts from the 1988 "Annual Report and Accounts" and the 1988 "Consolidated Group Accounts" prepared by BCCI Holdings (Luxembourg) S.A., at TABS 3 and 4. These reports demonstrate the corporate defendants' view of "the BCC Group" as a single entity.

a. The 1988 "Annual Report and Accounts" Report.

The map and graphics presented a pages 8-15 of this report at TAB 3 clearly illustrate BCCI's global operational network. These offices -- some owned by BCCI S.A., others by BCCI Holdings (Luxembourg), and others managed by BCCI (Overseas) Ltd. regardless of ownership -- are listed in a way suggesting that all are effectively the same. The regional management of these offices, without regard for ownership, is described in text at pages 23-26 of the report in its "Regional Overview." In detailing the BCCI operations by region, the various branches, subsidiaries, and affiliates are all described as equal partners contributing to the Group's success.

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b. The 1988 "Consolidated Group Accounts" Report.

This report explains the financial relationships among the various BCCI entities. Essentially, the report is a balance sheet which includes all BCCI entities in determining the BCC Group's profitability. As noted Note 2A of the "Notes to the Consolidated Accounts" at p. 33 of the report at TAB 4,

> [t]he consolidated accounts comprise those of BCCI Holdings (Luxembourg) S.A., its subsidiary companies and certain affiliated companies . . . . The accounts of these affiliated companies as set out in Note 6(ii) are consolidated since the holding company owns in each case a minimum of 40 per cent of the issued share capital and, by agreement, **the group is entitled to exercise control over their financial and operating policies.** [Emphasis added.]

Similarly, in Note 2D at p. 34 of the report,

> [i]nvestment in affiliates comprises companies in which the interest of the group is long term and substantial and one **over which the group exercises significant influence through participation in the affiliates' policy decisions . . . . The group share of the profits of the affiliated companies is included in the Consolidated Statement of Earnings.** [Emphasis added.]

These notes reflect both the integration of the subsidiaries and affiliates into BCCI, and the degree of control exercised by BCCI Holdings (Luxembourg) over them. A list of subsidiaries and affiliates is set out in Note 6(i)-(ii) at pages 36-37 of this report. Included in this list are all of the subsidiaries and affiliates whose former FABNY accounts were transferred to this Court by its March 18 Order.

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6. Rather than rely on these documents alone, however, the government has sought in each case to substantiate these indices of dominion and control over the subsidiaries and affiliates before seeking forfeiture of any of the assets of BCCI's subsidiaries and affiliates. This was the case with both BCC Spain and ICIC Investments Ltd., see United States v. BCCI Holdings (Luxembourg) S.A., 795 F. Supp. 477 (D.D.C. 1992). Accordingly, the government offers the following regarding the BCCI branches, subsidiaries and affiliates that had accounts at FABNY, and related accounts at Capital Bank in Miami, Florida. The accounts and approximate balances at issue are as follows:

First American Bank of New York

10300015	BCC Emirates	$ 10,255.80
00023012	Banque de Commerce et de Placements S.A., Geneva	827,396.35
10289001	BCC Zimbabwe Ltd.	234,734.21
21000007	BCC (Botswana) Ltd.	20,639.78
11278002	BCC S.A. Espanola, Spain	21,570.00
11801008	BCC Ghana Ltd.	470,526.70
10002016	BCC (Misr), Egypt	163,574.12
10838007	National Bank of Oman	483,647.97
11900017	BCCI (Trinidad & Tobago) Ltd.	5,047.40
11901007	Banco de Credito E Comercio de Investimento, S.A., Sao Paulo Brazil	22,875.22
10105012	BCC Canada	4,528.88
10753008	BCCI (Overseas) Sri Lanka	44,845.00
11386001	BCCI (Overseas) Lahore, Pakistan	283,010.40
20451002	BCCI (Overseas) Istanbul, Turkey	6,218.81
10001026	BCCI (Overseas) Freetown, Sierra Leone	1,747.44
10884000	BCCI (Overseas) Bombay, India	43,650.66
550547877	BCCI (Overseas) Kingston, Jamaica	166,199.77
11439008	BCCI (Overseas) Dhaka, Bangladesh	500.00

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20413009	BCCI (Overseas) Paris, France	30,581.69
21304009	BCCI (Overseas) Barbados	9,466.74
21301002	BCCI (Overseas) Cameroon	325.00

Capital Bank, Miami, Florida

0902205129	BCCI (Trinidad & Tobago Merchant Bankers) Ltd.	197,499.20
0902205080	Banco Credito e Comercio de Investimento S.A., Sao Paulo, Brazil Commercial Dollar Account	160,788.30
0920013341	Banco Credito e Comercio de Investimento S.A., Sao Paulo, Brazil Tourist Dollar Account	12,178.60
0902205153	BCC Credit and Finance (Uruguay) S.A.	375,728.87

For the following reasons, the government seeks to forfeit all of the accounts listed above, with the exceptions of BCC Canada, BCC Botswana, and BCC Zimbabwe. In those instances, while these entities' ownership by the BCCI defendants can readily be established, the government holds no additional evidence demonstrating either the defendants' exercise of dominion and control over them or any alternate theory of forfeiture. Finally, in the case of BCC Spain, the government seeks to forfeit only one-third of BCC Spain's funds at FABNY pursuant to the earlier settlement and forfeiture of its assets. See Order of January 4, 1993.

A. BCCI (Overseas) Ltd. Branch accounts

As listed above, the BCCI accounts at FABNY include ten accounts in the names of branches of BCCI (Overseas) Ltd. These accounts are:

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Branch Name	Approx. balance
BCCI Sri Lanka	$ 44,845.00
BCCI Lahore, Pakistan	283,010.40
BCCI Istanbul, Turkey	6,218.81
BCCI Freetown, Sierra Leone	1,747.44
BCCI Bombay, India	43,650.66
BCCI Kingston, Jamaica	165,965.63
BCCI Dhaka, Bangladesh	500.00
BCCI Paris, France	30,581.69
BCCI Barbados	9,466.74
BCCI Cameroon	325.00

As the assets of one of the four named corporate defendants, the balances in these accounts are all immediately forfeitable.

B. BCCI (Trinidad & Tobago Merchant Bankers) Ltd.

This entity ("BCCI Trinidad & Tobago"), established in 1986 as a 100%-owned subsidiary of BCCI S.A., held only a limited merchant banking license from the government of Trinidad & Tobago. BCCI Trinidad & Tobago was among the many BCCI entities supervised by BCCI Latin America and Caribbean Regional Office ("LACRO") within the BCCI Miami Agency office in Miami, Florida, as set out in the "Latin America and Caribbean Region" memorandum attached at TAB 5. Documentation retrieved from that office reflects that BCCI Trinidad and Tobago had virtually no autonomous decision-making or loan approval authority. See, e.g., LACRO memorandum of 1/07/8 from S.M. Shafi to Mr. Abbas Jafferi, BCCI Trinidad [sic], titled "Country Limit" at TAB 6. Rather, documents reveal that a steady flow of loan activity developed by BCCI Trinidad & Tobago was sent through the Miami office to the Central Credit Division at BCCI's London headquarters for approval. This was true even in the case of loans for as little as TT$15,000 (approximately U.S. $5,000).

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See LACRO telex dated September 25, 1987 from Mr. S.M. Shafi to BCCI Central Credit Division, BCCI London at TAB 7. After BCCI's Miami offices were closed in 1990, supervision of BCCI Trinidad & Tobago was assumed by BCCI (Overseas) Ltd. in the Cayman Islands. The documentation available reflects close supervision and control by both BCCI S.A. and BCCI (Overseas) of virtually all of BCCI Trinidad & Tobago's operations. BCCI Trinidad & Tobago appears to have had virtually no independent corporate identity. For this reason, forfeiture of it its assets is warranted.

In April 1991, BCCI Trinidad & Tobago's account at FABNY became subject to a cease and desist order issued by the Board of Governors of the Federal Reserve System. BCCI Trinidad & Tobago then opened an account at Capital Bank of Miami, Florida. As determined through the deposition of Capital Bank as ordered by the Court on April 21, 1992, that account has a balance of approximately $197,499.20. The government seeks forfeiture of both accounts.

C. Banco de Credito e Comercio de Investimento S.A., Sao Paulo, Brazil

This entity ("BCCI S.A. Brazil") is 50% owned by BCCI (Holdings) Luxembourg S.A., although the first office was initially opened as a representative office of BCCI (Overseas). In the initial capitalization process, however, BCCI Holdings S.A. entered into an agreement with the major local shareholder, Mr. Jaques Eluf, to guarantee him a rate of return on his 30% share hold interest equal to the best rate he would have obtained investing his interest in Brazilian certificates of deposit. Mr.

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Eluf therefore bore no risk with his investment in BCCI S.A. Brazil. See BCCI S.A. London memorandum of September 4, 1990 from Europe and America's [sic] Division Expense Management Committee at TAB 8. Such guaranteed returns on investments were commonly used by the corporate defendants to obtain nominee shareholders as frontmen for many BCCI entities. Each year thereafter, Mr. Eluf submitted his demand for payment under this arrangement. These appear to have been paid not by BCCI Holdings (Luxembourg), however, but rather by BCCI (Overseas) Ltd. See BCCI Brazil facsimile transmission dated September 24, 1990 to Mr. Bande Hasan at TAB 9.

The arrangement with Mr. Eluf is yet another example of the unusual measures commonly used by the corporate defendants in penetrating new markets, usually done to evade local foreign ownership laws. The fact that his guaranteed payments were made by BCCI (Overseas), and not the actual owner BCCI Holdings (Luxembourg), is also indicative not only of the corporate defendants' cooperation in the operation of their criminal enterprise, but also of their coordinated exercise of dominion and control over BCCI S.A. Brazil. For this reason, BCCI S.A. Brazil's funds its FABNY account should be subject to forfeiture.

As in the case of BCCI Trinidad & Tobago, BCCI S.A. Brazil was managed by the BCCI's LACRO office in Miami and later by BCCI (Overseas) in the Cayman Islands. See LACRO memo at TAB 5. BCCI S.A. Brazil also opened two accounts at Capital Bank in Miami in

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April 1991, after its FABNY account was frozen by the Federal Reserve's order. Those accounts have balances of approximately $160,788.30 (the "Commercial Dollar Account") and $12,178.60 (the "Tourist Dollar Account"), respectively. The government seeks forfeiture of both accounts as well.

D. National Bank of Oman S.A.O.

National Bank of Oman S.A.O. ("NBO") is a 40%-owned consolidated affiliate of BCCI Holdings (Luxembourg). NBO has been associated with BCCI since the latter's inception in 1973. The consolidated group accounts report for 1985 states that

> [f]ollowing acquisition of a further 11% interest in the share capital of National Bank of Oman Limited (SAO) in 1985, Management have [sic] decided to consolidate this company . . . . The group has owned a minimum of 29% of the share capital of National Bank of Oman since its establishment in February 1973, and, **under an agreement entered into at that time, the group continues to exercise management control over its financial and operating policies** [emphasis added].

See BCCI Holdings (Luxembourg) S.A. 1985 Consolidated Group Accounts Report excerpt at TAB 10.

NBO's chairman is Ali Bin Sultan Bin Mohammed Fadel, who is also the director of W.J. Towell & Co., a company in Muscat, Oman. Fadel owns 37% of NBO's shares through NBO and another 9% personally. W.J. Towell & Co. also held a 20% interest in Kuwait International Finance Co. ("KIFCO"), an unconsolidated affiliate of BCCI Holdings (Luxembourg). See Price Waterhouse report dated September 30, 1989, Supplementary Briefing Paper at TAB 11.

Among the documentation available to the government is a 1978 telex listing W.J. Towell & Co. as a shareholder in Credit

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and Commerce American Holdings ("CCAH"), the holding company through which BCCI ultimately controlled First American Bankshares. Among the other shareholders are International Credit and Investment Co. (Overseas) Ltd., one of the four corporate defendants, and Sheikh Kamal Adham, who has been found guilty in the state of New York for his misconduct associated with his CCAH shareholding. See BCCI London message dated August 3, 1978 at TAB 12.

NBO's relationship to the corporate defendants is extensive. In 1982, BCCI (Overseas) provided a loan in the amount of $16,322,169 to NBO as additional capital (so that NBO could extend additional credit to borrowers), with the notation that repayment was not expected. See BCCI (Overseas) Credit Proposal dated January 26, 1982 at TAB 13. That same year, NBO was one of only 19 BCCI entities authorized by Swaleh Naqvi to pay interest at 1% above market on U.S. dollar deposits as part of BCCI's effort to build its U.S. dollar deposit base. See BCCI S.A. letter dated 21 December 1982 at TAB 14. Also that year, NBO guaranteed repayment of a $25 million loan issued by BCCI (Overseas) Ltd. to Gaith Pharoan. See BCC Treasury telex dated 1.10.82 to Mr. Fakhir Hussain at TAB 15.

In 1983, S.M. Shafi, who served as Chief Executive Officer of NBO for ten years up to that time, was made president of BCCI (Overseas) Ltd. Management moves such as this were common among all the BCCI entities. In fact, Shafi's appointment to BCCI (Overseas) was necessitated by that company's director moving to

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BCCI S.A. See Minutes of BCCI Directors' Meeting of October 7, 1983 at TAB 16.

In 1985, specifically relying on the long-term business relationship between NBO and the corporate defendants, BCCI (Overseas) Ltd. approved a loan in excess of $10 million to Haji Ali Sultan Mohammed Fadel, another director of W.J. Towell & Co., for the purpose of his acquiring 9,000 shares in NBO. See Memorandum to the Central Credit Committee dated 3.1.85 at TAB 17. BCCI auditors discovered in 1989 that Fadel's loans were not being serviced. See Price Waterhouse report of September 30, 1989 at TAB 11.

As evidenced by the above, NBO's intimate and long-term involvement with the corporate defendants renders the corporate form meaningless in this case. Accordingly, the government seeks the forfeiture of NBO's account at FABNY.

E. BCC Ghana Ltd.

BCC Ghana Ltd. ("BCC Ghana") is a 55%-owned consolidated subsidiary of BCCI Holdings (Luxembourg). In 1985, after BCC Ghana's establishment, it entered into a "Technical Management Contract" with BCCI S.A. for a term of seven years. Under the terms of the agreement, BCCI S.A. "shall be entitled to provide management services and guidance to the extent deemed necessary by it" in the following areas: credit evaluation, foreign exchange operations, internal auditing and inspection, personnel ("providing up to six expatriate officers"), appointments (including sub-managers, departmental heads, and senior

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cashiers), staff training, accounting procedure, operation procedures and computerization, planning and strategy, investments, and financial discipline. The contract further provided that "BCCI's guidance in the specific areas mentioned above will be in addition to its overall direction and supervision of the day to day affairs of the bank." BCC Ghana was bound to consider all of BCCI S.A.'s advice "and shall implement such directions and recommendations . . . ." See Technical Management Agreement dated March 3, 1985 at TAB 18.

Under these circumstances, there can be no question that BCC Ghana was controlled entirely by BCCI S.A. For this reason, its assets deposited at FABNY should be subject to forfeiture.

F. BCC (Misr) S.A.E.

Located in Cairo, Egypt, BCC Misr is a 49%-owned subsidiary of BCCI Holdings (Luxembourg). As in the case of BCP, BCCI Holdings (Luxembourg) was found to be in contravention of local bank regulations regarding foreign ownership in 1986. At that time, BCC Misr had six directors with two groups of three each representing 51% and 49% of its shares, respectively. BCCI Holdings (Luxembourg) then reduced the number of representatives of its 49% share from three to two.

The documentation available to the government reveals BCC Misr's operations within the bank to be somewhat enigmatic. BCC Misr appears to have been most closely linked with BCCI (Overseas) Ltd., for whom it conducted numerous routing transactions. Although many of these may have been legitimate in

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nature, BCC Misr appears to have engaged in a number of highly unusual transactions with BCCI (Overseas) on behalf of BCC Misr's local clients.

In 1985, a credit proposal on behalf of Artisan Co. of Alexandria, Egypt was submitted to BCCI (Overseas). In describing the purpose of the loan, mention is made of "the transfer of the remaining three Branches of BCCI Overseas to BCC Misr." See BCCI (Overseas) Credit Proposal dated 5th December 1985 at TAB 19. In servicing other preexisting loans and other matters with the same customer, it is reported that "BCC Misr continues to handle all relevant matters as agent of BCCI Overseas." Id.

In 1988, two loan accounts were opened on the same day at BCCI (Overseas) "per the instructions" of Sheik Kamal Adham. One of these was in the amount of $800,000, with the second for $2 million. These were to be remitted "urgently by telex" to BCC Misr. See Letters from Manager, BCCI Grand Cayman to Credit Division, BCCI Grand Cayman dated April 14th, 1988 at TAB 20. There appears to have been no other approval or authorization for this loan. As mentioned above, Adham has since been found guilty by the State of New York regarding his ownership of CCAH shares.

These remittances to Adham are more significant because of his 49% share interest in Red Sea Enterprises Holdings S.A., which enjoyed extensive loans jointly held by BCC Misr and BCCI (Overseas). A 1990 audit memorandum indicates that Adham received inexplicable additional advances on those loans, despite

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the fact that these were in arrears from 1988. See BCCI Central Audit Division Credit Examination dated 31.05.90 at TAB 21. BCC Misr thus appears to have served as a direct routing point for these activities on behalf of BCCI (Overseas).

First American Bank itself was well aware of BCC (Misr)'s relationship to the BCCI Group, as evidenced by the FABNY Credit Department memorandum at TAB 22. As stated in that memorandum,

> BCC (Misr) is 49% owned by BCCI Holdings, but, **by agreement, BCCI Holdings has control over the financial and operating policies of the bank. Therefore, BCC (Misr) financials have been consolidated into BCCI Holdings financials.** [Emphasis added.]

This statement not only demonstrates the BCCI Group's control over BCC Misr, but also corroborates the significance of the consolidation of all of BCCI's subsidiaries and affiliates in the 1988 reports at TABS 3 and 4, discussed at paragraphs 5a-b supra.

Given both the evidence of BCC Misr's participation in the misconduct of that defendant and the evidence of the BCCI Group's control over BCC (Misr), the corporate form should be disregarded in this case and BCC Misr's deposits at FABNY should be forfeited.

G. Banque de Commerce et de Placements S.A., Switzerland

Banque de Commerce et de Placements S.A. ("BCP") is a nonconsolidated affiliate, in which BCCI Holdings (Luxembourg) presently holds a 15% interest. As mentioned earlier, BCCI once held 70% of BCP's share outright, but Swiss authorities challenged this degree of foreign ownership resulting in the current 15% ownership percentage. However, this apparent

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divestiture of ownership is illusory, for BCCI Holdings (Luxembourg)'s former stock in BCP was then acquired by the ICIC Foundation (with 35%) and the ICIC Staff Benefit Fund (also with 35%), themselves both entities within the ICIC Group that owned ICIC (Overseas) Ltd. and ICIC Investments Ltd. BCP has been affiliated with the corporate defendants since 1976. Account records for virtually all BCCI entities routinely reflect numerous transfers of funds to or through BCP, up to BCCI's being seized worldwide on July 5, 1991.

As BCCI's massive fraud was unravelled in the late 1980s, auditors from Price Waterhouse detected the equally massive account manipulations by BCCI to hide its losses and inflate its profits. Price Waterhouse's investigation found that

> . . . there have been enormous movements of funds, within and around the BCCI group, which have been required in order to cover up losses, present accounts as if performing and to make good prior manipulations. The total funds flows in the years 1981-1989 which have not been directly related to valid customer transactions is likely to have been several $ billions [sic].

Price Waterhouse report for Meeting of 28 April 1991, p. 6 at TAB 23. The sources of funding for these manipulative routing transactions included unsecured loans created within BCCI, borrowing from other banks not recorded in BCCI, the use of funds controlled by ICIC, and other sources. Price Waterhouse further found that

> [t]he flows of funds for manipulation purposes have been extensive and has involved a vast web of transactions requiring the significant assistance of some major customers.

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> Funds have seldom been passed from one location directly to another but instead intermediary bank accounts have been used. These accounts were not within the accounting records of BCCI. Amongst others they included:
>
> - **Bank accounts at BCP controlled by officers of BCCI or officer of ICIC.**
>
> - Third party bank accounts of customers who were prepared to allow funds to be passed through their accounts.
>
> - Bank accounts established for routing purposes at entities controlled by [major customers].
>
> - Bank accounts of ICIC Holdings or other ICIC related entities at third party banks.
>
> - Bank accounts of other related parties such as [Saudi Development & Commercial Co.] and KIFCO.

[Emphasis added.] Id. at p. 7. BCP was thus a central component of BCCI's largest frauds. BCP's central role was underscored when Price Waterhouse auditors complained that the lack of records and information available regarding these transactions made its work in this area "extremely difficult," but added that "[f]ull access to the records of ICIC, the full cooperation of ICIC management and information from the conduit companies, **notably BCP, would enable this exercise to be expedited** [emphasis added]." Id. at p. 10.

It is therefore clear that even after BCCI divested itself of its improper and excessive investment in BCP, BCP continued to operate at the very center of BCCI's routing network that supported some of its largest frauds. For this reason, the BCP funds formerly on deposit at FABNY should be subject to forfeiture.

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H. BCC Credit and Finance (Uruguay) S.A.

This 100%-owned consolidated subsidiary ("BCC Uruguay")has been associated with BCCI Holdings (Luxembourg) since 1982.

As with both BCC Trinidad & Tobago and BCC Brazil, BCC Uruguay was supervised by BCCI's LACRO office in Miami, Florida. The minutes of an LACRO meeting reported the following:

> In spite of the profitability of this unit, which is due in part due [sic] to revaluation of fixed assets[,] [t]he net worth falls below the minimum net worth requirements laid down by the central bank [of Uruguay], thus facing regular (quarterly) requests for capital infusion. To overcome this and prevent further erosion of networth [sic] it was resolved:
>
> > a) more business will be parked at Uruguay to avoid the necessity of further capital infusion by increasing networth;
> >
> > b) improve treasury operation at BCC Argentina and thereby gain by spinoff in Uruguay . . . .

See Minutes of Americas Support Committee with LACRO dated April 11, 1988 at TAB 24, at p. 12. The above reflects that just as BCC Spain was heavily dependent on BCCI Holdings for capital infusions, so too was BCC Uruguay. It is especially worth noting that the minutes of the LACRO meeting reveal that the above decisions were made without any BCC Uruguay representative present. It is also noteworthy that LACRO was simultaneously manipulating yet another BCCI Holdings (Luxembourg) subsidiary, BCC Argentina, on behalf of BCC Uruguay.

Additional documentation reviewed by the government reflects that virtually every level of action undertaken by BCC Uruguay was supervised by LACRO in Miami and BCCI (Overseas) Ltd. in the Cayman Islands, to include even the opening of term deposit

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accounts. BCC Uruguay had no apparent independent decision-making authority, and as such its asset at FABNY warrant forfeiture as the assets of the defendants.

Further, it was reported at a 1990 investigatory audit committee meeting attended by BCCI's most senior executives and Price Waterhouse representatives that a large number of loans made to the Gulf Group, one of BCCI's largest customers, had been "parked" at BCC Uruguay. See Executive Summary of Findings of the Task Force, pp. 6-10, at TAB 25. Losses and extremely high additional risk incurred by insufficient collateralization of loans to the Gulf Group proved to be among BCCI's greatest financial problems, contributing greatly to its ultimate failure. BCC Uruguay's apparent support for the efforts and manipulations to conceal those loans further warrants forfeiture of the assets now before the Court.

I. BCC Emirates

The BCC Emirates account at FABNY was closed in May, 1991. Union National Bank ("UNB"), BCC (Emirates)' corporate successor, disclaims any interest in the funds subsequently deposited into the account, and is not aware of any unreconciled entries regarding these funds nor any creditor seeking their return. UNB has notified the Court-Appointed Fiduciaries that these funds were most likely intended for a BCCI account and were deposited in BCC Emirates' account mistakenly. See Letter of Ted G. Semaya dated May 7, 1993 at TAB 26. Accordingly, these funds are the

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property of the Court-Appointed Fiduciaries and are subject to forfeiture under the Plea Agreement.

7. Finally, I am also aware of the activities of ICIC Investments within the ICIC Group that led to the forfeiture of the assets of ICIC Investments Ltd. ("Investments") by this Court. See United States v. BCCI Holdings (Luxembourg) S.A. et al., 795 F. Supp. 477 (D.D.C. 1992). As set out in the Memorandum of the United States in Support of its Motion to Amend Order of Forfeiture to Include Assets Held in the Name "ICIC Investments Limited" filed June 24, 1992, the ICIC Group established dozens of companies in the Cayman Islands for the benefit of BCCI. See Memorandum at p. 14. Since that time, the government has discovered additional companies created for BCCI's benefit by the ICIC Group at locations other than the Cayman Islands.

8. Among these since-discovered companies is "North American Investment & Finance Company Limited" ("NAIF") chartered in the Turks and Caicos Islands, an island group in the British West Indies. As described in the Declaration of Stephen Clive H. Jennings appended elsewhere to the Government's Motion to Amend, NAIF was created and controlled by the ICIC Group. Documentation available to the government reveals that NAIF was used for the manipulations involving Investments. See Excerpt from Price Waterhouse report of June 1991 titled "Sources and Utilizations of Funds," p. 17, at TAB 27. NAIF was one of the ICIC Group companies used by Investments to move funds out of Investments'

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accounts at brokerage houses in New York. As these accounts generated revenue, the money would be sent to NAIF or other companies instead of back to Investments. Because of NAIF's status as a wholly-owed subsidiary of the ICIC Group and its participation in BCCI's corporate misconduct, any funds in the United States held by NAIF should be subject to this Court's Order of Forfeiture of July 29, 1992, regarding Investments.

May 10, 1993
Date

ROBERT C. DALTON

1325015-000-11855

U.S. $50,000,000
BCCI FINANCE N.V.

(Incorporated with limited liability in the Netherlands Antilles)

Guaranteed Floating Rate Notes due 1990

Unconditionally and irrevocably guaranteed as to payment of principal and interest by

BCCI HOLDINGS (LUXEMBOURG) S.A.

(Incorporated as a Société Anonyme in the Grand Duchy of Luxembourg)
(Régistre de Commerce, Luxembourg, No. B12810)

The issue price of the Notes will be 100 per cent. of their principal amount.

The Notes mature in December 1990 and may be redeemed in whole or in part at the option of BCCI Finance N.V. on any Interest Payment Date falling in or after December 1986 at their principal amount. In addition, the Notes may be redeemed at their principal amount on any Interest Payment Date in the event that Netherlands Antilles or Luxembourg taxes are imposed on payments on the Notes, as described under "Description of the Notes – Redemption and Purchase".

Notes may be redeemed at their principal amount at the option of a holder thereof on any Interest Payment Date falling in or after December 1988 as described under "Description of the Notes – Redemption and Purchase".

Interest will be payable semi-annually in June and December and will (subject to a minimum rate of 5 ¾ per cent. per annum) be at an annual rate of ¼ per cent. above the London inter-bank offered rate for six months Eurodollar deposits as described under "Description of the Notes – Interest".

The Notes will be unsecured obligations of BCCI Finance N.V. The due payment of the principal and interest in respect of the Notes will be unconditionally and irrevocably guaranteed by BCCI Holdings (Luxembourg) S.A. as described under "Description of the Notes – Guarantee".

Principal of and interest on the Notes will be payable in Hong Kong, London and Luxembourg as described under "Description of the Notes – Payments". Such payments will be made without any deduction, or withholding, for or on account of Netherlands Antilles or Luxembourg taxes, as described under "Description of the Notes – Taxation".

Application has been made to list the Notes on the Luxembourg Stock Exchange.

The Notes will initially be represented by a temporary Global Note without interest coupons. The temporary Global Note will be delivered to Cedel S.A. for the account of the Managers as agents of the subscribers against payment to BCCI Finance N.V. on or about December 1, 1983. The temporary Global Note will be exchangeable for definitive Notes, with interest coupons, not earlier than 90 days following the completion of the distribution of the Notes, as determined by Bank of America International Limited, and after due certification of non-United States beneficial ownership.

Bank of America International Limited — **London & Continental Bankers Limited**
Abu Dhabi Investment Company — **Arab Banking Corporation (ABC)**
Bank of China — **Banque Arabe et Internationale d'Investissement (B.A.I.I.)**
Banque Nationale de Paris — **Bayerische Vereinsbank Aktiengesellschaft**
Credit Suisse First Boston Limited — **First Chicago Limited**
Kidder, Peabody International Limited — **Kuwait International Investment Co. s.a.k.**
Lehman Brothers Kuhn Loeb International, Inc. — **Merrill Lynch Capital Markets**
Orion Royal Bank Limited — **Prudential-Bache Securities**
Sanwa Bank (Underwriters) Limited

Prospectus dated November 22, 1983

CWF-019335
R6E GJ DOCM'T

HISTORY

The BCC Group was originally conceived as an international banking organisation backed by Middle Eastern investors to provide commercial banking services world-wide, initially in the Middle East and in the United Kingdom. The first bank to be established was Bank of Credit and Commerce International S.A. ("BCCI") in Luxembourg in 1972 with one branch in each of Luxembourg, United Arab Emirates and the United Kingdom. Its initial paid-up capital of $2.5 million was subscribed by Bank of America (25% later increased to 30%) and the balance by investors from the Middle East.

The original purpose of Bank of America's investment in BCCI was to gain access to the Middle East market. In due course Bank of America determined that its strategic interests in the area required a direct presence. At the same time, the BCC Group wished to undertake banking operations within the United States but was unable to do so whilst Bank of America retained its shareholding. Therefore, by mutual agreement, Bank of America divested its shareholding by June 1980.

Between 1972 and the end of 1974, the BCCI network was expanded in the Middle East and the United Kingdom through the addition of seven branches in the United Arab Emirates, one branch in the Sultanate of Oman and five branches in the United Kingdom. In 1973, a 35% interest was acquired in National Bank of Oman Limited (S.A.O.) in the Sultanate of Oman, which was subsequently reduced to 29%, and an 80% interest was acquired in Banque Chartouni, Lebanon, which was re-named Bank of Credit and Commerce International (Lebanon) S.A.L. and in 1977 became a wholly-owned subsidiary. In order to establish a presence in the Far East, BCCI Finance International Limited, a finance company, was established in Hong Kong in 1973.

In December 1974, the BCC Group was restructured with the establishment of BCCI Holdings (Luxembourg) S.A. which in 1975 acquired BCCI, its subsidiaries, Bank of Credit and Commerce International (Lebanon) S.A.L. and BCCI Finance International Limited, and its investment in National Bank of Oman Limited (S.A.O).

The next period of expansion which occurred between 1975 and 1980 began with the establishment of Bank of Credit and Commerce International (Overseas) Limited ("Overseas") in the Cayman Islands. During this period, Overseas opened branches in Egypt, Sudan, Bangladesh, France, Kenya, Sierre Leone, South Korea, Pakistan, Gabon, Ivory Coast, Liberia, Sri Lanka, Togo and Senegal. Meanwhile, BCCI established branches in Mauritius, North Yemen, Jordan, West Germany, Sudan, Djibouti, Seychelles, Oman and Bahrain.

During the same period, the following companies were established or acquired: Kuwait International Finance Company S.A.K. (49%); BCCI Canada Inc (50%); Premier Bank Limited, Ghana (45%); Bank of Credit and Commerce International (Swaziland) Limited (55%); Bank of Credit and Commerce International (Nigeria) Limited (40%); Hong Kong Metropolitan Bank Limited (96%), since renamed Bank of Credit and Commerce Hong Kong Limited, and Credit and Finance Corporation Limited, the Cayman Islands (100%). In 1976 a 55% shareholding was acquired in Banque de Commerce et de Placements S.A. in Geneva which was increased to 70% in 1979. In 1983 this shareholding was reduced to 20% to comply with Swiss regulations relating to agreements of reciprocity between Switzerland and the places of residence of the shareholders of the BCC Group. Some re-alignments of branches were also made; branches of BCCI operating in the Sultanate of Oman were transferred to Overseas and branches of Overseas in Egypt were transferred to a new joint venture bank, Bank of Credit and Commerce (Misr) S.A.E. (49%), which was established with the participation of Egyptian investors.

From 1981 onwards, BCCI and Overseas opened branches in the Philippines, Panama, Jamaica, Macao, Cyprus, Turkey, Monaco, the Maldives, India, Barbados and the Bahamas. Agencies were also established in the states of California and Florida in the United States. A representative office of Overseas was opened in Beijing, People's Republic of China. The following subsidiaries and affiliates were also established: Bank of Credit and Commerce Zimbabwe Limited (53%), Bank of Credit and Commerce (Zambia) Limited (100%), Italfinance International S.p.A. (85%), Bank of Credit and Commerce Cameroon S.A. (65%), Bank of Credit and Commerce (Botswana) Limited (100%), BCCI Leasing (Malaysia) Sdn Bhd (49%), BCC Credit and Finance (Uruguay) S.A. (100%) and Bank of Credit and Commerce (Emirates) (40%) to which were transferred existing branches of Overseas in the United Arab Emirates.

During 1981, Bank of Credit and Commerce Canada was established as a wholly-owned subsidiary of BCCI, into which was merged BCCI Canada Inc.

In 1983, interests were also acquired in the following two existing commercial banks: Banco Mercantil (49%) in Colombia, since renamed Banco de Credito y Comercio Colombia and Banco de Descuento S.A. (99%) in Spain. In October, BCCI was authorised to establish an agency in New York.

STRUCTURE

The BCC Group and its non-consolidated affiliates presently consists of 28 operating companies which are set out in the organisation chart on the opposite page.

As at September 30, 1983 the branch, agency and representative office network of the BCC Group and its non-consolidated affiliates totalled 351 offices in 63 countries, of which 90 are in Europe including Frankfurt, Geneva, London, Luxembourg and Paris, 48 in North and South America including New York, 45 in the Far East and South East Asia including Hong Kong and Tokyo, 94 in the Middle East including Abu Dhabi, Bahrain, Dubai and Kuwait and 74 in Africa including Cairo.

CWF-019346-
R6E GJ DOCM'T
1325015-000-11857

June 26, 1992

This is a statement taken from ALVARO LOZANO, at the Miami office of the FEDERAL BUREAU OF INVESTIGATION, 16320 Northwest 2nd Avenue, North Miami Beach, Florida, taken by Special Agent KATHLEEN MITCHELL.

" I, ALVARO LOZANO, was born on January 6, 1948 and social security number 267-80-4146. I live at 14220 Southwest 92nd, Miami, Florida, with a telephone number (305) 378-0359. I presently own the INTERSTATE SOFTDRINK CORPORATION, 7298 Northwest 70th Street, Miami, Florida, telephone (305) 883-6004.

"I was employed with the AMERICAN EXPRESS BANK between 1966 and 1986. My assignments at the AMERICAN EXPRESS BANK were:

Vice President of Operations in the Banking Division,
Branch Manager - Taipei, Taiwan (2 years),
Branch Manager - Philippines (9 - 10 months),
Deputy Manager - Indonesia (3.5 years),
opened bank branch - Istanbul, Turkey (6 months),
Vice President/Manager - Cairo, Egypt (1 year),
Vice President Representative/Spain and Portugal - Madrid, Spain (3.5 years).

"I was approached while I was working for AMERICAN EXPRESS BANK, in Madrid, Spain by MOHAMMED IKRAMULLAH KAHN, to join the BANK OF CREDIT AND COMMERCE INTERNATIONAL (BCCI), at BANK OF CREDIT AND COMMERCE S.A. ESPANOLA (BCC SAE).

"The BANCO DE DESCUENTO was bankrupt and BCCI purchased the bank and operated it as BCC SAE. There was an extreme interest in the banking license of BANCO DE DESCUENTO because of its value. As a result, BCCI purchased the BANCO DE DESCUENTO for what seemed like twice its value. In retrospect, it was obvious, by this action, that BCCI wanted to get into any country they could.

"I was acquainted with KAHN while working at AMERICAN EXPRESS BANK. KAHN offered me a position to manage the 26 branches of BCC SAE. I felt this was exciting and challenging and accepted the position. I realized there were problems at BCC SAE after two (2) to three (3) months.

"BCC SAE did not operate as a bank as BCC SAE used unprofessional banking practices. BCC SAE was losing approximately $1,000,000 per month which did not bother BCCI.

"BCC SAE'S only focus for its primary source of revenue was obtaining deposits. This is the only thing they were interested in. BCC SAE offered no customer services. My mission was to go out and get deposits. I was also expected to hire employees from other banks to bring in more deposit accounts from those banks. The main focus was corporate accounts because they would have larger deposits.

"When BCC SAE capital would run out, money would be sent from the BCCI offices in London, England. The money would come from different places and no one at BCC SAE would know the origin of the money.

Annual Report & Accounts 1988

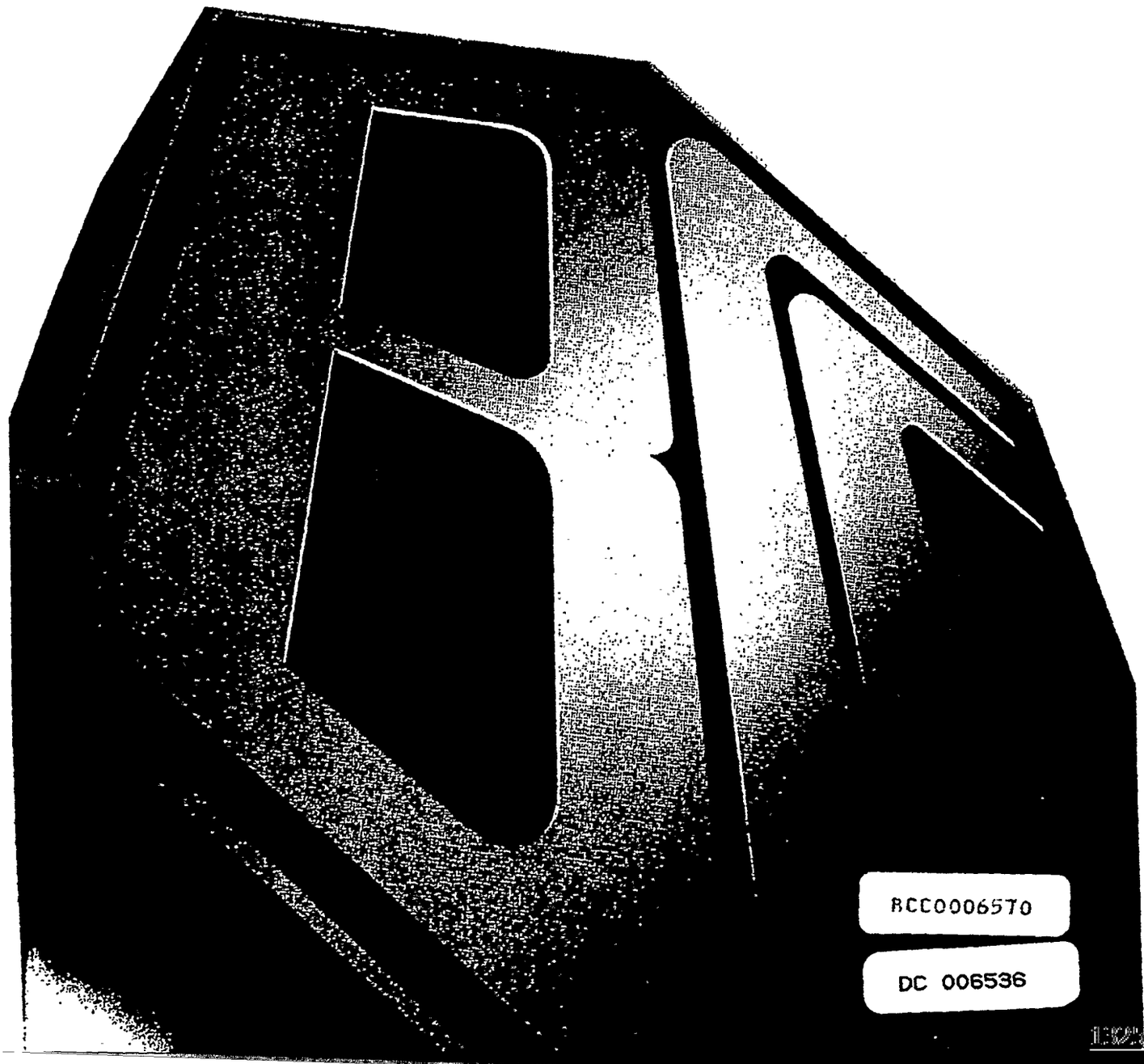
BCCI HOLDINGS (LUXEMBOURG) SA

BCC0006569

Exhibit 3 -- Crim. No. 91-0655 (JHG)

DC 006538 1385015-000 11859

BCCI Holdings (Luxembourg) SA
Head Office: 39 Boulevard Royal, Luxembourg



BCC0006570

DC 006536

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Financial Highlights

DC 006537

BCC0006571

1325015-000-11861

	1988	1987
	$'000	$'000
Capital Fund *since increased to over $1,517 million	1,417,133	1,469,182
Net Operating Profit	191,934	185,441
Profit before tax	46,934	115,441
Total Assets	20,637,655	19,643,000
Deposits from customers	15,662,018	15,439,237
Deposits and other funds	18,815,879	17,724,502
Loans and Advances (net of provisions)	9,838,179	9,224,882

* Capital Fund increased in April 1989 by $100 million

Ratios		1988	1987
		%	%
Liquidity/Assets	Cash, Banks, CD's and Marketable Securities/Total Assets	47.47	48.18
Liquidity/External Liabilities	Cash, Banks, CD's and Marketable Securities/External Liabilities	50.97	52.07
Loan Ratio	Net Loans/Total Deposits and Other Funds	52.29	52.05
Capital/Deposits	Capital Fund/Customer Deposits	9.05	9.52
Leverage Ratio	Capital Fund/External Liabilities	7.37	8.08
Capital/Assets	Capital Fund/Total Assets	6.87*	7.48

* Capital/Risk Weighted Assets ratio now exceeds 9% after above increase in Capital

BCC0006572

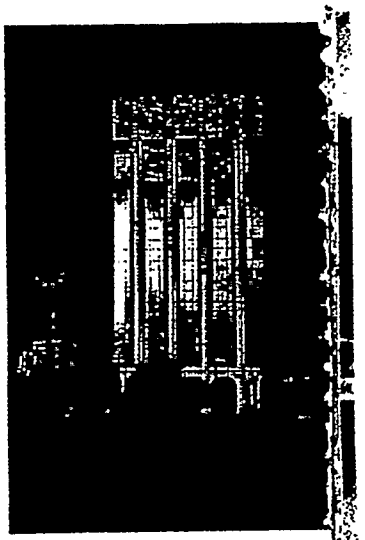
DC 006538

1325015-000-11862

LONDON

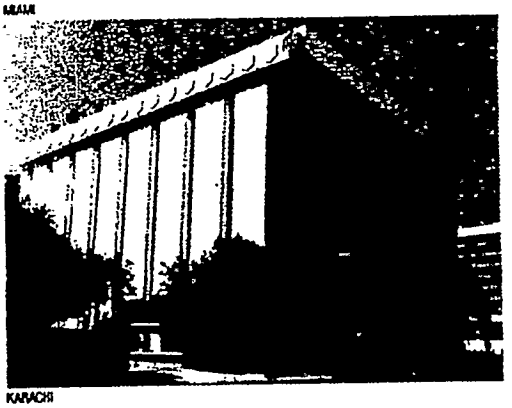
PORT LOUIS

MIAMI

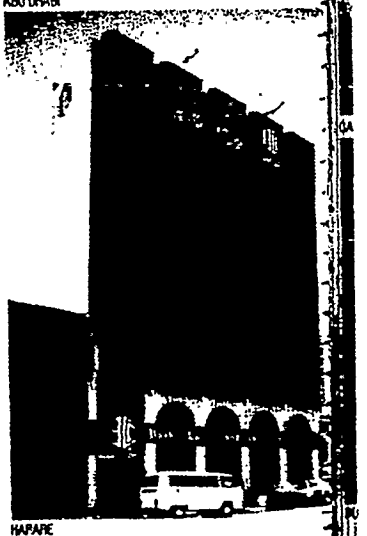


ABU DHABI

HONG KONG



KARACHI



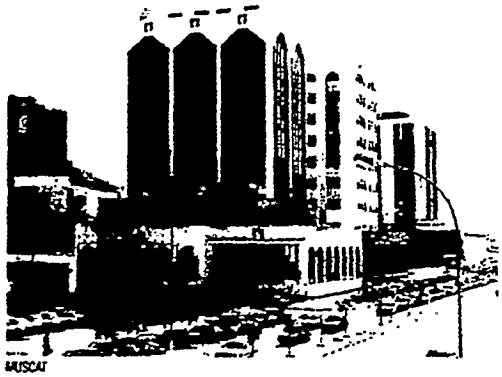
HARARE

BCC0006573

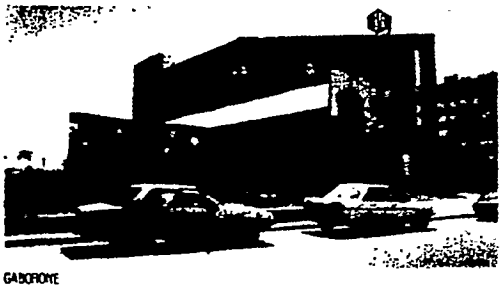
DC 006539

1325015-000-11863

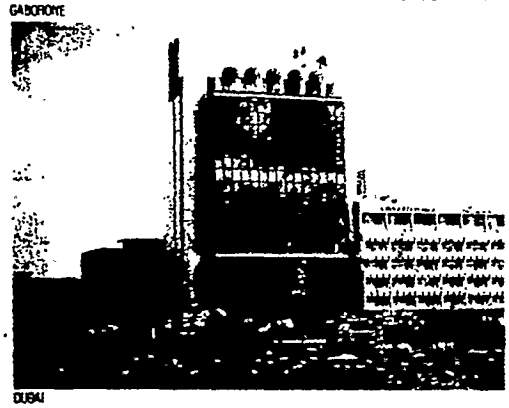
Board of Directors



MUSCAT



GABORONE



DUBAI

Yves C. Lamarche
Director (American)
Chairman, Banque Arabe et Internationale d'Investissement

J. D. van Oenen
Director (Dutch)
Formerly Executive Vice President
Bank of Montreal

Ghanim Faris Al-Mazrui
Director (UAE)
Chairman, Private Department for
H H Sheikh Zayed Bin Sultan Al Nahyan
Secretary General, Abu Dhabi
Investment Authority

Dr. Alfred Hartmann
Director (Swiss)
Chairman, Banque de Commerce
et de Placements SA

P. C. Twitchin
Director (British)
Formerly Vice President
Bank of America

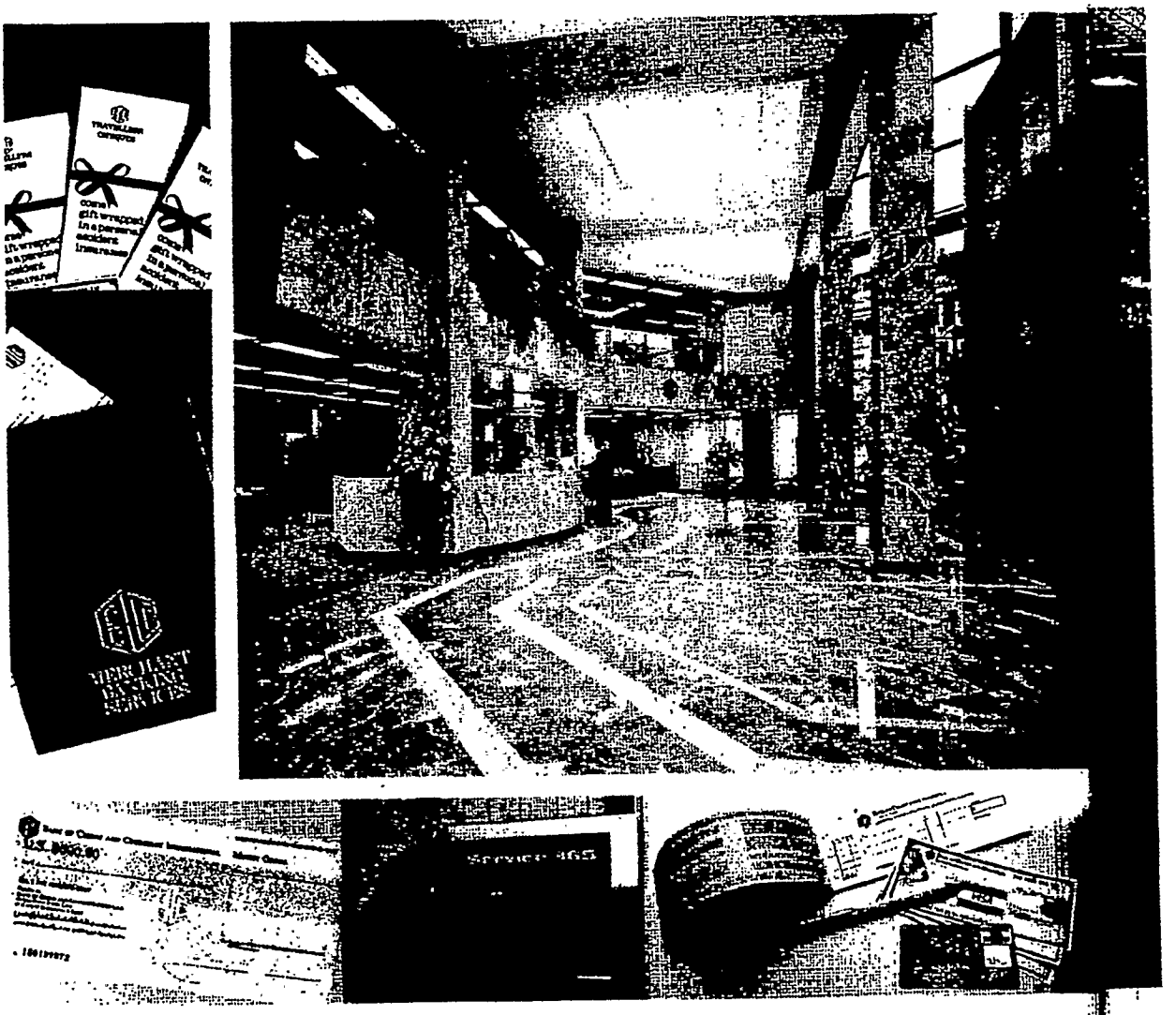
Khalid Salem Bin Mahfouz
Director (Saudi)

Agha Hasan Abedi
Director and President (Pakistani)
Formerly Chairman and President
United Bank Ltd

Swaleh Naqvi
Director and Chief Executive Officer (Pakistani)

BCC0006574

DC 006540 1325015-000-11864


MERCHANT
BANKING
SERVICES
Service 365

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BCC0006576

DC 006542 1325015-000-11866

MEETING HELD: April 11, 1988

SUBJECT: Colombia

	BUDGET 88	A MARCH	B MARCH	B JUNE
			(US$ 000's omitted)	
Profit	7.334	1.396	1.630	3.460
Advances	132807	124628	123913	126989
Deposits	167192	141536	165760	166262
Current	59936	48569	57608	58304
Savings	34069	19765	31159	32179
Term	68138	65674	71196	70243
Others	5049	7528	5797	5536

The new measures introduced by the government of Colombia has had a detrimental effect on the profitability of Banco Credito - although there has been an adverse effect on the short term profitability, the unit felt confident that they would strive to overcome this by special efforts to make good the deficiency in the long term.

The new measures are:

a) increase of reserve requirements on official deposits (primarily current accounts) from 44% to 65%;

b) details of accounts of Pesos 6 Mio (US$21,000) and over to be reported to the local tax authorities - this has led to flight of deposits from the banking sector;

CAY 0021831

1325015-000-11867

c) reserve requirements on ordinary loans which comprises 67% of the total advances have been introduced at 15.5%. This has impacted profitability adversely by Pesos 43.M US$160,000 per month;

d) Representative office expenses not budgeted for 1987 were booked in sundry debtors instead and had to be written off against P & L account.

EMP

The current servicing for EMP accounts is handled by the representative office in Bogota. While the targeting and identification of potential customers is the responsibility of the branch managers.

In view of this account holders tend to relate more closely with the branch managers in case of any hiccups - in order to prevent recurring visits regarding servicing complaints by the account holders, branch managers tend to concentrate more on term deposit account which are albeit more expensive, have lesser transactions than money market accounts which carry lower rates of interests.

It was considered that the servicing would be the specific responsibility of Area Account Managers who would interact with the account holders to establish a close rapport. These area managers would be located at Miami to handle service, establish close contact with clients and thus devote more and concentrate on money market accounts.

CAY 0021832

1325015-000-11868

It was resolved as follows:

a) Latin America Regional would establish a marketing team and redefine EMP strategy, particularly with regard to 'EA'.

b) Review existing procedures and take necessary precautions to prevent services/regulatory bottle necks.

CAY 0021833

1325015-000-11869

MEETING HELD: April 11, 1988

SUBJECT: Argentina

	BUDGET 88	A MARCH	B MARCH	(US$000's omitted) B JUNE
Profit	831	(.803)	42	45
Advances	28316	15296	18790	25425
Deposits	14060	10715	8964	10556
Current	704	609	694	702
Savings	370	246	385	381
Term	12961	9860	7860	9448
Others	25	-	25	25

Mr. U.K. Ghosh gave a brief background history of the bank from the date of acquisition of the first 30% of the shares from Banco D'Italia to the current 99.97% he outlined briefly the 2 major areas which effect profitability.

a) At the time of acquisition of Banco Fin America, the previous owners had violated capital adequacy rules by acquiring fixed assets, (building) for more than the networth of the bank, this was incurring a penalty from the central bank. In order to reduce this adverse impact on profitability several schemes were devised involving the sale and lease back of these buildings. However, one of the three buildings remains vacant and is therefore incurring monthly maintenance and rental expenses as well.

CAY 0021834

1325015-000-11870

b) The bank has substantial credit card operation which suffers a loss on account of:

(i) bad loan portfolio of equivalent US$150,000;

(ii) maximum interest ceiling of 3% over and above deposit rates on lending to credit card holders;

(iii) compulsory deposit with Argen card centre which pay a spread of 3 to 4% (@ bonex rate) which is well below comparable spreads available on normal lending.

c) The liquid capital is invested in dollar denominated instruments such as bonex and Tidol, these instruments carry very low returns, unless there is a large devaluation, the loss of spread has sustained negative impact on the profitability of this unit.

Not withstanding the above BCC Argentina has surpassed its targets in the following areas:

(i) Total deposits, although not in the mix, in particular low cost deposits, current and savings;

(ii) Net interest margin $1.287 Mio against .607 Mio;

(iii) Commissions $1.9 Mio against $1.349 Mio;

CAY 0021835

1325015-000-11871

(iv) Profit on exchange .207 Mio against .060 Mio.

However, this unit has incurred a substantial loss in other income, which is the main reason for the shortfall in achievement against target.

It was suggested by Mr. Ameer Siddiki that after appointment of the new Joint Chief Executive following should be attended to without delay:

i) ascertain whether at least one of the buildings can be either sold or written off the books;

(ii) consider debt equity swap to buy the buildings in the name of an outside agency/co.;

(iii) consider reduction of staffing levels to a more manageable level, thereby only retaining quality personnel.

(iv) consider closing down some of the branches;

(v) revamp the automation system of the bank to improve delivery capability and improve controls.

CAY 0021836

1325015-000-11872

MEETING HELD: April 11, 1988

SUBJECT: Uruguay

	BUDGET 88	A MARCH	B MARCH	(US$ 000's omitted) B JUNE
Profit	900	272	180	430
Deposits	5000	1300	1500	2500
Advances	10000	5100	6000	7000

This unit cannot accept current deposits.

The future profitability of this unit is inextricably linked to Argentina. As Uruguay is used as an outlet for Argentina citizens for their foreign exchange operations. Inspite of the profitability of this unit, which is in a large part due to revaluation of fixed assets. The net worth falls below the minimum net worth requirements laid down by the central bank, thus facing regular (quarterly) requests for capital infusion. To overcome this and prevent further erosion of networth it was resolved:

a) more business will be parked at Uruguay to avoid the necessity of further capital infusion by increasing networth;

b) improve treasury operations at BCC Argentina and thereby gain by spin off in Uruguay,

c) issuance of credit cards and discounting of merchant credit card receipts locally;

d) increased emphasis on EMP business.

CAY 0021837

1325015-000-11873

MEETING HELD: April 11, 1988

SUBJECT: Jamaica

	BUDGET 88	A MARCH	B MARCH	(US$ 000's omitted) B JUNE
Profit	3250	868	660	1395
Advances	27300	13911	15240	18150
Deposits	38000	37125	34050	35450
Current	2900	4710	2100	2465
Call	200	35	-	-
Term	24550	21703	22160	23005
Others	7750	8621	7750	7825

BCC Jamaica has successfully surpassed targets for profits 868, budgeted 660, deposits 37,125 budgeted 34,050 (eqiv. US$ 000') and mix of deposits, under current and savings, there is shortfall in term deposits, the growth in term deposits seem to have been discouraged due to their adverse impact on profitability.

Jamaica has achieved their quarterly targets in all areas except the above and credit cards.

However, because of the improvement in the mix of deposits, profit target has been surpassed - if the advances and business targets had been met profits would have displayed even better achievement.

CAY 0021838

1325015-000-11874

MEETING HELD: April 11, 1988

SUBJECT: Barbados

	BUDGET 88	A MARCH	B MARCH	(US$ 000's omitted) B JUNE
Profit	750		110	260
Advances	22000		17000	18000
Deposits	35000		26600	29000

Barbados has come on stream as a productive, cohesive and well managed unit of BCC. The country has very successfully surpassed its profit target of .110 Mio by 0.35 Mio to US$.145 Mio. There is a very slight shortfall in deposits and advances, efforts will be made to make good these shortfalls by the end of the second quarter, '88.

CAY 0021839

1325015-000-11875

MEETING HELD: April 11, 1988

SUBJECT: Bahamas

	BUDGET 88	A MARCH	B MARCH	(US$ 000's omitted) B JUNE
Profit	1300	241	275	575
Advances	40000	26363	32000	35000
Deposits	100000	82249	75000	82500

This country has also displayed good progress vis a vis budget in the first quarter of 1988. The growth in deposit has been 17.4 Mio mainly as a recipient of EMP business and deposits from overseas. . The unit however has developed some capability to generate deposits, but this needs considerable effort to upgrade it to a satisfactory level.

The (June) 2nd quarter deposit target is revised from 82.5 Mio to US$100 Mio.

CAY 0021840

1325015-000-11876

MEETING HELD: April 11, 1988

SUBJECT: Florida

(US$000's omitted)

	BUDGET 88	A MARCH	B MARCH	B JUNE
Profit	8667	1668	1012	3162
Advances	215000	181096	151864	175728
Deposits	665000	446386	455000	515000

The state of Florida has 3 operating agencies in Miami, Tampa and Boca Raton. The performance for the March quarter shows actual profits over budget at 1.6, against a target of 1.012 (US$. Mio).

Advances, deposits have also exceeded targets. The performances of the three agencies are shown below:

(US$000's omitted)

	Miami	Tampa	Boca Raton
Profit	1565	0.63	.040
Advances	154033	16873	10190
Deposit	380174	32105	34107

CAY 0021841

1325015-000-11877

In view of the sluggish performance of the agencies at Tampa and Boca Raton it was agreed that the viability of the continued existence of these agencies must be assessed as soon as possible, so as to determine the necessity of their ongoing usefulness.

The Regional Office was requested to forward a report to Support Centre in this respect.

CAY 0021842

1325015-000-11878

MEETING HELD: April 11, 1988

SUBJECT: Paraguay

			(US$ 000's omitted)	
	BUDGET 88	A MARCH	B MARCH	B JUNE
Profit	378	62	95	189
Advances	5000	5088	3800	4000
Deposits	5000	3939	3500	9000

Paraguay has maintained steady albeit relatively small growth in profits and deposits. Although advances have exceeded budget, the performance of profits and deposit is below budget.

Paraguay will also undergo a change of personnel, as Mr. Waseem Siddiqui is being transferred to Argentina and replaced by a new Country Manager.

CAY 0021843

1325015-000-11879

Functioning of Management and Dynamics Committees and Budget and Marketing Committees

While emphasising the necessity of these Committees in the Management of the bank, special mention was made of the booklet entitled "The Committees" sent to all units under a covering letter dated February 27, 1988. It is by continuous interaction, interfusion and dialogue with the members of these committees that the management of a unit will achieve a fusion. Individuals, while capable in themselves, achieve respect for each other and in that process gain the feeling of commitment to the organisation, culture and philosophy of BCC.

The organisation needs the budget and marketing committees to encapsulate and communicate its' business plan and the strategy for its achievement. The BCC management culture is communicated and disseminated through the Management and Dynamics committees.

The minutes of such meetings encapsulate the proceedings for the benefit of the Regional office and the support centre. The timing of these meetings sets certain standards of discipline and organisation.

Some of the units may not be able to meet the strict deadlines set for the timing of these meetings and despatch of the minutes. The exact dates are not as important as the frequency of these meetings.

CAY 0021844

1325015-000-11880

Staff relationship and Morale

Morale and the importance of staff relationships and their importance in our culture was highlighted. The conditions that our units face in Latin America and to a large extent the Caribbean may at times effect the confidence, the morale and hence the productivity of staff members. This is particularly relevant in the case of large units such as Colombia with a staff compliment of 900 people and 30 branches, Brazil and Argentina to a lesser extent. Except for Brazil which is staffed entirely by staff who are new commers to the bank, the banks in Argentina and Colombia were acquired by BCC. So although the institution remained the same the corporate culture will have to, if necessary, undergo a change.

In the light of this scenario, the subject was further highlighted by the added dimension of the expatriate officers of the bank who are posted to the Latin American continent. These international officers as representatives of BCC to these banks have the added responsibility of spreading the BCC culture among the new comers to the group. Their attitude and conduct have a very significant impact on the officers who form the local cadre.

The problem faced by these officers, because of the hyperinflationary conditions, and the rapidly reducing currencies was also highlighted by the regional office. The erosion of purchasing power by rapid devaluation/hyperinflation is a phenomenon which needs urgent attention. A proposal for change in the determination of local currency salaries for international officers has been forwarded by the regional office and is currently being reviewed by the Human Resources Division. Mr. Ameer Siddiki promised to expedite decision on this.

1325015-000-11881

Central Bank and Government Relationships

The relationship with our customers, the central bank of the country where we operate and interaction with other governmental agencies determine our image in the short and long term. We should at all times maintain good relationship with the Central banks.

BCC Image

BCC has entered a new phase in its short history. The banking sector as whole is under close scrutiny by regulators and government agencies through out the world.

BCC as a large multinational organisation is subjected to similar scrutiny.

It is therefore of paramount importance that we should be very conscious of our image in the countries where we operate. After all we are a local bank in each country where we operate.

Summation

The proceedings of this meeting were summed up in direct relation to our "Ten year strategy" - while highlighting the importance of the ten year strategy - the unit heads/country managers and the regional office were requested to conduct a country by country exercise as part of this process to suggest new products.

CAY 0021846

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These suggestions should be incorporated in the form of a strategy paper and forwarded to regional office and the support centre

- while discussing the strategy for the next 10 years Mr. Ameer Siddiki summed up as follows:

- notwithstanding growth plans, future strategy, and the improvement in delivery capability planned by BCC these are some concepts which are sacrosanct to the cultural ethos of BCC.

- We must at all times preserve our identity and culture;

- sacrifice a little if we must to preserve this cultural identity; by sacrificing we become strong and part of a dynamic vehicle to take us into the future;

- the meetings that we hold by virtue of their success in motivation aid our effort to preserve and enhance this enthusiasm;

- we must remind ourselves that regardless of other people's attitudes we must adhere to our culture;

- we must be a high quality bank; quality is an underlying theme.

CAY 0021847

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- In this connection the outline of the next 10 years is very timely.

The future is a new challenge, different from the past and this needs newer and finer skills and a fresh approach.

- This is part of our BCC plan. BCC theme within which there are different segments/sectors - one of these sectors is Latin America.

This is an agreed plan but do we have the right skills to achieve it?

CAY 0021848

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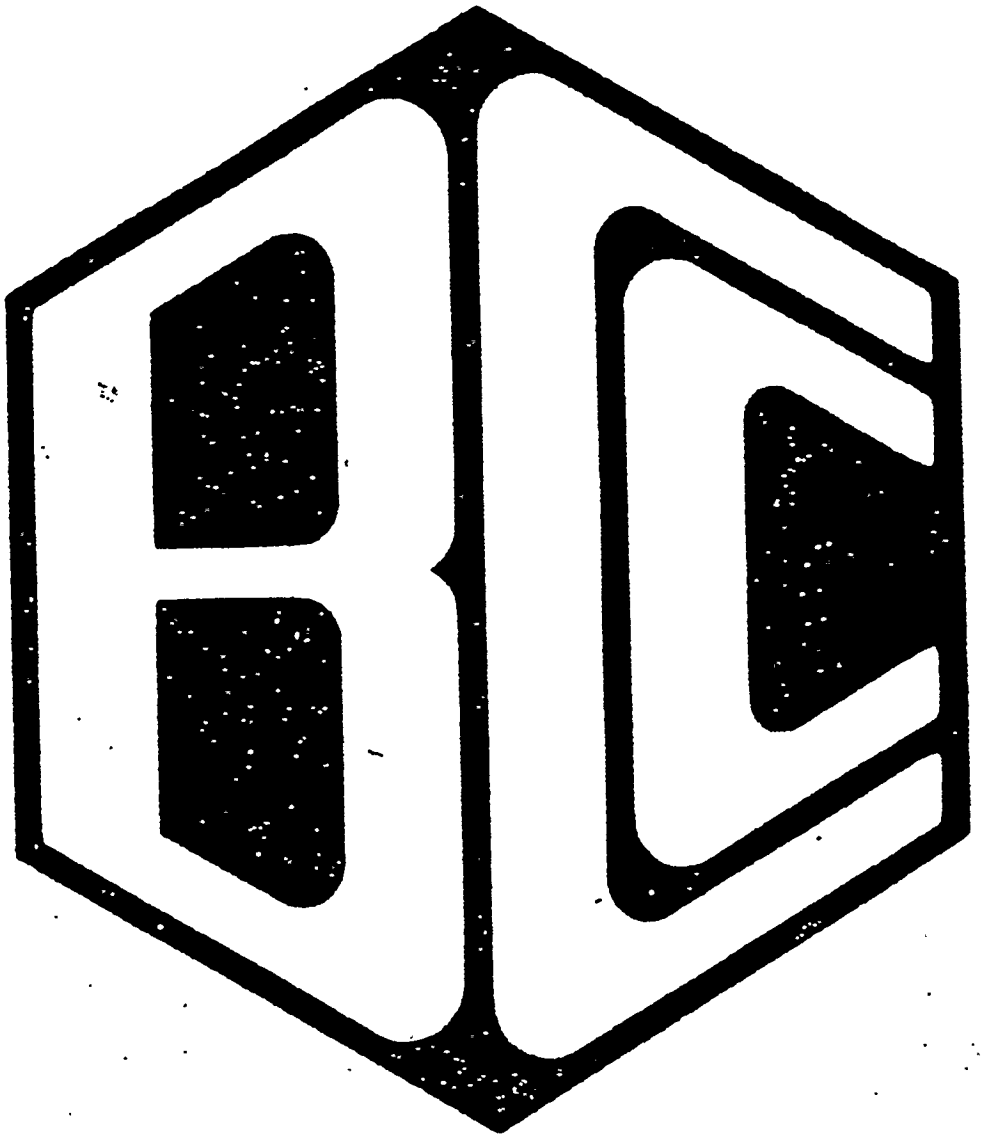

BCC0019743 F

Exhibit 25 -- Crim. No. 91-0655 (JHG) DC 020432

EXECUTIVE SUMMARY OF

FINDINGS OF THE TASK FORCE

1.00 Most of the concerns expressed by Price Waterhouse in their Initial Report to the Task Force of 14th March '90 (covering 9 large loans case plus several slow moving advances in Grand Cayman) and the Supplementary Report of 6th April '90 (covering 12 loan cases including some more slow moving advances in G/C) were after detailed case by case review by the Task Force, found to be valid and justified and required significant amount of additional provisioning.

2.00 The Task Force review of the global audit arrangements of the BCC Group showed that these arrangements (covering all the Group's 'consolidated' locations (71) incorporating 30 banking units) are both intensive and extensive. In the earlier years they were carried out primarily by Ernst & Whinney (now Ernst & Young) with Price Waterhouse (PW) doing the audit of BCCI (Overseas) Ltd, Grand Cayman since 1975. From 1987 the global audit was consolidated under PW.

2.01 The audit is done in two parts - an interim audit covering the Groups' 9 months results up to September (done in October/November) and a final audit in December (extending from January to March of each subsequent year).

2.02 The global 'Audit Instruction' and 'Questionnaires' issued by PW to all local offices of PW and in some cases to other audit firms (where PW were not directly present) were comprehensive and extensive).

2.03 Senior partners of PW from UK and other key locations travelled to nearly a dozen key locations of BCC including Grand Cayman to directly review the local operation and the quality of audit and their audit findings.

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2.04 Management's view that PW had full access to all locations' records and documents were found to be correct (with the exception of Grand Cayman where serious difficulties were faced by PW).

2.05 The Task Force was informed, that PW also did not have adequate access to 2 non consolidated unit's records - Kuwait and Switzerland. This was said to be due to secrecy laws and minority shareholding of BCCI. Independent Local Board of Directors were responsible for these 2 operations.

3.00 The Task Force found that more or less all the loan cases and transactions referred to by PW in their two Reports related wholly to the Grand Cayman branch of BCCI Overseas (or to ICIC) both of which were, audited by Price Waterhouse from their very inception.

3.01 The Task Force found that even where the counterpart of the transactions or loans were "parked" in other BCC location they were invariably initiated from Grand Cayman (or ICIC).

4.00 The audit findings of 1989, for the rest of the BCC Group were reviewed in depth by the Task Force; These were found to be very normal and indeed the issues raised were minimal as far as significant items were concerned, indicating that Management's view was correct that there has been considerable improvement year on year, in the global quality of operation in the BCC Group. This was also independently reconfirmed to the Task Force by PW.

5.00 The entire series of loans/transactions identified by PW as "matters of concern", fall into 3 broad categories.

A - Loans/Transactions relating to CCAH shareholders and granted to them either by BCCI (or ICIC). (CCAH is the vehicle used by some of the BCC shareholders for acquiring the First American Bank Group covering the East Coast of U.S.A.)

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B - Loans/Transactions relating to shareholders of BCCI (Holdings) Lux, SA granted primarily by ICIC.

C - Certain very large commercial loans granted primarily in Grand Cayman branch to a number of Business Houses or businessmen, which besides the risk of concentration of such loans to a few companies/individuals, and the corresponding risk of repayment, also had extremely poor documentation and supporting evidence of its use.

5.01 The Task Force was able to conclude with reasonable certainty that the 'problems' related entirely to these three categories of loans and transactions and did NOT spill over to the global business and activity of the Group which covered 1.3 million customers in 73 countries with 58 currencies, and a total advances portfolio in excess of US$11 billion.

5.02 The local audits and regulatory controls in all the BCC countries were found to be of a high order, safe-guarding the quality and health of the bank in all these locations.

6.00 Regarding items A and B above i.e. Shareholder Loans

6.01 The Task Force after many hours of interviews with the concerned Accounts Executives/Accounts Officers and reviewing many files and documents made available to it (most of which were of very poor quality) concluded that:

- these share backed lendings from BCCI and ICIC, either for share acquisition or commercial/personal reasons, extended back to several years.

- had very inadequate supporting documents including absence of written requests from the shareholders or clients.

- often no written report of the purpose for the loans/transactions and

- in quite a few cases not even year end confirmation of balances.

6.02 The Task Force therefore confirms the 'concern' of PW in many of the referred cases.

6.03 The Task Force simultaneously expresses considerable surprise and disappointment at such obvious flaws in basic banking procedures and documentation .

6.04 The Task Force feels that the regular annual audit thereof should have easily detected and corrected such haphazard transactions several years ago.

6.05 The Task Force concludes that there is little doubt from the sparse records available and inadequate explanations given by the Accounts Executives/Officers that there must be some 'interlocking' arrangements between the shareholders of both BCCI Holdings (Lux) SA and CCAH whereby in several cases 'nominee' routes may have been taken to front each others investment in these two banking groups with corresponding loans being drawn from BCCI (& ICIC) to fund such 'interim' holdings.

6.06 However the Task Force concluded that as the underlying security/asset i.e. shares of CCAH and shares of BCCI (H) both have considerable real and tangible value and market worth; Therefore the real risk to the bank is in any shortfall in their gross exposure viz a viz the valuation of security and the need to provide against it. Management and PW have provided alternative basis for computing these valuations. PW's computations shows a significant shortfall while management's valuation adequately covers the exposure. The Task Force felt that in the case of CCAH some 'general provision' is called for. (This is recommended at US$30 million.) However no such provision is deemed necessary for BCCI (H) cases.

6.07 The Task Force has been informed that negotiations are at an advanced stage in the United Arab Emirates (UAE) with certain major existing shareholders of the BCCI Group - both individuals and Institutional, whereby they would acquire substantial amounts of additional shares of BCCI Group, and shortly thereafter shares of CCAH - at previously transactional price of $40 per share and at 'carrying cost' respectively. This would unwind the outstanding 'interlocking' arrangements and greatly reduce the exposure of the bank to such shareholder loans.

6.08 The Task Force recommends vigorous follow through of this vital Plan of Action.

6.09 The Task Force also recommends that in future there should be no interlocking or nominee arrangements for shareholders of BCCI (H) and CCAH, if such exists at the moment.

7.00 Regarding item C of para 5.00 i.e. Commercial Loans

7.01 The Task Force subdivided these loans into 2 categories:

A - Normal commercial loans, granted primarily in Grand Cayman branch, that required further review of their year-end exposure and if necessary to enhance their cumulative provision in 1989.

B - Loans of the Gulf Group (Gokals) and all related "off shore" companies/loans linked directly or indirectly to this Group.

7.02 Regarding 7.01 - A the exercises has been completed with extensive and detail input from PW. As a result additional provision of $ 79 m over and above the $21.00 m already agreed with PW for Grand Cayman branch has been recommended to be set up in the 1989 accounts of the Group. This additional provision is now agreed with PW.

7.03 Regarding 7.01 - B Gulf Group and Related Accounts - this area of the bank's activity is perhaps the most depressing part of our findings. The Task Force after very extensive meetings with the concerned Accounts Executive/Officer and very detailed review of the several dozen files and documents made available to it were surprised and dismayed at the very poor quality of supporting documents which was supposed to be covering activities going back to 5 years and more and involving over $250 million in loans ranging from $1.5 to over $10 million in the books of Grand Cayman and also "parked" from Grand Cayman in several less controlled locations of BCC i.e. Panama, Bahamas, Bahrain, Uruguay and Kuwait.

It took the Task Force only a few days to note that nearly each of these cases had common patterns of initiation, activity, fund flow, weak documentation and vague explanations from the concerned account officers which any reasonable audit process should have tracked down, identified and stopped forthwith. That it extended over so many years is a great disappointment to the Task Force - particularly since their initiations was all from the same source in Grand Cayman (and London).

The explanation given by the Accounts Officer that the business was initiated by high networth clients from the Sub Continent who wanted confidentiality and these loans were intended for shipping and/or trading business, on a project to project basis, with input from the Gulf Group, is likely to have been valid in the very early years of initiation of the business when a senior bank officer - one Mr. Hashem Sheikh (who was then the Accounts officer for the Gulf Group, and also had wide personal contacts with the business community from the Sub Continent) set up such one-off deals. The account statements for the early years seen by Task Force showed a fair volume of throughput activity and fund flows. However substantial part of the outflows appeared to land up in the accounts of the Gulf Group directly or indirectly.

For this and other similar obvious reason listed in the Task Force Report it became clear to the Task Force that the entire arrangement was set up by Mr. Hashem Sheikh in conjunction with the Gulf Group.

The Task Force has therefore recommended that all such activities should stop forthwith and all these 'offshore' accounts with outstanding liabilities at the year end should be consolidated in the Gulf Group's global exposure (until such time as any of the Sub Continent client(s) can come forward and take direct responsibility for any of the outstanding loan(s) and show the security they can offer and the basis of the repayment proposed).

The entire Gulf Group should be reviewed as a consolidated exposure, the tangible security assessed and adequate provision set up for potential shortfall.

On this basis the figures arrived at by the Task Force were as under:

Gulf Group

		$m
Gross Exposure:		
- Parent Co. (CIH) related	:	242.46
- Other Subsidiary Companies (not consolidated)	:	199.57
- Other off-shore loans	:	263.50
Total Exposure	:	705.53

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Security:

Ships/Properties and Deposits, Government securities and other tangible assets	152.60
Net 'clean' exposure covered by BCCI's holding of 92% of CIH shares (Parent Holding Company)	552.93
Value of "networth" of CIH (92%) as per audited Balance Sheet discounted by 50% + BCC loan	433.40
Net Final Shortfall:	119.53
Proposed provisions for Gulf Group (Consolidated) for 1989	120.00

The Task Force have since met the owners of the Gulf Group (Mr. Abbas Gokal) and obtained from him the following:

(a) Acceptance of all liabilities of non consolidated/associated Gulf Group companies and

(b) Acceptances of all liabilities of all 'off shore' companies (as listed in Annexure P & Q)

(c) Personal Guarantee of Proprietors/Directors and

(d) Agreement that the security cover of 92% shares of GIH currently held by BCCI can be extended to cover items (a) and (b) above.

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The Gulf Group is a US$1.0 billion asset company, as per its audited balance sheet, with operations in over 40 countries. Great care is required to handle this account. The Task Force feels that an intensive follow-through is required to restructure the activities of the entire Gulf Group and carefully monitor its operation in order to minimize any further significant loss to the Bank. For this shipping and financial experts will have to join the BCC Special Task Force set up for this purpose and their work should start forthwith.

8.00 Final Conclusion

8.01 Since

(a) All concerned accounts officers have been removed from their assignment or severely restricted in their operation/authority.

(b) Huge additional provision of $265 million over and above the banks already high provision for the year of $210 m has been set up.

(c) A major restructuring of the Capital of the bank and the related restructuring of shareholdings of CCAH, is in final stages, bringing additional fresh capital of perhaps $300m into the bank which will reinstate the Capital of bank to nearly 8% of risk asset.

(d) The operative machinery in Grand Cayman is being overhauled.

(e) No other location of BCC Group is involved and indeed have now closed their audited position for 1989.

(f) Major restructuring of the Group for the purpose of enhancing the management strength including perhaps direct participation by the Abu Dhabi investors group.

(g) Major re-organisation of the Group for the purpose of drastic cost cutting is already in the pipeline

Therefore

It is in the interest of all concerned who are involved in safe guarding the existence of BCC Group - the shareholders, the directors, the management, the auditors and finally the Regulators to 'close' this matter urgently and allow the Bank's Annual Report to be issued to the public, globally at the earliest.

Without this there is now a grave and real danger of a serious 'run' on the Bank, worldwide, resulting in an uncontrolled situation which would even close the entire Group with serious consequences to the 1.3 million customers, the $17 billion plus deposits the over $2 billion in Due to correspondent bank as well as the future of over 14,000 employees all of which will be in serious jeopardy.

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DC 020442

1325015-000-11895

OPPENHEIMER WOLFF & DONNELLY

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May 7, 1993

VIA TELECOPIER AND MAIL

Stefan D. Cassella, Esq.
Senior Trial Attorney
United States Department of Justice
Asset Forfeiture Office
Bond Building
1400 New York Avenue, N.W.
Washington, D.C. 20038

Eric Lewis, Esq.
Nussbaum & Wald
One Thomas Circle, N.W.
Washington, D.C. 20005

Dear Mr. Cassella and Mr. Lewis:

We represent Union National Bank, formerly known as Bank of Credit and Commerce (Emirates) (hereinafter referred to as "UNB") as to certain specific matters. It has come to our attention that the Asset Forfeiture Office of the United States Department of Justice ("DOJ") filed on March 16, 1993 in an action entitled United States of America v. BCCI Holdings (Luxembourg), S.A., et al., Criminal Number 91-0655 (JHG) a motion for certain funds to be paid into the Court Registry Investment System. Said funds were represented to be the contents of twenty-one accounts that had been maintained at First American Bank of New York ("FABNY"). The DOJ's motion was granted by Hon. Joyce Hens Green, United States District Judge, by Order dated March 18, 1993. In its motion, the DOJ indicated that it would seek to forfeit most or all of the listed accounts.

One of the listed accounts was identified in Exhibit A to the motion as account number: 10300015 (the "Account"); account name: BCC Emirates; and approximate balance: $10,255.80.

This is to confirm that we have provided evidence to the DOJ, which it has confirmed from files of FABNY, that the aforementioned account had been closed, with a zero balance, on May 22, 1991. The account balance identified in the DOJ's motion is obviously the result of a mistake occurring after UNB had closed the Account and withdrawn all funds therefrom and does not represent property in which UNB has or claims any interest.

OPPENHEIMER WOLFF & DONNELLY

The DOJ has advised us that it has learned from a review of FABNY files that of the $10,255.80 balance it listed (the "Funds") $5,047.00 appears to have come from a transfer by Commercial Bank of Ceylon in Colobmo, Sri Lanka on July 3, 1991. We understand that the source of the balance of the Funds has not been identified at this time. UNB had given notice of the closing of the Account to its correspondent banks at or about the time the Account was closed. UNB has no unreconciled entries relating to the Account. No creditor has come forward to UNB to claim the Funds. The Funds can thus be considered unclaimed, or clearing, funds.

Given the foregoing circumstances, the most likely scenario is that the Funds were intended to be transferred to one of the BCCI accounts (in the case of the $5,047, perhaps to BCCI (Overseas) Sri Lanka, another of the 21 accounts listed) and were mistakenly transferred to the closed BCC Emirates account.

Therefore, UNB advises the Department of Justice that it has no interest in and makes no claim to the subject Funds and advises Nussbaum & Wald, as attorneys for the Liquidators of BCCI Holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A. and Bank of Credit and Commerce International (Overseas) Limited, that the Liquidators for one or more of said entities may have an interest in the Funds.

Sincerely,

Ted G. Semaya

Ted G. Semaya

cc: Union National Bank

SOURCES AND UTILISATION OF FUNDS

The balances outstanding on these BCP Lux accounts at 30 September 1990 were:

ICIC Client account	- $7.2 million (debit)
One Zero Five Five	- $7.6 million (credit)
Numbered account ref 1001	- Closed

External accounts

We have been provided with details from the work on 20071 of five accounts at third party banks, which have been used for routing purposes. These involved some of the most sophisticated routings.

Three are accounts of ICIC Holdings, with two at Saudi National Commercial Bank, Bahrain and one at Credit Suisse. Again these were outside of the books at ICIC.

There are a further two accounts with Credit Suisse. One is in the name of Mashriq Holding Co Ltd, a Grand Cayman registered company which we were informed was incorporated with a name that was chosen deliberately to confuse with a Luxembourg registered company with a very similar name. The other account was in the name of North American Investment and Finance Company ("NAIF") which was incorporated in the Turks and Caicos Islands and whose sole activity appears to have been routings.

The turnover on these accounts has been:

Credit turnover:	1987 $m	1988 $m	1989 $m	1990 $m	Total $m
SNCB	-	231	550	132	913
Credit Suisse	359	371	134	21	885
	359	602	684	153	1,798

We have extracted approx 1,000 transactions from these accounts of which 590 have so far been identified.

The main sources of funding for these accounts have been deposits mainly from IBU and BCCI Bahrain, a loan draw down in BCC Emirates and repo receipts from ICIC Investments. Utilisations have included deposit reinstatement, interest servicing for off balance sheet borrowings and loan manipulation.

All these accounts are currently being analysed, however the records maintained on them are very poor and it is only in 1990 that ICIC employed

Exhibit 27 -- Crim. No. 91-0655 (JHG)

1325015-000-11898

The strategic decisions to manipulate the accounts are likely to have been taken by Mr Abedi and Mr Naqvi. The inflation of Treasury profits in the early 1980's is held out by Mr Naqvi as the sole responsibility of Ziauddin Akbar however it seems more likely that Akbar was responding to the expectations of Abedi and Naqvi.

A small group of officers close to Mr Naqvi and Mr Abedi, who were compliant to the situation and loyal to the senior management, have been responsible for executing the account manipulations and funds flows. Some of these people are still employed by the bank or are in the Advisor's Office in Abu Dhabi.

Outside of this inner circle, there appear to have been others who have played active roles in assisting the manipulation of accounts, orchestrating schemes to generate profits and who have been party to other irregular activity.

Generally they have left the bank. They include Ziauddin Akbar and M Saghir (Treasury); Dildar Rizvi (Virani, property deals, Mahfouz); Hashim Sheikh (Gulf Group); Jamil Khan (Adham, Jawhary).

It is also clear that regional management must have been aware of some of the irregularities that took place particularly when they were involved in authorising funds transfers or obtaining balance confirmations. Many other senior officers at the central office or in branches are likely to have been directly or indirectly aware that certain transactions were irregular but did not challenge them.

ICIC management, notably Mr HM Kazmi, has assisted in the improper flow of funds accepting instruction from BCCI management. This may also be the case at other related parties such as BCP, Attock and CCI.

There is little evidence of personal gain for any of these individuals. Other than Mr Abedi there are few signs of individuals living extravagantly. There have however been a lot of UK property transactions financed by the bank for staff and these warrant further investigation.

The investigation team to date have relied upon the co-operation and assistance of BCCI management and staff and interviews held have been enquiring rather than accusatory. The next stage of the investigation will include collation of the involvement of staff members across all the borrower groups and activities and an assessment of the extent of their culpability and the related evidence.

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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

Central Credit Committee

The Central Credit Committee has not controlled the exposure to major customer groups. In many cases has been bypassed totally.

- It has been misled.

In the case of the Gulf Group, advances through offshore companies have been presented to Central Credit Committee as if totally independent with fictitious information on beneficial ownership and purpose of lending being presented.

- It has been ignored.

A significant number of advances have been approved by Central Credit Committee well after the date of drawdown. Often these have not been presented to a full meeting of the Central Credit Committee but authorised in circulation without full discussion of the circumstances.

- It has been ineffectual.

On review dates the Central Credit Committee has done nothing to bring about a reduction in exposures but in effect sanctioned the inexorable rise in limits. It is evident that so long as a proposal was understood to have the support of Mr Abedi or Mr Naqvi then Central Credit Committee approval was in effective a formality. The Central Credit Committee was passive and ineffective.

Board

There is no indication that the Board of Directors was aware of the major irregularities within the bank and it has been consistently provided with misleading and inaccurate financial and other information. Global exposures presented to the Board have on occasions been incomplete, and it has not been informed about hold harmless arrangements. A significant number of drawdowns that should have gone to the Board for approval prior to disbursement were not presented until after the event thereby effectively overriding its control.

There is no real evidence that the Board took any effective action to limit or reduce the exposure to individual customer groups nor to monitor the implementation of the Credit Policy. All major loans had to be approved by the Board and there is little evidence that proposals submitted to it were subject to rigorous scrutiny. Limits were generally increased after the event without insistence on effective recovery action.

BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

The Board did not adequately supervise and control a dominant management.

The Audit Committee was established in 1986 following the discovery of significant Treasury losses. It consisted of two Board Directors with Mr Naqvi attending as management's representative. Reports to the Audit Committee specifically dealt with the global exposures of the major customer groups and brought many of the serious control issues concerning the problem accounts to their attention. The Audit Committee failed to take any action and proved to be ineffectual.

Internal Audit

We have seen little evidence of internal audit's involvement in any activities relating to the problem loans, Treasury division or external funding. It is probable that internal audit's activities were limited to those dictated by Naqvi or Abedi.

External Audit

The external auditors have for many years brought issues of global exposures to the attention of the Board, regulators and the Audit Committee. However, the complex deception described earlier was specifically designed to portray that unprovided loans were performing and recoverable. False balance confirmations and other documentation were provided to disguise the nature of non-recourse loans.

Up to and including 1986 advantage was made of having two firms of auditors dealing with separate parts of the Group. Access was also restricted to related entities.

It has become clear from the investigation work that significant volumes of relevant information and documentation were purposefully kept from the auditors. The Advisor's Office filing alone contained over 6,500 files which had been kept under the personal control of Mr Naqvi and his staff.

1325015-000-11901

BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

Regulators

The BCCI Group has effectively only been regulated as a group since the establishment of a College of Regulators in 1988, the senior representatives of which are the IML and the Bank of England. Before then the IML was the principal supervisor but found itself unable to adequately deal with the diverse group operations.

The bank has misled the regulators over many years by providing only limited information on exposure to the larger borrowers, by not disclosing off balance sheet lending and by generally misleading them about the relationships with CCAH, ICIC and shareholders.

1325015-000-11902

BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

Summary of possible recoverable amounts

Set out below is a summary of amounts that are considered to be possibly recoverable from the main customer groups whose accounts have been investigated and which are included within the financial support arrangements. Unfunded accounts are not being assigned and any loss on these will fall on the bank directly. The impact of unfunded facilities on the overall recovery of assigned loans is discussed in the later detailed analyses. CCAH exposures are not dealt with in this summary.

$'million	Net Exposure	Possible Median	Possible Low
Gulf Group	583	90	65
Pharaon	463	90	35
Sh Kamal Adham	249	86	50
Prince/IMC	64	60	48
Crown	76	53	42
Batace/Taplute	24	24	-
Virani	69	28	18
Red Sea	22	13	-
Rawas	19	10	5
Attock Oil	111	10	5
Hammoud	27	9	6
Others	919	15	10
Indicated amount	2,626	497	284

(1) The net exposures relate to accounts that are covered by the investigation and are being assigned to Companies A1 and B. The exposures are net of provisions and suspended interest and represent the book value being assigned.

(2) No allowance has been made for funding costs.

1325015-000-11903

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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

Further investigation work

There are outstanding issues on all problem accounts. On some there will be diminishing returns on further investigation and they may not warrant much more, if any, work.

There are however a number of most important areas that will require significantly more work in order, if possible, to determine the facts and trace substantial cash flows. These include:

- Treasury activity 1981 - 1986
- Non-recourse lending of Dr Ghaith Pharaon
- Use of external funds in account manipulation and the Gulf Group

Although these investigations are continuing, ultimate determination of the facts will require better access to information from ICIC, BCP, KIFCO and SDCC.

Other areas require further investigation work to present a more complete record and to assist the legal advisors in the obtaining of information for advising on possible litigation. These would include:

- CCAH
- Virani
- Sh Kamal Adham
- Payments to individuals

Ongoing research work will also be required to assist Neil Blair and his recovery team in considering what action to take on individual accounts.

As a result of matters identified during the course of the investigation and the 1990 audit, a number of accounts have been added to the investigation.

At this stage the investigation team can now address in more detail:

- the responsibilities of bank and other personnel involved
- funds flows outside the group

1325015-000-11904

BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

The investigation team will need to work closely with the legal advisors to assess the evidence and consider what action might be taken by the bank.

Consideration needs to be given to the role still to be played by the Advisor's Office. Mr Naqvi's assistance has been most important in progressing the investigation and the reconciliation work to date by his staff has been helpful. The work of the investigation team has now however rapidly gone beyond the stage reached by his staff and it is doubtful whether they have the motivation to assist the investigation team productively.

1325015-000-11905

MEETING OF THE AMERICAS SUPPORT CENTRE WITH LACRO

MEETING HELD: April 11, 1988

PRESENT:	Mr. Ameer Siddiki	Mr. S.M. Shafi - LARCO
	Mr. Dildar Rizvi	Mr. S.M. Akbar - LARCO
	Mr. Tariq Shaikh	Mr. Feroze Deane - Colombia
		Mr. Ashley Jenner - Brazil
		Mr. Bande Hasan - LACRO
		Mr. U.K. Ghosh - Argentina
		Mr. Mazhar Zuberi - Colombia

RECAPITULATION OF THE PROCEEDINGS OF APRIL 10, 1988

This being the follow up meeting of April 10, management meeting; the first item of the agenda i.e. recapitulation of the discussions of the main meeting was taken up. The participants stressed that BCC has its own culture, which is based on inter-relationships, with inter-dependence and respect for each other.

The purpose of this culture was service to clients, profit, quality and success. The essence of the matter was to achieve a fusion of individuals who are being capable in themselves also had respect for the capability and quality of others.

CAY 0021826
Exhibit 24 -- Crim. No. 91-0655 (JHG)

1325015-000-11906

CAPABILITY AND GUARDIANSHIP OF GROUP OFFICERS

Mr. Ameer Siddiki initiated the discussion on item 2 and 5 of the agenda. He stressed that capability enchancement has to take place in the members of the management committee and also in the younger officers. Within the members of the management committee capability enhancement takes place through interfusion and inter-action. There should be an emphasis on the quality of interaction as well as the actual absorption of technical skills from outside.

For the younger officers. The guardianship programme has been started for the specific purpose of enhancing their capability. Their interfusion and integration in the bank is the first step. Through continuous and intense interaction with their professional guardians these younger officers should be given the opportunity to develop the necessary technical skills and awareness of the importance of the BCC Culture.

While the Capability Budget exercise enhances capability by interaction and interfusion within the members of the committees, the guardianship programme introduces younger people into BCC by creating a sense of awareness of the goals and objectives of the organisation and enhances the five components of capability i.e. source, organised being, Relationship and Marketing and Selling and commitment.

With the current changes in the regulatory climate effecting BCC, the third world debt scenario and deep penetration that we have achieved both in Latin America and North America, the need of the times is to take

CAY 0021827

1325015-000-11907

stock of our present situation, plan on which direction we wish to set our future strategy for each Unit and Country. How are we going to achieve this aim? Clear perception is required to organise our efforts and identify a specific market niche to service vis a vis our strengths, as a Trade Finance bank (within the parameters laid down by regulators on third world exposure). In order to exploit this identified market niche the necessary tools, i.e. enhancement/upgrading of technology, capability of people and knowledge of the market place, have to be adopted as required.

CAY 0021828

1325015-000-11908

MEETING HELD: April 11, 1988

REVIEW OF BUSINESS AND PROFIT BUDGET

SUBJECT: Brazil

Budgets

	BUDGET 88	A MARCH	B MARCH	B JUNE
			(US$000's omitted)	
Profit	2000	(129)	65	550
Deposits	100000	30621	22000	45000
Advances	135789	6994	42723	71202

In view of the local regulatory constraints BCC cannot handle deposits of less than 180 days maturity or checking accounts. The unit incurred shortfalls against budget for profit, advances and deposits for the first quarter.

A decline in profitability to a loss of 0.129M for the first quarter is due to the following factors:

- Foreign exchange banking license was not available thus delaying the first FEX operation to the first week of February, 1988.

- This delay effected the fee income of the unit;

- Surplus funds were thus utilised in the local syndication market. As the participation is with recourse to the lead bank, these advances are classified as due "from", thereby

CAY 0021829

1325015-000-11909

earning smaller spreads and incurring a shortfall in Quarterly targets;

In view of this misconception about classification of advances, BCC Brazil would revise their subsequent quarterly advances Budgets.

Because of the current regulations in force on the 3rd world debts and the provisions attracted by Brazilian exposure, ways and means were discussed to keep the upstanding exposure to a minimum; it was suggested that the following be investigated for its practicability.

1) BCC Miami may take a lien on the BCC Brazil export collections, thereby reducing the outstanding exposure by netting off the exports against the outstandings;

2) Pre planning, maturities on import bills so as to achieve reduction/repayment by the year end; thus avoiding requirement of outstanding debt provisions.

3) BCC Miami to consider purchasing export bills on a periodic basis to reduce outstanding exposure;

4) Utilising the maximum permissible over bought position.

CAY 0021830

1325015-000-11910

LIST OF AUTHORIZED UNITS

1. BCCI SA Abu Dhabi
2. BCCI Overseas Deira Dubai
3. BCCI SA Bahrain
4. BCCI SA London
5. BCCI Overseas Paris
6. BCCI SA Luxembourg
7. BCCI Overseas Cairo
8. BCCI SA Amman
9. BCCI Overseas Seoul
10. BCCI Overseas Muscat
11. BCCI Overseas Panama
12. BCCI Overseas Colombo
13. BCCI Overseas Miami
14. BCCI Misr Cairo
15. National Bank of Oman Ltd Muscat
16. Credit & Finance Corporation Grand Cayman
17. Kuwait International Finance Co Kuwait
18. BCCI Finance Ltd Hong Kong
19. Hong Kong Metropolitan Bank Kong Kong

CAY 5043530

1325015-000-11911

PLEASE TRANSMIT THE FOLLOWING
TELEX MESSAGE

CATEGORY

MESSAGE NO. LDN/

75

TELEX NO.

DATE 1.10.82

TIME

TO Mr Fakhir Hussain
National Bank of Oman
Muscat

COPIED
FEDERAL
RECORDED
INDEXED

TESTED ON US$25 MILLION, FRIDAY, 1 OCTOBER 1982

We are transmitting the following message on behalf of BCCI (O) Grand Cayman:

"In consideration of your allowing a loan of US$25 million to Dr. Gaith Rashid Pharaon for three months, 30.9. - 31.12.82, we Bank of Credit and Commerce International (Overseas) Limited, Grand Cayman, hereby guarantee the payment or discharge to you and undertake to pay on demand to you all monies and liabilities due to you from Dr. Gaith Rashid Pharaon. Our guarantee shall be valid for a period of three months from 30.9. - 31.12.82."

Regards.

FROM M Saghir
BANCRECOM LONDON

Loan to Dr. G R P.
$25M 30/9 - 31/12 13½
Monthly Interest Rate
3 Months Libor + 2 %

NOT TO BE TRANSMITTED

Signature | Treasury Dept/Div | 1st Floor

GL-F-09 D

AD 0011725

Exhibit 15 -- Crim. No. 91-0655 (JHG)

Mr S M Shafi was, till recently, Managing Director and Chief Executive Officer of National Bank of Oman Ltd (S.A.O.) which position he held for a period of ten years. Mr S M Shafi was a suitable choice for this position and the Board was requested to approve this appointment. After discussion, the Board agreed with the proposal and adopted the following Resolution unanimously:

'RESOLVED that Mr S M Shafi be and is hereby appointed as President and Chief Executive Officer of Bank of Credit and Commerce International (Overseas) Limited to replace Mr M A K Yousufi.

FURTHER RESOLVED that Mr S M Shafi be and is hereby delegated all the necessary powers to manage the Bank under the guidance of the Board of Directors and for the purpose may be issued the necessary Power of Attorney under the joint signatures of any two Directors of the Bank.'

9. The Board was informed that the profit of the Bank up to 31st August 1983 amounted to US$101.348 million. It was proposed that an interim cash dividend of US$40 million be paid to BCCI Holdings (Luxembourg) S.A. the holder of 100% share capital. The external Auditors of the Bank, Messrs Price Waterhouse & Co had cleared that this interim dividend could be given out of the profits for the year 1983. The Board agreed with the proposal and adopted the following Resolution unanimously:

'RESOLVED that an interim cash dividend of US$40 million be paid to BCCI Holdings (Luxembourg) S.A. the holder of 100% share capital out of the profits for the year 1983.

FURTHER RESOLVED that Mr Masihur Rehman be and is hereby authorised to take the necessary steps in respect thereof.'

10. In the meeting of the Board of Directors held on 11th December 1980, a Draft Power of Attorney was presented for approval to be issued in

due consideration on each case, approved the proposals and passed the following Resolution unanimously:

'RESOLVED that the following nine lines of credit, as per particulars given in the annexures, be and are hereby approved:

Reference Number	Name
83/CSO/08	Philippines National Oil Company
ADV/SH/G111	Unimarine S.A.
ADV/SH/G112	Unimarine S.A.
ADV/SH/G113	International Cement Marketing Co S.A.
ADV/SH/G114	Gulf Pancontinental Inc
ADV/SH/G115	Gulf Offshore & Coastal Services Limited
ADV/SH/G116	Middle East Holdings International S.A.
ADV/SH/G117	Gulf International Holdings S.A.
ADV/SH/G118	Marine Equipment Inc.'

With the permission of the Chair, the following further business was transacted:

8. The Board was informed that on 26th January 1982, the Board had appointed Mr M A K Yousufi as President of the Bank to replace Mr Agha Hasan Abedi who had desired to be relieved of this assignment because of the pressure on his time so that he could devote more time towards planning and development of the Group.

With his appointment as Executive In Charge of the Merchant Banking Services Division of Bank of Credit and Commerce International S.A., London, Mr M A K Yousufi had relinquished his post as President of our Bank. Mr Agha Hasan Abedi proposed that Mr S M Shafi be appointed President of this Bank to replace Mr M A K Yousufi.

1325015-000-11914

BANK OF CREDIT AND COMMERCE INTERNATIONAL
(OVERSEAS) LIMITED
CUMMINGS MAHON BUILDING PO BOX 1386 FORT STREET GEORGE TOWN GRAND CAYMAN

3.1.85

MEMORANDUM TO THE CENTRAL CREDIT COMMITTEE

Loan of US$ 10,088,227 in the name of Haji Ali Sultan Mohammed Fadel

Haji Ali Sultan Mohammed Fadel is a director of W.J. Towel & Co. LLC., Muscat. Sultanate of Oman. He is very influential and resourceful person in the Sultanate of Oman. He has been very helpful to NBO in the development of its business since inception.

Haji Ali Sultan Fadel has requested for a loan of US$ 10,088,227 for the purpose of acquiring 9,000 shares of National Bank of Oman of the nominal value of R.O. 100 each. However, the present value of the shares is R.O. 387.500 per share.

In view of credit worthiness of the borrower and also in view of the business relationship it is recommended that a loan of US$ 10,088,227 may be allowed to him at BCCI Grand Cayman on the following terms and conditions:-

Amount:	US$ 10,088,227 (US Dollar Ten Million, Eighty Eight Thousand Two Hundred and Twenty Seven Only)
Security:	1) Pledge of 9000 shares of National Bank of the present value of R.O. 3,487,500.00 @ R.O. 387.500 per share (equivalent US$ 10,091,195)
	2) Undertaking to pledge Bonus Shares as and when issued against the holding of 9000 shares.
Interest:	1% over 6 months LIBOR Rate, with quarterly rests.
Repayment:	Partly out of dividend income and partly from his own resources at regular intervals or in lumpsum on or before expiry of limit.
Expiry Date:	18.12.1989

INITIATED BY:

APPROVED

Exhibit 17
Crim. No. 91-0655 (JHG)

1325015-000-11915

TECHNICAL MANAGEMENT CONTRACT

THIS AGREEMENT is signed this third day of March 1985

BETWEEN

BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A. (hereinafter referred to as "BCCI") of 39 Boulevard Royal, Luxembourg.

AND

BANK OF CREDIT AND COMMERCE GHANA LIMITED (hereinafter referred to as the "BANK") a banking company established in Ghana.

"WHEREAS the parties have mutually agreed to extend the existing Technical Management Contract on the same terms and conditions except that the fees payable to BCCI shall be cedis one hundred thousand instead of cedis fifty thousand".

NOW this Agreement WITNESSETH and is agreed by and between the parties hereto as under:

1. This Agreement shall be referred to as the "TECHNICAL MANAGEMENT CONTRACT"

2. This Agreement shall be current for 7 years from the 3rd day of March, 1985 and cannot be terminated before expiry of the said period without the consent of both the parties to this Agreement. It shall be reviewed at its expiry by the then Board of Directors of the Bank for any further extension by mutual agreement.

3. The Bank shall suitably advise BCCI in writing of its intention to extend or determine this Agreement three months prior to the expiry of this Agreement.

4. BCCI shall under this Agreement be entitled to provide management services and guidance to the extent deemed necessary by it and more particularly in the following areas:

a) CREDIT EVALUATION - including procedure and determination of creditworthiness of borrowers, feasibility studies, repayment schedules, requirements of securities.

b) FOREIGN EXCHANGE OPERATIONS - in accordance with the laws of Ghana, including approval of forms and procedures for documentation, accounting and checks and determination of limits of exposure for different currencies and different banks.

c) INTERNAL AUDITING AND INSPECTION - including procedures for submission of reports, their study and implementation.

d) PERSONNEL - providing up to six expatriate officers for manning such portfolios as it considers necessary for the Bank.

e) APPOINTMENTS - including procedure for interviewing and approving appointments to all posts at the level of sub-managers, departmental heads, senior cashiers and others of equivalent rank. (All appointments shall be with the approval of the Managing Director).

f) STAFF TRAINING - particularly of Ghanaian personnel, at such institutions and such centres in Ghana or abroad with such curriculum and for such period as may be deemed necessary.

g) ACCOUNTING PROCEDURE - including introduction of accounting systems and forms and training of the bank's staff in the working and operation of such procedures.

h) OPERATION PROCEDURES AND COMPUTERISATION - either on a universal or selective basis such as for deposits, advances, foreign exchange etc.

i) PLANNING AND STRATEGY - including development of strategy, planning of branch network, launching and operation of deposit campaign etc.

j) SPECIAL PROJECTS AND ACTIVITIES - including leasing, factoring, local and international bond issues etc.

k) INVESTMENTS - including evaluation of proposals, within and outside Ghana.

LBC00007148

1325015-000-11917

1) FINANCIAL DISCIPLINE - and guidelines in essential areas thereof.

BCCI's guidance in the specific areas mentioned above will be in addition to its overall direction and supervision of the management of the day to day affairs of the Bank.

5. BCCI shall at all times work in the interest of the Bank and provide professional management in keeping with its international status.

6. The Bank shall:

a) provide or procure work permits and residence permits for all expatriate personnel selected to work with the Bank for their stay in Ghana.

b) consider all advice, direction, suggestions, recommendations, guidance given by BCCI under this Agreement and shall implement such directions advice and recommendations, (Unless there are justifiable circumstances to the satisfaction of BCCI needing modification therein)

c) avoid at all times exertion of any undue influence on BCCI to divert from its agreed task of running the Bank as per its professional expertise.

7. It is agreed that the technical management fees payable to BCCI for all services under this Agreement shall be Cedis 100,000/- per annum payable in Ghana. The fees shall be payable within the first seven days of each calendar year.

SIGNED this third day of March 1985

LBC00007149

For and on behalf of
BANK OF CREDIT AND COMMERCE
GHANA LIMITED

For and on behalf of
BANK OF CREDIT AND COMMERCE
INTERNATIONAL S.A.

1325015000-11918

BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED

PROPOSAL RECOMMENDED BY THE CENTRAL CREDIT COMMITTEE

PLACED BEFORE THE BOARD OF DIRECTORS FOR APPROVAL

Serial No. OS/5A

Date: 5th December 1985 Branch: Grand Cayman

Borrower: Artisan Co. Ref No: GC/15/84

Place of Incorporation: Alexandria, Egypt

Estimated Worth: US$ 12 million

Nature & Amount of Limit:

Loan	Outstanding (30.10.85)
US$ 28.5 million	US$27,778 million

Total Commitment to the Group: US$ 36.0 million (including US$ 7.5 million with BCC Misr[in local currency)

Interest/ Commission: 10.5% p.a.

Expiry/ Review Date: 30.09.86

Other Details:

Purpose: In view of the transfer of the remaining three Branches of BCCI Overseas to BCC Misr, it was mutually agreed this account involving certain litigations would be retained by BCCI Overseas. Also for purposes of recovery follow-up and negotiations for disposal of assets account was retained and funded by BCCI Overseas although BCC Misr continues to handle all relevant matters as agent of BCCI Overseas. The advance is being allowed at our Grand Cayman Branch. Recently some timber was sold and proceeds are expected shortly. Further sales will also take place in due course and repayments should be received in the account. Negotiations are also in train with the borrower to settle this account from other business.

Security: Stocks of timber under pledge valued at US$ 9.5 million and substantial warehouse valued at US$ [illegible] million (as at US$ 23.2 million).

Exhibit 19
Crim. No. 91-0655 (JHG)

IAF/lr/396 DATE: April 14th, 1988

FROM: Manager
BCCI Grand Cayman

TO: Credit Division
BCCI Grand Cayman

SUBJECT:

As per instructions from H.E. SH. Kamal Adham, please open a new loan account in his name with a reference ABl 88 N01 with US$ 2,000,000 (US Dollars Two Million Only), value 11.04.1988 and remit urgently by telex to BCC Misr, Cairo, Attn: Mr. Aftab Ahmed, for the credit of deposit A/C in the name of H.E. SH. Kamal Adham.

Regards,

CAY 8008906

Exhibit 20 -- Crim. No. 91-0655 (JHG)

1325015-000-11920

IAF/lr/397 DATE: April 14th, 1988

FROM: Manager
BCCI Grand Cayman

TO: Credit Division
BCCI Grand Cayman

SUBJECT:

As per instructions from H.E. SH. Kamal Adham, please open a new loan account in his name with a reference AB1 88 N02 with US$ 800,000 (US Dollars Eight Hundred Thousand only), value 11.04.1988 and remit urgently by telex to BCC Misr, Cairo Attn: Mr. Aftab Ahmed, for the credit of deposit A/C in the name of H.E. SH. Kamal adham.

Regards,

CAY 8054358

1325015-000-11921

CENTRAL AUDIT DIVISION

TITLE: CR[redacted] EXAMINATION	
DATE/BRANCH:	31.05.90 GRAND CAYMAN

NAME OF BORROWER: RED SEA ENTERPRISES HOLDINGS S.A.

SUMMARY OF OBSERVATIONS, FINDINGS, EXCEPTIONS AND RECOMMENDATIONS

The Red Sea Enterprises Holdings S.A. is reported to be a limited company registered in Luxembourg with paid up capital of US$15m; H.E. Sh. Kamal Ibrahim Adham owns 49% shareholding whereas Shaher Abdul Hayek Bisher owns 50% and Ahmes Khalifa owns 1% shareholding in the company. The principal business of the company is understood to be equity investment in long term projects in the Arab Republic of Egypt, the Yemen Republic and France.

The credit file indicates that a memorandum was presented to the Central Credit Committee for it's approval on 14.02.86 for the following facilities to Red Sea Enterprises Holdings S.A., the purpose of which was to set up beverages plants and meet working capital requirements :

- Secured Overdraft : US$2m
- Clean Overdraft : US$2m

The facilities were partly secured by lien on term deposit for US$2m. It was stated in the memorandum that the account has been discussed in detail with Ahmes M. Khalifa, Managing Director of the company, who has assured that the outstanding liability will be adjusted by 31.03.87.

Instead of adjustment, the borrowers were allowed excess over limit to the extent of US$6.642m, being balance as at 30.06.87, which was subsequently approved by CCC on 06.07.87 against the existing securities and with expiry date of 31.03.88.

The present facilities at Grand Cayman are covered by a limit for Red Sea Group for $30.827m which was approved by the Board of Directors at it's meeting on 30.03.89, as follows :

Name	Nature	Limit $
Red Sea Enterprises Holdings	Overdraft	13,000,000
Cairo Beverages and Industrial Company	Loan	5,500,000
	LGs	4,727,000
Alexandria Beverages and Industrial Company	Loan	3,500,000
	LGs	4,100,000
		$30,827,000

CAY 5031262

Exhibit 21 -- Crim. No. 91-0655 (JHG)

1325015-000-11922

NAME OF BORROWER: RED SEA ENTERPRISES HOLDINGS S.A.

SUMMARY OF OBSERVATIONS, FINDINGS, EXCEPTIONS AND RECOMMENDATIONS (Contd).

Although the group was reported to have modern plants and qualified management, it was also stated that it was facing unfavourable competition from the public sector and the soft drink bottling factories were not generating sufficient cash flow even for servicing of loans.

In October 1987, the borrowers started the process of restructuring of its two subsidiaries, i.e. Cairo Beverages and Industrial Company and Alexandria Beverages and Industrial Company and requested for two short term loans of US$9m and US$2.800m with an undertaking that the 2nd loan of US$2.800m would be adjusted positively by 31.10.87 and the first loan of US$9m would be repaid before 30.06.88. The said loans were approved by CCC on 15.10.87. The borrowers could not meet their commitment and the facilities to the group were restrcutured and reviewed by CCC/Board of Directors on 17.03.89 and 30.03.89 respectively. The unsecured portion of the facilities was to be repaid within 2 years upto 31.03.91. It was stipulated that if the resources of the company are not sufficient to cover repayment and accrued interest, the shareholders will place additional funds from their own resources to secure the clean liability. In this connection, it was noted that :

a) Instead of reducing the liability, Affiliates Co-ordination Unit debited Grand Cayman account with Leadenhall Street and remitted US$2m to BCC Misr, Talaat Harb Branch for account of Red Sea with Saudi Egyptian Investment & Finance Co. on 10.10.89. Previously in 1988, $2m was similarly remitted. Customer request is not held and purpose of the remittances are not documented.

b) Since at least January 1988, no funds have been recevied in the account to repay or service interest. Follow up is not evidenced on records at Grand Cayman.

Approval of the Board of Directors for excess over the limit is not held.

Since the borrowers are reported to have started the process of restructuring it's two subsidiaries, cash flow projections and their future plans should be obtained and fresh re-appraisal of the companies, their projections and facilities with definite repayment arrangement should be undertaken and presented to the Board of Directors for approval/consideration.

Credit report/audited accounts of the company and its subsidiaries should be obtained.

Account Opening Form, duly filled in and signed by the authorised personnel, and supporting statutory documents should be obtained.

Letters of lien for the term deposit should be obtained.

CAY 5031263

Conclusion

On account of the above matters, pending further inquiry, no audit comments/conclusion/recommendations can be offered.

1325015-000-11923

FABNY Credit Department

BCCI Group

Review of BCCI Holdings SA Subs./Affiliates

BCC Misr (49%)
BCC Emirates (40%(
BCC Hong Kong (96%)
National Bank of Oman (40%)
IZ Company, Kuwait (74% indirect)
BCP, Switzerland (15%)
BCC, Canada (100%)

BCC Misr

BCC (Misr) is 49% owned by BCCI Holdings, but, by agreement, BCCI holdings has control over the financial and operating policies of the bank. Therefore, BCC (Misr) financials have been consolidated into BCCI Holdings financials.

The results for FY 1986 reflect a 20% decrease in net profitability growth due to a 17% drop in interest income and a slowdown in loan growth. The balance sheet reflects acceptable liquidity levels and a substantial drop in leverage levels. The leverage levels declined from 42.03X NW + sub debt at FY 1985 to 22.73X NWSD at FY 1986 due to a substantial increase in subordinated debt. The debt subordinated was obtained from BCCI (Luxembourg) SA on an inexpensive (zero interest) basis. The asset quality is difficult to evaluate due to lack of statistics, however, $10MM BCCI holdings (Luxembourg) SA and $12.5MM BCCI (Overseas) Ltd. (Grand Cayman) guarantee of potential loan losses provides more than adequate comfort. In addition, BCCI (Overseas) Ltd. has waived management fee due after year end 1986. These monies would directly and positively impact BCC (Misr)'s bottom line. Finally, after approvals of the relevant authorities, the banks share capital was increased by 100% during FY 1987.

With respect to credit risk, BCC (Misr) Sae obtains group support from BCCI (Holdings) Ltd., which given its size and adequate capitalization, would mitigate this credit risk.

FRR0055450

Exhibit 22 -- Crim. No. 91-0655 (JHG)

1325015-000-11924

History/Description of Business/Management:

BCC (Misr) is a joint venture between BCCI (Holdings) S.A., Luxembourg (49%) and Egyptian nationals (51%). Management is affiliated with BCCI. Although management is tightly controlled from London, it is itself quite experienced.

Summary of Bank/Trade Checkings:

Summary of Lines/Relationships with other Lenders:

Officer's Comment (indicate pros/cons,repayment sources, advantages):

Through the courtesy of BCCI's top management in London, BCC (Misr) has not only opened an account with FABNY but has routed L/C's and other international business through First American. BCC (Misr) would like FABNY to become its major banker in the U.S. and, therefore, require Foreign Exchange and Money Market facilities.

Approved by: (,19)
Remarks/Instructions:

Approved by: (19,)
Last review date:
Next review date:
Administrative Code #:

FRR0055451

1325015-000-11925

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PRODUCED FOR LEGAL ADVICE

BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

Introduction

This report sets out in summary form the findings of the investigation team to date to assist discussion at the meeting of the Investigating Committee on 28 April 1991. Substantial progress has been made since the last meeting of the Investigating Committee on 26 February 1991 in corroborating the preliminary views put forward at that meeting and in obtaining further understanding and information on the matters under investigation.

A word of warning however is required. This summary report and the detailed reports prepared on each borrower group cannot be taken as representing cast iron facts. They cover enormous ground, dealing perhaps with the most complex deception in banking history spanning over ten years. The work of the committee has been carried out by a very small team for reasons of extreme secrecy whereas many of the issues and much of the research would normally demand resources several times that applied. For instance, the US Federal Reserve have many investigators researching the CCAH arrangements whereas the investigation team has only one team member dedicated to these matters. One team member has reviewed in detail the records relating to Pharaon, Virani and Crown whereas any one of these borrower groups could alone justify many times this resource. Several thousand files have been reviewed and more information is being requested each day. Full access to information continues to be an obstacle, particularly at ICIC and other related entities although some progress is now being made at BCP. Other important information available only at third party banks and elsewhere may never become available. However in every area a comprehensive picture is being built up and it is believed that what at first can only be put forward as conjecture is rapidly being established as the most likely explanation of fact.

As far as evidence is concerned we must be most circumspect. The records have been manipulated and fabricated over many years so that even the main protagonists now find it difficult or impossible to differentiate between the written fiction and the written fact. The detailed reports provide an important foundation for the taking of legal advice and the development of strategies for the recovery of funds. However there is no doubt that there will be significant further developments as research in certain areas is continued and dialogue is pursued with the borrowers concerned.

STRICTLY PRIVILEGED & CONFIDENTIAL
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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

This report is prepared solely for the use of Members of the Investigating Committee at its meeting on 28 April 1991 and should be returned afterwards to the Investigation Office for safe custody. No responsibility is taken for any circumstances that might arise should the report be seen or the contents become known by any other person.

Contents

This summary report deals with:

- History of the bank
- Origins of the problems
- Nature of the deception
- How the accounts were manipulated
- Non-recourse lending
- The ICIC connection and external funds
- Flow of funds out of the Group
- BCCI share capital
- Management and control
- Summary of possible recoverable amounts
- Further investigation work

In the second section of the report there are:

- Account summaries

The account summaries comprise:

- Brief overview
- Recovery strategy
- Recommended further action

- Analysis of possible recoverable amounts

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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

History of the bank

The BCCI Group was founded in 1972 with capital from wealthy Arab investors in the Gulf and with Pakistani management. Bank of America initially had a 25% interest in the bank, but they divested themselves of this in 1978, causing, incidentally, a setback to BCCI's acceptability within the international banking community.

The bank grew rapidly on the international scene, and by the end of 1989 had 14,000 staff in more that 70 countries. Its assets stood at more than $23 billion. The majority of its customers have continued to come from the Arab world.

The founder of the bank, and the driving force behind this achievement until his heart transplant early in 1988, was Agha Hasan Abedi. His right hand man was Swaleh Naqvi, who continued to run the bank after Abedi fell ill. Both Abedi and Naqvi resigned as officers of the bank in October 1990 following discovery earlier in that year of the problems now being investigated.

Abedi had always been the visionary, the man who defined the broad concepts of the global role that BCCI should play; Naqvi was the man of detail, whose job it was to put Abedi's theories into practice.

Origins of the problems

The BCCI Group has always suffered from a bad press, mainly because of the problem of its identity within the public mind. Its rapid growth and a general uncertainty as to who actually owned and controlled the bank, led to scepticism in the banking community. The fact that it had no lender of last resort nor a regulatory authority on a consolidated basis also contributed to its poor image.

The reputation of the bank therefore was always regarded by Abedi and Naqvi as very vulnerable, and they believed that it could not afford to show either a weak balance sheet or poor operating results. Presenting the right image to the world also involved very heavy expenditure on suitable premises, and, particularly with the bank's highly decentralised structure, the burden of its overhead costs became very onerous.

BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

The results of the bank were reasonably satisfactory in the 1970s, during the boom period that resulted from the huge increase in oil wealth that took place in the Gulf region at that time. However this period was followed by the severe economic problems of the early 1980s. The fall in oil prices, the Suq al Manakh crisis in Kuwait, the shipping industry recession as well as other factors at this time all had a severe effect on BCCI's business and profitability.

Since the bank had no lender of last resort, liquidity had to be maintained at a relatively high level. This was always precarious, particularly as the bank did not have a firm US dollar or other hard currency base.

All of these factors contributed to the difficulties of maintaining the desired level of profitability, a factor that Abedi and Naqvi considered crucial to the very existence of the bank.

So it was that Abedi, and subsequently Naqvi, a little over a decade ago, began to manipulate transactions so that the bank could report good results.

In order to achieve this, they had to deal with two major problems:

- how to avoid provisioning of poor lending, including in particular the large losses within the Gulf Group loans.

- how to inflate the reported results to sustain the image of success.

It was believed that the disclosure of the full extent of the losses from poor lending could have jeopardised the existence of the bank, and therefore ways had to be found to conceal such losses and generate profits.

A very complicated series of manipulations of account balances was therefore entered into from the early 1980's, with the twin objectives of concealing losses and boosting profits. These transactions needed to be hidden from the knowledge of the other directors, from staff, from the auditors and from the regulators.

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Naqvi contends that all of these manipulations were carried out solely to prevent the bank from going under. Initially they were regarded very much as temporary measures; the basic intention was to build up the premium within the BCCI shares that the bank held through nominees until they could sell those shares at, say, $50 or $60 each, and make a gain sufficient to cover the deficit.

The manipulation of accounts and the disguising of transactions still meant that many of BCCI's loans were not generating income flows. For example:

- lending secured on shares that was more akin to an investment had no dividend flows
- Gulf Group was unable to service its interest and charges
- non-recourse lending or bogus loans with no underlying assets did not generate cash.

These loans may have given the appearance of performance but this only came about through balance sheet account manipulation.

Interest expense, however, still had to be met. The burden was exacerbated by the non-recording of customer liabilities where interest expense still had to be paid even though the liability was not recorded.

The results did not improve sufficiently even with substantially inflated Treasury profits, and matters generally began to get out of control when in early 1986 the large Treasury losses were discovered during the 1985 audit. The bank had no fall-back position and matters got worse. Abedi's illness in early 1988, and the money-laundering indictment in Florida later that year compounded the bank's problems; the latter in particular did little to help the bank's image.

It became increasingly difficult to keep up the fiction, and matters were brought to a head during the 1989 year end audit, early in 1990.

Nature of the deception

A very sophisticated structuring of fictitious transactions was created in order to hide losses and to inflate profits. In addition a number of investments, including those in the bank itself, were made by using nominees, in order to circumvent the local legal requirements of the investee companies.

BCCI GROUP INVESTIGATING COMMITTEE
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The conspiracy headed by Abedi and Naqvi required the loyalty and tacit compliance of a number of the bank's senior staff, as well as the collusion of certain of its major customers and a major bank, NCB, owned by one of the shareholders.

Extensive use was made of related companies, such as ICIC, BCP and KIFCO, for the routing of fund transfers outside the group, in order to disguise the nature of the transactions taking place.

Funds from external, as well as internally created, sources were used to finance the losses concealed by the bank and give the appearance of performance.

How the accounts were manipulated

Our investigation work has shown that there have been enormous movements of funds, within and around the BCCI group, which have been required in order to cover up losses, present accounts as if performing and to make good prior period manipulations. The total funds flows in the years 1981 - 1989 which have not been directly related to valid customer transactions is likely to have been several $ billions.

The sources of funding varied over the years but included:

- Clean and purportedly secured loans created within BCCI
- Loans drawndown within BCCI and ICIC on the backing of securities where the underlying value was considered to have improved; most notably BCCI and CCAH shares.
- Borrowings from other banks not recorded in BCCI.
- Direct utilisation of funds under management at ICIC.
- Direct utilisation of customer deposits and investment portfolios.
- Clean loans drawndown at ICIC.
- Repo transactions.

The flows of funds for manipulation purposes have been extensive and has involved a vast web of transactions requiring the significant assistance of some major customers.

BCCI GROUP INVESTIGATING COMMITTEE
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Funds have seldom been passed from one location directly to another but instead intermediary bank accounts have been used. These accounts were not within the accounting records of BCCI. Amongst others they included:

- Bank accounts at BCP controlled by officers of BCCI or officers of ICIC.
- Third party bank accounts of customers who were prepared to allow funds to be passed through their accounts.
- Bank accounts established for routing purposes at entities controlled by the Gulf Group.
- Bank accounts of ICIC Holdings or other ICIC related entities at third party banks.
- Bank accounts of other related parties such as SDCC and KIFCO.

Funds flows have not been in just one direction. Funds drawndown in one location would be subsequently repaid by drawdowns from another location, clearing accounts or giving the semblance of performance.

Part of the account manipulation was brought about by financing from third party banks. Lending was provided by NCB to certain CCAH related customers and to Pharaon with the funds drawndown and applied within BCCI at its direction.

We have also seen examples of regular short term lending by BAII Paris and State Bank of India which have not been recorded as liabilities due to banks by BCCI but used to adjust customer accounts over year ends.

Funds have also circuitously flowed backwards and forwards between BCCI and ICIC, which have different year ends.

The Treasury Division and most notably its manager, Ziauddin Akbar, wielded significance and power within the BCCI group and particularly in the early 1980's used a pooling system to fund the Treasury activity. Deposits were booked directly into Treasury and diverted from the branches, often booked in the name of AR Khalil. The funds would be utilised within Treasury unbeknownst to the customer. The customer would continue to have a direct relationship with the branch and would receive acknowledgement of their placements from the branch. Mr Akbar left the group in 1986 following the discovery of major Treasury losses.

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Pooling systems were used to minimise the detailed recording of transactions. Funds would be placed in the pool and quickly utilised, as if repaid, creating a minimal balance. Interest expense was not accounted for within these pools.

Non-recourse lending

We have identified a significant number of loans where there is no recourse to the borrower in whose name the loans are booked. These have generally been of two types:

Lending disguising an investment

The loan would typically be secured on shares, with a side agreement between the bank and the borrower passing the benefit of the shareholding to the bank and holding the borrower harmless. Whilst the lending would be in BCCI, the side agreement would more often be with ICIC (Overseas) or ICIC Holdings. Examples of this type of lending have included loans to finance shares in CCAH, Independence Bank, BCCI Holdings, affiliates of BCCI (e.g. BCC Misr) and related entities such as SDCC and SECIF.

This lending has been further used by the bank as a source of funding for account manipulation purposes. By revaluing the underlying security to an assumed market value the bank generated further capacity for drawing down supposedly secured loans. By arranging transfers of shares between nominees at increasing values, surplus funds were made available for adjustment purposes.

Other non-recourse lending

Customers have allowed loans to be drawn down in their own names with all the risk attaching to the bank. Dr Ghaith Pharaon and CCAH related borrowers have been the most notable. At 31 December 1990 Dr Pharaon's non-recourse lending totalled over $400 million.

This non-recourse lending has been used, inter alia, for debt servicing, financing of capital notes and transferring funds to ICIC and other companies and customer accounts controlled by Abedi and Naqvi. The routings of these funds are complex and the supporting documentation scant or non-existent. A complete analysis of the ultimate destination of Pharaon non-recourse lending could take several months. Similarly, to establish the utilisation of drawdowns on CCAH related accounts for purposes other than CCAH funding will require significant additional investigation.

Some other borrowers, notably Hammoud, Saigol, Virani and Attock Oil, have allowed their accounts to be used by the bank for the parking of bad loans or for the charging of excessive interest and charges.

As has been noted earlier the non-recourse lending was often supported by a formal hold harmless letter, although in some cases this was a tacit understanding. Where necessary, to ensure that audit confirmations of balances were signed by customers, letters have been sent by the bank to the borrowers expressly concerned advising them that they should sign the letters as they will not be expected to repay the loans.

Fees paid

Fees have generally been paid to non-recourse borrowers or other favours granted, such as large facilities.

- Sayed Jawhary - $2.7 million for acting as nominee
- Hammoud - over $10 million paid for his nominee and joint venture arrangements. Much of this has been paid through ICIC
- Faisal Al Fulaij - fees of over $1 million for acting as nominee and services in Kuwait as Chairman of KIFCO
- Ruler of Ajman - $6.5 million as a notional profit accruing to him during the period he financed his CCAH shares.
- Ruler of Fujairah - fees of over $1 million in respect of CCAH nominee arrangements
- Ali Mohammad Shorafa - fees in excess of $1 million in respect of CCAH nominee arrangements

Whilst other nominee shareholders have also received fees it appears so far that neither Dr Pharaon nor Sh Kamal Adham received direct payment for arrangements with them.

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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

The ICIC connection and external funds

The use of ICIC and other companies and customer accounts under the control of Abedi and Naqvi as sources of funding and as vehicles for booking transactions has been established for many of the accounts reviewed.

The ICIC group, including ICIC Holdings and ICIC Investments, have fully co-operated in providing mechanisms for BCCI to mask transactions. ICIC (Overseas) is a registered bank providing private banking for a limited number of high net worth individuals. The nature of the banking arrangement is such that the accounts are kept on holdmail basis with no written contact with the depositors. ICIC (Overseas) has been used as a location to book short term loans and to provide financing for investment projects felt best to be kept out of the bank such as Attock Oil and the CCL insurance group.

A number of bank accounts controlled by ICIC or ICIC management have been used for routing funds around the BCCI Group. These include an account at Credit Suisse, Geneva for a company called North American Finance and Investment Company. At present very little is known about this company or this account.

External funds placed with ICIC and related entities have been managed by Abedi and Naqvi and channelled to BCCI for account manipulation purposes. The chief executive of ICIC group, HM Kazmi, still maintains that he was unaware of how these funds were being used within the bank and did not realise until recently that they had been lost.

However it is apparent that vast amounts of client money were passed through this route to BCCI and whilst this may have been at the behest of BCCI, ICIC must have assisted in routing funds and masking transactions.

Reconciliation work in this area is progressing however it is extremely difficult. The limited information supplied by ICIC of the inflows of funds and the scant records available at BCCI of their utilisation are making it very hard to trace the flows of funds. Full access to the records of ICIC, the full co-operation of ICIC management and information from the conduit companies, notably BCP, would enable this exercise to be expedited.

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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

Flows of funds outside of the Group

The funds that have been circulated around the BCCI Group have been vast and the associated routings extremely complex. The interaction with ICIC and the injection of further funding from ICIC and other companies and accounts under the control of Abedi and Naqvi has complicated the position even further. As part of our investigation work we are trying to establish how these funds have been utilised and trying to ascertain what funds have actually left the Group. This may ultimately necessitate a very sophisticated matrix being established but at the moment we are concentrating on tracing the major tranches of funding. This process is slow because there are few records available that clearly show the utilisations. It is also complicated by the fact that we do not have access to the records at ICIC to prove the origin and timing of the funds flows.

The circuitous routing of funds was done to disguise transactions to make them appear third party, particularly repayments, so that loans looked as if they were performing. There would be no permanent movement of funds out of the companies controlled by Abedi and Naqvi in this situation but funds would pass through a complex loop. Through our investigation work we are attempting to find out whether any funds passed out of the loop and if they did do so, for whose benefit.

There are certain areas where it is proving extremely difficult to get the necessary information to establish which funds left the Group. Further investigation is required to establish whether the following key questions can be answered:

- At this time reconstruction of the group's Treasury activities in the early 1980's is not feasible. It is possible that deals were structured to provide benefit outside the group.

- The utilisation of customer deposits and funds from bogus loans may not all have been used for inflating Treasury profits and debt servicing. Without a full trail this cannot be proven.

- The full extent of funds passing from ICIC and other companies and accounts under the control of Abedi and Naqvi has not yet been determined. No record was maintained by BCCI and it is not known what information may be available at ICIC.

- Payments made to refinance customer borrowings at other banks may not represent the actual customer liabilities.

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- It may never be known whether advances were made in the expectation that they would be written off and were in effect in the nature of a gift.

Substantial amounts have been provided from external sources to adjust accounts. For the Gulf Group substantial sums have been used to repay other banks. It may never be clear whether or not some of this has been diverted.

We have also identified the following amounts as having passed out of the Group. Whether any of these funds made their way back has yet to be established.

- Settlement payment of $15 million to AR Khalil absolving the bank of any liability on his account
- Cash payments in small amounts on AR Khalil's accounts in 1980 - 1985 totalling $10 million
- UK property purchases through Treasury Division
- Various payments to Credit Suisse accounts of North American Investment and Finance Company
- Payments to Swiss bank accounts through Hammoud and Pharaon lending
- Commission payments to officials in Nigeria, Cameroon and elsewhere
- Settlement payment to an individual making allegations about the bank's activities in Nigeria

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BCCI GROUP INVESTIGATING COMMITTEE
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Ex-gratia payments

The following ex-gratia payments were made to senior employees of the bank, for the most part during the years 1987 and 1988. These employees had direct or indirect knowledge of major irregularities within the bank and the payments made to them were in effect for their silence. Some of the payments were made as loans but no attempt has been made to recover.

		US$ M
Ziauddin Akbar	Head of Treasury	32.0
GR Khan	An officer in London, who later joined CAPCOM operations	11.0
Muzaffar Nourani	Responsible for Nigerian operations	0.5
Jamil Khan	In charge of ACU, London	0.3
Kamal Shoaib	General manager UK, then in CSO, then GM Independence Bank	3.6
Alauddin Sheikh	An officer in London involved in Nigerian marketing	3.5
Tansif AT Lodhi	MD of Attock Oil	0.5
Hashim Sheikh	Account officer in London for Gulf Group	1.7

Recovery of the payments should be vigorously pursued, although recovery prospects are not considered high. Alauddin Sheikh has intimated that he may refund the $3.5 million paid to him, plus interest.

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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

BCCI share capital

The BCCI Group was established in 1972 with an original share capital of $2.5 million. Since then there have been numerous rights and scrip issues. At 31 December 1990, the share capital amounted to $845 million and there were capital notes and convertible notes outstanding of $462 million.

The investigation has revealed extensive use of nominee arrangements initially to increase the share capital of the bank in the following ways:

- Shareholdings financed directly by loans from ICIC and BCCI.

  The beneficial ownership of the present nominee shareholdings has to be established as some of the registered shareholdings may not be held in a nominee capacity. Shares which are not third party owned will need to be eliminated from the capital of the bank.

- Shareholdings financed from accounts and companies under the control of Abedi and Naqvi. During 1990, the nominee shares purchased in this way were transferred to Sheikh Khalifa.

  The legal position on the share transfers in respect of these shares has not yet been addressed and will require review by the legal advisors to confirm that effective title has passed from the nominees to the current shareholders.

Further investigation work is being carried out to match the nominee share transfers with the funding cash flows and to investigate the funding of the capital notes and convertible notes. Full access to the records of ICIC Group and related entities will be required during this work.

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BCCI GROUP INVESTIGATING COMMITTEE
SUMMARY REPORT FOR MEETING ON 28 APRIL 1991

Management and control

Abuse of responsibilities

From the investigation work that has been carried out it is apparent that senior management of BCCI have been grossly irresponsible and abused their responsibilities to depositors, shareholders and investors. Clearly the Board has also failed to properly discharge its responsibilities.

The financial statements have given an entirely false account of the performance and financial position of the bank. Customer deposits have been utilised and the liability excluded from the financial statements. Shareholder transactions have not been properly recorded in the share register.

Personnel involved and style of management

The detailed reports identify the key personnel involved with the major borrower groups and in the arrangement of deception. The style of management and cultural environment at BCCI referred to earlier enabled a small group of people to exercise considerable power and autonomy which, together with access to external funds, has enabled the complex conspiracy to be perpetrated for many years without discovery. Mr Abedi engendered an aura of almost mystic quality within the bank and directions from him or Mr Naqvi or through their chosen aides were acted upon without challenge or dissent. BCCI promoted secrecy within the organisation often on the grounds of customer confidentiality but this has been abused and lead to information being kept under tight control and not made available to those who might require it.

The scale and complexity of the action taken by BCCI to mask the true picture was immense. It was more akin to a bank within a bank. Mr Naqvi has said that at the end of each day he had to manage the next day's crises and forthcoming scenarios and there is a certain amount of evidence showing how the account manipulation was planned. This involved a number of key officers and the close co-operation of ICIC. In the mid 1980's when the manipulation was probably at its peak there must have been considerable time and effort spent in detailing the routings to be used, the locations at which loans were to be drawndown and in ensuring that the true nature of transactions was adequately disguised. Many of the individuals who assisted with this have since left the bank and without their co-operation it is going to be very difficult to fully understand the mechanics concerned.

1325015-000-11940

WALL STREET LONDON: FLOATING

DATE: September 4, 1990

FROM: Europe and America's Division

TO: Expense Management Committee

SUBJECT: BCCI, Brazil

BCCI Holdings (Luxembourg) S.A. is the 50% owner of Banco de Credito E Comercio de Investimento S.A. BCCI's investment is US$16.1 million representing our 50% of share capital (total of $14.8 x 0.5 = US$7.4 million) and premium of $8.7 million. Other shareholders include PARBAN Ltd. (10%), SCC Ltd (10%) and IAT Ltd (30%). Shares are divided between Common (voting) and Preferred (non-voting). The structure is as follows:

(no. of shares)

	Common	Preferred	Total	%
BCCI (Holdings)	12 662 495	25245 000	378 67 500	50
IAT Ltd	15 123 003	7573 500	227 20 500	30
Parban Ltda	5 041 001	2524 500	75 73 500	10
SC Ltda	5 041 001	2523 500	75 73 500	10
	37 876 500	37867 500	757735 000	

The major local shareholder Mr. Jacques Eluf (IAT 30%) had entered into an agreement with BCCI at the time the Brazilian bank was created as follows:

Mr Eluf contributed US$1,650,000 for his 30% participation of liquid capital. This continues to be his nominal amount of investment since the entire value of the license was borne by BCCI. Also, he was initially guaranteed a return based on the assumed opportunity cost of this investment as compared to the best rate of return he would have received on CD's in Brazil. The agreement referred to did not specify a maximum top to be paid to him and as a result of hyper inflation/devaluation the interest rates in cruzados shot up very high driving the amount payable to him to about US$572,000. After much negotiation US$385,000 was paid to him in 1989 for the year 1988 out of Suspense Account, which was subsequently reversed.

For the future, an agreement (enclosed) with him was modified and an upper limit was fixed i.e. US$275,000. Mr Eluf now requires the payment to be made for 1989's return of investment to his account in New York, for which we request your approval for US$275,000.

EXPENDITURE OF US$275,000.00 APPROVED

Ameer Sidikki

enc

FOR EXPENSE MANAGEMENT COMMITTEE

Ref: Date 199

Approved in MRC meeting dated 19-9-90

CAY 5003650

1325015-000-11941

TRANSMISSION

SEPTEMBER 24 1990

005412-90

TO: MR. BANDE HASAN
BCCI - GRAND CAYMAN

FAX NO

NO OF PAGES 01

REF. NO. AJ: 1517

MR. ELUF'S DIVIDEND

AS WE DISCUSSED BY PHONE KINDLY REMIT $ 275,000 TO MANUFACTURER'S HANOVER TRUST, NEW YORK (SWIFT CODE MAHAUS 33) FOR CREDIT TO BANCO ECONÔMICO S/A. SÃO PAULO - BRAZIL, A/C NO. 544.7.05682 FOR FURTHER PAYMENT TO IAT COMPANHIA DE COMÉRCIO EXTERIOR, SÃO PAULO.

MR. Bedar.
Pleas debit Exp. A/c
Misc Expenses and
remit above payment.
24/9

KINDEST REGARDS,

ASHLEY C. JENNER
BCCI - BRAZIL

BANCO DE CRÉDITO E COMÉRCIO DE INVESTIMENTO S.A.
AV PAULISTA 1106 2º ANDAR TEL (011) 283-5677 CEP 01310 SÃO PAULO - SP - BRASIL - TELEX 1130311 BCCR BR - FAX (011) 288-4347

CAY 5003649

Exhibit 9 -- Crim. No. 91-0655 (JHG)

1325015-000-11942

Notes to the Consolidated Accounts continued

(ii) Affiliates

At December 31, 1985 the group's affiliated companies were :

	Country of Incorporation	% Shareholding
Consolidated - see Note 2.A.ii		
Bank of Credit and Commerce (Misr) S.A.E.	Egypt	49
Bank of Credit and Commerce International (Nigeria) Ltd	Nigeria	40
Bank of Credit and Commerce (Emirates)	U.A.E.	40
National Bank of Oman Limited (SAO)	Oman	40
Unconsolidated		
BCCI Leasing (Malaysia) Sdn. Bhd.	Malaysia	49
Kuwait International Finance Company S.A.K.	Kuwait	49
Bank of Credit and Commerce (Ghana) Ltd.	Ghana	45
Banco Finamerica S.A. (acquired in 1985)	Argentina	30
Banque de Commerce et de Placements S.A.	Switzerland	20

During the year, the group increased its shareholding in Banco de Credito y Comercio de Colombia from 49% to 99% and this company is accordingly now consolidated as a subsidiary (1984: consolidated affiliate).

Following the acquisition of a further 11% interest in the share capital of National Bank of Oman Limited (SAO) in 1985, Management have decided to consolidate this company with the group results in the 1985 accounts with effect from the date of the acquisition of the additional shares. The group has owned a minimum of 29% of the share capital of National Bank of Oman since its establishment in February, 1973 and, under an agreement entered into at that time, the group continues to exercise management control over its financial and operating policies.

The group banks have entered into banking transactions in the normal course of business with each other and with affiliated companies. At 31st December, 1985 amounts Due from Banks and Due to Banks included balances of $223,725,000 and $131,395,000 respectively (1984: $403,404,000/$432,366,000) pertaining to affiliates which have not been consolidated.

The group's share of after-tax profits of unconsolidated affiliates is included in the Consolidated Statement of Earnings at $2,206,000 (1984: $5,450,000).

Notes to the Consolidated Accounts continued

(i) Subsidiaries

The following subsidiary companies have been consolidated as at December 31, 1985. The financial statements of the subsidiaries have been made up to that date except where stated below.

	Country of Incorporation	% Shareholding
Bank of Credit and Commerce International S.A.	Luxembourg	100
Bank of Credit and Commerce International (Overseas) Limited	Cayman Islands	100
Bank of Credit and Commerce Hong Kong Limited	Hong Kong	98
Bank of Credit and Commerce Canada	Canada (Oct. 31,1985)	100
Bank of Credit and Commerce S.A.E.	Spain	99
Banco de Credito y Comercio de Colombia (formerly Banco Mercantil)	Colombia	99
Bank of Credit and Commerce International (Lebanon) S.A.L.	Lebanon	100
Bank of Credit and Commerce International (Zambia) Limited	Zambia	100
Bank of Credit and Commerce (Botswana) Ltd.	Botswana	100
Bank of Credit and Commerce Niger	Niger (Sept. 30, 1985)	100
Bank of Credit and Commerce (Cameroon) S.A.	Cameroon (June 30,1985)	65
Bank of Credit and Commerce International (Swaziland) Limited	Swaziland	55
Bank of Credit and Commerce Zimbabwe Limited	Zimbabwe	53
Bank of Credit and Commerce Gibraltar Limited	Gibraltar	100
Credit and Finance Corporation Limited	Cayman Islands	100
BCCI Finance International Limited	Hong Kong	99
Italfinance International S.p.A.	Italy	85
BCCI Finance (Kenya) Limited	Kenya	100
BCC Credit and Finance (Uruguay) S.A.	Uruguay	100
BCCI Finance N.V.	Netherlands Antilles	100
Unconsolidated:		
P.T. BCC Pratama Leasing Indonesia (The above subsidiary was not operational in 1985)	Indonesia	70

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Notes to the Consolidated Accounts continued

C. Investment in Securities and Other Dealing Assets

i. Securities held for trading purposes are carried at the lower of cost and market value on a portfolio basis. Other Dealing Assets are carried at market value.

ii. Investments in Securities which are intended to be held until maturity are carried at cost. Premiums and discounts on investments redeemable at fixed dates are amortised over the period remaining to maturity.

iii. Premium income and expense relating to option trading are recognised when received or paid and provision is made at buy-back value for all open option contracts. This is a change in accounting policy which is explained further in note 20.

D. Investment in Affiliates

An affiliated company is one in which the interest of the group is long term and substantial and one over which the group exercises significant influence through participation in the affiliate's policy decisions. Except as described in note 2.A.ii, investments in affiliates are stated at cost together with the group's share of reserves and retained earnings. The group share of the profits of the affiliated companies is included in the Consolidated Statement of Earnings.

E. Premises and Equipment

These are stated at cost after deducting depreciation. Depreciation has been provided on the basis of equal annual instalments to amortise the assets over their estimated useful life primarily at rates between 10 per cent and 25 per cent per annum. Capital expenditure on fixed assets which are not yet in operation is depreciated once the assets concerned are brought into use.

F. Income Recognition

Commissions and fees charged to customers are credited to income at the time of effecting the transactions.

G. Loan Loss Provision

Management review the loan portfolio of the group each year and based upon their judgment set aside specific and general provisions for loan losses. The specific element relates to identified risk facilities and the general element relates to the risks which are present in any banking portfolio but which have not been specifically identified.

1325015-000-11945

BCCI HOLDINGS (LUXEMBOURG) SA

SUPPLEMENTARY BRIEFING PAPER

Al Haji Sultan Fadel

$ million

Funded exposure:	31 December 1989	31 December 1988
BCCI (Overseas) - Grand Cayman	12.2	11.8
BCCI SA - Bahrain	6.2	5.6
	18.4	17.4

1 BACKGROUND

Al Haji Sultan Fadel is an Omani businessman who controls WJ Towell & Co in Oman. He is Chairman of the National Bank of Oman (NBO) holding 9.9% of the shares in his personal capacity and a further 37% through NBO.

2 SECURITY

The loans are secured on 1,818,000 RO1 shares in NBO (9.9% of the issued capital).

3 CONCERNS

(1) Evidence of recoverability

The original advance in 1985 was for $15 million. Interest has not been serviced and consequently the increase in the outstandings represents unpaid interest.

Whilst there is value in the security it is unlikely to be enforced by BCCI.

We have not seen evidence of the ability of Al Haji Sultan Fadel to service his personal external lending. Whilst he does have personal wealth and a significant shareholding in WJ Towell & Co we do not know whether he has the cash flows to repay these loans.

(2) Other concerns

These loans were advanced to enable Al Haji Sultan Fadel to purchase shares in NBO. It is more realistic to treat these as an investment of BCCI and write them down to net asset value with no interest recognition. At 31 December 1989 this would require the loans to be written down to $3 million - $9 million.

BCC0019777

DC 020466

Exhibit 11 -- Crim. No. 91-0655 (JHG)

1325015-000-11946

TELEX MESSAGE

000624

FROM: MR. SWALEH NAQVI

DATE: 3.8.1978

TO: MR. DILDAR RIZVI
BCCI REPRESENTATIVE OFFICE
TELEX: 234746 BCC NY
NEW YORK

TIME:

WE ARE FURNISHING BELOW BACKGROUND INFORMATION ON THE FOLLOWING SHAREHOLDERS OF CCAH.

FAISAL AL FULAIJ
H.E. SHAIKH KAMAL ADHAM
MUHAMMAD RAHIM MOTAGHI IRVANI
SHAIKH MOHAMMAD BIN ZAYED REPRESENTED BY H.E. ABDULLAH DARWAISH
SHAIKH SULTAN BIN ZAYED
W.J. TOWELL & COMPANY
INTERNATIONAL CREDIT & INVESTMENT COMPANY (OVERSEAS) LTD

COPIED AND SEGREGATED

KINDLY NOTE THAT THE PERCENTAGE SHAREHOLDING OF W.J. TOWELL & COMPANY HAS NOT BEEN DECIDED. MR. BIN SULTAN IS COMING TO LONDON ON THE 8TH AND WILL MEET AGHA SAHEB AFTER WHICH HIS PERCENTAGE SHAREHOLDING WILL BE DECIDED.

WE LEAVE IT TO YOUR DISCRETION TO SEND OR NOT TO SEND THEIR WRITE UP.

I MAY ALSO POINT OUT THAT IN THE FOLLOWING CASES INTEREST HAS BEEN SHOWN IN BANKS:

MUHAMMAD RAHIM MOTAGHI IRVANI
W.J. TOWELL & COMPANY

.../2

SIGNATURE

DEPT.

GL-F-098

J913

AD0005425

Exhibit 12 - Crim. No. 91-0655 (JHG)

1325015-000-11947

TELEX MESSAGE

000025

FROM:

DATE:

TO:

---- 2 ----

TIME:

THE TWO BANKS NAMELY NATIONAL BANK OF OMAN AND IRAN ARAB BANK ARE AFFILIATES OF BCCI HOLDINGS. BEFORE YOU FINALISE THIS WRITE UP, YOU SHOULD CONSULT WITH THE LAWYERS THE IMPLICATION OF THE SAME.

THE WRITE-UPS HAVE BEEN PREPARED IN A HURRY. I WOULD LIKE YOU TO GO THROUGH THEM AND DISCUSS WITH THE LAWYERS AND ADDING THEM TO THE EXTENT NECESSARY FOR YOUR APPLICATION. IF IT IS NOT NECESSARY TO GIVE TOO MUCH DETAIL AT THIS STAGE YOU CAN SHORTEN THEM TO THE EXTENT DESIRED.

IF ANY FURTHER QUESTIONS OR INFORMATION IS NEEDED KINDLY TELEX MR. AZMATULLAH IMMEDIATELY.

COPIED AND DISCLOSED AT REQUEST OF FEDERAL RESERVE BOARD

REGARDS.

SWALEH NAQVI

SIGNATURE

DEPT.

GL-F-09B

AD0005426

1325015-000-11948

BANK OF CREDIT & COMMERCE INTERNATIONAL (OVERSEAS) LTD

PROPOSAL RECOMMENDED BY THE CENTRAL CREDIT COMMITTEE

PLACED BEFORE THE BOARD OF DIRECTORS FOR APPROVAL

Serial No. OS 9 **Date:** 26th January,1982. **Branch:** Abu Dhabi Main U.A.E.

Borrower: National Bank of Oman Ltd (S.A.O) **Ref. No:** AD/CR/BD/1001R5

Place of Incorporation: Incorporated at Muscat, Sultanate of Oman

Estimated Worth: Capital Funds R.O. 5,440,723 (eq. US$ 16,322,169) as per Statement of Condition as at 31st December 1980

Nature & Amount of Limit:

Existing		Proposed
Nature of Limit	Amount of Limit	Amount of Limit
Risk sharing Guarantee	R.O. 13,000* = (US$ 39,000) @ R.O. 1 = US$ 3	R.O. 25,300 (US$ 75,900)

* Approved by the Board of Directors on 9.2.1981

Total Commitment: As stated above

Interest/ Commission: 1% p.a.

Expiry/ Review Date: 31.9.82

Other Details:

Purpose: To enable National Bank of Oman Ltd to extend credit facilities beyond the ceiling (10% of Capital Funds) laid down by the Monetary Authorities of Sultanate of Oman to any one customer.

Security: Right of Assignment of Charge documents and securities held by National Bank of Oman Ltd from the particular borrower at the time of a claim arising under the Risk Sharing Guarantee.

Repayment: No claim is anticipated under the guarantee, in view of the satisfactory dealings under the arrangement since 1975.

CAY 5042250

Exhibit 13 -- Crim. No. 91-0655 (JHG)

1325015-000-11949

5. The interest differential facility will be for a period of one year from 1.1.83 - 31.12.83 unless renewed further after a review of the progress and conduct of the arrangements.

6. In the best interest of our image and reputation it is imperative that the Branches/Dealing Rooms do not quote rates over the market to the clients. However, in cases where business considerations justify special rates to clients, Branches may consult Regional General Manager/Chief Dealer of the Regional Dealing Room and obtain their prior approval before offering such rates.

We shall be thankful if suitable instructions are issued to the authorised Dealing Rooms and designated Branches in your Region.

A list of such authorised units at present is enclosed herewith. Any modification to this may kindly be admited in due course to CTD.

SWALEH NAQVI

AMEER SIDDIKI

CAY 5043529

1325015-000-11950

Notes to the Consolidated Accounts
continued

18
Other Reserve Movements

	1988 $'000	1987 $'000
Taxation effect of adjustments to provisions brought forward (Note 17)	—	8,000
Surplus on revaluation of property (Note 7)	6,353	20,000
Effect of consolidation of Brazilian affiliate	5,530	—
Net effect of adjustment to goodwill in an affiliate	(6,850)	—
Translation differences	(41,282)	(15,629)
	(36,249)	12,371

19
Dividends

	1988 $'000	1987 $'000
Proposed Stock Dividend	—	66,000

20
Other Appropriations

	1988 $'000	1987 $'000
Contribution to Staff Benefit Fund	671	800
Donations and Grants	7,985	7,769
	8,656	8,569

Donations and Grants are shown net of related tax relief of **$13 million** (1987: $14 million).

21
Segment Information

The geographical spread of the group's advances and deposits was as follows:

	Total Advances		Total Deposits	
	1988 $ million	1987 $ million	1988 $ million	1987 $ million
Middle East	2,863	2,513	3,655	3,499
Europe	1,892	2,047	4,420	4,843
North America and Caribbean	2,682	2,322	2,916	3,087
South America	189	190	367	207
Far East and South Asia	1,848	1,655	2,474	2,148
Africa	1,025	1,060	1,830	1,655
Total	10,499	9,787	15,662	15,439

Notes to the Consolidated Accounts
continued

22
Commitments

At December 31, 1988 group companies were committed to future foreign exchange and other trading contracts arising in the normal course of business.

23
Pending Litigation in Tampa, Florida

The Company, BCCI S.A. and BCCI (Overseas) Limited have been indicted in Tampa, Florida for alleged money laundering in connection with transactions involving sums totalling $14 million. These charges arise out of the alleged activities of nine employees and other outside parties who have also been charged.

The charges against the Company and its subsidiaries are premised entirely upon the legal theory that a corporation in the U.S.A. is criminally liable for criminal conduct of its employees.

It is not alleged in this case that the Board of Directors, the corporate management of the Company, or any shareholders had any knowledge of, or involvement in, the alleged wrong-doing.

If convicted, BCC group entities could be subject to substantial fines and penalties, including forfeiture of certain bank property in the U.S.A. alleged to have been used by the individual defendants and related to the charges.

The BCC group and its corporate management deny the allegations and state that they have not knowingly violated any laws. The BCC group is taking necessary steps to ascertain the facts in this matter, and intends vigorously to defend itself against the charges. It is impossible at this time to determine the ultimate outcome of the litigation and, therefore, no provision has been made for any liability that may arise.

The U.S. operations of the group accounted for net income of **$6 million** in 1988, and total assets of **$843 million**.

24
Related parties

In the ordinary course of business the group has taken deposits amounting to **$817 million** (1987: $305 million) from and provided loans of **$263 million** (1987: $289 million) to significant shareholders and their related entities.

25
Subsequent Events

Subsequent to December 31, 1988, the company has increased its share capital by means of a rights issue of 1,875,000 new shares at a price of $40 per share in cash resulting in an increase in Shareholders' Equity of $75 million.

In addition, Series M Subordinated Capital Notes have been issued and paid amounting to $25 million ranking *pari passu* with the existing series of Capital Notes. Series M Notes carry interest at a rate of 1% above 6 months LIBOR and mature on March 31, 1995.

BCC0006610

DC 006576

1325015 000-11952

from: T. Hancock

LATIN AMERICA AND CARIBBEAN REGION

The functions of the Regional Office are to provide support and to exercise effective control and supervision of branches, subsidiaries and affiliates in the Region with a view to achieving the organizational objectives of growth, business development, high profitability, safety of operations, efficiency, staff quality and promoting the image of a sound and progressive bank adhering to all the regulatory requirements and BCC value system.

How far and how best these objectives are achieved depends upon the leadership of the Officers responsible for implementing policies and the manner in which they utilize their talent, ability and judgement. Success will also depend on the quality of commitment of the officers and their level of interfusion and interaction.

The Regional Head is the principal Executive Officer of the Region, who manages the affairs of the Region through joint personality of the Regional Committees, supported by heads of key groups of the Regional Office, Country Managers and Branch Managers. The Regional Head is responsible for the creation of joint personality with the aim of forging and developing a vision for sound growth and operation of the Region and implementing Real Management. In particular, the Regional Head is charged with:

a) Growth, quality business development and maximization of the profit of branches/subsidiaries/affiliates in the Region.

b) The successful implementation of the Bank's policies and to suggest refinement and evolution of those policies.

c) Administration of credit policies and approval, review and control of advances in the Region.

d) Close coordination with CSO Divisions, Support Center and interregional cooperation.

e) Appointment of staff below Senior Officer level and training, growth and optimum utilization of the staff in the Region.

f) Expenditure control.

g) Regional inspection.

and Regional level committee members support the Regional Head in furtherance of the above, and are responsible for their specific allocated duties.

List of countries in the Region, Regional Committees, their members and an organogram of the Regional Office are enclosed.

1017977-F

LATIN AMERICA AND CARIBBEAN REGION

- - LOCATIONS - -

1. ARGENTINA
2. BAHAMAS
3. BARBADOS
4. BRAZIL
5. COLOMBIA
6. JAMAICA
   - New Kingston
   - King Street
   - Montego Bay
7. PANAMA
   - Panama Main Branch
   - Colon Free Zone
8. PARAGUAY
9. TRINIDAD & TOBAGO
10. URUGUAY
11. VENEZUELA

1017978

1325015-000-11954

LATIN AMERICA AND CARIBBEAN REGION

LIST OF MEMBERS OF MANAGEMENT AND DYAMICS COMMITTEE

MR. S.M. SHAFI — Chairman

MR. L. PALMA CANE / Mr. U.K. GHOSH

MR. E. GAITAN / MR. M. ZUBERI

MR. T.M. HANCOCK

MR. BANDE HASAN

MR. ABBAS JAFFERI

MR. ASHLEY C. JENNER

MR. AMIN JINDANI

MR. S.M.H. RIZVI

MR. S.A. SHABBIR

MR. BASHIR SHAIKH

1017979

1325015-000-11955

LATIN AMERICA AND CARIBBEAN REGION

LIST OF MEMBERS OF REGIONAL BUDGET AND MARKETING COMMITTEE

MR. S.M. SHAFI — Chairman

MR. HASEEN AHMAD

MR. SHASHA AHUJA

MR. L. PALMA CANE / MR. U.K. GHOSH

MR. I. KAZMI / MR. TYRONE FOWLER

MR. E. GAITAN / MR. M. ZUBERI

MR. T.M. HANCOCK

MR. BANDE HASAN

MR. ABBAS JAFFERI

MR. ASHLEY C. JENNER

MR. AMIN JINDANI

MR. RASHID MAQSOOD

MR. S.M.H. RIZVI — Secretary

MR. S.A. SHABBIR

MR. BASHIR SHAIKH / MR. ASHFAQUE AHMED

MR. WASEEM SIDDIQI

MR. AIJAZ WAFAI

1017980

1325015-000-11956

LATIN AMERICA AND CARIBBEAN REGION

LIST OF MEMBERS OF REGIONAL CREDIT COMMITTEE

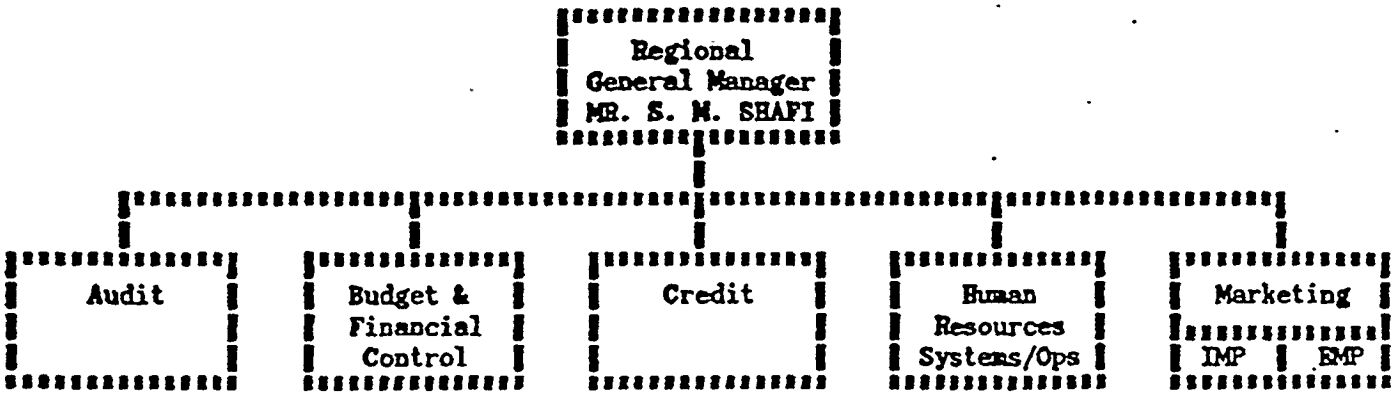
MR. S.M. SHAFI	Chairman
MR. T. M. HANCOCK	
MR. BANDE HASAN	
MR. S.M.H. RIZVI	
MR. S.U. SAKRANI	Secretary

1017981

1325015-000-11957

LATIN AMERICA AND CARIBBEAN REGION

REGIONAL OFFICE — MIAMI



Audit	Budget & Financial Control	Credit	Human Resources Systems/Ops	Marketing IMP	Marketing EMP
Mr. A. Qureshi	Mr. S.M.H. Rizvi	Mr. Bande Hasan*	Mr. Hancock	Mr. Jindani	
Mr. R. Lopez	Mr. R. Syed	Mr. S.U. Sakrani			
		Mr. N. Ahmed			
		Ms. M. Navarro			
		Mr. S. Jawaid			
		Mr. A. Mukhtar			

CENTRAL AUDIT	SPECIAL DESK	REGIONAL COMMITTEES
Mr. I.A.K.Tareen	Mr. S.F. Akhtar	*REGIONAL MANAGEMENT & DYNAMICS COMMITTEE*
Mr. M. Qureshi		
Mr. M. Hussain		*REGIONAL BUDGET & MARKETING COMMITTEE*
Mr. F. Bhatty		*REGIONAL CREDIT COMMITTEE*
Mr. M. Habib		
Mr. E. Llopis		
Mr. F. Schulz		

*Responsible for RGM's functions during the absence of Mr. S.M.Shafi

LACRO Organogram - March, 1989

1017982

1325015-000-11958

LATIN AMERICA & CARIBBEAN REGIONAL OFFICE
1200 BRICKELL AVENUE. 15th FLOOR. MIAMI, FLORIDA 33131-3288 U.S.A.

DATE: 1/07/88 CRT/6293

FROM: S.M. Shafi

TO: Mr. Abbas Jafferi
BCCI Trinidad

SUBJECT: Country Limit

We advise as under the limits for country exposure approved by the Board of Directors:

1. Central Bank of Trinidad & Tobago
   US$25 million

2. Trinidad & Tobago Oil Company, Ltd.
   US$15 million

3. Country limit for Import/Export Financing for a maximum period of 180 days in favour of clients up to US$250,000 per transaction up to a maximum of US$5 million. Any further facility in excess of these limits will require approval of Central Credit Committee on a case to case basis.

Please note that the above are approvals for country exposure only. Any credit facility to be made under the country exposure would require necessary approval under the usual procedure.

Regards,

S.M. Shafi

/mm

TPA 0003985
LAC

Exhibit 6 -- Crim. No. 91-0655 (JHG)

853

PLEASE TRANSMIT THE FOLLOWING

TELEX MESSAGE

MESSAGE No. MIA/

TELEX No. DATE TIME

TEST No.

AMOUNT

VALUE

SEPTEMBER 25, 1987

MR IMTIAZ AHMED
CENTRAL CREDIT DIVISION
BCCI - LONDON

RE: IRON AND STEEL CO. OF TRINIDAD AND TOBAGO LTD. (ISCOTT)

WE HAVE RECEIVED THE FOLLOWING PROPOSAL FROM OUR TRINIDAD OFFICE FOR CREDIT FACILITIES TO THE ABOVE COMPANY:

	(IN 000)
1. SIGHT L/C/USANCE L/C (90 DAYS)/LTR (90 DAY).	TT$10,000
2. EXPORT BILL DISCOUNT (90 DAYS)	TT$ 5,000
Total	TT$15,000

THE FACILITIES WILL BE SECURED BY:

I. GUARANTEE FROM THE GOVERNMENT OF TRINIDAD AND TOBAGO.

II. CREDIT FACILITY AGREEMENT WITH RECOURSE TO ISCOTT.

THE L/C FACILITY IS REQUIRED TO FINANCE IMPORT OF IRON ORE MAINLY FROM BRAZIL AND VENEZUELA. SPARE PARTS AND OTHER RAW MATERIALS FROM U.S.A. AND EUROPE.

THE "EXPORT-BILL DISCOUNT" FACILITY IS TO COVER EXPORT OF FINISHED STEEL TO USA AND EUROPE ON OPEN ACCOUNT.

THE RATES AND COMMISSION WILL BE AS BELLOW:

I. INTEREST AT 13.5% P.A. FOR L.T.R.s AND 13% FOR BILL DISCOUNT UPFRONT.

II. L/C OPENING COMMISSION 0.5% FLAT.

BACKGROUND

ISCOTT WAS SET UP IN 1981 AS A STEEL PLANT FOR THE CONVERSION OF IRON ORE TO STEEL BILLETS AND WIRE RODS WITH A PLANT INFRASTRUCTURE AT POINT LISAS. ISCOTT IS 100 PERCENT OWNED BY THE GOVERNMENT OF TRINIDAD AND TOBAGO. SINCE JANUARY, 1986 THE GOVERNMENT HAS ENTERED INTO A TECHNICAL SERVICES AGREEMENT WITH AN EUROPEAN CONSORTIUM OF VOEST ALPINE (AUSTRIA) AND HAMBURGER STAHLWERKE (WEST GERMANY). THIS EUROPEAN CONSORTIUM LOOKS AFTER THE TECHNICAL AND MANAGEMENT ASPECTS. AT PRESENT THEY HAVE AROUND 40 WEST GERMAN AND AUSTRIAN PERSONNEL IN VARIOUS KEY POSITIONS.

AT PRESENT ISCOTT IS MAKING HUGE LOSSES WHICH ARE BEING SUBSIDISED BY THE GOVERNMENT. FINANCIALS HAVE NOT BEEN SUBMITTED AS THESE ARE TREATED AS CONFIDENTIAL BY THE TREASURY. THE REASON FOR THE LOSSES ARE MAINLY DUE TO THE FACT THAT THE WORLD STEEL MARKET IS VERY SOFT AT PRESENT. ALSO ISCOTT DO NOT HAVE THE NEEDED FINANCE REQUIRED FOR CAPITAL EXPENDITURE TO IMPROVE THE CARBON CONTENT OF THE

FROM
BANCAMERICOM MIAMI

NOT TO BE TRANSMITTED

TPA 0016808

Authorized Signature Authorized Signature Dept LAC

PAN AMERICAN GRAPHIC INC.

CHARGES RECOVERED FROM CLIENT YES/NO
DEBIT.

1325015-000-11960

Regional Offices

AFRICA

ASIA/AUSTRALIA

FRANCOPHONE REGION – AFRICA REGION

Regional Office
125 Avenue des Champs
Elysees,
Paris 75008, France
Phone: 47239019
Telex: 611710 BCCI P
Fax: 331 4720 5643

Countries
Cameroon
Cote d'Ivoire
Djibouti
France
Gabon
Monaco
Niger
Senegal
Togo

AFRICA REGION

Regional Office
Cunard House,
88 Leadenhall Street
London EC3A 3AD
Phone: 01283 8566
Telex: 892251
Fax. 626 9596

Countries
Botswana
Ghana
Kenya
Liberia
Sierra Leone
Sudan
Swaziland
Zambia
Zimbabwe
*Egypt
*Nigeria

FAR EAST REGION

Regional Office
802 Admiralty Centre,
18 Harcourt Road,
Hong Kong,
Phone: 297301/6
Telex: 72042 BCCRO HX
Fax: 852 8654 320

Countries
Australia
Bangladesh
China
Hong Kong
Indonesia
Japan
Korea (South)
Macau
Malaysia
Philippines
Taiwan
Thailand

SOUTH ASIA REGION

Regional Office
BCC House,
Chundrigar Road,
Karachi, Pakistan
Phone: 241 4030/3070
Telex: 28824 BCCGM PK
Fax: 9221 241 7006

Countries
Maldives
Pakistan
Sri Lanka

INDIA REGION

Regional Office
Maker Chambers II,
Nariman Point,
Bombay 400 021, India
Phone: 241012
Telex: 011-5839 BCCI IN
Fax: 9122 2042280

Countries
India
Mauritius
Seychelles

*BCC Subsidiaries and Affiliates in Canada, Egypt, Italy, Kuwait, Lebanon, Nigeria, Oman, Spa

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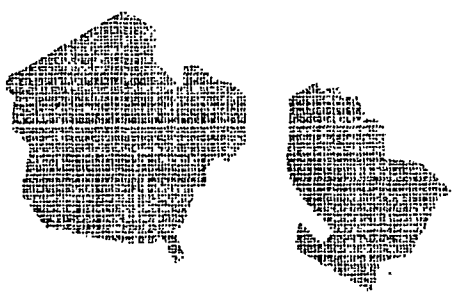
DC 006543

1325015-000-11961

EUROPE

AMERICAS

MIDDLE EAST REGION	LUXEMBOURG REGION	U.K. REGION	UNITED STATES OF AMERICA REGION	LATIN AMERICA & CARIBBEAN REGION
Regional Office BCC Building, Bin Yas Street, Deira Dubai, U.A.E. Phone: 285161 Telex: 23478 BCC ISH Fax: 9714 237732	**Regional Office** 25 Boulevard Royal, PO Box 46, Luxembourg Phone: 470391/8 Telex: 2812 BCCI LU Fax: 35 247 5186	**Regional Office** 100 Leadenhall Street, 1st Floor London EC3A 3AD Phone. 01 283 6566 Telex: 892251 BCC LNA G Fax: 01 929 1016	**Regional Office** 20th Floor, 320 Park Avenue, New York, NY 10022 Phone: 1212 715 2800 Telex: 234746 BCC NY Fax: 1212 715 2880	**Regional Office** 1200 Brickell Avenue, Miami, Florida 33131-3209, U.S.A. Phone: 1305 374 8668 Telex: 264862 BCC LAR Fax: 1305 371 6501
Countries Bahrain Jordan Morocco Oman UAE Yemen (North) *Kuwait *Lebanon	**Countries** Cyprus Germany (West) Luxembourg Netherlands Portugal Turkey *Italy *Spain	**Countries** Gibraltar Isle of Man United Kingdom	**Countries** United States of America *Canada	**Countries** Argentina Bahamas Barbados Brazil Colombia Grand Cayman Jamaica Panama Paraguay Trinidad and Tobago Uruguay Venezuela



Spain and UAE are not under any Region but looked after directly by Central Support Organisation

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DC 006544

1325015-000-11962

BCC Group Subsidiaries & Affiliates

Bank of Credit and Commerce International SA — 100%
39 Boulevard Royal, 2449 Luxembourg

Bank of Credit and Commerce International (Overseas) Limited — 100%
Ansbacher House, Fort Street, George Town, Grand Cayman,
Cayman Islands, B.W.I.

Bank of Credit and Commerce Hong Kong Limited — 99%
Admiralty Centre, Tower 1, 21st Floor, 18 Harcourt Road, Hong Kong

Bank of Credit and Commerce Canada — 100%
Suite 2601, 40 King Street West, Scotia Plaza, Toronto, Ontario, M5H 3Y2, Canada

Bank of Credit and Commerce S.A. Española — 99%
Serrano 11, PO Box 50887, 28001-Madrid, Spain

Banco de Credito y Comercio de Colombia — 99%
Carrera 7A, No. 14-23, Apartado No. 6826, Bogotá, Colombia

Bank of Credit and Commerce International (Lebanon) SAL — 100%
PO Box 11-1889, Piccadilly Building, 2nd Floor, Hamra, Beirut, Lebanon

Bank of Credit and Commerce (Zambia) Limited — 100%
Zimco House, Phase II, Chaida Place, Cairo Road, PO Box 34940, Lusaka, Zambia

Bank of Credit and Commerce (Botswana) Limited — 100%
Industrial Area, Plot No. 1278 — Extension 6, Lobatse Road, PO Box 871,
Gaborone, Botswana

Bank of Credit and Commerce Niger — 100%
BP 12792 Immeuble El-Nasr, Niamey, Niger

Bank of Credit and Commerce Cameroon SA — 65%
Kennedy Building, Ave. John F. Kennedy, B.P. 1188, Yaounde, Cameroon

Bank of Credit and Commerce International (Swaziland) Limited — 55%
PO Box 645, Nkoseluhlaza Street, Manzini, Swaziland

Bank of Credit and Commerce Zimbabwe Limited — 53%
60 Union Avenue, Union House, PO Box 3313, Harare, Zimbabwe

Bank of Credit and Commerce Gibraltar Limited — 100%
PO Box 168, 20/22 Main Street, Gibraltar

Credit and Finance Corporation Limited — 100%
Genesis Building, PO Box 1673, George Town, Grand Cayman,
Cayman Islands, B.W.I.

BCCI Finance International Limited — 99%
Admiralty Centre, Tower 1, 21st Floor, 18 Harcourt Road, Hong Kong

Italfinance International SpA — 100%
Via Marche 1, 00187, Rome, Italy

BCCI Finance (Kenya) Limited — 100%
PO Box 44080, Koinange Street, Nairobi, Kenya

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1325015-000-11963

BCC Credit and Finance (Uruguay) SA — 100%
Sarandi 588, Casilla de Correo 480, Montevideo, Uruguay

BCCI Finance NV — 100%
De Ruyterkade 62, Curaçao, Netherlands Antilles

PT BCC Pratama Leasing Indonesia — 70%
Central Plaza, Jalan Jenderal Sudirman Kav 47, 48,
PO Box 4718, Jakarta 10001, Indonesia

Bank of Credit and Commerce (Misr) SAE — 49%
56-A Gameat El Dowal El Arabia Street, Mohandesseen, Giza, Egypt

Bank of Credit and Commerce International (Nigeria) Limited — 40%
42/44 Warehouse Road, PMB 1040, Apapa, Lagos, Nigeria

Bank of Credit and Commerce (Emirates) — 40%
PO Box 3865, Abu Dhabi, U.A.E.

National Bank of Oman Limited (SAO) — 40%
PO Box 3751, Ruwi, Muscat, Sultanate of Oman

BCCI Leasing (Malaysia) Sdn Bhd — 49%
Suite 1701-3, 17th Floor, Wisma Hamzah Kwong Hing,
1, Leboh Ampang, 50100 Kuala Lumpur, Malaysia

Kuwait International Finance Company SAK — 49%
Al Rashid Building, PO Box 23792, Fahad Al-Salem Street, 13098 Safat, Kuwait

Bank of Credit and Commerce Ghana Limited — 55%
4 Graphic Road, PO Box 11011, Accra, Ghana

Bank of Credit and Commerce SA — 99%
Reconquista 579, Buenos Aires (1003), Argentina

Banque de Commerce et de Placements SA — 15%
25 Rue Chantepoulet, Case Postale 215, CH-1211, Geneva 1, Switzerland

BCC Finance and Securities Limited — 10%
Bangkok Bank Building, 17th Floor, 333 Silom Road, Bangkok, Thailand

BCC Australia Limited — 100%
BCC House, 263 George Street, Sydney NSW 2000, Australia

Bank of Credit and Commerce International
(Trinidad & Tobago — Merchant Bankers) Limited — 100%
41-43 St. Vincent Street, PO Box 782, Port of Spain, Trinidad and Tobago, W. Indies

Banco de Credito e Comercio de Investimento SA — 50%
Avenida Paulista, 1.106-3 andar, Cerqueira Cesar, CEP 01310, Sao Paulo, Brazil

% indicates percentage shareholding

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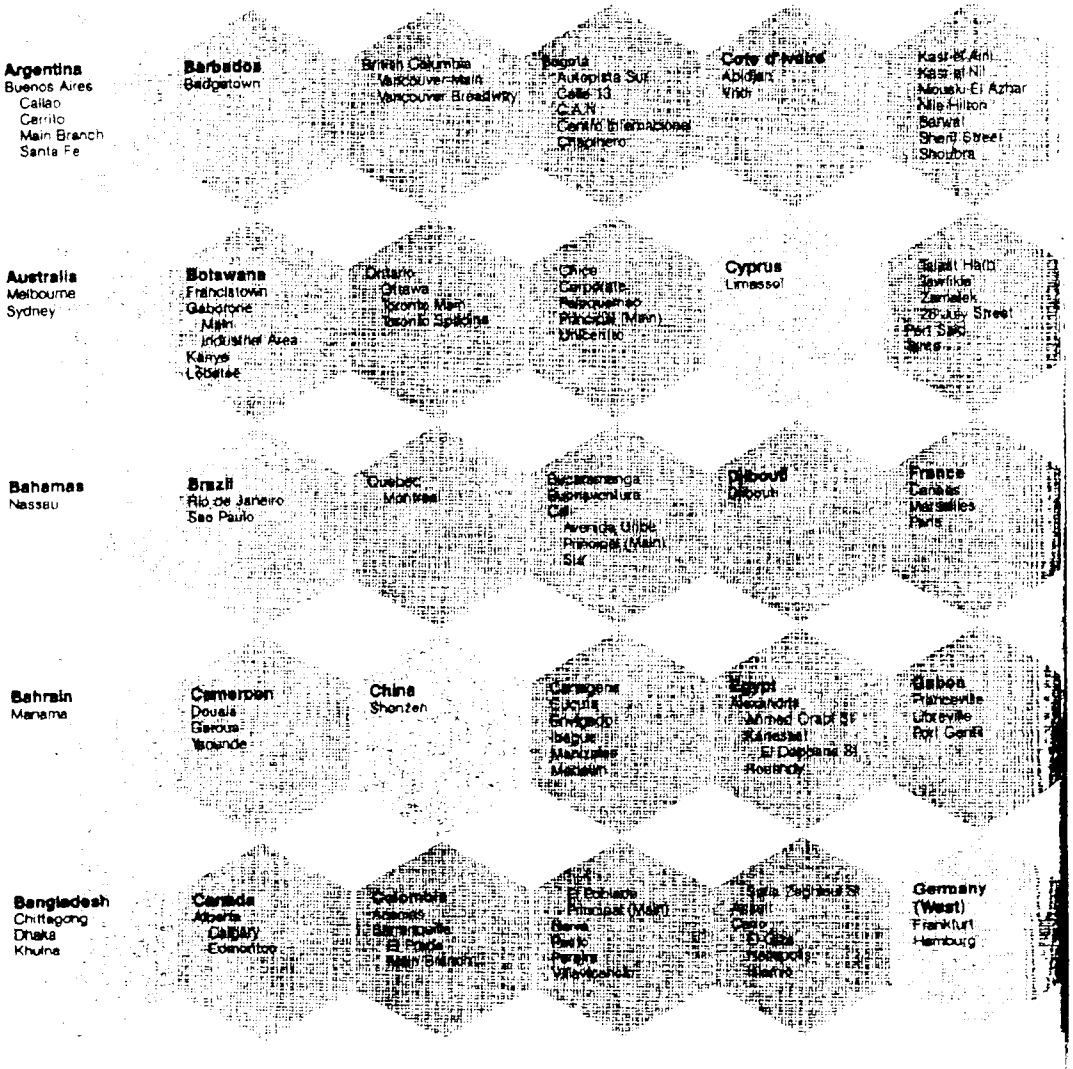
1325015-000-11964

Network of Branches



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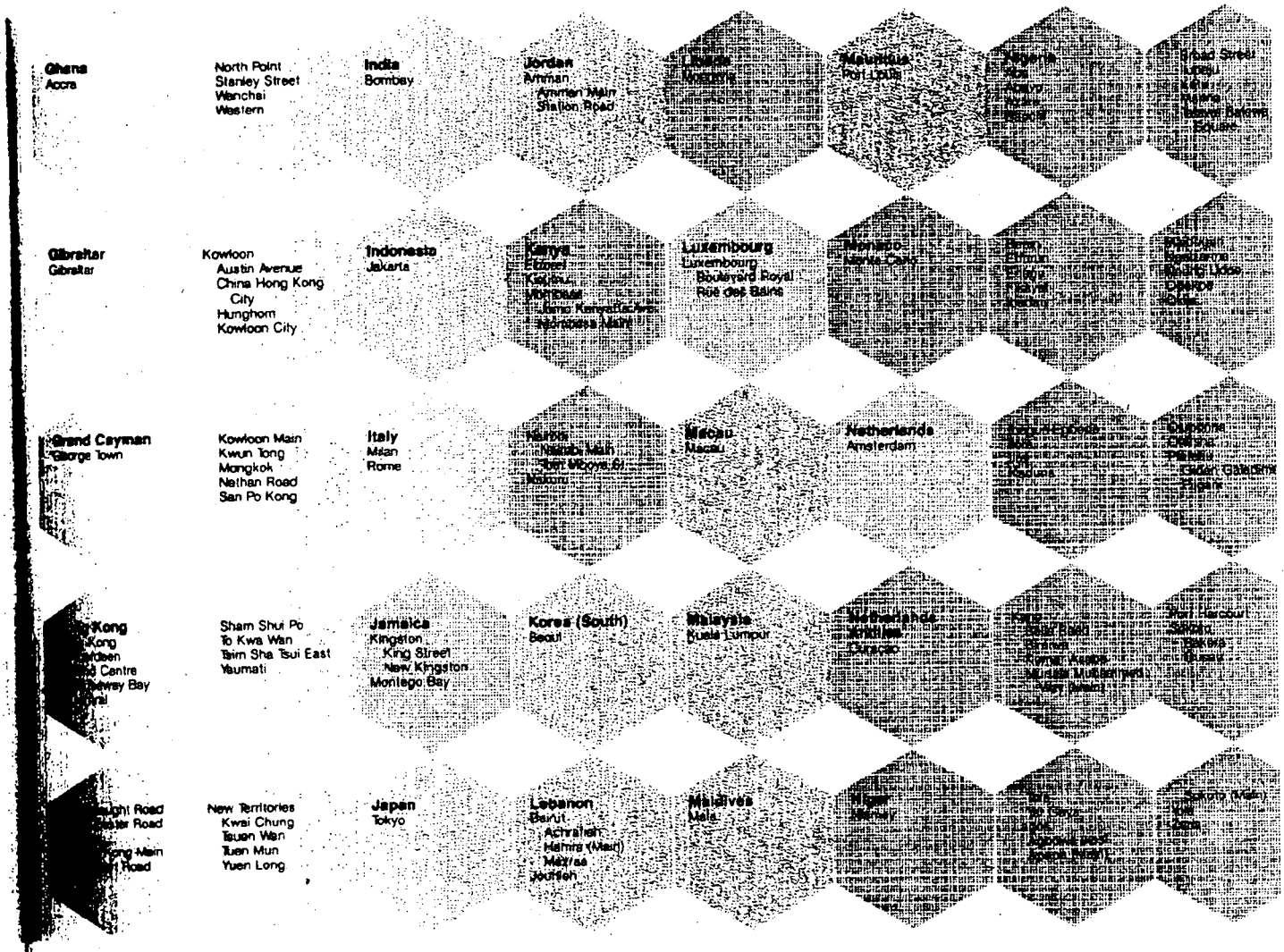
1325015-000-11965

Network of Branches



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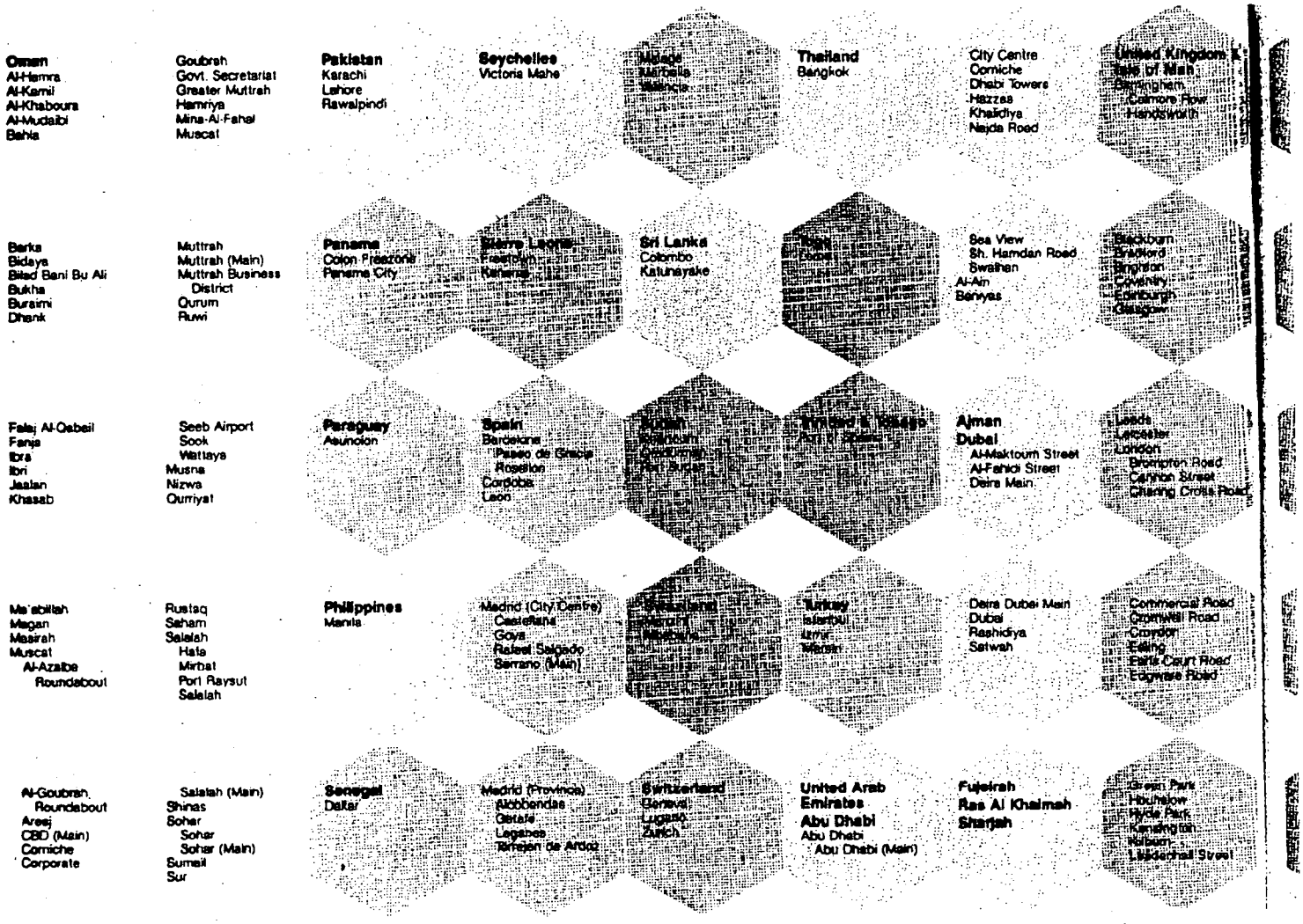
Network of Branches

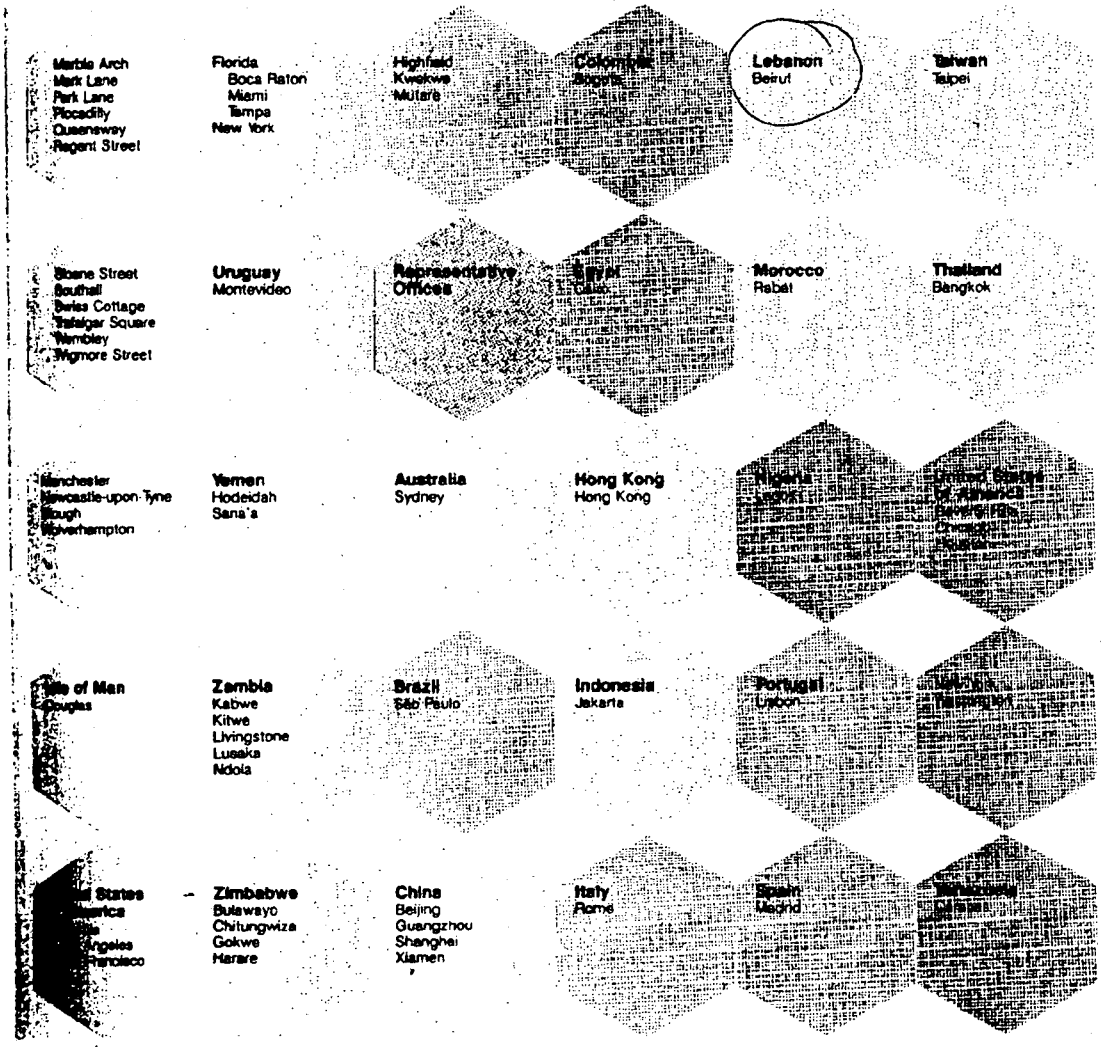


DC 006549

BCC0006583

1325015-000-11967

Network of Branches and Offices



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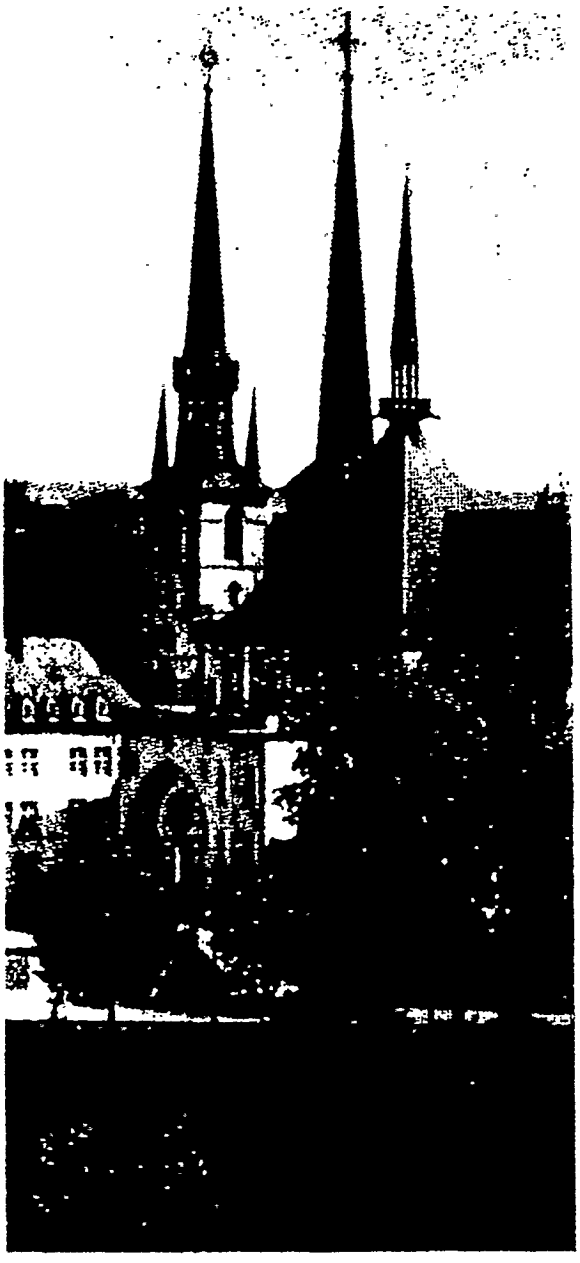

Report of the Directors

On behalf of the Directors I have pleasure in placing before you the Consolidated Statement of Condition and Consolidated Statement of Earnings of BCCI Holdings (Luxembourg) S.A. for the year ended December 31, 1988, together with the Auditors' Report.

A number of unfortunate circumstances marred the otherwise satisfactory operational results of the Group in 1988. First came the serious illness of the President, Mr. Agha Hasan Abedi, in March. He is currently making satisfactory progress. The management structure of the Group, however, showed the expected resilience and strength which ensured continuity and smooth transition. In October, we were faced with an indictment in Tampa, Florida, which alleged that nine of our employees had violated U.S. money-laundering laws by laundering $14 million. The individuals have denied the charges and are contesting them vigorously, as are the bank entities. It has not been suggested or alleged that either the corporate management or the Directors had any knowledge of the transactions. Appropriate steps have been taken in the United States and elsewhere to strengthen procedures and controls, particularly on client relationships.

Although this last event generated a high degree of adverse publicity, the Group's underlying strength and viability remained unimpaired resulting in a strong balance sheet at the year-end with assets exceeding $20 billion and an improved operating profit of $192 million for the year. The final profit figures, however, were strongly influenced by a significant increase in provisions against commercial and cross border risk situations, a step decided on as a matter of prudence and in the light of the regulatory guidelines on such risks. The decision had the full support of our shareholders who contributed to the increase of $100 million in the Group's Capital fund subsequent to the year end.

Some of the countries where the Group has an operating presence will continue to be affected by external debt problems. These remain of serious concern not only to the financial community but also to the political leaders around the world. It is clear that a fresh approach is needed requiring a large degree of financial realism and political goodwill. The recent initiatives must be seen as a positive step in the right direction.

With our geographic diversification and having made conservative provisions in 1987 and 1988, we can face the next financial year with confidence and anticipate a good improvement in our earnings.

In accordance with our well-established philosophy, a gross amount of $21 million was allocated to various charitable causes.

I take this opportunity to thank the Central Banks and Regulatory Authorities in the countries where BCC operates for their guidance and day to day assistance.

I also place on record my deep appreciation for the loyalty and hard work of each and every BCC staff member often under difficult circumstances. Their collective contribution will form the foundation for the Group's future growth in the year ahead.

Y. C. Lamarche

Yves C. Lamarche
Director

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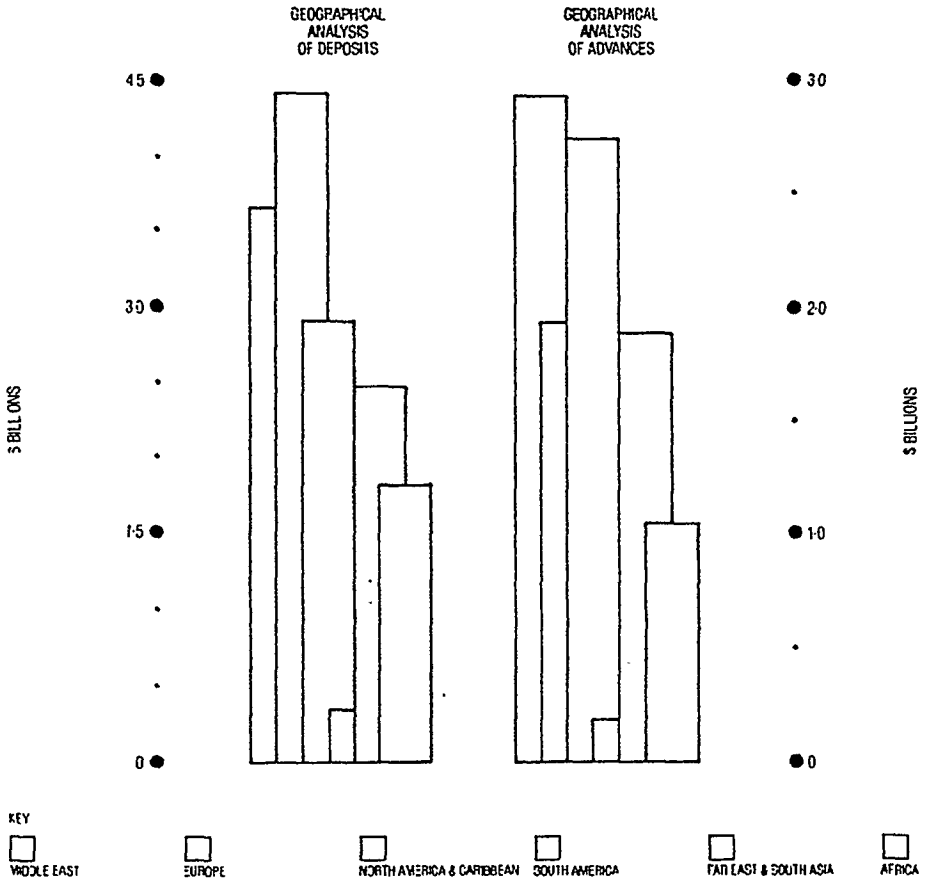

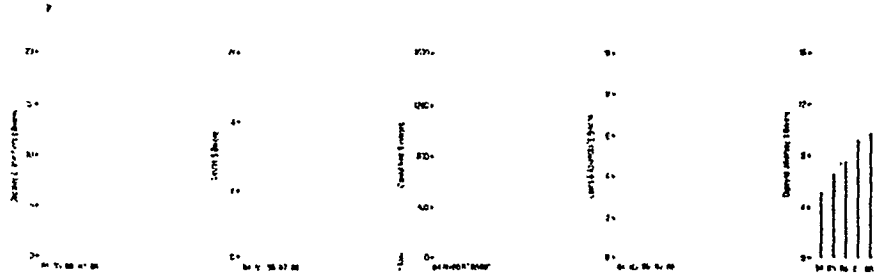

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The true strength of an organisation is tested when it is faced with new challenges or adverse circumstances. The year 1988 was such a year for BCC particularly in October when it found itself the subject of certain allegations made against its operations in Tampa, Florida relating to money laundering. This matter is discussed in more detail in the Report of the Directors.

The financial industry as a whole is faced with unprecedented challenge from a rapidly changing business and regulatory environment. While business becomes more and more competitive, compressing profit margins and placing extraordinary demands on the creativity and quality of management, the scope and application of new laws and regulations has already widened, directly affecting the ways in which financial institutions should conduct their business.

There is for example much greater emphasis now not merely on the knowledge of the business of a client, but more importantly the underlying sources of funding. This requires a whole set of intricate and complex control procedures and adds a new dimension to the operational aspects.

The social and legal processes in many countries have been changing, sometimes dramatically. All institutions working under such conditions need to continually update their operating policies and procedures to take account of such changes.

The various aspects of the 1988 Group Balance Sheet and Operating Results have therefore to be considered against this background.

In 1988 BCC's global structure remained more or less unchanged. The total number of branches and offices globally now stands at 417 covering 73 countries servicing 1,300,000 customers through 14,000 members of staff from 90 nationalities.

For the last three years emphasis has been on consolidation, on becoming more competitive and on securing a larger share of the markets in which the Group operates.

BCC Group continues to be engaged primarily in commercial banking, mobilising deposits and lending against short term trade and commercial transactions. Its business policies and strategies are based on providing quality banking and financial services to its customers and it always strives to follow the high ethical and moral standards required in the industry.

Group Balance Sheet and Operating Results

Capital Fund

During the year, the Group significantly increased the level of provisions against commercial and cross border risks in response to guidelines of the regulatory authorities and in recognition of the deterioration in the economies of some of the developing countries in which the Group operates. The charge of $145 million to the current year's income had a negative effect on both the results for the year and the Group's capital fund.

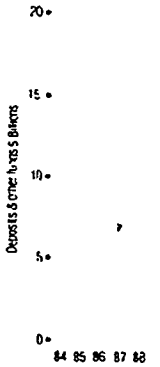
To keep the capital base strong a fresh injection of $100 million was made after the year end through a contribution of $75 million by the shareholders to the Group's equity and through the issue and subscription of new Subordinated Capital Notes for $25 million. Both issues were fully paid by early April 1989. The latest increase has enhanced the Capital Fund to over $1,500 million as compared to $1,469 million in December 1987.

Outside shareholders' interests increased by $20 million during the year mainly through retained earnings.

The capital to risk asset ratio stands at over 9% after the capital increase which compares favourably with the prevailing ratios in the industry.

Deposits and Other Funds

There was an increase in customer deposits to $15.7 billion with an addition of more than 75,000 deposit customers reflecting the continuing emphasis placed by management on the need to maintain a strong and diversified deposit base.



We are particularly satisfied with the geographical segmentation and widening base of customer deposits, bringing greater stability to available funds.

The Group's depositors include individuals, business organisations, corporations, governments, semi-government organisations, central banks and other financial and non-financial institutions.

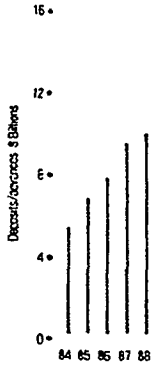
It is a pleasure to report to our shareholders, counterparties and clients that the Group was able to replenish the temporary outflow of deposits following the Tampa incident. Here we must also acknowledge the efforts of all BCC personnel globally.

Funds placed with us by correspondent banks, together with some borrowings in the inter-bank market, totalled $2.8 billion at the end of December as against $2.0 billion at the previous year end.

Total Deposits and Other Funds at the end of the year stood at $18.8 billion as compared to $17.7 billion at the end of the previous year.

Liquidity

The high liquidity policy pursued by the Group since inception continued.



At the end of the year liquid assets stood at $9.8 billion, which is over 47% of the total assets. This included cash and inter-bank balances of $6.0 billion, certificates of deposit of prime international banks of $1.6 billion and marketable securities – predominantly US Government Bonds and Treasury Notes of $2.2 billion.

Loans and Advances

Loans and Advances rose by 7% to $9.8 billion as against $9.2 billion in 1987. In accordance with our established policy these assets are well diversified geographically and by industry and maturity. The main sector remains trade-related and of a self-

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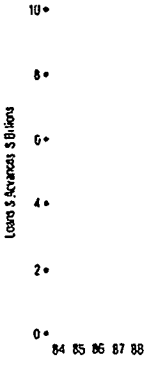
liquidating nature. Geographical and industry analysis of the loans and advances portfolio is given in the Notes to the Accounts.

The ratio of loans and advances to customer deposits stood at 63% at the end of 1988.



Without deviating from the basic policy of keeping the loan portfolio short term and trade related in character, we are continuously reviewing our credit policies in various countries with a view to introducing new credit products where feasible, to meet our customer needs. This will include consumer finance products, small and middle market business loans, and loan initiation and packaging for onward placement with other financial institutions. With the current greater focus on the enhancement of technological and automation capability, we hope that such products will bring added value to our business and profitability.

Trade financing nevertheless remains one of our major strengths. We propose not only to retain this strength but to enhance it by introducing new products which would enable us to increase our share of the market in financing the ever growing volume of international trade now touching nearly $2.5 trillion globally. In this particular sector we are advantageously placed because of our worldwide network of branches. An increase of 16% over the previous year in the volume of international trade related transactions handled by the Group which amounted to $17.0 billion in 1988 is an indication of this strength.

Provisions

As stated earlier, it was decided to make significant additional provisions against commercial and cross border risks. After a full review of the loan portfolio, the amount of provisions charged to the current year's income was $145 million. The commercial risk portion of the provision takes into account loan-servicing problems encountered by clients in some of the developing countries where domestic economies remain adversely affected. The cross border risk portion is created in response to regulatory guidelines and relates largely to commercial loans and trade related transactions. In many cases these loans are continuing to be serviced as scheduled and the outstanding amounts, in fact, have declined.

Operating Results

The Group's combined net operating profit increased from $185 million to $192 million before Taxes and Provisions, notwithstanding such factors as the unfavourable exchange rate movements in several countries, the adverse effects of the negative publicity caused by the Tampa incident and the deterioration in the state of the economies of several countries where BCC operates.

Our Treasury activity, although it has been profitable during the year as against the loss position in both 1986 and 1987, was not able to contribute very significantly to 1988 results due to the establishment of stringent risk limits in the light of volatile market conditions.

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Apart from the Loan Loss Provisions as stated earlier, the results were also affected by a higher than normal taxation provision which was primarily due to the significant profits earned in high tax areas and the unavailability of tax relief, currently, on certain expenses and loan loss provisions. During this year an amount of $74 million has been charged in the accounts for taxation. After setting aside loan loss provisions, taxation and outside shareholders' interests the result for the year was a loss of $49 million.

All of us believe that for the reasons explained the negative result of the year 1988 was an exceptional situation. The Group retains its basic profit generating capacity as is reflected by its increased operating profit of $192 million despite the adverse conditions during the year.

Compared to 1987 the net interest margin has not only been maintained but in quantum terms improved by 3%. Other operating income has significantly improved by 29%. The total income after interest cost reached $776 million an increase of 14% over the previous year. However, the total expenses have increased by 18% to $584 million.

The increase in operating expenses is partly accounted for by higher staff related expenses, particularly in the faster growing regions. This rate of increase has now subsided and we expect staff related costs to remain in check in the foreseeable future. This year, other expenses have recorded an exceptionally high increase due to certain one time expenses and high legal and communication costs; also they incorporated the expenses of BCC Argentina and BCC Brazil for the first time.

We have already embarked on a programme of rationalising operating expenses. The reduction is going to be achieved by direct cost-cutting, increased productivity and by closer monitoring.

At the same time, organised and focussed marketing efforts aimed at generating higher value business and enhancement of several fee related products should contribute to increases both in the interest spread and in fee income.

Management Structure

The management structure of the Group has been further strengthened during 1988. A greater balance is being brought between the Central Management and Regional Management. Additions have been made at the senior management levels both from within and outside the organisation. The objective is to attain a management capability which matches the needs of the diverse and changing markets and maintains a unified identity to promote the common goal and objectives of BCC Group.

Specific measures have been taken in this area which will remain under focus in the coming years and will ensure continuity and development of the Group management resources.

Human Resources

During the year the total number of personnel in the Group including Graduate Trainees rose from 13,745 to 14,090 comprising nearly

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90 nationalities. Out of this 1,270 were international officers while the remaining 12,820 were local officers and staff.

In BCC Human Resources development has always remained a subject of close attention by us. Much of the success which has been achieved by the Group can be attributed to the quality and commitment of our staff.

At present, in addition to a Central Management Development Unit in London, the Group has seven other Training Centres in different locations. Several programmes for the development of the capability of BCC's human resources and their professional and technical skills are being pursued.

Plans are also in hand to systematically review and enhance the productivity of staff and utilisation of their energy. This has become particularly urgent in view of the Group's policy to rationalise its operating expenses and make them commensurate with performance and results.

Regional Overview

The segment analysis given in the Notes to the Accounts and some of the graphs in this report illustrate the regional diversification of the BCC Group's Deposit and Advances base, and provides an indication of the relative importance of each region of BCC Group's operations. The salient features of various Regional areas are highlighted hereunder.

Far East

The Far East has been, during recent years, a prosperous geographical region and continues to hold enormous promise and potential of economic growth.

The importance given to this Region by BCC and efforts expended in developing its operations there are now bearing fruit. In 1988 the region contributed $1,757 million to the Deposit base of the group and $28 million towards its operating profit.

BCC Hong Kong has consolidated its position during the last three years and, with 29 branches in Hong Kong, is well poised for making significant contributions to Group results.

BCC was amongst the first international banks to establish a presence in China after the introduction of its new economic policies. It now has four representative offices in China with a branch in Shenzhen. The branch has developed substantial contacts with encouraging business prospects.

Japan remains a highly competitive market but BCC's branch in Tokyo has already started to provide good support to the Group's business.

BCC's branch in Seoul, South Korea, is a strong contributing operation, which also provides a valuable link with Korean businesses in many other countries where BCC operates.

There is a continuous process of upgrading the mangement, marketing and technological capability in the region. This includes development of technology-driven products and real time on line computer linkage for the whole region providing a wide range of consumer services.

South Asia

India, Pakistan, Bangladesh, Sri Lanka and Maldives, the countries of the Indian sub-

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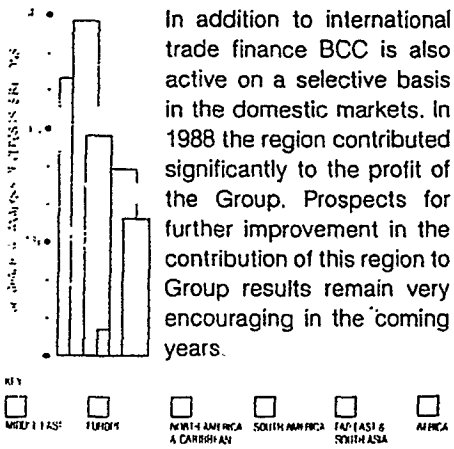
continent, have been consistently high performers in the BCC Group. Our historical knowledge of customers and business conditions provides an inherent strength and competitive edge to our operations in the region.



In addition to international trade finance BCC is also active on a selective basis in the domestic markets. In 1988 the region contributed significantly to the profit of the Group. Prospects for further improvement in the contribution of this region to Group results remain very encouraging in the coming years.

The Middle East

The Middle East is not only BCC's major shareholders' base, but continues to be a significant contributor to its deposits, profits and other business.

Nothwithstanding the decline in the revenues of oil exporting countries, the overall state of the economies and their long term future remain healthy.

There is a wider dispersal of wealth and more efficient use of resources. Investment income is now an important part of the Government's revenue. Evolution of regional co-operation will gradually bring greater stability to the economies of member countries. The number of high net worth individuals is large and provides a valuable source of our customer deposits.

BCC Group has three major locally incorporated banks in the Region – BCC Emirates with 16 branches in UAE, BCC Misr with 19 branches in Egypt and National Bank of Oman with 49 branches in Oman and 3 abroad. Being local banks, they participate fully in all kinds of business and remain among the leading financial institutions in each country, contributing to the Group results in 1988 very effectively.

Additionally, BCC Group has 31 other branches in the region with stable streams of business and income during 1988.

Both Governments and individuals in this Region have large investments overseas. With BCC's international network of branches it offers a twofold opportunity to such clients both in terms of local business and in handling their international business. Because of traditional relationships, the Group continues to be optimistic about its growth prospects in the countries of this Region.

Africa

BCC has a wide coverage of the countries in the continent. It has presence in 19 countries through 11 Group banks and 84 branches.

BCC first established its presence in the African continent in 1976. Since then it has acquired considerable experience and extensive knowledge of African countries and their economies.

Other than its exposure to Nigeria on account of commercial and trade related transactions, the Group's cross border exposure to most other African countries is well controlled.

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Notwithstanding the generally sluggish economy in many countries of Africa during 1988, the BCC locations contributed well to both the Group balance sheet and to its operating profit.

In the foreseeable future, while the cross border exposure will remain controlled, the local subsidiaries and branches will continue to expand the domestic business within the overall framework of Group policies.

The deposit base will be widened through organised marketing effort and local lending opportunities will be selectively sought.

The UK and Europe

This is a region of growing importance to the Group. It covers most of the major countries in the EEC, as well as Switzerland and Turkey, through 80 branches and offices.

The Group's network of banking offices offers an excellent opportunity to BCC for participating in the prospects arising out of 1992 EEC unification plans.

In preparation for 1992 and to provide BCC's operations in Europe with greater depth and to take advantage of these opportunities, the Group has initiated a new plan with short term and long term goals.

Pursuant to this plan, it is restructuring its management and marketing resources in the region. Automation and technology is being upgraded to enable the bank to develop technology based products and delivery systems to compete in a more unified European market.

Despite intense competition, BCC is focusing on special niches of business and continues to rely on its intrinsic strength as a marketing orientated global bank. It will optimise on its overseas customers' requirements for banking services in Europe. It will similarly develop effective relationships with European corporations for services required by them in countries outside Europe where BCC has a presence.

While deregulation is a challenge to competitiveness, it is also an opportunity for institutions like BCC who could develop capability to serve such market segments which require specialisation, more personalised approach and a high level of efficiency.

Already the region makes a significant contribution to the Group results. In 1988 this amounted to $4,420 million in Deposits, $6,757 million in Assets and $24 million in operating profit. By following the above strategy, BCC expects to enhance this contribution in the coming years.

North America

BCC has been attempting to establish a presence in the North American Region, consisting of Canada and the USA, over the last few years and was intending eventually to make it a major region of the group. While BCC Canada continues to show steady growth, in the USA – where we have six banking offices – the local operation suffered from the Tampa incident.

Nevertheless the US operation has an assets base in excess of $843 million, and

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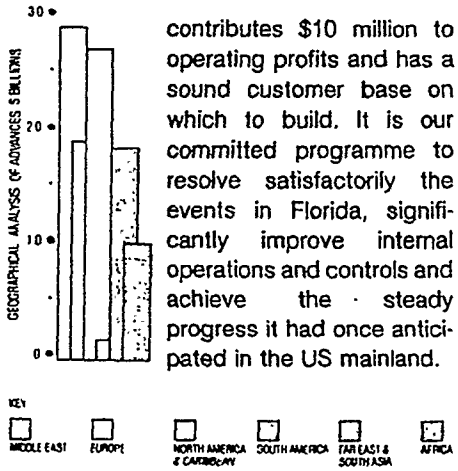
Management Report
continued



contributes $10 million to operating profits and has a sound customer base on which to build. It is our committed programme to resolve satisfactorily the events in Florida, significantly improve internal operations and controls and achieve the steady progress it had once anticipated in the US mainland.

Latin America and the Caribbean

BCC Group covers 13 countries in the region. Notwithstanding the well known Latin American debt burden and high inflation rate the internal economies of each of these countries provide adequate selective domestic and trade related business opportunities for a global bank with a local presence.

It is expected that in the next 5 to 10 years, once the debt issue is brought under some kind of a workable discipline, some of these countries will re-emerge as significant economic forces both in international trade and finance as well as growing domestic markets.

BCC has established its presence in this region with a long term objective. For the time being, its cross border exposure to most of the countries in the region is negligible and the emphasis remains on domestic and trade related business opportunities.

In 1988 most of the units in the Region continued to build up their deposit base and achieved encouraging profitability.

Future Prospects

We live in an age of innovative competition which is unlikely to slacken; the traditional roles of financial institutions are being radically transformed; there is a global urge towards a new interdependent order in trade, financial co-operation and economic development.

BCC, founded as a truly international bank, matches the needs of the present with the likely needs of the future. It is committed to the principle of promoting local and international trade and to be the bridge between the developing and the developed countries of the world. BCC today has the fifth largest banking network in the world, spread over Africa, Asia, Australia, Europe, the Far East, the Middle East, North and South America, serving them through a dedicated team of 14,000 people.

BCC claims no country as its own, but treats every city and every town it operates in as its home. It is committed to local communities with its belief that indigenous enterprise can benefit from the application of financial skills and knowledge acquired through years of international experience.

Through these unique features of BCC, we propose to optimise our market share and contribution in promoting and financing international trade and attracting investment from surplus countries to the developing countries. In providing such services we shall also promote sophisticated and technology driven products and enhance the professional and technical skills of human resources so that our capabilities do not begin to lag behind new opportunities.

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Management Report
continued

BCC is at a threshold in the process of its future development. Whereas it continues to progress and grow in the markets where it is more entrenched, such as the Far East, Middle East, South Asia and Africa, it has to adopt new policies and strategies in other markets, particularly industrialised countries, to enhance and further diversify its profitability and also meet the ever changing expectations of the customer.

BCC has, therefore, set up a Strategy & Planning Group in its management structure distinct from its existing Planning Division. This group will formulate short and long term strategies of business. It will make a careful assessment of each geographic region's potential and possibilities taking into account economic and political conditions, the nature of competition, the products in demand and those for which demand can be created.

Success is the best motivator and enhances creativity. The Strategy Group will therefore also identify the sectors where BCC could be more successful in the immediate future. This group will also be responsible for matching the possibilities with BCC's marketing capability either present, enhanced or acquired.

In the new strategy, this aspect is already being given greater attention. A significant number of senior bankers from other large international banks have already joined BCC. The process of education, training and skill development of the existing staff is being improved and accelerated, both by in-house facilities and with the assistance of outside expertise.

While our products, delivery systems, and market niches may undergo changes, our basic business and the principles of conducting the same are not expected to change in the near future. This means that:

— our principal activities will be in the area of commercial banking

— our business policies will be based on the following preferences:

  - o High liquidity to be maintained through broad based and diversified customer deposits.
  - o Cost of deposits will continue to be kept at an economic level.
  - o Quality of assets to remain high – largely short term, self-liquidating.
  - o Quality profit generated both from sustainable and regular streams and through short term transactions and deals.

BCC is destined to earn its distinction by the quality of its operation and by the role it plays as a link between what is and what is possible – a bridge between developing and developed countries.

We have every reason to look to the future with confidence and are determined to make 1989 significantly better than last year.

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BCCI HOLDINGS (LUXEMBOURG) SA

Consolidated Statement of Condition

as at December 31, 1988

	Note	1988 $'000	1987 $'000
Assets			
Cash and Due from Banks		5,959,765	5,425,282
Certificates of Deposit	3	1,594,558	1,983,805
Investment in Securities and Other Dealing Assets	4	2,241,708	2,054,389
Loans and Advances (less provision for loan losses)	5	9,838,179	9,224,882
Accrued Interest		383,265	351,820
Investment in Affiliates and Goodwill	6	65,373	75,365
Property and Equipment	7	254,606	239,393
Other Assets	8	300,201	288,064
Total Assets		20,637,655	19,643,000
Liabilities			
Demand Deposits		3,137,322	2,990,813
Savings and Time Deposits		12,524,696	12,448,424
Due to Banks	9	2,827,135	2,010,987
Floating Rate Notes	10	43,000	50,000
Accrued Interest on Deposits & Other Funds		283,726	224,278
Total Deposits and Other Funds		18,815,879	17,724,502
Provision for Taxes		65,596	46,745
Other Liabilities		339,047	402,571
Total Liabilities		19,220,522	18,173,818
Capital Fund			
Issued and Paid up Shares	11	726,000	660,000
Proposed Stock Dividend	19	—	66,000
Legal Reserves	12	50,220	48,316
Retained Earnings and Other Reserves	13	109,665	206,701
Shareholders' Equity		885,885	981,017
Subordinated Capital Notes	14	412,500	389,000
Outside Shareholders' Interests	15	118,748	99,165
Total Capital Fund		1,417,133	1,469,182
Capital Fund and Total Liabilities		20,637,655	19,643,000
Contra Accounts			
Acceptances		301,417	323,556
Letters of Credit		2,350,381	2,122,327
Letters of Guarantee		2,237,446	2,107,926
		4,889,244	4,553,809

The notes on pages 33 to 42 form part of these accounts.

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Consolidated Statement of Earnings

for the year ended December 31, 1988

	Note	1988 $'000	1987 $'000
Income			
Interest Income		1,892,174	1,581,185
Interest Expense		(1,493,493)	(1,195,456)
Net Interest Income		398,681	385,729
Other Operating Income	16	377,100	293,130
Total Income		775,781	678,859
Operating Expenses			
Salaries and Related Costs		259,801	230,536
Occupancy Expenses		90,912	81,550
Depreciation on Property and Equipment		31,588	29,908
Other Expenses		201,546	151,424
Total Expenses		583,847	493,418
Net Operating Profit		191,934	185,441
Loan Loss Provision	5	(145,000)	(70,000)
Profit before Taxation		46,934	115,441
Taxation for the year		(74,000)	(60,000)
(Loss)/Profit after Taxation		(27,066)	55,441
Outside Shareholders' Interests	15	(21,654)	(17,988)
(Loss)/Profit attributable to Shareholders		(48,720)	37,453
Statement of Retained Earnings and Other Reserves			
At beginning of the year		206,701	336,212
Adjustment to provisions brought forward	17	—	(100,000)
(Loss)/Profit for the year		(48,720)	37,453
		157,981	273,665
Other Reserve Movements	18	(36,249)	12,371
Appropriations			
Proposed Stock Dividend	19	—	(66,000)
Transfer to Legal Reserves	12	(3,411)	(4,766)
Other Appropriations	20	(8,656)	(8,569)
Carried forward at end of the year		109,665	206,701

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The notes on pages 33 to 42 form part of these accounts.

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BCCI HOLDINGS (LUXEMBOURG) SA

Consolidated Statement of Changes in Financial Position

for the year ended December 31, 1988

	1988 $'000	1987 $'000
Financial resources provided by operations:		
Net (loss)/profit after taxation	(27,066)	55,441
Non cash charges:		
Depreciation, amortisation and loan loss provision	181,623	101,089
Financial resources provided by operations	154,557	156,530
Cash dividends paid to Outside Shareholders' Interests	(9,183)	(10,905)
Other Appropriations	(8,656)	(8,569)
Net financial resources provided by operations	136,718	137,056
Deposits and other financing activities:		
Customers' deposits	222,781	1,653,794
Due to Banks	809,148	424,025
Subordinated Capital Notes (net)	23,500	78,500
Total financial resources provided by operations, deposits and other financing activities	1,192,147	2,293,375
Currency translation adjustments	(42,789)	(16,728)
Change in net non-earning assets	(58,506)	(90,971)
Increase in financial resources invested in Earning Assets	1,090,852	2,185,676
Change in Earning Assets:		
Due from Banks	534,483	(670,996)
Certificates of Deposit	(389,247)	572,107
Investment in Securities and Other Dealing Assets	187,319	457,797
Loans and Advances	758,297	1,826,768
Total Increase in Earning Assets	1,090,852	2,185,676

The notes on pages 33 to 42 form part of these accounts.

DC 006566

BCC0006600

1:92-cv-11000-11983

Notes to the Consolidated Accounts

December 31, 1988

1
Incorporation and Activities

BCCI Holdings (Luxembourg) S.A. is incorporated in Luxembourg and is the ultimate holding company of the Bank of Credit and Commerce group. The group provides commercial banking and related services in 73 countries.

2.
Significant Accounting Policies

These accounts have been prepared under the historical cost convention as modified by revaluation of freehold property in accordance with International Accounting Standards. The significant accounting policies are as follows:

A Basis of Consolidation

The consolidated accounts comprise those of BCCI Holdings (Luxembourg) S.A., its subsidiary companies and certain affiliated companies, as detailed in Note 6. The accounts of these affiliated companies as set out in Note 6 (ii) are consolidated since the holding company owns in each case a minimum of 40 per cent of the issued share capital and, by agreement, the group is entitled to exercise control over their financial and operating policies.

Cost of acquisition in excess of attributable net tangible assets at the date of acquisition is included in investment in affiliates and goodwill and is amortised over the shorter of its estimated useful life and a period of forty years.

B Currency Translation

i Assets and liabilities denominated in other currencies are translated into United States Dollars at appropriate year-end rates of exchange. Income and expenses are translated at average rates for the year.

ii Gains and losses on translation of foreign currencies arising from the group's normal trading activities are credited or charged to income as they arise.

iii Translation differences arising from the application of year-end rates of exchange to opening net assets denominated in foreign currencies are taken directly to General Reserve.

iv Forward foreign exchange contracts are valued at market rates ruling at the year-end, except in the case of contracts covered by corresponding swap transactions where the resulting premium or discount is amortised over the period of the transactions.

C Investment in Securities and Other Dealing Assets

i Securities and Other Dealing Assets held for trading purposes are carried at market value.

ii Investments in Securities which are intended to be held until maturity are carried at cost. Premiums and discounts on investments redeemable at fixed dates are amortised over the period remaining to maturity.

iii Premium income and expense relating to option trading are recognised when received or paid and provision is made at buy-back value for all open option contracts.

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DC 006567

1325013 000-11984

Notes to the Consolidated Accounts
continued

D Investment in Affiliates

Investment in affiliates comprises companies in which the interest of the group is long term and substantial and one over which the group exercises significant influence through participation in the affiliates' policy decisions. Except as described in Note 2 A, investments in affiliates are stated at cost together with group's share of reserves and retained earnings. The group share of the profits of the affiliated companies is included in the Consolidated Statement of Earnings.

E Property and Equipment

Property and Equipment are stated at cost except for freehold premises which are at amounts determined by periodic valuations. Depreciation is provided on the basis of equal annual instalments to amortise the assets over their estimated useful life primarily at rates between 10 per cent and 25 per cent per annum. Capital expenditure on fixed assets which are not yet in operation is depreciated once the assets concerned are brought into use.

F Income Recognition

Interest income and expense are recognised on the accruals basis. Commissions and fees charged to customers are credited to income at the time of effecting the transactions to which they relate.

G Loan Loss Provision

Management review the loan portfolio of the group each year and based upon their judgement set aside specific and general provisions for loan losses. The specific element relates to identified risk facilities, including cross border exposure to troubled-debtor countries, and the general element relates to the risks which are present in any banking portfolio but which have not been specifically identified.

H Taxation

Provision is made by the liability method for all foreseeable local and overseas taxation liabilities after allowance for such reliefs as are available in each location.

I Other Appropriations

Contributions to the Staff Benefit Fund and Donations and Grants are entirely discretionary in nature and based on the available net resources of the group and subject to the annual approval of the Shareholders. These amounts, net of the associated tax relief, are classified under Other Appropriations in the Consolidated Statement of Retained Earnings and Other Reserves.

3
Certificates of Deposit

The certificate of deposit portfolio is carried at cost as adjusted for unamortised premiums or discounts. Of the total portfolio, certificates of deposit totalling **$1,225 million** (1987: $1,423 million) mature on dates in excess of one year from the year-end.

DC 006568

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1325015000-11985

4
Investment in Securities and Other Dealing Assets

	$'000	1988 $'000	$'000	1987 $'000
Trading Porfolio				
Securities		174,183		107,878
Other Dealing Assets		796		37,671
		174,979		145,549
Investment Portfolio				
— under 1 year	690,175		480,673	
— over 1 year	1,376,554		1,428,167	
		2,066,729		1,908,840
		2,241,708		2,054,389

The trading portfolio is readily marketable. The investment portfolio predominantly consists of US Treasury and other Government Bonds. The market value of this portfolio was approximately **$99 million** (1987: $96 million) lower than the book value at December 31, 1988.

5(a)
Loans and Advances

Loans and advances are stated after deduction of the following provision for possible loan losses:

	1988 $'000	1987 $'000
Balance at the beginning of the year	561,927	440,884
Adjustment to provisions brought forward (Note 17)	—	100,000
Charge for the year	145,000	70,000
Amounts written off, net of recoveries	(37,820)	(44,508)
Exchange and other adjustments	(8,591)	(4,449)
Provision at the end of the year	660,516	561,927

5(b)
Loans and Advances — Analysis by Industry

	1988 $ million	1987 $ million
Short-term trade related	4,231	4,108
Shipping and transport	359	412
Manufacturing	552	688
Hotel and tourism	213	199
Construction and Engineering	542	630
Real estate	836	644
Banks and other financial institutions	710	693
Public sector	1,173	1,245
Others	1,883	1,168
Total Loans and Advances before provision for loan losses	10,499	9,787

Notes to the Consolidated Accounts
continued

6
Investment in Affiliates and Goodwill

	1988 $'000	1987 $'000
Goodwill arising on consolidation, net of amortisation (total cost of investment $1,145 million)	49,909	42,954
Affiliates (unconsolidated)		
Investment at cost	9,975	26,105
Group's share of reserves and retained earnings	5,489	6,306
	65,373	75,365

(i) Subsidiaries

The following subsidiary companies have been consolidated as at December 31, 1988:

	Country of Incorporation	% Shareholding
Bank of Credit and Commerce International S.A. (BCCI S.A.)	Luxembourg	100
Bank of Credit and Commerce International (Overseas) Limited (BCCI (Overseas) Limited)	Cayman Islands	100
Bank of Credit and Commerce Hong Kong Limited	Hong Kong	99
Bank of Credit and Commerce Canada	Canada	100
Bank of Credit and Commerce S.A.E.	Spain	99
Banco de Credito y Comercio de Colombia	Colombia	99
Bank of Credit and Commerce International (Lebanon) S.A.L.	Lebanon	100
Bank of Credit and Commerce (Zambia) Limited	Zambia	100
Bank of Credit and Commerce (Botswana) Limited	Botswana	100
Bank of Credit and Commerce Niger	Niger	100
Bank of Credit and Commerce Cameroon S.A.	Cameroon	65
Bank of Credit and Commerce International (Swaziland) Limited	Swaziland	55
Bank of Credit and Commerce Zimbabwe Limited	Zimbabwe	53
Bank of Credit and Commerce Gibraltar Limited	Gibraltar	100
Credit and Finance Corporation Limited	Cayman Islands	100
BCCI Finance International Limited	Hong Kong	99
Italfinance International S.p.A.	Italy	100
BCCI Finance (Kenya) Limited	Kenya	100
BCC Credit and Finance (Uruguay) S.A.	Uruguay	100
BCCI Finance N.V.	Netherlands Antilles	100
Bank of Credit and Commerce (Ghana) Limited	Ghana	55
BCC Australia Limited	Australia	100
BCCI (Trinidad & Tobago – Merchant Bankers) Ltd.	Trinidad & Tobago	100
Bank of Credit and Commerce S.A.	Argentina	99
P.T. BCC Pratama Leasing Indonesia	Indonesia	70

BCC0006604

DC 006570

1325013 000-11987

(ii) Affiliates

At December 31, 1988 the Group's affiliated companies were:

	Country of Incorporation	% Shareholding
Consolidated—see Note 2.A.		
Bank of Credit and Commerce International (Nigeria) Limited	Nigeria	40
Bank of Credit and Commerce (Misr) S.A.E.	Egypt	49
Bank of Credit and Commerce (Emirates)	U.A.E.	40
National Bank of Oman S.A.O.	Oman	40
Banco de Credito e Comercio de Investimento S.A.	Brazil	50
Unconsolidated		
BCCI Leasing (Malaysia) Sdn. Bhd.	Malaysia	49
Kuwait International Finance Company S.A.K.	Kuwait	49
Banque de Commerce et de Placements S.A.	Switzerland	15

The group banks have entered into banking transactions on normal terms with each other and with affiliated companies. At December 31, 1988 amounts Due from Banks and Due to Banks included balances of **$261 million** and **$79 million** respectively (1987: $154 million and $23 million) pertaining to affiliates which have not been consolidated.

The group's share of after-tax profits of *unconsolidated affiliates* included in the Consolidated Statement of Earnings at December 31, 1988 amounted to **$762,000** (1987: $820,000).

7
Property and Equipment

	Property $'000	Equipment $'000	1988 Total $'000	1987 Total $'000
Cost or Valuation				
At the beginning of the year	239,061	120,250	359,311	279,133
Exchange and other adjustments	(8,704)	(4,314)	(13,018)	32,615
Additions at cost	33,819	22,638	56,457	37,990
Surplus on revaluation	6,353	—	6,353	20,000
Disposals	(7,050)	(3,455)	(10,505)	(10,427)
At the end of the year	263,479	135,119	398,598	359,311
Accumulated depreciation	(68,691)	(75,301)	(143,992)	(119,918)
Net book amounts	194,788	59,818	254,606	239,393

Valuations of the group's freehold properties were performed by independent firms of professional surveyors in 1987 and 1988. Revaluation surpluses totalling $26 million have been included in reserves.

BCC0006605

DC 006571

1325015000-11988

Notes to the Consolidated Accounts
continued

8
Other Assets

	1988 $'000	1987 $'000
Items under Clearing	23,455	32,849
Advance Rents and Other Prepayments	30,663	39,286
Unamortised pre-operating expenses	8,216	11,618
Sundry Debtors	81,696	51,115
Advance Taxation	14,634	11,746
Short-term Receivables and other Miscellaneous items	141,537	141,450
	300,201	288,064

9
Due to Banks

Due to Banks consists of availed lines of credit and other money market placements by banks.

10
Floating Rate Notes

Floating Rate Notes were issued during 1983 at par by BCCI Finance N.V. and are guaranteed by the holding company. The Notes, which are listed on the Luxembourg Stock Exchange, bear interest at ¼ per cent over six months LIBOR and mature in 1990. Notes totalling $7 million were redeemed during the year at the option of the holders.

11
Share Capital

	1988 $'000	1987 $'000
Authorised (150,000,000 shares of $10 each)	1,500,000	1,500,000
Issued and fully paid		
Balance at the beginning of the year	660,000	599,169
Stock dividend	66,000	60,831
	726,000	660,000
Proposed Stock Dividend (Note 19)	—	66,000
Number of Shares of $10 each	72,600,000	66,000,000

Subsequent to the year-end the Company has increased its Share Capital by means of a Rights Issue which raised $75 million (Note 25).

DC 006572

BCC0006606

1-02015-000-11989

12
Legal Reserves

	1988 $'000	1987 $'000
Balance at the beginning of the year	48,316	44,649
Appropriations	3,411	4,766
Translation differences	(1,507)	(1,099)
	50,220	48,316

13
Retained Earnings and Other Reserves — Consolidated Statement of Condition

	1988 $'000	1987 $'000
Share Premium	77,500	177,500
Revaluation Reserve	26,353	20,000
General Reserve and Retained Earnings	5,812	9,201
	109,665	206,701

The Board of Directors has approved the transfer of **$100 million** (1987: $110 million) from Share Premium to Retained Earnings as permitted by Luxembourg regulations.

14
Subordinated Capital Notes

	Final Maturity	% Floating Rate above 6 months LIBOR	1988 $'000	1987 $'000
Convertible Notes	1991	½	330,000	330,000
Bearer Notes				
Series C	1990	¾	2,500	4,000
Series F	1990	½	5,000	5,000
Series K	1992	1	50,000	50,000
Series L	1994	1	25,000	—
			412,500	389,000

The Capital Notes are subordinated in favour of all other creditors.

The Convertible Capital Notes were issued in 1986. Registered holders of these Notes may, at their option, convert them into shares on December 31 of any year prior to maturity on June 30, 1991 at the rate of $40 per share. No such conversions have taken place to date.

The Bearer Notes are redeemable at the option of the issuer and $1.5 million Series C notes were redeemed during the year.

$25 million of Series L Subordinated Capital Notes were issued on December 30, 1988.

Subsequent to the year-end a further $25 million of Subordinated Capital Notes have been issued (Note 25).

BCC0006607

DC 006573

1325015-000-11990

Notes to the Consolidated Accounts
continued

12
Legal Reserves

	1988 $'000	1987 $'000
Balance at the beginning of the year	48,316	44,649
Appropriations	3,411	4,766
Translation differences	(1,507)	(1,099)
	50,220	48,316

13
Retained Earnings and Other Reserves — Consolidated Statement of Condition

	1988 $'000	1987 $'000
Share Premium	77,500	177,500
Revaluation Reserve	26,353	20,000
General Reserve and Retained Earnings	5,812	9,201
	109,665	206,701

The Board of Directors has approved the transfer of **$100 million** (1987: $110 million) from Share Premium to Retained Earnings as permitted by Luxembourg regulations.

14
Subordinated Capital Notes

	Final Maturity	% Floating Rate above 6 months LIBOR	1988 $'000	1987 $'000
Convertible Notes	1991	½	330,000	330,000
Bearer Notes				
Series C	1990	¾	2,500	4,000
Series F	1990	½	5,000	5,000
Series K	1992	1	50,000	50,000
Series L	1994	1	25,000	—
			412,500	389,000

The Capital Notes are subordinated in favour of all other creditors.

The Convertible Capital Notes were issued in 1986. Registered holders of these Notes may, at their option, convert them into shares on December 31 of any year prior to maturity on June 30, 1991 at the rate of $40 per share. No such conversions have taken place to date.

The Bearer Notes are redeemable at the option of the issuer and $1.5 million Series C notes were redeemed during the year.

$25 million of Series L Subordinated Capital Notes were issued on December 30, 1988.

Subsequent to the year-end a further $25 million of Subordinated Capital Notes have been issued (Note 25).

BCC0006607

DC 006573

1325015-000-11991

Notes to the Consolidated Accounts
continued

15
Outside Shareholders' Interests

	1988 $'000	1987 $'000
Consolidated Statement of Condition		
Subsidiaries	8,444	6,695
Consolidated affiliates	110,304	92,470
	118,748	99,165

	1988 $'000	1987 $'000
Consolidated Statement of Earnings		
Subsidiaries	2,849	2,184
Consolidated affiliates	18,805	15,804
	21,654	17,988

16
Other Operating Income

	1988 $'000	1987 $'000
Commission and fees	200,933	196,710
Foreign exchange	60,018	71,294
Profit/(Loss) on Investments	16,592	(52,986)
Other income	99,557	78,112
	377,100	293,130

Profit/(Loss) on Investments comprises the net results of trading in Securities and Other Dealing Assets after charging the related cost of funds. Interest on Securities is included in Interest Income.

17
Adjustment to provisions brought forward

Management in 1987 conducted a fundamental reappraisal of the risks associated with both commercial and cross border lending following which the directors approved the transfer of $100 million from reserves to strengthen accumulated provisions brought forward.

DC 006574

BCC0006608

1325015 000-11992

File - Serial Charge Out
FD-5 (Rev. 10-13-89)

Date _____

File 296 WF 171994 FS Sub 25
Class. Office of Origin Case No. Last Serial

☐ Pending ☐ Closed

Serial No.	Description of Serial	Date Charged
3		
4		

b6
b7C

Date _____

To _____ From _____

Initials of Clerk _____ Date _____

Date charged

Employee

Location

★U.S.GPO:1991-0-282-066/25203
1325015-000-11993

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/10/97

To: ADIC, WFO

From: SA [redacted]
C-1/FAST, NVMRA
Contact: DA [redacted] EXT 9072

b6
b7C

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **Close 29B-171994 (SUB-25)**

Details: The purpose of this memorandum is to request that 29B-WF-171994 (SUB-25) be closed based on the fact that it was inadvertently opened and treated as a SUB FF to gather information when a SUB FF already existed.

Close sub 25 #4 2/10/97 MM 2/11/97

1-29B-WF-171994 (SUB-25)

5

29B-WF-171994 (Sub 25)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED MM FILED MM
FEB 10 1997
FBI - WASH. METRO FIELD OFFICE

1325015-000-11994

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 12
Page 6 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;
Page 16 ~ Duplicate;
Page 17 ~ Duplicate;
Page 18 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-F-214	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS ;FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI	$ 6,122,965.17	☐ Yes ☒ No

16. Forfeiture Deferred	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified
☐ Yes ☐ No		

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	NORTH AMERICAN INVESTMENT & FINANCE, LTD $ 6,122,965.17

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date
[redacted]	5	☐ Yes ☐ No

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-8124

FBI/DOJ

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195 through 0214 (0209)

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

b6
b7C

Sub FS
Sub-3
-1

12/2/93

Scanned
Serialized
Indexed
Filed

b6
b7C

[redacted]

Rec'd 12/2/93

1325015-000-8122

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 61
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Page 10 ~ Duplicate;
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Page 71 ~ Duplicate;
Page 74 ~ Duplicate;

order of forfeiture and how such amount will be distributed (i.e., claims, Worldwide Victims Fund, etc.).

As WFO has only been involved with the BCCI forfeiture files in an administrative capacity and as WFO has no means other than relying on the CATS database of determining when income has been received and how income will be distributed for each of the orders of forfeiture, WFO is closing its seizure files associated with the BCCI investigation (specifically, 3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060, 3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097, 3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195, 3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075, and 3920-97-F-0126). Attached are printouts from the CATS database for each of the six seizures which reflect income and distribution of seized funds as of 4/1/99.

Attachments

CC: 13 - Bureau (Attn: [redacted] FSPU) b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126 (w/o attachments)
1 - WFO, 29B-WF-171994 SUB FS [with all six CATS forms]
13 - WFO, 29B-WF-171994 FF-21 (3920-95-F-0058),
FF-22 (3920-95-F-0059), FF-23 (3920-95-F-0060),
FF-24 (3920-95-F-0097), FF-26 (3920-96-F-0024),
FF-1 (3920-96-F-0097), FF-2 (3920-96-F-0134),
FF-3 (3920-96-F-0186), FF-4 (3920-96-F-0195) [each with CATS form for 4th Order of Forfeiture];
FF-5 (3920-97-F-0028), FF-6 (3920-97-F-0052),
FF-7 (3920-97-F-0075), and FF-8 (3920-97-F-0126) [each with CATS form for 5th Order of Forfeiture]

♦♦

1325015-000-9760

AIRTEL

Date 05/16/95

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Unit

Subject: 3920-95-F-0097

Entry (Check One)
[X] New Case
[ ] Change or Add

U.S. v $17,000,000 IN U.S. CURRENCY
18 U.S.C. SECTION 982

[X] CATS Record of Seized Property

[X] FD-302

[ ] In Forma Pauperis

[ ] Quick Release

[ ] Indemnity Agreement

[ ] Final Decree

[X] Receipt for Transfer/
Disposition of Funds/Property

[ ] Newspaper Clippings

[ ] Lab Reports

[ ] Police Reports

[ ] Settlement Statement/Agreement

[ ] Title Documentation

[ ] Appraisal Report

[ ] Default Judgement

[ ] Investigative Insert

[ ] Warrant of Arrest in Rem

[ ] Complaint for Forfeiture

[ ] Search Warrant

[ ] Affidavit

[ ] Seizure Warrant

[ ] Plea Agreement

[ ] Sharing Request
[ ] Dag-71 [ ] Dag-72

[ ] Petition

[ ] Claim & Cost Bond

[ ] Petition Investigation

[ ] Civil Forfeiture Report

[ ] Notice of Seizure

[X] Order of Forfeiture

[ ] Employment Check

[ ] Address Check

[X] Other Subsequent Materials: 5/19/95
MEMO FROM SA [redacted]

FOIMS 7/14/95 SGT

b6
b7C

1-BUREAU, FSPU
1-WMFO 29B-WF-171994
**ATTACHMENTS
AC/js
(2)

29B-WF-171994 Sub FS Sub-24-1

Searched
Serialized
Indexed
Filed

1325015-000-9690

Seizure Form

Asset ID: <A> | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920	WF			95-97	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	SA [redacted] C-5

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
2/13/95	CRIMINAL ORDER	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
SA [redacted] C-1	202-324-9072

(17) Seized From: BCCI HOLDINGS

(18) Place/Address Where Seized:	(19) City:
	(20) State:

(21) Seizure: DC	Judicial District (22) Processing: DC	(23) Forfeiture Statute: 18 USC 982	(24) Violation Statute: 18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
$ 17 M	YES	5/15/95	CURRENCY	BANK ACCT.	JUDICIAL

(31) Asset Description: B.C.C.I. ASSETS TOTALING $ 17,000,000.00

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
NO	NO	NO	NO
(36) Expenses Incurred?	**(37) Forfeiture-Dependent Award?**	**(38) Quick Release Performed?**	**(39) Intra-Agency Assistance?**
NO	NO	NO	NO
(40) Suitable for Official Use?	**(41) OCDETF Case?**	**(42) Sharing Anticipated?**	**(43) Additional Agencies?**
NO	NO	NO	YES

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:
ROBB EVANS, TRUSTEE	#149-240-134

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

b6
b7C

Seizure Form

Asset ID: <A> | Date: <B>

Asset Description: <C>

(92) Name: BCCI HOLDINGS | (93) Phone Number: | (94) Party Type (Select 1 -or- More)

(95) Address:

(96) City: | (97) State: | (98) Zip Code: | (99) Country:

(100) Contact Name (if business): | (101) Phone Number:

(102) Lien Amount Held By Party ($): | (103) Quick Release Recipient? | (104) Quick Release Date: | (105) Expenses Reimbursed ($):

(106) Incarcerated? | (107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City: | (111) State: | (112) Zip Code: | (113) Country:

(114) Represented by Counsel? | (115) Attorney's Name (if any):

(116) Firm's Name: | (117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City: | (120) State: | (121) Zip Code: | (122) Country:

Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	X
Institution Seized From	
Occupant	
Victim	
Other	

(92) Name: | (93) Phone Number: | (94) Party Type (Select 1 -or- More)

(95) Address:

(96) City: | (97) State: | (98) Zip Code: | (99) Country:

(100) Contact Name (if business): | (101) Phone Number:

(102) Lien Amount Held By Party ($): | (103) Quick Release Recipient? | (104) Quick Release Date: | (105) Expenses Reimbursed ($):

(106) Incarcerated? | (107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City: | (111) State: | (112) Zip Code: | (113) Country:

(114) Represented by Counsel? | (115) Attorney's Name (if any):

(116) Firm's Name: | (117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City: | (120) State: | (121) Zip Code: | (122) Country:

Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	
Institution Seized From	
Occupant	
Victim	
Other	

Seizure Form

Asset ID: <A>	Date: <B>	Page 3
Asset Description: <C>		

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	UNITED STATES v. BCCI HOLDINGS		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name:		(134) Agency Case ID:		
DEPT. OF JUSTICE				
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
NO		FEDERAL		
(137) Address:		(138) City:		
		WASHINGTON		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
DC		USA		NO
(144) Contact Name:		(145) Contact Phone Number:		
[redacted] TRIAL ATTORNEY		b6 b7C		

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:		(145) Contact Phone Number:		

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:		(145) Contact Phone Number:		

Seizure Form

Asset ID: <A>	Date: <B>	Page 4
Asset Description: <C>		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name: FEDERAL RESERVE BANK, N.Y.	(148) Storage Date: 2/13/95
(149) Storage Facility Address:		
(150) City: NEW YORK	(151) State: NY	(152) Zip Code:
(153) Storage Rate: $	Per:	

PREPARED BY

(154)		(155) Date: 5/15/95
(156) Prepared By:		(157) Title: SPECIAL AGENT, FBI

b6
b7C

APPROVED BY

(158) Sign:		(159) Date: 5/18/95
(160) Approved By:		(161) Title: SUPERVIORY SPECIAL AGENT

FBI

Probable Cause

<D>

1325015-000-9694

Memorandum

To : ADIC, WMFO (29B-WF-171994) (FS) Date 5/10/95

From : SA [redacted] (C-1) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
00:WMFO

WMFO FAST has a limited role acting as an administrative processor monitoring and reporting to FSPU assets seized from criminal orders of forfeitures in the above captioned investigation. Attached is the fourth criminal order of forfeiture entered by the Honorable JOYCE GREEN, United States District Judge, District of Columbia forfeiting properties of the Bank and Commerce International (BCCI) and of the International Credit and Investment Company (Investments). This order was entered on December 21, 1994.

For information of FSPU, WMFO FAST only recently learned of the fourth criminal order of forfeiture from the case agent, [redacted] SA, FBI (WMFO). Trial Attorney's [redacted] b6 b7C DEPARTMENT OF JUSTICE (DOJ) have handled all forfeiture matters concerning this investigation. WMFO FAST has not been kept apprised by DOJ of any claims, petitions, or objections concerning the assets seized pursuant to the fourth court order.

In conclusion the U.S. Marshals in New York City are still in the process of taking possession of the assets outlined in the fourth court order. SA [redacted] WMFO FAST will keep FSPU b6 b7C informed of any new developments as the information becomes available.

1-29B-WF-171994 (FS)

AC:ac

1325015-000-9695

Memorandum

To : ADIC, WMFO (29B-WF-171994) (P) Date 5/16/95

From : SA [redacted] (C-1)

b6
b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF-FAG;
00:WMFO

On 5/10/95, ROBERT EVANS,Trustee for the United States overseeing the BCCI assets furnished the writer with the attached documents a facsimile cover letter and a 2/13/95 bank remittance wire transfer in the amount of $17,000,000.00 (seventeen million dollars).

1-29B-WF-171994

AC:ac

29B-WF-171994 Sub FS Sub-24 - 2

3920-95-0097

SEARCHED BB INDEXED BB

JUL 11 1995

WDC

1325015-000-9705

Seizure Form

Assoc[redacted]95-FBI-001472 | Date: 05[redacted]95 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920		20		3920950097	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
02/13/95	Other	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
	(202)-324-9072

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized:	(19) City:	(20) State:
Not Given	Not Given	DC

(21) Judicial Seizure:	District (22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1958

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
17000000.00	Y	05/15/95	Financial Instrument	04	Civil/Judicial

(31) Asset Description: B.C.C.I. Assets Totaling $17,000,000.00

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

VEHICLE (Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VESSEL

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:
Robb Evans, Trustee	149-240-134

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:

Seizure Form

Asset ID: [redacted]5-FBI-001472 | Date: 05[redacted]95

Asset Description: B.C.C.I. Assets Totaling $17,000,000.00

[redacted] Name: BCCI Holdings				(93) Phone Number:
(95) Address: Not Given				
(96) City: Not Given	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	
(100) Contact Name (if business): Not Given				(101) Phone Number:
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	
(106) Incarcerated: N	(107) Prisoner ID:			
(108) Institution Name (if incarcerated):				
(109) Institution Address:				
(110) City:	(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel: N	(115) Attorney's Name (if any):			
(116) Firm's Name:				(117) Attorney's Phone Number:
(118) Attorney's Address:				
(119) City:	(120) State:	(121) Zip Code:	(122) Country:	

(94) Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	X
Institution Seized From	
Occupant	
Victim	
Other	

(92) Name:				(93) Phone Number:
(95) Address:				
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	
(100) Contact Name (if business):				(101) Phone Number:
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	
(106) Incarcerated?	(107) Prisoner ID:			
(108) Institution Name (if incarcerated):				
(109) Institution Address:				
(110) City:	(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel?	(115) Attorney's Name (if any):			
(116) Firm's Name:				(117) Attorney's Phone Number:
(118) Attorney's Address:				
(119) City:	(120) State:	(121) Zip Code:	(122) Country: ----	

(94) Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	
Institution Seized From	
Occupant	
Victim	
Other	

Seizure Form

Asset ID: [redacted]-FBI-001472 | Date: 05/[redacted]/95

Asset Description: B.C.C.I. Assets Totaling $17,000,000.00

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	United States v. BCCI Holdings		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number: (202)-514-7566
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name: DEPARTMENT OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From? N		(136) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(137) Address: Asset Forfeiture Office Bond Bldg., 10th Floor, 1400 New York Ave., N.W.		(138) City: Washington		
(139) State: DC	(140) Zip Code: 20005	(141) Country: USA	(142) NCIC Code: DOJ	(143) Sharing Possible? N
(144) Contact Name: [redacted] Trial Attorney			(145) Contact Phone Number: (202)-514-7999	
(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	
(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

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Seizure Form

Asset ID: [redacted]-FBI-001472	Date: 05/[redacted]/95	Page 4 of 5
Asset Description: B.C.C.I. Assets Totaling $17,000,000.00		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:		(148) Storage Date:
Seizing Agency	Federal Reserve Bank, N.Y.		02/13/95
(149) Storage Facility Address: Not Given			
(150) City: New York	(151) State: NY	(152) Zip Code: 00000	(153) Storage Rate: Per:

PREPARED BY

(154) Signature:	(155) Date: 05/15/95
(156) Prepared By: [redacted]	(157) Title: Special Agent, FBI

b6
b7C

APPROVED BY

(158) Signature:	(159) Date: 05/18/95
(160) Approved By: [redacted]	(161) Title: Supervisory Special Agent, FBI

b6
b7C

Asset ID: 95-FBI-001472
Asset Description: B.C.C.I. Assets Totaling $17,000,000.00

Probable Cause

29B-WF-171994 Sub FS Sub-24-3

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
NOV 08 1995
FBI — WASH. METRO FIELD OFFICE

4th order
9 pg.

12/21/94

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/07/1995

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Enclosures: Fourth Order of Forfeiture.

Reference: 11/1/95, [redacted], FSPU. b6 b7C

Details: Pursuant to FSPU's request is a status update concerning the following seizures: A) 3920-95-F-058, 82,156.99; B)3920-95-F-059, $10,430.00; C) 3920-95-F-060, $4,545.47 and D)3920-95-F-097, $17,000,000.

All of the above seizures were incorporated in the fourth judicial order of forfeiture and have been transferred by the court appointed trustee to the United States Marshal's Service. [redacted] Trial Attorney, Department of Justice b6 b7C has advised until all assets have been identified and seized no final orders of forfeiture will be issued by the court.

1-Bureau
(FSPU Attn: [redacted] b6 b7C

4-WMFO
(3920-95-F-058)
(3920-95-F-059)
(3920-95-F-060)
(3920-95-F-097)

1-SA [redacted] b6 b7C

29B-WF-171994 Sub FS Sub-24-4

AC:ac

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 0 8 1995
FBI—WASH. METRO FIELD OFFICE
[redacted]

1325015-000-9727

29B-WF-171994 Sub FS Sub-24

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SEARCHED INDEXED
SERIALIZED FILED
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FBI — WASH. METRO FIELD OFFICE

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3930-95-F-80400

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APR 12 1995

FBI — WASHINGTON FIELD OFFICE

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3920-95-F-0097-8
SEARCHED INDEXED
SERIALIZED FILED
AUG 14 1996
FBI-WASH. METRO FIELD OFFICE

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/3/1997

To: Director, FBI **Attn:** [redacted] (FSPU)

From: WFO
Squad C-1 (FAST)

Approved By: [redacted] b6 b7C

Drafted By: [redacted]

Case ID #: 209B-WF-198831 SUB FF SUB 2 (Pending)

Title: U.S. v. $96,801.25 IN U.S. CURRENCY

Synopsis: To advise FSPU of the status of certain WFO cases.

Reference: Reference is made to a 1/3/97 communication from FSPU to WFO requesting status of seizure files.

Enclosures: Enclosed for FSPU is a 10/9/96 Consent Order of Forfeiture pertaining to WFO seizures 3920-F-94-151 & 155.

Details: Referenced FSPU communication requested a status update on several WFO forfeiture cases. These cases are updated below by seizure number:

1) 3920-F-94-151 &155: The Consent Order of Forfeiture is attached. The final order will not be issued until after further legal proceedings are concluded in April, 1997.

2) 3920-95-F-021: AFO DOJ is still in the process of ruling on the petitions. The latest estimate of completion is sometime in March, 1997.

3) 3920-95-F-058-60, 95-91, 95-97, 96-024, 96-134, 96-186, 96-195, 97-28 and 97-52: These are all seizure files regarding the BCCI case. There have been several criminal forfeiture orders, but no final orders of forfeiture will be signed until all assets have been identified and turned over.

4) 3920-95-102 & 96-023: Subject [redacted] was recently sentenced to twenty-five months in jail. AFO has yet to rule on the petitions and no final forfeiture order has been received from the U.S. Attorney's Office. b6 b7C

5) 3920-96-F-053: Three separate Petitions for Remission have been filed in this case. WFO's Petition Investigation was submitted on 2/28/97.

-10
Sub FS-24
29B-WF-171994

3920-95-F-097

SEARCHED INDEXED
SERIALIZED FILED
MAR 07 1997
FBI-WASH. METRO FIELD OFFICE

To: Director, FBI From: WFO
Re: 209B-WF-198831 SUB FF SUB 2, 03/03/1997

Should you have any questions regarding these cases, please contact DA [redacted] or SSA [redacted] at (202) 252-7118. b6 b7C

CC: 17 - FSPU [redacted] b6 b7C
17 - WFO
1 - 3920-94-F-151
1 - 3920-94-F-155
1 - 3920-95-F-021
1 - 3920-95-F-050
1 - 3920-95-F-059
1 - 3920-95-F-060
1 - 3920-95-F-091
1 - 3920-95-F-097
1 - 95-102
1 - 96-23
1 - 96-24
1 - 96-53
1 - 96-134
1 - 96-186
1 - 96-195
1 - 97-28
1 - 97-52

♦♦

1325015-000-9742

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)
[redacted]

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By [redacted]

Drafted By: [redacted] :llt

b6
b7C

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA)
CATS

CC: 9-BUREAU, ATTN: [redacted]
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994 -112

b6
b7C

[redacted]

b6
b7C

LT990425.ec

1325015-000-9744

29B-WF-171994 (FF-24)

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/06/1999

To: Washington Field

From: Washington Field
Squad C-1
Contact: SSA [redacted] Ext. 2295

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. v. BCCI Holdings

Synopsis: CLOSING COMMUNICATION

Details: The purpose of this communication is to summarize recent events surrounding the 63 seizure files associated with the BCCI investigation. On 2/1/99, several members of DOJ, USMS, and FBI met to determine how to close out the BCCI seizures entered in the CATS database as the Sixth and Final Order of Forfeiture had been entered into as of 12/22/98. A summary of this meeting is attached as reference. In brief, it was decided that the 63 BCCI individual seizures entered into CATS would be deleted in exchange for 6 seizures entered into CATS corresponding to each of the six orders of forfeiture. The following CATS ID numbers and corresponding seizure numbers were utilized for the respective orders of forfeiture.

92-FBI-000460 (3920-92-F-0115; 1st Order - 1/24/92 & 1/31/92)
92-FBI-000461 (3920-92-F-0116; 2nd Order - 7/29/92)
92-FBI-000462 (3920-92-F-0117; 3rd Order - 8/19/93)
95-FBI-003535 (3920-95-F-0097; 4th Order - 12/21/94)
96-FBI-003688 (3920-96-F-0097; 5th Order - 9/20/96)
99-FBI-000970 (3920-99-F-0092; 6th Order - 12/22/98)

The USMS has taken the responsibility for associating each of the 63 individual seizures with the 6 seizures for each order of forfeiture. Attached for reference is a spreadsheet which correlates each of the 63 seizures with the appropriate order of forfeiture. The USMS will make entries to the itemized list in CATS which will detail the total amount received for each

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12

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29B-WF-171994 FF-24

1325015-000-9759

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Page 76 ~ Duplicate;
Page 77 ~ Duplicate;
Page 78 ~ Duplicate;
Page 79 ~ Duplicate;
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Page 81 ~ Duplicate;
Page 82 ~ Duplicate;
Page 83 ~ Duplicate;
Page 84 ~ Duplicate;
Page 85 ~ Duplicate;
Page 86 ~ Duplicate;
Page 87 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXXX

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 68
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;
Page 16 ~ Duplicate;
Page 17 ~ Duplicate;
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Page 77 ~ Duplicate;
Page 78 ~ Duplicate;

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)

b6
b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: NVRA X 3226

Approved By:

Drafted By: llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA)
CATS

CC: 9-BUREAU, ATTN:
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994

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LT990425.EC

-13

1325015-000-10391

29B-WF-171994-11-13

AIRTEL

Date 03/13/95

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Unit

Subject: 3920-95-F-0060

Entry (Check One)
[X] New Case
[ ] Change or Add

U.S. v $4,545.47 IN U.S. CURRENCY
18 U.S.C. SECTION 982

[X] CATS Record of Seized Property

[ ] FD-302

[ ] In Forma Pauperis

[ ] Quick Release

[ ] Indemnity Agreement

[ ] Final Decree

[ ] Receipt for Transfer/
Disposition of Funds/Property

[ ] Newspaper Clippings

[ ] Lab Reports

[ ] Police Reports

[ ] Settlement Statement/Agreement

[ ] Title Documentation

[ ] Appraisal Report

[ ] Default Judgement

[ ] Investigative Insert

[ ] Warrant of Arrest in Rem

[ ] Complaint for Forfeiture

[ ] Search Warrant

[ ] Affidavit

[ ] Seizure Warrant

[ ] Plea Agreement

[ ] Sharing Request
[ ] Dag-71 [ ] Dag-72

[ ] Petition

[ ] Claim & Cost Bond

[ ] Petition Investigation

[ ] Civil Forfeiture Report

[ ] Notice of Seizure

[X] Order of Forfeiture

[ ] Employment Check

[ ] Address Check

FASTRACK 3/17/95

[X] Other Subsequent Materials:
MEMO FROM SA [redacted]

O+H Sub 23 A [redacted] 3/27/95

FOIMS Kah 3/15/95 b6 b7C

29B-WF-171994 Sub FS Sub-23-1

Searched
Serialized
Indexed
Filed

1-BUREAU, FSPU
1-WMFO 29B-WF-171994
**ATTACHMENTS
AC/js
(2)

1325015-000-10326

Memorandum

To : ADIC, WMFO (29B-WF-171994) (FS) Date 3/10/95

From : SA [redacted] (C-1) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
00:WMFO

WMFO FAST has a limited role acting as an administrative processor monitoring and reporting to FSPU assets seized from criminal orders of forfeitures in the above captioned investigation. Attached is the fourth criminal order of forfeiture entered by the Honorable JOYCE GREEN, United States District Judge, District of Columbia forfeiting properties of the Bank and Commerce International (BCCI) and of the International Credit and Investment Company (Investments). This order was entered on December 21, 1994.

For information of FSPU, WMFO FAST only recently learned of the fourth criminal order of forfeiture from the case agent, [redacted] SA, FBI (WMFO). [redacted] STEF CASSELLA and [redacted] DEPARTMENT OF JUSTICE (DOJ) have handled all forfeiture matters concerning this investigation. WMFO FAST has not been kept apprised by DOJ of any claims, petitions, or objections concerning the assets seized pursuant to the fourth court order. b6 b7C

In conclusion the U.S. Marshals in New York City are still in the process of taking possession of the assets outlined in the fourth court order. SA [redacted] WMFO FAST will keep FSPU informed of any new developments as the information becomes available. b6 b7C

Seizure Form

Asset ID: <A> | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920				95-0060	N

(7) Case Number: 29B-WF-177994

(8) Case Name: U.S. v. HIDDEN INTERESTS

(9) Operation Name:

(10) Case Agent: SA b6 b7C

SEIZURE

(11) Seizure Date: 12/21/94

(12) Seizure Method: consent order of forfeiture

(13) Indictment Date:

(14) Adoption Date:

(15) Seizing Agent:

(16) Phone Number:

(17) Seized From: BCCI HOLDINGS

(18) Place/Address Where Seized: BANK OF AMERICA NATIONAL TRUST & SAVINGS ASS'N ACCOUNT # 599-09995 BCCI OVERSEAS - BOMBAY

(19) City:

(20) State:

(21) Seizure: BO | Judicial District | (22) Processing: NY

(23) Forfeiture Statute: Title 18 USC 982

(24) Violation Statute: 18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
$4,545.47	N		CURRENCY		FORFEITABLE

(31) Asset Description: $4,545.47 in United States Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	N
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	N

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:
(49) VIN/Serial Number:		(50) Condition Code:		(51) NCIC Search Results Positive?
(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?
(58) Special Equipment or Accessories?		(59) Damages Present?		(60) Caliber?	

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Ty

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hour
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:

(88) Account Number: 1325015-000-10328

FOREIGN

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

Seizure Form

Asset ID: <A> | Date: <B> | Page 2

Asset Description: <C>

(92) Name: | (93) Phone Number:

(95) Address:

(96) City: | (97) State: | (98) Zip Code: | (99) Country:

(100) Contact Name (if business): | (101) Phone Number:

(102) Lien Amount Held By Party ($): | (103) Quick Release Recipient? | (104) Quick Release Date: | (105) Expenses Reimbursed ($):

(106) Incarcerated? | (107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City: | (111) State: | (112) Zip Code: | (113) Country:

(114) Represented by Counsel? | (115) Attorney's Name (if any):

(116) Firm's Name: | (117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City: | (120) State: | (121) Zip Code: | (122) Country:

(94) Party Type (Select 1 -or- More)

- Owner
- Lienholder
- Seized From
- Institution Seized From
- Occupant
- Victim
- Other

(92) Name: | (93) Phone Number:

(95) Address:

(96) City: | (97) State: | (98) Zip Code: | (99) Country:

(100) Contact Name (if business): | (101) Phone Number:

(102) Lien Amount Held By Party ($): | (103) Quick Release Recipient? | (104) Quick Release Date: | (105) Expenses Reimbursed ($):

(106) Incarcerated? | (107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City: | (111) State: | (112) Zip Code: | (113) Country:

(114) Represented by Counsel? | (115) Attorney's Name (if any):

(116) Firm's Name: | (117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City: | (120) State: | (121) Zip Code: | (122) Country:

(94) Party Type (Select 1 -or- More)

- Owner
- Lienholder
- Seized From
- Institution Seized From
- Occupant
- Victim
- Other

1325015000:10329

Seizure Form

Asset ID: <A>	Date: <B>	Page 3
Asset Description: <C>		

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: DEPT. OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign): FEDERAL		
(137) Address:		(138) City: WASHINGTON		
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:	(143) Sharing Possible? NO
(144) Contact Nam [redacted]			(145) Contact Phone Number: [redacted]	

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(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: <A>	Date: <B>	Page 4
Asset Description: <C>		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
	UNITED STATES MARSHALS SERVICE	

(149) Storage Facility Address:
U.S. COURTHOUSE - ANNEX, 1st ANDREWS PLAZA

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
NEW YORK	NY	10007	$	

PREPARED BY

(154) Signature:

(155) Date: 3/13/95

b6
b7C

(156) Prepared By: SA

(157) Title: SPECIAL AGENT FBI

APPROVED BY

(158) Signature:

(159) Date: 3/14/95

b6
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(160) Approved By:

(161) Title: Supervisory Special Agent

Probable Cause

<D>

29B-WF-171994 Sub FS Sub-23-2

SEARCHED INDEXED
SERIALIZED FILED
MAR 2 1 1995
FBI — WASH. METRO FIELD OFFICE

Seizure Form

Asset [redacted]05-FBI-000818 | Date: 03/[redacted]5 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920		05		3920950060	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	US vs Hidden Interests

(9) Operation Name:	(10) Case Agent:

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b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
12/21/94	Other	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
	202-324-3000

(17) Seized From: BCCI-Holdings

(18) Place/Address Where Seized:	(19) City: (Not Given)
Bank of America National Trust and Savings Ass'n Account # 599-09995 BCCI Overseas - Bombay	(20) State: DC

(21) Seizure: DC	Judicial District (22) Processing: NYS	(23) Forfeiture Statute: 18 USC 982	(24) Violation Statute: 18 USC 1958

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
4545.47	N		Cash/Currenc	01	Criminal

(31) Asset Description: $4,545.47 in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:
USA		0.00

FBI/DOJ

Seizure Form

Asset ID: [redacted]-FBI-000818 | Date: 03/[redacted]5

Asset Description: $4,545.47 in U.S. Currency

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI-Holdings		Owner	
(95) Address: Bank of America National Trust and Savings Ass'n Account # 599-09995 BCCI Overseas - Bombay		Lienholder	
(96) City: (Not Given) / (97) State: DC / (98) Zip Code: 0 / (99) Country: USA		Seized From	X
(100) Contact Name (if business): (Not Given)	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated: N	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel: N	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:		Owner	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Lienholder	
(100) Contact Name (if business):	(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):		Victim	
(109) Institution Address:		Other	
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

Seizure Form

Asset ID: [redacted]-FBI-000818 | Date: 03/[redacted]5

Asset Description: $4,545.47 in U.S. Currency

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
UNKNOWN	Unknown		
(125) AUSA Name:		(126) Judicial District: NYS	(127) Phone Number:

b6
b7C

(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name:			(134) Agency Case ID:	
DEPT OF JUSTICE				
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
N		Federal		
(137) Address:			(138) City:	
			Washington	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
DC	00000	USA	DCDOJ0000	N
(144) Contact Name:			(145) Contact Phone Number:	

b6
b7C

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID [redacted]-FBI-000818	Date: 03/[redacted]
Asset Description: $4,545.47 in U.S. Currency	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	USMS	12/21/94

(149) Storage Facility Address:
US Courthouse - Annex, 1st Andrews Plaza

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
New York	NY	10007		

PREPARED BY

(154) Signature:	(155) Date:
	03/13/95
(156) Prepared By:	(157) Title:
	SA

b6
b7C

APPROVED BY

(158) Signature:	(159) Date:
	03/13/95
(160) Approved By:	(161) Title:

Asset ID: 95-FBI-000818
Asset Description: $4,545.47 in U.S. Currency

Probable Cause

See File for Detailed FACTS and CIRCUMSTANCES.

29B-WF-171994 Sub FS Sub-23-3

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
NOV 0 8 1995
FBI — WASH. METRO FIELD OFFICE

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/07/1995

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: [redacted]

Drafted By: [redacted]:AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Enclosures: Fourth Order of Forfeiture.

Reference: 11/1/95, [redacted] FSPU. b6 b7C

Details: Pursuant to FSPU's request is a status update concerning the following seizures: A) 3920-95-F-058, 82,156.99; B)3920-95-F-059, $10,430.00; C) 3920-95-F-060, $4,545.47 and D)3920-95-F-097, $17,000,000.

All of the above seizures were incorporated in the fourth judicial order of forfeiture and have been transferred by the court appointed trustee to the United States Marshal's Service. [redacted] Department of Justice has advised until all assets have been identified and seized no final orders of forfeiture will be issued by the court. b6 b7C

1-Bureau
(FSPU Attn: [redacted]) b6 b7C

4-WMFO
(3920-95-F-058)
(3920-95-F-059)
(3920-95-F-060)
(3920-95-F-097)

1-SA [redacted] b6 b7C

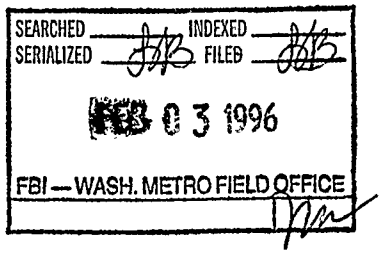
AC:ac

29B-WF-171994 Subfs Sub-23-4

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 08 1995
FBI — WASH. METRO FIELD OFFICE

1325015-000-10368

29B-WF-171994 Sub B Sub-23-5



MEMORANDUM

DATE: JANUARY 15, 1996

TO: Mr. [redacted] b6 b7C
Federal Bureau of Investigation
FAX: (202)324-6426

FROM: [redacted] b6 b7C
Robb Evans, Trustee
FAX: [redacted]

PAGE: 3PAGES (INCLUDING COVER PAGE)

SUBJECT: REMITTANCE

Hope you had a great holiday! b6 b7C

Attached please find the remittance schedule and the cash flow report. If you need more information or have any questions, please call me at [redacted] I am usually in the office around 6:30 AM.

Best Regards,

[redacted] b6 b7C

1325015-000-10370

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 01/22/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X9073

Approved By: [redacted]

Drafted By: [redacted] AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
OO:WMFO

Enclosures: Facsimile of schedule of distribution to USMS Service from May 5, 1993 to December 31, 1995 & summary of cumulative distribution to USMS.

Details: On 1/15/96, Robb Evans and [redacted] b6 b7C handling the liquidation of assets in the captioned investigation provided the attached chart. From 5/15/93 until 12/31/95, $88,000,000.00 has been remitted to US Marshals Service (via wire transfer) pursuant to four criminal orders of forfeiture.

Assets being liquidated range from fungible property i.e. cash to real estate involving other investors not associated with this investigation. Assets are continually being liquidated from all four forfeiture orders. More complex assets take longer to liquidate depending on the real estate market and other economic indicators.

Assets remitted to date off the December 1994 fourth order equal approximately $19,000,000.00. A fifth order of forfeiture is scheduled in late January of 1996.

1 - SA [redacted] b6 b7C
1 - 29B-WF-171994 (Sub)
1 - 3920-95-F-0058
1 - 3920-95-F-0059

29B-WF-171994 Sub, FS Sub-23-6
3920-95-F-0058

1

1325015-000-10373

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: ADIC, WMFO From: SA [redacted]
Re: 209A-WF-198483 (FSO, 12/14/1995

b6
b7C

1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-96-F-0024

1325015-000-10374

29B-WF-171994 Sub 15 Sub-23-7

SEARCHED INDEXED
SERIALIZED FILED
FEB 13 1996
FBI — WASH. METRO FIELD OFFICE

MEMORANDUM

DATE: JANUARY 15, 1996

TO: Mr [redacted] b6 b7C
Federal Bureau of Investigation
FAX: (202)324-6426

FROM: [redacted] b6 b7C
Robb Evans, Trustee
FAX: [redacted]

PAGE: 3PAGES (INCLUDING COVER PAGE)

SUBJECT: REMITTANCE

Hope you had a great holiday!

Attached please find the remittance schedule and the cash flow report. If you need more information or have any questions, please call me at [redacted] b6 b7C [redacted] I am usually in the office around 6:30 AM.

Best Regards,

[redacted] b6 b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 01/22/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X9073

Approved By: [redacted]

Drafted By: [redacted] AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
CO:WMFO

Enclosures: Facsimile of schedule of distribution to USMS Service from May 5, 1993 to December 31, 1995 & summary of cumulative distribution to USMS.

Details: On 1/15/96, Robb Evans and [redacted] b6 b7C handling the liquidation of assets in the captioned investigation provided the attached chart. From 5/15/93 until 12/31/95, $88,000,000.00 has been remitted to US Marshals Service (via wire transfer) pursuant to four criminal orders of forfeiture.

Assets being liquidated range from fungible property i.e. cash to real estate involving other investors not associated with this investigation. Assets are continually being liquidated from all four forfeiture orders. More complex assets take longer to liquidate depending on the real estate market and other economic indicators.

Assets remitted to date off the December 1994 fourth order equal approximately $19,000,000.00. A fifth order of forfeiture is scheduled in late January of 1996.

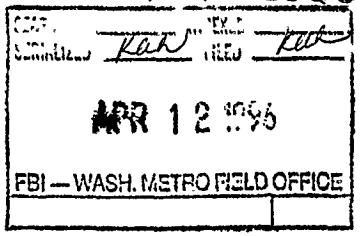
1 - SA [redacted] b6 b7C
1 - 29B-WF-171994 (Sub)
1 - 3920-95-F-0058
1 - 3920-95-F-0059

29B-WF-171994 Sub FS Sub-23-8

SEARCHED INDEXED
SERIALIZED FILED
FEB 13 1996
FBI—WASH. METRO FIELD OFFICE

1325015-000-10379

29B-WF-171994 Sub FS Sub 23 - 9
3920-95-F-0060



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3920-95-F-0060 -10

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SERIALI ____

AUG 14 1996

FBI-WASH. METRO FIELD OFFICE

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: Director, FBI From: ADIC, Washington Metropolitan Field Office
Re: 000-WF-000000,06/12/1995

1-3920-95-F-0060
1-3920-95-F-0097
1-SA [redacted]
ATTACHMENTS

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1325015-000-10385

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted]
C-1/FAST, NVMRA
Contact: SA [redacted] x9072

b6
b7C

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted], Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

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SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

◆◆
1- 29B-WF-171994
1- All seizure files

Close #4
12/20/96
1

Martin DM
Seiz. log
29B-WF-171994-FS SUB 23-11

SEARCHED INDEXED
SERIALIZED FILED
DEC 19 1996
FBI - WASH. METRO FIELD OFFICE
[redacted]

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12/23/96

1325015-000-10387

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/3/1997

To: Director, FBI **Attn:** [redacted] (FSPU) b6 b7C

From: WFO
Squad C-1 (FAST)

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 209B-WF-198831 SUB FF SUB 2 (Pending)

Title: U.S. v. $96,801.25 IN U.S. CURRENCY

Synopsis: To advise FSPU of the status of certain WFO cases.

Reference: Reference is made to a 1/3/97 communication from FSPU to WFO requesting status of seizure files.

Enclosures: Enclosed for FSPU is a 10/9/96 Consent Order of Forfeiture pertaining to WFO seizures 3920-F-94-151 & 155.

Details: Referenced FSPU communication requested a status update on several WFO forfeiture cases. These cases are updated below by seizure number:

1) 3920-F-94-151 &155: The Consent Order of Forfeiture is attached. The final order will not be issued until after further legal proceedings are concluded in April, 1997.

2) 3920-95-F-021: AFO DOJ is still in the process of ruling on the petitions. The latest estimate of completion is sometime in March, 1997.

3) 3920-95-F-058-60, 95-91, 95-97, 96-024, 96-134, 96-186, 96-195, 97-28 and 97-52: These are all seizure files regarding the BCCI case. There have been several criminal forfeiture orders, but no final orders of forfeiture will be signed until all assets have been identified and turned over.

4) 3920-95-102 & 96-023: Subject [redacted] was recently sentenced to twenty-five months in jail. AFO has yet to rule on the petitions and no final forfeiture order has been received from the U.S. Attorney's Office. b6 b7C

5) 3920-96-F-053: Three separate Petitions for Remission have been filed in this case. WFO's Petition Investigation was submitted on 2/28/97.

3920-95-F-060

SubFS-23
298-WF-171994-10

SEARCHED RP INDEXED RP
SERIALIZED RP FILED RP
MAR 07 1997
FBI-WASH. METRO FIELD OFFICE

132501500-10388

To: Director, FBI From: WFO
Re: 209B-WF-198831 SUB FF SUB 2, 03/03/1997

Should you have any questions regarding these cases, please contact DA JOSEPH SCHULTE or SSA [redacted] at (202) 252-7118.

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b7C

CC: 17 - FSPU (Ms. [redacted])
b6
b7C
17 - WFO
1 - 3920-94-F-151
1 - 3920-94-F-155
1 - 3920-95-F-021
1 - 3920-95-F-050
1 - 3920-95-F-059
1 - 3920-95-F-060
1 - 3920-95-F-091
1 - 3920-95-F-097
1 - 95-102
1 - 96-23
1 - 96-24
1 - 96-53
1 - 96-134
1 - 96-186
1 - 96-195
1 - 97-28
1 - 97-52

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1325015-000-10389

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 60
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(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)

[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log ___
Foims (PFA) ___
CATS ___

CC: 9-BUREAU, ATTN: [redacted] b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994

[redacted] b6 b7C

LT990425.EC

1325015-000-9908

29B-WF-171994 FF-[illegible]

AIRTEL

Date 03/13/95

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Unit

Subject: 3920-95-F-0059

Entry (Check One)
[X] New Case
[ ] Change or Add

U.S. v $10,430.00 IN U.S. CURRENCY
18 U.S.C. SECTION 982

[X] CATS Record of Seized Property

[ ] FD-302

[ ] In Forma Pauperis

[ ] Quick Release

[ ] Indemnity Agreement

[ ] Final Decree

[ ] Receipt for Transfer/
Disposition of Funds/Property

[ ] Newspaper Clippings

[ ] Lab Reports

[ ] Police Reports

[ ] Settlement Statement/Agreement

[ ] Title Documentation

[ ] Appraisal Report

[ ] Default Judgement

[ ] Investigative Insert

[ ] Warrant of Arrest in Rem

[ ] Complaint for Forfeiture

[ ] Search Warrant

[ ] Affidavit

[ ] Seizure Warrant

[ ] Plea Agreement

[ ] Sharing Request
[ ] Dag-71 [ ] Dag-72

[ ] Petition

[ ] Claim & Cost Bond

[ ] Petition Investigation

[ ] Civil Forfeiture Report

[ ] Notice of Seizure

[X] Order of Forfeiture

[ ] Employment Check

[ ] Address Check

[X] Other Subsequent Materials:
MEMO FROM SA ANDREW CARLIE

FOIMS Kah 3/15/95

29B-WF-171994 Sub FS Sub-22-1

1-BUREAU, FSPU
1-WMFO 29B-WF-171994
**ATTACHMENTS
AC/emm
(2)

Searched
Serialized
Indexed
Filed

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1325015-000-9849

Seizure Form

Asset ID: <A> | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
2000				95-0059	N

(7) Case Number:	(8) Case Name:
288-NY-171990	U.S. v HIDDEN INTERESTS

(9) Operation Name:	(10) Case Agent:
	SA [redacted]

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SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
12/21/94	consent order of forfeiture		

(15) Seizing Agent:	(16) Phone Number:

(17) Seized From: BCCI HOLDINGS

(18) Place/Address Where Seized: BANK OF AMERICA NATIONAL TRUST AND SAVINGS ASS'N ACCOUNT NUMBER 8597-09998 BCCI OVERSEAS - SRI LANKA

(19) City:

(20) State:

(21) Seizure: DC	Judicial District	(22) Processing: NY	(23) Forfeiture Statute: 18 USC 981(a)(1)(A)	(24) Violation Statute: 18USC1963

ALL ASSET TYPES

(25) Asset Value ($): 10,430.00	(26) Above Minimum Threshold Value? Y	(27) Appraisal Date:	(28) Asset Type: currency	(29) Asset Sub-Type:	(30) Forfeiture Type: criminal

(31) Asset Description:

(32) Lien Exists? N	(33) Hold as Evidence after Forfeiture? N	(34) Expedited Release Notice Served? N	(35) Special Handling Code(s)? N
(36) Expenses Incurred? N	(37) Forfeiture-Dependent Award? N	(38) Quick Release Performed? n	(39) Intra-Agency Assistance? N
(40) Suitable for Official Use? N	(41) OCDETF Case? N	(42) Sharing Anticipated? N	(43) Additional Agencies? N

VEHICLES (Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

1325015-000-9851

Seizure Form

Asset ID: <A> | Date: <B>

Asset Description: <C>

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: DEPT. OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City: WASHINGTON		
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:	(143) Sharing Possible? NO
(144) Contact Name:			(145) Contact Phone Number:	

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(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	
(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: <A>	Date: <B>
Asset Description: <C>	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
	UNITED STATES MARSHALS SERVICE	

(149) Storage Facility Address: U.S. COURTHOUSE - ANNEX 1st ANDREWS PLAZA

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
New York	NY	10007	$	

PREPARED BY

(154) Signature: [redacted]

(155) Date: 3/13/95

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b7C

(156) Prepared By: SA [redacted]

(157) Title: SPECIAL AGENT FBI

APPROVED BY

(158) [redacted]

(159) Date: 3/14/95

b6
b7C

(160) Approved By: SSA [redacted]

(161) Title: Supervisory Special Agent

Probable Cause

<D> ***SEE ATTACHED***

29B-WF-171994 Sub FS Sub-22 -2

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
MAR 2 1 1995
FBI — WASH. METRO FIELD OFFICE

Seizure Form

Asset [redacted]95-FBI-000817 | Date: 03/[redacted]5 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920		05		3920950059	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	US vs Hidden Interests

(9) Operation Name:	(10) Case Agent:

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
12/21/94	Other	12/21/94	

(15) Seizing Agent:		(16) Phone Number:
		202-324-3000

(17) Seized From: BCCI-Holdings

(18) Place/Address Where Seized:	(19) City: (Not Given)
Bank of America National Trust and Savings Ass'n Account # 6597-09996 BCCI Overseas - Sri Lanka	(20) State: DC

(21) Seizure: DC	Judicial District (22) Processing: NYS	(23) Forfeiture Statute: 18 USC 982	(24) Violation Statute: 18 USC 1958

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
10430.00	Y		Cash/Currenc	01	Criminal

(31) Asset Description: $10,430.00 in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:
USA		0.00

Seizure Form

Asset ID: [redacted]-FBI-000817	Date: 03/[redacted]5
Asset Description: $10,430.00 in U.S. Currency	

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI-Holdings		Owner	
(95) Address: Bank of America National Trust and Savings Ass'n Account # 6597-09996 BCCI Overseas - Sri Lanka		Lienholder	
(96) City: (Not Given) / (97) State: DC / (98) Zip Code: 0 / (99) Country: USA		Seized From	X
(100) Contact Name (if business): (Not Given)	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated: N	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City:	(111) State: / (112) Zip Code: / (113) Country:		
(114) Represented by Counsel: N	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City:	(120) State: / (121) Zip Code: / (122) Country:		

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
		Owner	
(95) Address:		Lienholder	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Seized From	
(100) Contact Name (if business):	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated?	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City:	(111) State: / (112) Zip Code: / (113) Country:		
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City:	(120) State: / (121) Zip Code: / (122) Country:		

Seizure Form

Asset ID: [redacted]-FBI-000817	Date: 03/[redacted]5
Asset Description: $10,430.00 in U.S. Currency	

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:			
UNKNOWN	Unknown			
(125) AUSA Name:			(126) Judicial District: NYS	(127) Phone Number: [redacted]
(123) Court Case Number:	(124) Case Name:			
(125) AUSA Name:			(126) Judicial District:	(127) Phone Number:

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INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name:			(134) Agency Case ID:	
DEPT OF JUSTICE				
(135) Adopted From: N			(136) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(137) Address:			(138) City: Washington	
(139) State: DC	(140) Zip Code: 00000	(141) Country: USA	(142) NCIC Code: DCDOJ0000	(143) Sharing Possible? N
(144) Contact Name: [redacted]			(145) Cont[redacted]	

b6
b7C

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	
(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: [redacted]-FBI-000817	Date: 03/1[redacted]
Asset Description: $10,430.00 in U.S. Currency	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	USMS	12/21/94

(149) Storage Facility Address:
US Courthouse - Annex, 1st Andrews Plaza

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: Per:
New York	NY	10007	

PREPARED BY

(154) Signature:	(155) Date:
	03/13/95

(156) Prepared By:			(157) Title:
			SA

b6
b7C

APPROVED BY

(158) Signature:	(159) Date:
	03/14/95

(160) Approved By:		(161) Title:
		SSA

b6
b7C

Asset ID: 95-FBI-000817
Asset Description: $10,430.00 in U.S. Currency

Probable Cause

See File for Detailed FACTS and CIRCUMSTANCES.

29B-WF-171994 Subfs Sub-22-3

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
NOV 0 8 1995
FBI — WASH. METRO FIELD OFFICE

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED

DEC 21 1994

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of Forfeited Property, see Order of Forfeiture, July 29, 1992, and

1325015-000-9877

A. With respect to the excess funds from the liquidation of the California agency of BCCI S.A., the United States shall not be required to send notice of the ancillary proceeding to any person to whom it sent notice of the forfeiture of the first set of such funds pursuant to the Third Order of Forfeiture (August 19, 1993) and who did not file a claim;

B. The United States shall send notice of the ancillary proceeding to any person appearing to have, or asserting, a shareholder's interest in CCAH, so that such person might have an opportunity to file a claim asserting that his or her ownership interest in CCAH is greater than the interest described in the determination submitted July 11, 1994, by the Department of Justice and the Federal Reserve, and that the defendants' ownership interest is correspondingly less than the 61.156 per cent described in that determination. The United States, however, shall not be required to send notice of the ancillary hearing to any creditor or lienholder of CCAH, CCAI, FAC or FAB. Because this Order of Forfeiture provides only for the forfeiture of 61.156 percent of the funds distributable to CCAH shareholders, and such distribution will not occur before payment or provision for all liabilities of CCAH, CCAI, FAC and FAB, creditors and lienholders of CCAH, CCAI, FAC and FAB have no legal interest in the property subject to the ancillary hearing.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

December 21, 1994

1325015-000-9881

29B-WF-171994 Sub FS Sub-22-4

SEARCHED ___ INDEXED ___
SERIALIZED ___ FILED ___
NOV 0 8 1995
FBI — WASH. METRO FIELD OFFICE

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/07/1995

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMF0

Enclosures: Fourth Order of Forfeiture.

Reference: 11/1/95, [redacted] FSPU. b6 b7C

Details: Pursuant to FSPU's request is a status update concerning the following seizures: A) 3920-95-F-058, 82,156.99; B)3920-95-F-059, $10,430.00; C) 3920-95-F-060, $4,545.47 and D)3920-95-F-097, $17,000,000.

All of the above seizures were incorporated in the fourth judicial order of forfeiture and have been transferred by the court appointed trustee to the United States Marshal's Service. [redacted] Department of Justice has advised until all assets have been identified and seized no final orders of forfeiture will be issued by the court. b6 b7C

1-Bureau
(FSPU Attn: [redacted] b6 b7C

4-WMFO
(3920-95-F-058)
(3920-95-F-059)
(3920-95-F-060)
(3920-95-F-097)

1-SA [redacted] b6 b7C

AC:ac

1325015-000-9892

MEMORANDUM

DATE: JANUARY 15, 1996

TO: Mr. [redacted] b6 b7C
Federal Bureau of Investigation
FAX: (202)324-6426

FROM: [redacted] b6 b7C
Robb Evans, Trustee
FAX: [redacted]

PAGE: 3PAGES (INCLUDING COVER PAGE)

SUBJECT: REMITTANCE

Hope you had a great holiday!

Attached please find the remittance schedule and the cash flow report. If you need more information or have any questions, please call me at [redacted] b6 b7C [redacted] I am usually in the office around 6:30 AM.

Best Regards

[redacted]

29B-WF-171994 Sub FF Sub-22-5

SEARCHED ____ INDEXED ____
SERIALIZED ____ FILED ____
FEB 05 1996
FBI — WASH. METRO FIELD OFFICE b6 b7C

ROBB EVANS, TRUSTEE
SCHEDULE OF DISTRIBUTION TO US MARSHAL
From: May 5, 1993 to December 31, 1995

From Account	Date Sent	Payment Sent	Comments
First Interstate Bank: 149-2-40134	26-Aug-93	35,964,405.69	By Order of August 19, 1993
First Interstate Bank: 149-2-40134	22-Oct-93	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	17-Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	16-Aug-94	8,850,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Oct-94	200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Dec-94	3,035,594.31	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Feb-95	17,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Dec-95	1,000,000.00	60 Day Remittance
Total		88,000,000.00	

EXHIBIT FEST ... ICK LLP : 1-16-95 ... A 95FL R.A.P.

ROBB EVANS, TRUSTEE

SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL

As of December 31, 1995

Forfeiture Order Date	19-Aug-93	21-Dec-94	21-Dec-94	10-Jun-95	03-Nov-95	
State	California	California	New York	New York	New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	20,000,000	0	49,000,000	107,027,213
Loans	20,245,041	0	28,696,395	0	7,050,559	55,992,0
Real Property	13,894,680	0	10,617,380	15,200,000	2,035,184	41,747,2
Miscellaneous Property	31,445	0	0	0	0	31,4
Other	0	0	0	5,950	106,063,264	106,069,2
Total Forfeiture Orders	68,550,808	3,647,571	59,313,774	15,205,950	164,149,037	310,867,1
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	20,000,000	0	0	58,027,2
Loans	22,884,847	0	386,814	0	404,721	23,676,3
Real Property	21,043,370	0	1,468,096	500,000	0	23,009,4
Miscellaneous Property	49,094	0	0	0	0	49,09
Other	124,228	0	22,645	0	157,090	304,1
Total Asset Conversions	78,481,182	3,647,571	21,877,555	500,000	561,811	105,068,3
Total Revenue Collection (1)	5,162,618		420,421	0	257,087	5,840,1
Total Sources of Funds	83,643,800	3,647,571	22,295,176	500,000	818,898	110,908,4
Uses of Funds						
Seller Financing and Cash Disbursements	(11,724,374)	0	(5,923,152)	(500,000)	(1,233)	(18,148,75
Operating Account Balance	(750,000)	0	(750,000)	0	0	(1,500,00
Special Reserve Account (2)	(766,079)	0	(916,256)	0	(817,665)	(2,500,00
Surplus Balance as of 12/31/95	(755,686)	0	0	0	0	(756,68
Total Uses of Funds	(13,996,139)	0	(7,589,408)	(500,000)	(818,898)	(22,905,44
Net Remittances	69,646,661	3,647,571	14,705,768	0	(0)	88,000,0
Present Book Value Per Budget						
Cash	2,272,765	0	1,666,256	0	49,817,555	53,756,5
Loans	3,725,571	0	11,701,052	0	3,707,4	19,134,0
Real Property	3,323,311	0	3,073,392	9,567,545	1,220,000	17,215,2
Miscellaneous Property	0	0	0	0	0	
Other Assets	42,996	0	36,154	0	2,740,324	2,819,4
Total Liabilities	(165,336)	0	(2,265,964)	(1,163,364)	(1,000,000)	(4,594,6
Total PBV Per Budget	9,259,308	0	14,210,4	8,734,1	56,485,422	88,689,0

Notes: *(1) Excluding gains on sale of FF&E of $49,394.36 (not in use by the Trustee) and gains on sale of REO of $3,085,015.*

(2) Special Reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/22/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] Y9073

Approved By: [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
OO:WMFO

Enclosures: Facsimile of schedule of distribution to USMS Service from May 5, 1993 to December 31, 1995 & summary of cumulative distribution to USMS.

Details: On 1/15/96, Robb Evans and [redacted] b6 b7C handling the liquidation of assets in the captioned investigation provided the attached chart. From 5/15/93 until 12/31/95, $88,000,000.00 has been remitted to US Marshals Service (via wire transfer) pursuant to four criminal orders of forfeiture.

Assets being liquidated range from fungible property i.e. cash to real estate involving other investors not associated with this investigation. Assets are continually being liquidated from all four forfeiture orders. More complex assets take longer to liquidate depending on the real estate market and other economic indicators.

Assets remitted to date off the December 1994 fourth order equal approximately $19,000,000.00. A fifth order of forfeiture is scheduled in late January of 1996.

1 - SA [redacted] b6 b7C
1 - 29B-WF-171994 (Sub)
1 - 3920-95-F-0058
(1) - 3920-95-F-0059

1 29B-WF-171994 Sub FS Sub-22 6

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
FEB 05 1996
FBI — WASH. METRO FIELD OFFICE

139-HQ-1000-9896

(03/31/95)

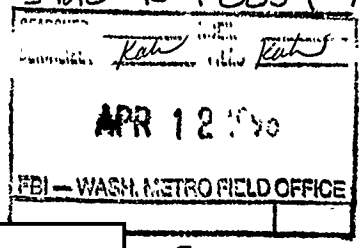
FEDERAL BUREAU OF INVESTIGATION

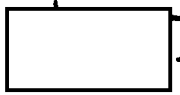
To: ADIC, WMFO From: SA [redacted] b6 b7C
Re: 209A-WF-198483 (FSO, 12/14/1995

1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-96-F-0024

1325015-000-9897

29B-WF-171994 SUB FS SUB-22
3920-95-F0059-7





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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/11/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: ASSA [redacted]

Drafted By: [redacted] :AC

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Details: On 4/10/96, [redacted], Asset b6 b7C
Forfeiture/Money Laundering Section, Department of Justice furnished the following information: The fifth order of forfeiture in the above captioned investigation has been delayed. No specific date has been scheduled but [redacted] anticipates within the next four to six weeks the court will issue the fifth order of forfeiture. The reason for the delay is to ensure DOJ has an opportunity to identify all potential assets subject to forfeiture.

[redacted] concluded the conversation by stating the BCCI b6 b7C
investigation is "getting toward the end." She does not believe additional orders of forfeiture are "imminent." However, it may take Robb Evans, the court appointed trustee a significant length of time to liquidate assets (i.e real estate). Then [redacted] promised to contact SA [redacted] when the fifth order of forfeiture becomes available.

1 - 29B-WF-171994 (FS)
1 - FSPU [redacted] b6 b7C
1 - 3920-95-F-0058
(1) - 3920-95-F-0059
1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-95-F-0024
1 - 3920-96-F-0097
1 - SA [redacted]

1325015-000-9899

3920-95-F-0059-8

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SERIALIZED ____ FILED ____
AUG 14 1996
FBI-WASH. METRO FIELD OFFICE

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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/15/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: SSA [redacted] b6 b7C

Drafted By: SA [redacted] :js

File Number(s): 29B-WF-171994 (FS) (Pending)
3920-95-F-0058,3920-95-F-0059,3920-95-F-0060,3920-95-F-0097,3920-96-F-0024

Title: U.S. v HIDDEN INTEESTS

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form

[ ] FD-302

[ ] Investigative Insert

[ ] Affidavit

[ ] Seizure Warrant

[ ] FD-597 (Receipt)

[ ] Settlement Statement

[ ] Claim & Cost Bond

[ ] Title Documentation

[ ] Appraisal Report

[ ] In Forma Pauperis

[ ] Order of Forfeiture

[ ] Complaint for Forfeiture

[ ] Search Warrant

[ ] Request for Adoption

[ ] Indemnity Agreement

[ ] Final Decree

[ ] Sharing Request
[ ] Dag 71 [ ] Dag 72

[ ] Petition

[ ] Petition Investigation

[ ] Civil Forfeiture Report

[ ] FD-783 (Expedited Release)

[ ] Plea Agreement

[ ] Police Reports

[X] Other Subsequent Materials
Status updates for 3920-95-F-0058,3920-95-F-0059,3920-95-F-0060,3920-95-F-0097

1- Bureau, FSPU (ATTN: [redacted]) b6 b7C
1- WMFO (29B-WF-171994) (FS)
1- 3920-95-F-0058
1- 3920-95-F-0059

1325015-000-9901

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: Director, FBI From: ADIC, Washington Metropolitan Field Office
Re: 000-WF-000000,06/12/1995

1-3920-95-F-0060
1-3920-95-F-0097
1-SA [redacted]
ATTACHMENTS

b6
b7C

[redacted] Money Laundering Section, Department of Justice (DOJ), has advised SA [redacted] that all assets seized to date in the BCCI investigation (pursuant to four forfeiture orders) will not be forfeited until DOJ is confident all potential forfeitable property is identified.

b6
b7C

DOJ is in the process of working on a fifth order of forfeiture regarding the remaining assets to be completed in the fall of 1996. No timetable has been established by DOJ regarding the completion of this investigation. Currently, WMFO FAST has been conducting interviews at the request of (DOJ) regarding assets controlled by BCCI's subsidiaries, including Lebanon.

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1/FAST, NVMRA
Contact: SA [redacted] x9072

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

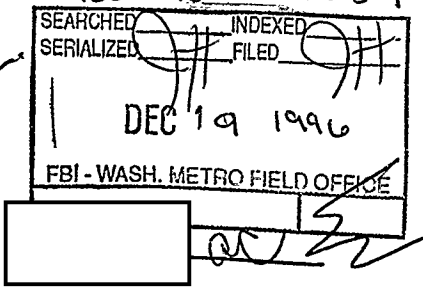
[redacted], Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court. b6 b7C

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

♦♦
1- 29B-WF-171994
1- All seizure files

Close #4
12/20/96
1

Main 29B-WF-171994 6 Subs-22-9
Seiz. 3920-95-F-0059
Log.



[redacted] b6 b7C

1325015-000-9904

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/3/1997

To: Director, FBI **Attn:** [redacted] (FSPU) b6 b7C

From: WFO
Squad C-1 (FAST)

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 209B-WF-198831 SUB FF SUB 2 (Pending)

Title: U.S. v. $96,801.25 IN U.S. CURRENCY

Synopsis: To advise FSPU of the status of certain WFO cases.

Reference: Reference is made to a 1/3/97 communication from FSPU to WFO requesting status of seizure files.

Enclosures: Enclosed for FSPU is a 10/9/96 Consent Order of Forfeiture pertaining to WFO seizures 3920-F-94-151 & 155.

Details: Referenced FSPU communication requested a status update on several WFO forfeiture cases. These cases are updated below by seizure number:

1) 3920-F-94-151 &155: The Consent Order of Forfeiture is attached. The final order will not be issued until after further legal proceedings are concluded in April, 1997.

2) 3920-95-F-021: AFO DOJ is still in the process of ruling on the petitions. The latest estimate of completion is sometime in March, 1997.

3) 3920-95-F-058-60, 95-91, 95-97, 96-024, 96-134, 96-186, 96-195, 97-28 and 97-52: These are all seizure files regarding the BCCI case. There have been several criminal forfeiture orders, but no final orders of forfeiture will be signed until all assets have been identified and turned over.

4) 3920-95-102 & 96-023: Subject [redacted] was recently sentenced to twenty-five months in jail. AFO has yet to rule on the petitions and no final forfeiture order has been received from the U.S. Attorney's Office. b6 b7C

5) 3920-96-F-053: Three separate Petitions for Remission have been filed in this case. WFO's Petition Investigation was submitted on 2/28/97.

-10 sub FS-22
29B-WF-171994

3920-95-F-059

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 07 1997
FBI-WASH. METRO FIELD OFFICE

1325615-000-9905

To: Director, FBI From: WFO
Re: 209B-WF-198831 SUB FF SUB 2, 03/03/1997

Should you have any questions regarding these cases, please contact DA JOSEPH SCHULTE or SSA [redacted] at (202) 252-7118. b6 b7C

CC: 17 - FSPU (Ms. [redacted]) b6 b7C
17 - WFO
1 - 3920-94-F-151
1 - 3920-94-F-155
1 - 3920-95-F-021
1 - 3920-95-F-050
1 - 3920-95-F-059
1 - 3920-95-F-060
1 - 3920-95-F-091
1 - 3920-95-F-097
1 - 95-102
1 - 96-23
1 - 96-24
1 - 96-53
1 - 96-134
1 - 96-186
1 - 96-195
1 - 97-28
1 - 97-52

♦♦

1325015-000-9906

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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 56
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Page 11 ~ Duplicate;
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Page 13 ~ Duplicate;
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Page 81 ~ Duplicate;

Willow Hollow, Houston TX — AFO will serve — $850,000.00

95-60

Bank of America National Trust and Savings Ass'n

Acct No. 6599-09995	BCCI Overseas - Bombay	Recd 2/22/95	$4,545.47 -134-1
Acct No. 6597-09996	BCCI Overseas - Sri Lanka	"	$10,430.00 -134-2

95-59

1325015-000-9610

AIRTEL

Date 03/13/95

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Unit

Subject: 3920-95-F-0058

Entry (Check One)
[X] New Case
[ ] Change or Add

U.S. v $82,156.99 IN U.S. CURRENCY
18 U.S.C. SECTION 982

[X] CATS Record of Seized Property

[ ] FD-302

[ ] In Forma Pauperis

[ ] Quick Release

[ ] Indemnity Agreement

[ ] Final Decree

[ ] Receipt for Transfer/
Disposition of Funds/Property

[ ] Newspaper Clippings

[ ] Lab Reports

[ ] Police Reports

[ ] Settlement Statement/Agreement

[ ] Title Documentation

[ ] Appraisal Report

[ ] Default Judgement

[ ] Investigative Insert

[ ] Warrant of Arrest in Rem

[ ] Complaint for Forfeiture

[ ] Search Warrant

[ ] Affidavit

[ ] Seizure Warrant

[ ] Plea Agreement

[ ] Sharing Request
[ ] Dag-71 [ ] Dag-72

[ ] Petition

[ ] Claim & Cost Bond

[ ] Petition Investigation

FASTRACK MFG

[ ] Civil Forfeiture Report

[ ] Notice of Seizure

[X] Order of Forfeiture

[ ] Employment Check

FOIMS KAW 3/15/95

[ ] Address Check

[X] Other Subsequent Materials:
MEMO FROM S [redacted]

b6
b7C

OIA
3/27/95
29B-WF-171994 SubFS Sub-21-1

1-BUREAU, FSPU
1-WMFO 29B-WF-171994
**ATTACHMENTS
AC/js
(2)

WDC 3/27/95

Searched
Serialized
Indexed
Filed

1325015-000-9547

Memorandum

To : ADIC, WMFO (29B-WF-171994) (FS) Date 3/10/95

From : SA [redacted] (C-1) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
00:WMFO

WMFO FAST has a limited role acting as an administrative processor monitoring and reporting to FSPU assets seized from criminal orders of forfeitures in the above captioned investigation. Attached is the fourth criminal order of forfeiture entered by the Honorable JOYCE GREEN, United States District Judge, District of Columbia forfeiting properties of the Bank and Commerce International (BCCI) and of the International Credit and Investment Company (Investments). This order was entered on December 21, 1994.

For information of FSPU, WMFO FAST only recently learned of the fourth criminal order of forfeiture from the case agent, [redacted] SA, FBI (WMFO). Trial Attorney's [redacted] b6 b7C DEPARTMENT OF JUSTICE (DOJ) have handled all forfeiture matters concerning this investigation. WMFO FAST has not been kept apprised by DOJ of any claims, petitions, or objections concerning the assets seized pursuant to the fourth court order.

In conclusion the U.S. Marshals in New York City are still in the process of taking possession of the assets outlined in the fourth court order. SA [redacted] WMFO FAST will keep FSPU b6 b7C informed of any new developments as the information becomes available.

Seizure Form

Asset ID: <A> | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
NY				95-0058	N

(7) Case Number: NY-NR-171698

(8) Case Name: U.S. v HIDDEN INTERESTS

(9) Operation Name:

(10) Case Agent: SA

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
12/21/94	consent order of forfeiture		

(15) Seizing Agent:

(16) Phone Number:

(17) Seized From: RUST HOLDINGS

(18) Place/Address Where Seized: ASSETS WAS HELD IN AN AMERICAN EXPRESS BANK ACCOUNT NUMBER 3/52977

(19) City:

(20) State:

(21) Seizure:	Judicial District (22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
00	NY	18 USC 982/1956/S?	18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
$2,156.00	Y		currency		CRIMINAL

(31) Asset Description: $2,156.00 in U.S. CURRENCY

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	N
(36) Expenses Incurred?	**(37) Forfeiture-Dependent Award?**	**(38) Quick Release Performed?**	**(39) Intra-Agency Assistance?**
N	N	N	N
(40) Suitable for Official Use?	**(41) OCDETF Case?**	**(42) Sharing Anticipated?**	**(43) Additional Agencies?**
N	N	N	N

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

1325015-000-9549

Seizure Form

Asset ID: <A>	Date: <B>	Page 2
Asset Description: <C>		

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)
(95) Address:		Owner
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Lienholder
(100) Contact Name (if business):	(101) Phone Number:	Seized From
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Institution Seized From
(106) Incarcerated?	(107) Prisoner ID:	Occupant
(108) Institution Name (if incarcerated):		Victim
(109) Institution Address:		Other
(110) City: / (111) State: / (112) Zip Code: / (113) Country:		
(114) Represented by Counsel?	(115) Attorney's Name (if any):	
(116) Firm's Name:	(117) Attorney's Phone Number:	
(118) Attorney's Address:		
(119) City: / (120) State: / (121) Zip Code: / (122) Country:		

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)
(95) Address:		Owner
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Lienholder
(100) Contact Name (if business):	(101) Phone Number:	Seized From
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Institution Seized From
(106) Incarcerated?	(107) Prisoner ID:	Occupant
(108) Institution Name (if incarcerated):		Victim
(109) Institution Address:		Other
(110) City: / (111) State: / (112) Zip Code: / (113) Country:		
(114) Represented by Counsel?	(115) Attorney's Name (if any):	
(116) Firm's Name:	(117) Attorney's Phone Number:	
(118) Attorney's Address:		
(119) City: / (120) State: / (121) Zip Code: / (122) Country:		

1325013-000-9550

Seizure Form

Asset ID: <A>	Date: <B>	Page 3
Asset Description: <C>		

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: DEPT. OF JUSTICE		(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign): FEDERAL	
(137) Address:		(138) City: WASHINGTON	
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:
(144) Contact Name:		(145) Contact Phone Number: (202) 514-2000	(143) Sharing Possible? NO

b6
b7C

(133) Agency Name:		(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:		(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:
(144) Contact Name:		(145) Contact Phone Number:	(143) Sharing Possible?

(133) Agency Name:		(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:		(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:
(144) Contact Name:		(145) Contact Phone Number:	(143) Sharing Possible?

Seizure Form

Asset ID: <A>	Date: <B>	Page 4
Asset Description: <C>		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name: US MARSHALS	(148) Storage Date:

(149) Storage Facility Address:

U.S. Courthouse - Annex, 1st Andrews Plaza

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
New York	NY	10007	$	

PREPARED BY

(154) Signature: [redacted]

(155) Date: 3/13/95

b6
b7C

(156) Prepared By: SA [redacted]

(157) Title: SPECIAL AGENT FBI

APPROVED BY

(158) Sign [redacted]

(159) Date: 3/14/95

(160) App SSA [redacted]

(161) Title: Supervisory Special Agent

Probable Cause

<D> ***SEE ATTACHED***

Memorandum

To : ADIC, WMFO (29B-WF-171994) (P) Date 2/27/95

From : SA [redacted] (C-1) b6 b7C

Subject: HIDDEN INTERESTS;
MAJOR CASE #38;
FIF; FAG;
00:WMFO

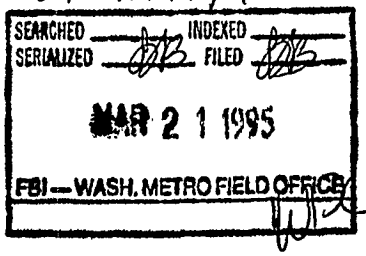
On 2/24/95, [redacted] Trial Attorney, b6 b7C
DEPARTMENT OF JUSTICE (DOJ), telephone number (202) 514-1322 provided SA [redacted] FBI with the following attached document the fourth forfeiture order in the BCCI investigation. The United States Marshals in New York City are currently in the process of seizing and liquidating the property identified in the court order.

1-29B-WF-171994 (Sub FS)

AC:ac

1325015-000-9553

29B-WF-171994 SubFS Sub-21-2



Seizure Form

Assc[redacted]95-FBI-000816 | Date: 03[redacted]95 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920		05		3920950058	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	US vs Hidden Interests

(9) Operation Name:	(10) Case Agent:
	b6 b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
12/21/94	Other	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
	202-324-3000

(17) Seized From: BCCI-Holdings

(18) Place/Address Where Seized:	(19) City: (Not Given)
American Express Bank, Asset of BCCI Nigeria Account # 3/52977	(20) State: DC

Judicial District (21) Seizure: DC	(22) Processing: NYS	(23) Forfeiture Statute: 18 USC 982	(24) Violation Statute: 18 USC 1958

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub Type:	(30) Forfeiture Type:
82156.99	Y		Cash/Currenc	01	Criminal

(31) Asset Description: $82,156.99 in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:
USA		0.00

Seizure Form

Asset ID: [redacted]-FBI-000816	Date: 03[redacted]5	Page 2 of 5
Asset Description: $82,156.99 in U.S. Currency		

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI-Holdings		Owner	
(95) Address: American Express Bank, Asset of BCCI Nigeria Account # 3/52977		Lienholder	
(96) City: (Not Given) / (97) State: DC / (98) Zip Code: 0 / (99) Country: USA		Seized From	X
(100) Contact Name (if business): (Not Given)	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated: N	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel: N	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
		Owner	
(95) Address:		Lienholder	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Seized From	
(100) Contact Name (if business):	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated?	(107) Prisoner ID:	Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

Seizure Form

Asset ID: [redacted]-FBI-000816 | Date: 03[redacted]95

Asset Description: $82,156.99 in U.S. Currency

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
UNKNOWN	Unknown		
(125) AUSA Name: [redacted]		(126) Judicial District: NYS	(127) Phone Number: 212-791-0008
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

b6 b7C

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name:		(134) Agency Case ID:		
DEPT OF JUSTICE				
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
N		Federal		
(137) Address:		(138) City:		
		Washington		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
DC	00000	USA	DCDOJ0000	N
(144) Contact Name: [redacted]			(145) Contact Phone Number: 202-514-2000	

b6 b7C

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: [redacted]-FBI-000816	Date: 03/[redacted]5
Asset Description: $82,156.99 in U.S. Currency	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	USMS	12/21/94

(149) Storage Facility Address:
US Courthouse - Annex, 1st Andrews Plaza

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: Per:
New York	NY	10007	

PREPARED BY

(154) Signature:	(155) Date:
	03/13/95
(156) Prepared By: [redacted]	(157) Title: SA

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b7C

APPROVED BY

(158) Signature:	(159) Date:
	03/14/95
(160) Approved By: [redacted]	(161) Title: SSA

Asset ID: 95-FBI-000816
Asset Description: $82,156.99 in U.S. Currency

Probable Cause

See File for Detailed FACTS and CIRCUMSTANCES.

29B-WF-171994 SubFS Sub-21-3

SEARCHED [illegible] INDEXED [illegible]
SERIALIZED [illegible] FILED [illegible]
NOV 0 8 1995
FBI — WASH. METRO FIELD OFFICE

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/07/1995

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: [redacted]

Drafted By: [redacted] AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Enclosures: Fourth Order of Forfeiture.

Reference: 11/1/95, [redacted] FSPU. b6 b7C

Details: Pursuant to FSPU's request is a status update concerning the following seizures: A) 3920-95-F-058, 82,156.99; B)3920-95-F-059, $10,430.00; C) 3920-95-F-060, $4,545.47 and D)3920-95-F-097, $17,000,000.

All of the above seizures were incorporated in the fourth judicial order of forfeiture and have been transferred by the court appointed trustee to the United States Marshal's Service. [redacted] Trial Attorney, Department of Justice has advised until all assets have been identified and seized no final orders of forfeiture will be issued by the court. b6 b7C

1-Bureau
(FSPU Attn: [redacted] b6 b7C

4-WMFO
(3920-95-F-058)
(3920-95-F-059)
(3920-95-F-060)
(3920-95-F-097)

1-SA [redacted]

AC:ac

29B-WF-171994 Sub FS Sub-21-4

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
NOV 0 8 1995
FBI—WASH. METRO FIELD OFFICE
[redacted] b6 b7C

1325015-000-9589

29B-WF-171994 Sub# Sub-21-5

SEARCHED INDEXED
SERIALIZED FILED
03 1996
FBI — WASH. METRO FIELD OFFICE

MEMORANDUM

DATE: JANUARY 15, 1996

TO: [redacted]
Federal Bureau of Investigation
FAX: (202)324-6426

FROM: [redacted] b6 b7C
Robb Evans, Trustee
FAX: (213)-955-8366

PAGE: 3PAGES (INCLUDING COVER PAGE)

SUBJECT: REMITTANCE

Hope you had a great holiday!

Attached please find the remittance schedule and the cash flow report. If you need more information or have any questions, please call me at (213) 955-8368. I am usually in the office around 6:30 AM.

[redacted]

29B-WF-171994 Sub FF Sub-22-5

b6 b7C

SEARCHED INDEXED
SERIALIZED FILED
FEB 05 1996
FBI — WASH. METRO FIELD OFFICE

1325015-000-9591

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of December 31, 1995

Forfeiture Order Date	19-Aug-93	21-Dec-94	21-Dec-94	10-Jun-95	03-Nov-95	
State	California	California	New York	New York	New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	20,000,000	0	49,000,000	107,027,213
Loans	20,945,041	0	28,696,395	0	7,050,559	55,692,000
Real Property	13,894,680	0	10,617,580	15,200,000	2,035,184	41,747,264
Miscellaneous Property	31,445	0	0	0	0	31,445
Other	0	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	69,250,808	3,647,571	59,313,974	15,205,950	164,149,007	310,817,310
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	20,000,000	0	0	58,027,213
Loans	22,884,847	0	386,814	0	404,721	23,676,382
Real Property	21,043,370	0	1,460,096	500,000	0	23,003,466
Miscellaneous Property	49,094	0	0	0	0	49,094
Other	124,228	0	22,645	0	157,090	303,963
Total Asset Conversions	78,481,182	3,647,571	21,869,755	500,000	561,811	105,060,319
Total Revenue Collection (1)	5,162,618		425,421	0	257,087	5,845,126
Total Sources of Funds	83,643,800	3,647,571	22,295,176	500,000	818,898	110,905,445
Uses of Funds						
Seller Financing and Cash Disbursements	(11,726,374)	0	(5,923,152)	(500,000)	(1,292)	(18,148,818)
Operating Account Balance	(750,000)	0	(750,000)	0	0	(1,500,000)
Special Reserve Account (2)	(766,079)	0	(916,256)	0	(817,665)	(2,500,000)
Surplus Balance as of 12/31/95	(755,686)	0	0	0	0	(756,686)
Total Uses of Funds	(13,997,139)	0	(7,589,408)	(500,000)	(818,898)	(22,905,444)
Net Remittances	69,646,661	3,647,571	14,705,768	0	(0)	88,000,001
Present Book Value Per Budget						
Cash	2,272,765	0	1,666,256	0	49,817,565	53,756,586
Loans	3,725,571	0	11,701,052	0	3,707,424	19,134,047
Real Property	3,323,311	0	3,077,342	9,697,546	1,220,000	17,318,199
Miscellaneous Property	0	0	0	0	0	
Other Assets	42,996	0	36,154	0	2,740,324	2,819,474
Total Liabilities	(165,336)	0	(2,265,964)	(1,163,364)	(1,000,000)	(4,594,664)
Total PBV Per Budget	9,259,308	0	14,210,439	8,734,182	56,485,422	88,689,351

Notes: (1) Excluding gains on sale of FF&E of $49,294.36 (not in use by the Trustee) and gains on sale of REO of $4,[illegible]

(2) Special Reserve to settle tax issues of real property holding corporations, to fund deferred maintenance and

ROBB EVANS, TRUSTEE
SCHEDULE OF DISTRIBUTION TO US MARSHAL
From: May 5, 1993 to December 31, 1995

From Account	Date Sent	Payment Sent	Comments
First Interstate Bank: 149-2-40134	26-Aug-93	35,964,405.69	By Order of August 19, 1993
First Interstate Bank: 149-2-40134	22-Oct-93	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	17-Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	16-Aug-94	8,850,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Oct-94	200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Dec-94	3,035,594.31	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Feb-95	17,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Dec-95	1,000,000.00	60 Day Remittance
Total		88,000,000.00	

1325015-000-9593

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 01/22/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X9073

Approved By: [redacted]

Drafted By [redacted] AC

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
OO:WMFO

Enclosures: Facsimile of schedule of distribution to USMS Service from May 5, 1993 to December 31, 1995 & summary of cumulative distribution to USMS.

Details: On 1/15/96, Robb Evans and [redacted] Court appointed trustees handling the liquidation of assets in the captioned investigation provided the attached chart. From 5/15/93 until 12/31/95, $88,000,000.00 has been remitted to US Marshals Service (via wire transfer) pursuant to four criminal orders of forfeiture. b6 b7C

Assets being liquidated range from fungible property i.e. cash to real estate involving other investors not associated with this investigation. Assets are continually being liquidated from all four forfeiture orders. More complex assets take longer to liquidate depending on the real estate market and other economic indicators.

Assets remitted to date off the December 1994 fourth order equal approximately $19,000,000.00. A fifth order of forfeiture is scheduled in late January of 1996.

1 - SA [redacted] b6 b7C
1 - 29B-WF-171994 (Sub)
1 - 3920-95-F-0058
1 - 3920-95-F-0059

29B-WF-171994 Sub FS Sub-21
3920-95-F-0058 -6

1

Rec'd 3/13/96

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: ADIC, WMFO From: SA [redacted]
Re: 209A-WF-198483 (FSO, 12/14/1995

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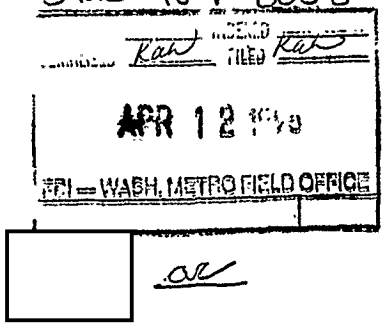
1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-96-F-0024

1325015-000-9595

29B-WF-111994 SUBFS Sub-21 - 7
3920-95-F-0058



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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/11/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: SA [redacted] X 9073

Approved By: ASSA [redacted]

Drafted By: [redacted] AC

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Details: On 4/10/96, [redacted] Trial Attorney, Asset b6 b7C Forfeiture/Money Laundering Section, Department of Justice furnished the following information: The fifth order of forfeiture in the above captioned investigation has been delayed. No specific date has been scheduled but [redacted] anticipates within the next four to six weeks the court will issue the fifth order of forfeiture. The reason for the delay is to ensure DOJ has an opportunity to identify all potential assets subject to forfeiture.

[redacted] concluded the conversation by stating the BCCI b6 b7C investigation is "getting toward the end." She does not believe additional orders of forfeiture are "imminent." However, it may take Robb Evans, the court appointed trustee a significant length of time to liquidate assets (i.e real estate). Then [redacted] promised to contact SA [redacted] when the fifth order of forfeiture becomes available.

1 - 29B-WF-171994 (FS)
1 - FSPU [redacted] b6 b7C
1 - 3920-95-F-0058
1 - 3920-95-F-0059
1 - 3920-95-F-0060
1 - 3920-95-F-0097
1 - 3920-95-F-0024
1 - 3920-96-F-0097
1 - SA [redacted]

1325015-000-9597

3920-95-F-0058 - 8

SEARCHED ___ INDEXED
SERIALIZED ___ FILED
AUG 14 1996
FBI-WASH. METRO FIELD OFFICE

[redacted]

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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/15/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: SS [redacted] b6 b7C

Drafted By: SA [redacted] jsp

File Number(s): 29B-WF-171994 (FS) (Pending)
3920-95-F-0058,3920-95-F-0059,3920-95-F-0060,3920-95-F-0097,3920-96-F-0024

Title: U.S. v HIDDEN INTEESTS

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form
[ ] FD-302
[ ] Investigative Insert
[ ] Affidavit
[ ] Seizure Warrant
[ ] FD-597 (Receipt)
[ ] Settlement Statement
[ ] Claim & Cost Bond
[ ] Title Documentation
[ ] Appraisal Report
[ ] In Forma Pauperis
[ ] Order of Forfeiture

[ ] Complaint for Forfeiture
[ ] Search Warrant
[ ] Request for Adoption
[ ] Indemnity Agreement
[ ] Final Decree
[ ] Sharing Request
[ ] Dag 71 [ ] Dag 72
[ ] Petition
[ ] Petition Investigation
[ ] Civil Forfeiture Report
[ ] FD-783 (Expedited Release)
[ ] Plea Agreement
[ ] Police Reports

[X] Other Subsequent Materials
Status updates for 3920-95-F-0058,3920-95-F-0059,3920-95-F-0060,3920-95-F-0097

1- Bureau, FSPU (ATTN: [redacted]) b6 b7C
1- WMFO (29B-WF-171994) (FS)
1- 3920-95-F-0058
1-3920-95-F-0059

1325015-000-959

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

To: Director, FBI From: ADIC, Washington Metropolitan Field Office
Re: 000-WF-000000,06/12/1995

1-3920-95-F-0060
1-3920-95-F-0097
1-SA [redacted] b6 b7C
ATTACHMENTS

1

[redacted] Trial Attorney, Money Laundering Section, Department of Justice (DOJ), has advised SA [redacted] that all assets seized to date in the BCCI investigation (pursuant to four forfeiture orders) will not be forfeited until DOJ is confident all potential forfeitable property is identified.

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DOJ is in the process of working on a fifth order of forfeiture regarding the remaining assets to be completed in the fall of 1996. No timetable has been established by DOJ regarding the completion of this investigation. Currently, WMFO FAST has been conducting interviews at the request of (DOJ) regarding assets controlled by BCCI's subsidiaries, including Lebanon.

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1/FAST, NVMRA
Contact: SA [redacted] x9072

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Trial Attorney, Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

◆◆
1- 29B-WF-171994
1- All seizure files

Close #4
12/20/96

Martin Seizure log

29B-WF-171994 FS SUB-21 - 9

SEARCHED INDEXED
SERIALIZED FILED
DEC 19 1996
FBI - WASH. METRO FIELD OFFICE

1325015-000-9602

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)

[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] 11t

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log ✓
Foims (PFA) LT
CATS LT

CC: 9-BUREAU, ATTN: [redacted] b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994

[redacted] 10

LT990425.EC

325015-000-9603

29B-WF-171994 FF-21

Fourth Supplemental List of Forfeited Property

Description	Approx. Value
Excess funds from liquidation of New York agency of BCCI S.A.	$ 77,000,000.00
Excess funds from liquidation of California agency of BCCI S.A. not included in Third Supplemental List of Forfeited Property	$ 3,647,571.00
Funds at Chase Manhattan Bank representing interest owed to BCCI S.A. on bonds issued by the Republic of Venezuela: Account No. C20135 B	$ 5,086.56
Account of BCCI, S.A. Dubai at Bank of New York: (transferred to Court Registry Investment System)	$ 3,600.00
Accounts of BCCI (Overseas) Bombay at New York agency of BCCI S.A.: Account Nos. 2044100105 and 2044100207 (transferred to Court Registry Investment System)	$ 45,163.04
Carlson Farm, Sherman, Connecticut	$ 2,000,000.00
Assets of BCCI Nigeria at American Express Bank, Account No. 3/52977 ("BCCI (Overseas) Nairobi")	$ 82,156.99
Bankruptcy distributions to BCCI:	
American Mills (transferred to Court Registry Investment System)	$ 7,000.00
Domino Investments, Ltd.	$ 23,673.14
Fastrax, Inc.	$ 197,500.00
Remittance of funds paid in contempt proceeding in the U.S. District Court for the Southern District of Florida, including interest (held by Nussbaum & Wald)	$ 165,233.00
61.156 percent of the amount distributable to CCAH shareholders as a consequence of the liquidation or other disposition of their indirect interest in First American Corporation.	$ 287,000,000.00

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Exhibit A -- Cr. No. 91-0655 (JHG)

1325015-000-9609

Page 82 ~ Duplicate;
Page 83 ~ Duplicate;
Page 84 ~ Duplicate;
Page 85 ~ Duplicate;
Page 86 ~ Duplicate;
Page 87 ~ Duplicate;
Page 88 ~ Duplicate;
Page 89 ~ Duplicate;

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X For this Page X
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FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
Page 4 ~ Duplicate;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
~~0208~~
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

Sub-20
21
208

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

b6
b7C

EPG:amm
(41)

12/2/93 29B-WF-171994 Sub FS Sub-20-1

WDC

0214 20

Scanned
Serialized
Indexed

WDC 12/2/93

Director (Forms)

Recd 12/2/93

1325015-000-9533

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

5/5/94

29B-WF-171994 Sub FS Sub-20-2
3920-93-F-0208-

SERIALIZED FILED
MAY 0 1 1994
FBI — WASH. METRO FIELD OFFICE

1325015-000-9546

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

117. Sharing ☐ Yes ☐ No

b6
b7C

11/29/93

118. Award Recommended

1325015-000-9536

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-9[illegible]-F-208	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 68,550,807.67	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency: FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	TRUSTEE FOR BCCI S.A. LOS ANGELES $ 68,550,807.67

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted] CS	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9535

FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 12
Page 4 ~ Duplicate;
Page 6 ~ Duplicate;
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Page 15 ~ Duplicate;
Page 16 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
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FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigatio

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Cod
3920-93-F-212	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 40,000.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBF

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	KOREA FIRST BANK, NEW YORK AGENCY $40,000.00

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-8110

FBI/D

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
~~0212~~
~~0213~~
0214
~~0209~~

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

212

Sub 1, 16 + 19

[redacted] b6 b7C

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

[redacted] (forms)

O & A sub-2 to Subs 12/2/93

Sub 2

29B-WF-171994 -1

Searched
Serialized
Indexed
Filed
12/2

[redacted] b6 b7C

5015-000-8108

Rec'd 12/2/93 BB

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
Page 5 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
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Page 16 ~ Duplicate;
Page 17 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
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Serials in this file have been automated 1 through serial 2

NO SERIAL CAN BE PLACED, CHANGED OR INSERTED PRIOR TO ABOVE SERIAL.

1325015-000-9833

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
~~0203~~
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
~~HIDDEN INTERESTS;~~
MAJOR CASE 38;
~~FIF;FAG;~~
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

Subfs b6 b7C

12/2/93 BB

29B-WF-171994

OIA Sub 15 to [redacted]

WDC Indexed 12/2/93 Filed

b6 b7C

[redacted]

(Bims)

Recd 12/2/93 BB

1325015-000-9834

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

5/5/94
C-4
3920-93-F-0203
5/5/94

29B-WF-171994 Sub FS Sub-15-2
3920-93-F-0205

SEARCHED INDEXED
SERIALIZED FILED
MAY 05 1994
FBI—W

b6
b7C

1325015-000-9848

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

117. Sharing ☐ Yes ☐ No

b6
b7C

11/29/93

118. Award Recommended

1325015-000-9837

3928

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

FROM: [redacted]

TO: [redacted]

FBI . WASH. FLD. OFC.

FAX NUMBER: 324-6426

DATE: 9/13/93

NUMBER OF PAGES INCLUDING THIS SHEET: 9

NAME OF PERSON TO CONTACT UPON RECEIPT: _____

TELEPHONE NUMBER OF PERSON TO CONTACT UPON RECEIPT: _____

SPECIAL INSTRUCTIONS: [redacted] - this is the recent BCCI forfeiture order, for info.

One note: the court deleted BCC Misr from the attached Exhibit A (note the gap among the first American Bank of New York entries) — but did not correct the arithmetic. Actual amount forfeited now $101,135,749.15

199-WF-171994 Subf5

SEARCHED _____ INDEXED _____
SERIALIZED _____ FILED _____
SEP 13 1993
FBI - FIELD OFFICE

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL 202 514-5522

b6
b7C

b6
b7C

152501-000-9838

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-F-203	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption	9. Associated Action Code	10. Administrative or Judicial	11. Property Code
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG	C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI	4 $ 17,763,910.10	☐ Yes ☒ No

16. Forfeiture Deferred	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified
☐ Yes ☐ No		

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	COURT REGISTRY INVESTMENT SYSTEM $ 17,763,910.10

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date
[redacted]	5	☐ Yes ☐ No

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9836

FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 20
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Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
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Page 31 ~ Duplicate;
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X No Duplication Fee X
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ADIC

DATE 01/06/94

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[ ] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0205
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0208
0209
0210
0211
0212
0213
0214
0215

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF; FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal order of forfeiture.

This is the third criminal order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted] b6 b7C
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0215)

EPG:amm
(41)

12/2/93
29B-WF-171994 Sub FS Sub-16-1
O & A
Sub 16 [redacted] WDC 12/2/93
WDC
Serialized
Indexed
Filed

b6 b7C

1325015-000-9634

Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment Company (Investments). This order was entered 8/19/93.

The total value of the order is $101,135,749.15

DOJ/TA [redacted] (DOJ ASSET FORFEITURE OFFICE LIAISON WITH FBI/LFU), is the BCCI seizure/forfeiture contact at DOJ. b6 b7C

Seizure Dates: WMFO/FAST is using 8/19/93 (the date of Judge Green's order) as the date of seizure in each of the attached FD-365's. This date may or may not correspond with actual seizure dates. Also, WMFO/FAST does not have addresses for the entities from which the accounts were seized. This information can be obtained from DOJ, if needed.

ADMINISTRATIVE:

For information of FSPU, FAST only recently learned of the above criminal order of forfeiture from the criminal case agent, SA [redacted] (NVMRA). FAST's responsibility in this matter has been limited to one of simply informing FSPU that orders have been entered and seizures have occurred. b6 b7C

FAST has not been kept apprised by DOJ of any claims, Petitions, or objections that may have been filed by potential claimants in this case. The BCCI criminal case has been handled entirely by DOJ with the assistance of WMFO Sas.

Questions concerning the above can be directed to T/A [redacted] 514-1263, or WMFO FAST SA [redacted] ext. 7118. b6 b7C

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-93-F-0215	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
1/16/93	BCCI HEDDEN INTERESTS: FIF: FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI	$ 3,414.007.28	☐ Yes ☒ No

16. Forfeiture Deferred	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified
☐ Yes ☐ No		

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	COURT APPOINTED Liquidators of bcci $ 3,414,007.28

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date
	5	☐ Yes ☐ No

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9636

FBI/DOJ

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted], FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

FASTRACK MFG

EPG~~:~~epg
(21)

5/5/94
C-4
3920-93-F-0215-
5/5/94

29B-WF-171994 Sub FS Sub-16-3
3920-93-F-0215-

SEARCHED [redacted] FILED [redacted]
SERIALIZ... [redacted]
MAY 05 1994
FBI—WASH METRO FIELD OFFICE

1325015-000-9659

AIRTEL

Date 03/10/94

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To:	Director, FBI	Entry (Check One) [X] New Cases
From:	ADIC, WMFO (29B-WF-171994)	[ ] Change or Add
Attention:	Administrative Services Division/PPMS Forfeiture/Seized Property Group	
Subject:	3920-93-F-0215 Previously, 3920-93-F-204 ENCLOSED FOR FSPU ON THE FOLLOWING: 1). FD-635 (3920-93-F-0215) 2). COPY OF 8/93 ORDER OF FORFEITURE, US DISTRICT COURT, DISTRICT OF COLUMBIA	U.S. Vs BCCI HIDDEN INTERESTS; MAJOR CASE # 38; FIF; FAG OO: WMFO

For the information of FSPU, $3,414,077.28 from a BCCI bank account was previously assigned seizure number 3092-93-F-204, and entered into foims. However, this number had already been assigned to another WMFO seizure (a 1986 Nissan). This BCCI seizure has since been designated as the seizure number 3920-93-F-0215, and so entered into forms.

1-FBIHQ/FSPU, ATTN: [redacted]
1-WMFO
(1-28B-WF-171994 SUB FS)
(1-3920-93-F-0215)
Attachments
EPG:amm
(3)

b6
b7C

WPC

29B-WF-171994 Sub FS Sub-16-2
Searched
Serialized
Indexed
Filed

1325015-000-9647

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-F-0215	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
03/10/94	BCCI HIDDEN INTERESTS: FIF: FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI	$ 3,414,077.28	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	COURT APPOINTED LIQUIDATORS OF BCCI

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WASHINGTON	WASHINGTON	DC	

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP
COURT APPOINTED LIQUIDATORS OF BCCI	1200 READING DRIVE	ORLANDO	FL	

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9648

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner		87. Name of Institution		
88. Street Address		89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner		93. Name of Institution		
94. Street Address		95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner		99. Name of Institution		
100. Street Address		101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

117.

118. 3/16/94

b6
b7C

1325015-000-9649

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address	65. City	66. State	67. ZIP	
68. Quick Release	69. Expenses Reimbursed	70. Name/Title		
71. Street Address	72. City	73. State	74. ZIP	
75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored
81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense	
86. Name/ID Number of Prisoner	87. Name of Institution			
88. Street Address	89. City	90. State	91. ZIP	
92. Name/ID Number of Prisoner	93. Name of Institution			
94. Street Address	95. City	96. State	97. ZIP	
98. Name/ID Number of Prisoner	99. Name of Institution			
100. Street Address	101. City	102. State	103. ZIP	
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature		117. Sharing ☐ Yes ☐ No
	1/6/94	118. Award Recommended

b6
b7C

1325015-000-9637

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 9
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Serials in this file have been automated 1 through serial 2

NO SERIAL CAN BE PLACED, CHANGED OR INSERTED PRIOR TO ABOVE SERIAL.

1325015-000-9817

Serialization Application begins with Serial # 1

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg

5/5/94

29B-WF-171994 Sub FS Sub-14 -2
3920-93-F-0202 -

SEARCHED [redacted] INDEXED
SERIALIZED [redacted] FILED
MAY 0 5 1994
FBI — WA [redacted]

b6
b7C

1325015-000-9832

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-[illegible]-F202	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 118,552.50	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	COMMERCIAL BANK OF KOREA NEW YORK $ 118,552.50

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9821

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

117. Sharing ☐ Yes ☐ No

b6
b7C

11/29/93

118. Award Recommended

1325015-000-9822

3520-93-F-0207

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

FROM: [redacted] b6 b7C

TO: FBI. WASH. FLD. OFC.

FAX NUMBER: 324-6426

DATE: 9/13/93

NUMBER OF PAGES INCLUDING THIS SHEET: 9

NAME OF PERSON TO CONTACT UPON RECEIPT: _____

TELEPHONE NUMBER OF PERSON TO CONTACT UPON RECEIPT: _____

SPECIAL INSTRUCTIONS: [redacted] b6 b7C this is the recent BCCI forfeiture order, for info.

One note: the court deleted BCC Mstr from the attached Exhibit A (note the gap among the first American Bank of New York entries) — but did not correct the arithmetic. Actual amount forfeited 29B-WF-171994 SubFS was $101,135,749.15

SEARCHED _____ INDEXED _____
SERIALIZED _____ FILED _____
SEP 13 1993
FBI/DOJ FIELD OFFICE

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL 202 514-5522

29B-WF-171994-132 SEP 15 1993 6

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

b6
b7C

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

Sub FS
Sub 14
-1

12/2/93

29B-WF-171994

Sub 14

b6
b7C

[redacted]

(forms)

Recd 12/2/93 BB

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 9
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Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
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ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

Subfs
Sub-1 b6 b7C

12/2/93

29B-WF-171994

RECORDED INDEXED
SERIALIZED FILED
DEC 01

[redacted] b6 b7C

[redacted]

(forms)

Recd 12/2/93 dfb [illegible]

1325015-000-9803

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

5/5/94
CC
3920-93-F-0201
5/5/94

29B-WF-171994 Sub FS Sub-13 -2
3920-93-F-0201
SEARCHED
SERIALIZED
FILED
MAY 05 1994
FBI

[redacted]

b6
b7C

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner		87. Name of Institution		
88. Street Address		89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner		93. Name of Institution		
94. Street Address		95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner		99. Name of Institution		
100. Street Address		101. City	102. State	103. ZIP
104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

117. Sharing ☐ Yes ☐ No

b6
b7C

11/29/93

118. Award Recommended

1325015-000-9806

3920-93-F-020 b

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

b6
b7C

FROM: [redacted]

TO: [redacted]
FBI. WASH. FLD. OFC.

FAX NUMBER: 324-6426

DATE: 9/13/93

NUMBER OF PAGES INCLUDING THIS SHEET: 9

NAME OF PERSON TO CONTACT UPON RECEIPT: [redacted]

b6
b7C

TELEPHONE NUMBER OF PERSON TO CONTACT UPON RECEIPT: [redacted]

SPECIAL INSTRUCTIONS: [redacted] - this is the recent BCCI forfeiture order, for info.

(N)

One note: the court deleted BCC Misr from the attached Exhibit A (note the gap among the first American Bank of New York entries) — but did not correct the arithmetic. Actual amount forfeited now $101,135,749.15

(Rev. WF-171994 Subfs)

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
SEP 13 1993
FBI - WASHINGTON FIELD OFFICE

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL 202 514-5522

132-0015-000-9807

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-WF-201	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/92	BCCI HIDDEN INTERESTS ; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 74,250.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	$74,250.00 CITIBANK NEW YORK

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9805

FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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Civil Action# 15-cv-01303-LL

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ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[_] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
~~0200~~
0201
0202
0203
0204
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0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

b6
b7C

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

Sub FS
Sub-12-1

12/2/93
0 of 14
sub-12
to Miscellaneous

29B-WF-171994

Serialized
Indexed
Filed
12/2/

DEC 01 1993

[redacted]

b6
b7C

00-9789

Recd 12/2/93

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(3)

BB 5/5/94
C-4
3920-93-F-0200-
Rec 5/5/94

29B-WF-171994 Sub FS Sub-12-2
3920-93-F-0200-

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 05 1994

[redacted]

b6
b7C

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

		117. Sharing ☐ Yes ☐ No	b6 b7C
	11/29/93	118. Award Recommended	1325015-000-9792

5920-93-F-0205

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

b6
b7C

FROM: [redacted]

TO: [redacted]

FBI . WASH. FLD. Ofc.

FAX NUMBER: 324-6426

DATE: 9/13/93

NUMBER OF PAGES INCLUDING THIS SHEET: 9

NAME OF PERSON TO CONTACT UPON RECEIPT: _____

b6
b7C

TELEPHONE NUMBER OF PERSON TO CONTACT UPON RECEIPT: _____

SPECIAL INSTRUCTIONS: [redacted] - this is the recent BCCI forfeiture order, for info.

One note: the court deleted BCC Misr from the attached Exhibit A (note the gap among the First American Bank of New York entries) — but did not correct the arithmetic. Actual amount forfeited now $101,135,749.15

(N)

249-WF-171994 Sub FS

SEARCHED _____ INDEXED _____
SERIALIZED _____ FILED _____
SEP 13 1993
FBI — WASH. FIELD OFFICE

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL 202 514-5522

152011f000-9793

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
5920-93-F-200	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
1/16/93	BCCI HIDDEN INTERESTS : FIF: FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☒ No
FBI	$ 13,527.00	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	CHASE MANHATTAN BANK NEW YORK $13,527.00

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9791

FBI/DOJ

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 2
Page 4 ~ Duplicate;
Page 8 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
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0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

b6
b7C

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

Sub FS
Sub-11-1

29B-WF-171994

INDEXED
FILED

[redacted]

b6
b7C

Rec'd 12/2/93

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
920-93-F-199	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS ; FIF; FAT

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI	$ 746,194.97	

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	CAPITAL BANK MIAMI $ 746,194.97

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9777

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

b6
b7C

117. Sharing ☐ Yes ☐ No

11/29/93

118. Award Recommended

1325015-000-9778

3920-93-F-0204

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

FROM: [redacted] b6 b7C

TO: FBI. WASH. FLD. OFC.

FAX NUMBER: 324-6426

DATE: 9/13/93

NUMBER OF PAGES INCLUDING THIS SHEET: 9

NAME OF PERSON TO CONTACT UPON RECEIPT: [redacted] b6 b7C

TELEPHONE NUMBER OF PERSON TO CONTACT UPON RECEIPT: _____

SPECIAL INSTRUCTIONS: [redacted] - this is the recent BCCI forfeiture order, for info.

One note: the court deleted BCC Misr from the attached Exhibit A (note the gap among the first American Bank of New York entries) — but did not correct the arithmetic. Actual amount forfeited now $ 101,135,749.15

(K)

SEARCHED _____ INDEXED _____
SERIALIZED _____ FILED _____
SEP 13 1993
FBI - WASH. FIELD OFFICE

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL - 202 514-5522

FBI/DOJ

Forfeiture, July 29, 1992.

The government has now identified additional assets of the corporate defendants which it believes are forfeitable to the United States under the January 24 Order. These assets were described in a proposed Third Supplemental List of Forfeited Property which was attached as Exhibit A to the government's motion.

For the reasons set forth in the government's motion and the accompanying declarations and exhibits, the Court finds that all property listed in the government's proposed Third Supplemental List, except property held by BCC (Misr) S.A.E.[1], is the property of the corporate defendants and that the property is located within the United States.

Accordingly, it is hereby

ORDERED that the property listed on the attached Third Supplemental List of Forfeited Property, which has been amended to exclude property of BCC (Misr) S.A.E., is forfeited to the United

---

[1] At this stage of the proceedings, the government has not satisfactorily established that BCC (Misr) S.A.E., which was a separately incorporated entity, was the alter ego of one or more of the corporate defendants. For example, the government has used equivocal language when describing the relationship between BCC Misr and the corporate defendants, stating that the subsidiary's operations were "somewhat enigmatic" and that the subsidiary "appears to have been most closely linked with BCCI (Overseas) Ltd." May 10, 1992 Declaration of Robert C. Dalton at 14. Indeed, the government has conceded that many of the subsidiary's transactions "may have been legitimate." Id. Should the government present additional evidence supporting its assertion that BCC Misr should be considered an alter ego of one or more of the corporate defendants, the Court will reconsider its conclusion.

1325015-000-9781

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

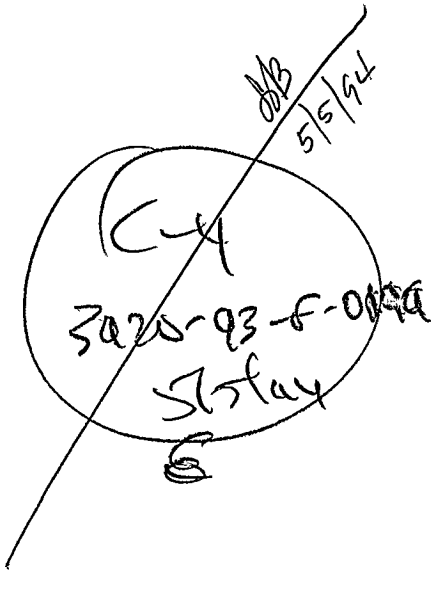
WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

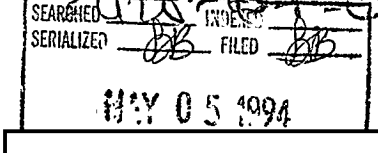
(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)



29B-WF-171994 Sub FS Sub-11-2
3920-93-F-0199



[redacted]

b6
b7C

Judge Sand for the transfer of the subject funds to the Marshals Service. It is

FURTHER ORDERED that in the case of any property transferred by this Court from First American Bank of New York to the Court Registry Investment System on March 18, 1993 that is listed on the Third Supplemental List, such funds shall be transferred to the Marshals Service forthwith, except that in the case of the funds transferred from the account held by BCC S.A. Espanola, only one-third of the funds in the Court Registry shall be transferred to the United States Marshals Service. It is

FURTHER ORDERED that in the case of the assets of BCC Canada, BCC Botswana Ltd., and BCC Zimbabwe Ltd., and the remaining two-thirds of the assets of BCC S.A. Espanola that were transferred from First American Bank of New York to the Court Registry Investment System on March 18, 1993, the government shall notify the liquidators of each entity, respectively, of its right to apply for the release of those funds, and such funds shall be released to the respective liquidators or their successors upon receipt by the Court of such application. It is

FURTHER ORDERED that the United States Marshals Service is directed to seize forthwith all other property listed on the Third Supplemental List that is not already in the possession of the Marshals Service. It is

FURTHER ORDERED that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title, or interest in all

125015-000-9783

property subject to this Order pursuant to 18 U.S.C. § 1963(l).

IT IS SO ORDERED.
August 19, 1993

JOYCE HENS GREEN
United States District Judge

1325015-000-9784

Third Supplemental List of Forfeited Property

Account No.	Description	Approx. Value
** American Express Bank, New York		
	BCC S.A. Espanola	$1,238,712.54
** Banco Bilbao Vizcaya, New York		
21018	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	58,000.00
** Bank of Tokyo Trust Co., New York		
01-75111-5	BCCI (Overseas) Dhaka, Bangladesh	1,464.86
** Bankers Trust Co., New York		
21001	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50
21003	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	18,894.05
** Subtotal **		54,781.55
** Capital Bank, Miami		
0902205153	BCC Credit & Finance (Uruguay) S.A.	375,728.87
0902205080	BCCI S.A. Sao Paulo (Brazil)	160,788.30
0920013341	BCCI S.A. Sao Paulo (Brazil)	12,178.60
0902205129	BCCI Trinidad & Tobago Merchant Bankers	197,499.20
** Subtotal **		746,194.97
** Chase Manhattan Bank, New York		
21041	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	13,527.00
** Citibank, New York		
20949	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	74,250.00
** Commercial Bank of Korea, New York		
21026	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	44,550.00
20964	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50
20989	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	38,115.00
** Subtotal **		118,552.50

1325015-000-9785

** Court Registry Investment System		
86052	BCC Emirates, Abu Dhabi	17,763,910.10
** Court-Appointed Liquidators of BCCI		
	1200 Reading Drive, Orlando, FL	300,000.00
	Canal Place Bankruptcy	3,015,813.13
	M/V Aeolian	95,121.88
** Subtotal **		3,414,077.28
** First American Bank of N.Y.		
10300015	BCC Emirates, Abu Dhabi	10,255.80
11801008	BCC Ghana Ltd.	470,526.70
11278002	BCC S.A. Espanola	7,190.00
21304009	BCCI (Overseas) Barbados	9,466.74
10884000	BCCI (Overseas) Bombay	43,650.66
21301002	BCCI (Overseas) Cameroon	325.00
11439008	BCCI (Overseas) Dhaka, Bangladesh	500.00
10001026	BCCI (Overseas) Freetown, Sierra Leone	1,747.44
20451002	BCCI (Overseas) Istanbul, Turkey	6,218.81
550547877	BCCI (Overseas) Kingston, Jamaica	165,965.63
11386001	BCCI (Overseas) Lahore, Pakistan	283,010.40
20413009	BCCI (Overseas) Paris	30,581.69
10753008	BCCI (Overseas) Sri Lanka	44,845.00
11901007	BCCI S.A. Sao Paulo (Brazil)	22,875.22
11900017	BCCI Trinidad & Tobago Merchant Bankers	5,047.40
00023012	Banque de Commerce et de Placements S.A.	827,396.35
10838007	National Bank of Oman	483,647.97
** Subtotal **		2,576,824.93
** First Interstate Bank Int'l, New York		
21046	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,169.75
** Foley & Lardner, Tampa, FL		
	Escrow Account	100,000.00
** Habib Bank Limited, New York		
21020	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	57,546.00
20298	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	20,927.00
** Subtotal **		78,473.00

1325015-000-9786

** Holland & Knight, Miami, FL		
	Escrow Account	220,500.00
** Janis Schuelke & Wechsler, Washington		
	Escrow Account	63,454.22
** Korea First Bank, New York Agency		
21017	BCCI (Overseas) Pakistan	40,000.00
	Foreign Deposit Bill Purchase	
** Metro Bank, Houston, TX		
MBD900158	BCCI (Overseas) Dhaka, Bangladesh	30,800.00
** Oppenheimer & Co., New York		
033-35263	North American Investment & Finance, Ltd U.S. Treasury notes	5,090,650.00
033-35263	North American Investment & Finance, Ltd	1,032,315.17
** Subtotal **		6,122,965.17
** Trustee for BCCI S.A. Los Angeles		
	Real property	13,894,680.00
	Coimbra Property, Kissimmee, FL Emerald Place Apts, Bermuda Dunes, CA Francor Property, Kissimmee, FL Int'l Industrial Park, Dade Co., FL	
	Cash Assets	34,379,641.99
	Loans Receivable	20,245,040.68
	Miscellaneous property	31,445.00
** Subtotal **		68,550,807.67
*** Total ***		$101,302,465.54

TOTAL P.09
1325015-000-9787

States.[2] It is

FURTHER ORDERED that in the case of any property on the Third Supplemental List that is under the control of the Court Appointed Fiduciaries, the Fiduciaries shall arrange for the orderly transfer of the property to the United States Marshals Service as soon as practicable. In the case of the real property located at 1200 Reading Drive, Orlando, Florida, the Marshals are directed to conduct an interlocutory sale of the property and to place the proceeds of the sale in the account used to hold all liquid funds pending the conclusion of the proceedings pursuant to 18 U.S.C. § 1963(l). It is

FURTHER ORDERED that in the case of any property on the Third Supplemental List that is described as being in the custody of the Court-Appointed Trustee for the surplus of the liquidation of BCCI Los Angeles, the property shall be managed by the Trustee and transferred to the Marshals in accordance with this Court's Order Appointing Trustee of March 5, 1993. It is

FURTHER ORDERED that in the case of property in the Court Registry Investment System in connection with the interpleader action pending before Judge Sand in the Southern District of New York, the government shall make the appropriate application to

---

[2] The proposed Third Supplemental List has also been amended to reduce the forfeitable proceeds from the Canal Place bankruptcy proceedings from $3,018,955.40 to $3,015,813.13. This modification was made at the request of the Court Appointed Fiduciaries for the corporate defendants and without objection by the United States to reflect costs incurred by the fiduciaries in connection with the bankruptcy proceedings. See The Court Appointed Fiduciaries' Notice of Additional Information Relevant to the May 10, 1993 Motion to Amend the Forfeiture Order.

1325015-000-9782

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 10
Page 4 ~ Duplicate;
Page 7 ~ Duplicate;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Duplicate;
Page 11 ~ Duplicate;
Page 12 ~ Duplicate;
Page 13 ~ Duplicate;
Page 14 ~ Duplicate;
Page 15 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
0203
0204
0205
0206
0207
0208
0210
0211
0212
0213
0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

Enclosed for FSPU are FD-635's for each of the above captioned seizure numbers (20 total). Each FD-635 may represent one or more seizures from the same or related financial institution. Also enclosed is a criminal Order of Forfeiture.

This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

Sub FS b6 Sub - b7C

12/2/93 29B-WF-171994

Searched Indexed Filed 12/2/93 [redacted]

Rec'd 12/2/93

1325015-000-9505

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

b6
b7C

Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

DB 5/5/94
C-4
3920-93F-0198
5/5/94

3920-93-F-0198-
29B-WF-171994 Sub FS Sub-10-2

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 05 1994
FBI—WASH METRO FIELD OFFICE

1325015-000-9518

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

b6
b7C

117. Sharing ☐ Yes ☐ No

11/29/93

118. Award Recommended

1325015-000-9508

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-F198	29B-WF-171994	WMFO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use ☐ Yes ☐ No
FBI	$ 54,781.55	☐ Yes ☒ No

16. Forfeiture Deferred ☐ Yes ☐ No	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	$54,781.55 Bankers Trust Co. New York

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date ☐ Yes ☐ No
[redacted]	5	b6 b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-9507

FBI/DOJ

ADIC

Date 11/29/93

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seized Property

To: Director, FBI

From: ADIC, WMFO (29B-WF-171994)

Entry (Check One)
[X] New Cases
[ ] Change or Add

Attention: Administrative Services Division/PPMS
Forfeiture/Seized Property Group

Subject: 3920-93-F-0195
0196
0197
0198
0199
0200
0201
0202
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0210
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0212
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0214
0209

U.S. VS BCCI
HIDDEN INTERESTS;
MAJOR CASE 38;
FIF;FAG;
OO: WMFO

This matter is commonly referred to as the BCCI case.

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This is the third criminal Order of Forfeiture entered by the Honorable JOYCE HENS GREEN, United States District Judge, District of Columbia, condemning and forfeiting properties of the

20-FBIHQ/FSPU, Attn: [redacted]
21-WMFO
(1-29B-WF-171994 SUB FS)
(1 each to 3920-93-F-0195 through 0214)

EPG:amm
(41)

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12/2/93
Sub FS
29B-WF-171994 Sub-1-1
O+V
Sub-1
Serialized
Indexed
Filed
WDC
12/2

[redacted]

b6
b7C

1325015-000-8075

Bank of Credit and Commerce International (BCCI) and of the International Credit and Investment Company (Investments). This Order was entered 8/19/93.

The total value of the Order is $101,135,749.15.

DOJ/TA [redacted] (DOJ ASSET FORFEITURE OFFICE LIAISON WITH FBI/LFU), is the BCCI seizure/forfeiture contact at DOJ. b6 b7C

Seizure Dates: WMFO/FAST lists 8/19/93 (the date of Judge Green's Order) as the date of seizure in each of the attached FD-365's. This date may or may not correspond with actual seizure dates. Also, WMFO/FAST does not have addresses for the entities from which the accounts were seized. This information can be obtained from DOJ, if needed.

ADMINISTRATIVE:

For information of FSPU, FAST only recently learned of the above criminal Order of Forfeiture from the criminal case agent, SA [redacted] (NVMRA). FAST's responsibility in this matter has been limited to one of simply informing FSPU that Orders have been entered and seizures have occurred. b6 b7C

FAST has not been kept apprised by DOJ of any claims, Petitions, or objections that may have been filed by potential claimants in this case. The BCCI criminal case has been handled entirely by DOJ with the assistance of WMFO SAs.

Questions concerning the above can be directed to T/A [redacted] 514-1263, or WMFO FAST SA [redacted] ext. 7118. b6 b7C

FD-635 (Rev. 5-15-87)

Record of Seized Property

Federal Bureau of Investigation

1. Seizure Number	2. Seizure Office File Number	3. Office of Origin	4. 00 File Number	5. Primary Violation Code	6. Secondary Violation Code
3920-93-F-213	29B-WF-171994	WMHO		E	

7. Date 635 Prepared	8. Case Caption
11/16/93	BCCI HIDDEN INTERESTS; FIF; FAG

9. Associated Action Code	10. Administrative or Judicial	11. Property Code
C	J	D

12. Joint Agency

13. Processing Agency	14. Appraised Value	15. Official Use
FBI	$ 30,800.00	☐ Yes ☒ No

16. Forfeiture Deferred	17. Date Claimant Notified of Disposition	18. Date U.S. Marshals Notified
☐ Yes ☐ No		

19. Agency

FBI

20. VIN/Serial Number	21. Year	22. Make	23. Model	24. Style	25. Color

26. Condition Code	27. Cylinders	28. Mileage	29. License Number/ State/Year	30. Equipment/Accessories

31. Repairs Needed	32. Description of Other Property
	METRO BANK HOUSTON TX $ 30,800.00

33. Case Agent	34. Seizure Method	35. Subject in Custody/Date
	5	☐ Yes ☐ No

b6
b7C

36. Date Seized	37. Place Seized - Street Address	38. City	39. State	40. ZIP
8/19/93	WDC			

41. Date Adopted	42. Agency

43. Place Adopted - Street Address	44. City	45. State	46. ZIP

47. Seized From - Name	48. Street Address	49. City	50. State	51. ZIP

52. Registered To - Name	53. Street Address	54. City	55. State	56. ZIP

57. Attorney's Name	58. Street Address	59. City	60. State	61. ZIP

1325015-000-8077

FBI/DOJ

62. Amount of Lien	63. Name/Title of Lienor			
64. Street Address		65. City	66. State	67. ZIP
68. Quick Release	69. Expenses Reimbursed		70. Name/Title	
71. Street Address		72. City	73. State	74. ZIP

75. Storage Facility	76. Street Address	77. City	78. State	79. ZIP	80. Date Stored

81. Seizure Expense	82. Transportation Expense	83. Storage Expense Per Day	84. Repair Expense	85. Appraisal Expense

86. Name/ID Number of Prisoner	87. Name of Institution		
88. Street Address	89. City	90. State	91. ZIP
92. Name/ID Number of Prisoner	93. Name of Institution		
94. Street Address	95. City	96. State	97. ZIP
98. Name/ID Number of Prisoner	99. Name of Institution		
100. Street Address	101. City	102. State	103. ZIP

104. Name of Additional Individual Requiring Notice	105. Street Address	106. City	107. State	108. ZIP
109. Name of Additional Individual Requiring Notice	110. Street Address	111. City	112. State	113. ZIP

114. Facts and Circumstances Surrounding Seizure Attached With Documentation

115. FA Signature	116. PLA Signature/Date	117. Sharing ☐ Yes ☐ No
	11/29/93	118. Award Recommended

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1325015-000-8078

3920-93-F-0195

ASSET FORFEITURE OFFICE
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C.

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FROM: [redacted]

TO: [redacted]
FBI . WASH. FLD. OFC.

FAX NUMBER: 324-6426

DATE: 9/13/93

NUMBER OF PAGES INCLUDING THIS SHEET: 9

NAME OF PERSON TO CONTACT UPON RECEIPT:

TELEPHONE NUMBER OF PERSON TO CONTACT UPON RECEIPT:

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SPECIAL INSTRUCTIONS: [redacted] - this is the recent BCCI forfeiture order, for info.

One note: the court deleted BCC Misr from the attached Exhibit A (note the gap among the first American Bank of New York entries) — but did not correct the arithmetic. Actual amount forfeited now $101,135,749.15

288B-WF-171994 Sub FS

SEARCHED INDEXED
SERIALIZED FILED
SEP 13 1993
FBI - WASH. FIELD OFFICE

1325015-000-8079

OUR FAX NUMBER IS: FTS 368-5522 OR COMMERCIAL 202 514-5522

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

BCCI HOLDINGS (LUXEMBOURG), S.A.,
BANK OF CREDIT AND COMMERCE
INTERNATIONAL, S.A.,
BANK OF CREDIT AND COMMERCE
INTERNATIONAL (OVERSEAS) LIMITED,
INTERNATIONAL CREDIT AND INVESTMENT
COMPANY (OVERSEAS) LIMITED,

Defendants.

Criminal No. 91-0655 (JHG)

FILED

AUG 19 1993

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

This matter came before the Court on the motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("January 24 Order") to include additional property on the schedule of property subject to forfeiture. The January 24 Order provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the January 24 Order contains a list of specific assets that were forfeited on January 24, 1992 and were to be seized by the United States Marshals Service on that date.

On January 31, 1992, the Court amended the January 24 Order to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the January 24 Order at various times to include additional assets, including property set forth on a Second Supplemental List of Forfeited Property. See Order of

Memorandum

To : ADIC, WMFO (29B-WF-171994)(P) Date 5/4/94

From : SA [redacted] FAST

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Subject: FORFEITURE MATTER
BCCI SEIZURE SUB-FILES;
OO: WMFO

WMFO FAST acts as a paper processor only insofar as reporting criminal forfeitures to FBIHQ/FSPU. All seizures result from criminal orders of forfeiture. Therefore, there appears to be no need to keep our seizure sub-files open. Please close the following BCCI related seizure files:

29B-WF-171994 SUB FS
SEIZURE FILES 3920-93-F-0195 THROUGH 0203
3920-93-F-0205 THROUGH 0215

(Note: Seizure file 3920-93-F-0204 is assigned to a non-BCCI related seizure.)

21-WMFO
(1-29B-WF-171994 SUB FS)
(1-EACH SEIZURE FILE AS CAPTIONED)

EPG:epg
(21)

5/5/94
C-4
3920-93-F-0213
5/5/94

29B-WF-171994 Sub FS Sub-1-2
3920-93-F-0213

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAY 0 [illegible] 1994
FBI — WASHINGTON METRO FIELD OFFICE

1325015-000-8088

States.[2] It is

FURTHER ORDERED that in the case of any property on the Third Supplemental List that is under the control of the Court Appointed Fiduciaries, the Fiduciaries shall arrange for the orderly transfer of the property to the United States Marshals Service as soon as practicable. In the case of the real property located at 1200 Reading Drive, Orlando, Florida, the Marshals are directed to conduct an interlocutory sale of the property and to place the proceeds of the sale in the account used to hold all liquid funds pending the conclusion of the proceedings pursuant to 18 U.S.C. § 1963(l). It is

FURTHER ORDERED that in the case of any property on the Third Supplemental List that is described as being in the custody of the Court-Appointed Trustee for the surplus of the liquidation of BCCI Los Angeles, the property shall be managed by the Trustee and transferred to the Marshals in accordance with this Court's Order Appointing Trustee of March 5, 1993. It is

FURTHER ORDERED that in the case of property in the Court Registry Investment System in connection with the interpleader action pending before Judge Sand in the Southern District of New York, the government shall make the appropriate application to

---

[2] The proposed Third Supplemental List has also been amended to reduce the forfeitable proceeds from the Canal Place bankruptcy proceedings from $3,018,955.40 to $3,015,813.13. This modification was made at the request of the Court Appointed Fiduciaries for the corporate defendants and without objection by the United States to reflect costs incurred by the fiduciaries in connection with the bankruptcy proceedings. See The Court Appointed Fiduciaries' Notice of Additional Information Relevant to the May 10, 1993 Motion to Amend the Forfeiture Order.

1325015-000-8082

Judge Sand for the transfer of the subject funds to the Marshals Service. It is

FURTHER ORDERED that in the case of any property transferred by this Court from First American Bank of New York to the Court Registry Investment System on March 18, 1993 that is listed on the Third Supplemental List, such funds shall be transferred to the Marshals Service forthwith, except that in the case of the funds transferred from the account held by BCC S.A. Espanola, only one-third of the funds in the Court Registry shall be transferred to the United States Marshals Service. It is

FURTHER ORDERED that in the case of the assets of BCC Canada, BCC Botswana Ltd., and BCC Zimbabwe Ltd., and the remaining two-thirds of the assets of BCC S.A. Espanola that were transferred from First American Bank of New York to the Court Registry Investment System on March 18, 1993, the government shall notify the liquidators of each entity, respectively, of its right to apply for the release of those funds, and such funds shall be released to the respective liquidators or their successors upon receipt by the Court of such application. It is

FURTHER ORDERED that the United States Marshals Service is directed to seize forthwith all other property listed on the Third Supplemental List that is not already in the possession of the Marshals Service. It is

FURTHER ORDERED that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title, or interest in all

1325015-000-8083

property subject to this Order pursuant to 18 U.S.C. § 1963(l).

IT IS SO ORDERED.
August 19, 1993

JOYCE HENS GREEN
United States District Judge

1325015-000-8084

Third Supplemental List of Forfeited Property

Account No.	Description	Approx. Value
**	American Express Bank, New York	
	BCC S.A. Espanola	$1,238,712.54
**	Banco Bilbao Vizcaya, New York	
21018	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	58,000.00
**	Bank of Tokyo Trust Co., New York	
01-75111-5	BCCI (Overseas) Dhaka, Bangladesh	1,464.86
**	Bankers Trust Co., New York	
21001	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50
21003	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	18,894.05
** Subtotal **		54,781.55
**	Capital Bank, Miami	
0902205153	BCC Credit & Finance (Uruguay) S.A.	375,728.87
0902205080	BCCI S.A. Sao Paulo (Brazil)	160,788.30
0920013341	BCCI S.A. Sao Paulo (Brazil)	12,178.60
0902205129	BCCI Trinidad & Tobago Merchant Bankers	197,499.20
** Subtotal **		746,194.97
**	Chase Manhattan Bank, New York	
21041	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	13,527.00
**	Citibank, New York	
20949	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	74,250.00
**	Commercial Bank of Korea, New York	
21026	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	44,550.00
20964	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,887.50
20989	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	38,115.00
** Subtotal **		118,552.50

** Court Registry Investment System		
86052	BCC Emirates, Abu Dhabi	17,763,910.10
** Court-Appointed Liquidators of BCCI		
	1200 Reading Drive, Orlando, FL	300,000.00
	Canal Place Bankruptcy	3,015,813.13
	M/V Aeolian	95,121.88
** Subtotal **		3,414,077.28
** First American Bank of N.Y.		
10300015	BCC Emirates, Abu Dhabi	10,255.80
11801008	BCC Ghana Ltd.	470,526.70
11278002	BCC S.A. Espanola	7,190.00
21304009	BCCI (Overseas) Barbados	9,466.74
10884000	BCCI (Overseas) Bombay	43,650.66
21301002	BCCI (Overseas) Cameroon	325.00
11439008	BCCI (Overseas) Dhaka, Bangladesh	500.00
10001026	BCCI (Overseas) Freetown, Sierra Leone	1,747.44
20451002	BCCI (Overseas) Istanbul, Turkey	6,218.81
550547877	BCCI (Overseas) Kingston, Jamaica	165,965.63
11386001	BCCI (Overseas) Lahore, Pakistan	283,010.40
20413009	BCCI (Overseas) Paris	30,581.69
10753008	BCCI (Overseas) Sri Lanka	44,845.00
11901007	BCCI S.A. Sao Paulo (Brazil)	22,875.22
11900017	BCCI Trinidad & Tobago Merchant Bankers	5,047.40
00023012	Banque de Commerce et de Placements S.A.	827,396.35
10838007	National Bank of Oman	483,647.97
** Subtotal **		2,576,824.93
** First Interstate Bank Int'l, New York		
21046	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	35,169.75
** Foley & Lardner, Tampa, FL		
	Escrow Account	100,000.00
** Habib Bank Limited, New York		
21020	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	57,546.00
20298	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	20,927.00
** Subtotal **		78,473.00

1325015-000-8086

** Holland & Knight, Miami, FL		
	Escrow Account	220,500.00
** Janis Schuelke & Wechsler, Washington		
	Escrow Account	63,454.22
** Korea First Bank, New York Agency		
21017	BCCI (Overseas) Pakistan Foreign Deposit Bill Purchase	40,000.00
** Metro Bank, Houston, TX		
MBD900158	BCCI (Overseas) Dhaka, Bangladesh	30,800.00
** Oppenheimer & Co., New York		
033-35263	North American Investment & Finance, Ltd U.S. Treasury notes	5,090,650.00
033-35263	North American Investment & Finance, Ltd	1,032,315.17
** Subtotal **		6,122,965.17
** Trustee for BCCI S.A. Los Angeles		
	Real property	13,894,680.00
	Coimbra Property, Kissimmee, FL Emerald Place Apts, Bermuda Dunes, CA Francor Property, Kissimmee, FL Int'l Industrial Park, Dade Co., FL	
	Cash Assets	34,379,641.99
	Loans Receivable	20,245,040.68
	Miscellaneous property	31,445.00
** Subtotal **		68,550,807.67
*** Total ***		$101,302,465.54

Forfeiture, July 29, 1992.

The government has now identified additional assets of the corporate defendants which it believes are forfeitable to the United States under the January 24 Order. These assets were described in a proposed Third Supplemental List of Forfeited Property which was attached as Exhibit A to the government's motion.

For the reasons set forth in the government's motion and the accompanying declarations and exhibits, the Court finds that all property listed in the government's proposed Third Supplemental List, except property held by BCC (Misr) S.A.E.[1], is the property of the corporate defendants and that the property is located within the United States.

Accordingly, it is hereby

ORDERED that the property listed on the attached Third Supplemental List of Forfeited Property, which has been amended to exclude property of BCC (Misr) S.A.E., is forfeited to the United

---

[1] At this stage of the proceedings, the government has not satisfactorily established that BCC (Misr) S.A.E., which was a separately incorporated entity, was the alter ego of one or more of the corporate defendants. For example, the government has used equivocal language when describing the relationship between BCC Misr and the corporate defendants, stating that the subsidiary's operations were "somewhat enigmatic" and that the subsidiary "appears to have been most closely linked with BCCI (Overseas) Ltd." May 10, 1992 Declaration of Robert C. Dalton at 14. Indeed, the government has conceded that many of the subsidiary's transactions "may have been legitimate." Id. Should the government present additional evidence supporting its assertion that BCC Misr should be considered an alter ego of one or more of the corporate defendants, the Court will reconsider its conclusion.

1325015-000-8081

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 16
Page 46 ~ Referral/Consult;
Page 47 ~ Referral/Consult;
Page 48 ~ Referral/Consult;
Page 49 ~ Referral/Consult;
Page 50 ~ Referral/Consult;
Page 51 ~ Referral/Consult;
Page 52 ~ Referral/Consult;
Page 53 ~ Referral/Consult;
Page 54 ~ Referral/Consult;
Page 55 ~ Referral/Consult;
Page 56 ~ Referral/Consult;
Page 57 ~ Referral/Consult;
Page 58 ~ Referral/Consult;
Page 59 ~ Referral/Consult;
Page 60 ~ Referral/Consult;
Page 61 ~ Referral/Consult;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/11/1999

To: Washington Field

From: Washington Field
C-1 (WFO Forfe[illegible])
Contact: SSA [redacted] Ext. 2298 b6 b7C

Approved By: [redacted]

Drafted By: [redacted]:llt

Case ID #: 29B-WF-171994
3920-97-F-0126

Title: U.S. v. $1,750,000.00 (BCCI Assets)

Synopsis: CLOSING COMMUNICATION

Details: The purpose of this communication is to request that the above referenced seizure file be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture. The instant assets are included and identified in the fifth Order of Forfeiture dated 9/20/96.

CC: 1-WFO; 29B-WF-171994 (FF-8).

♦♦

[redacted] Thank you
4 Attorney copies of
for BCCI Orders for forfeiture
EO 3/16/99 3/16/99 b6 b7C

Seizure Log N/A
Foims (PFA) N/A
CATS N/A
1325015-000-5895

[redacted] b6 b7C

29B-WF-171994 (FF-8)

199 0711.ec

29B-WF-171994-FF8 (2)

3920-97-F-0126

SEARCHED ____ INDEXED ____
SERIALIZED DA FILED DA
APR 16 1997
FBI - Wash. METRO FIELD OFFICE

[redacted]
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

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b7C

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. [redacted] **DATE:** Apr. 10, 1997

b6
b7C

FIRM: Federal Bureau of Investigation **FAX NO.:** (202) 324-6426

FROM: [redacted] **NO. OF PAGES:** three (3)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Attached, please find a copy of the wire transfer confirmation and the Funds Transfer Schedule sent to the U.S. Marshal. The Summary of Cumulative Distributions to the U.S. Marshal as of April 8, 1997 will be faxed to you shortly.

1325015-000-5855

[redacted]

04/10/97 16:15 ☎213 622 2681 001/003

b6
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WIRE INQUIRY DETAIL

DEBIT ACCOUNT [redacted] WIP LINE REASON [redacted] ACCT NO [redacted] b6 b7C

NAME [redacted] TTEE

725 S FIGUEROA ST

SUITE 2260

LOS ANGELES CA 900175422

A CUSTOMER PAID WITH CASH
B CUSTOMER PAID WITH CHECK
C FUNDS IN
D NON-CUSTOMER

MAIL ADVICE? Y (Y/N)

DOLLAR AMOUNT $ 1,750,000.00

BENEFICIARY NAME US TREASURY ACCT 00008154

BANK ABA/BIC 021030004

BANK NAME US TREASURY FRB NEW YORK

ADDRESS SORT CODE

CITY NEW YORK

STATE NY COUNTRY

INFO FOR BENEFICIARY REF.NO. CRIMINAL NO. 91-0655 JHG

INFO FOR BENEFICIARY BANK US MARSHAL DISTRICT OFFICE SDNU

ATTN. [redacted] b6 b7C

...MORE

1325015-000-5856

[redacted] b6 b7C

[redacted] TRUSTEE

RECORD OF SURPLUS FUNDS TRANSFERRED TO U.S. MARSHAL

As of April 8, 1997

(Amount in Dollars)

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DATE TRANSFERRED	AMOUNT TRANSFERRED
26-Aug-93	35,964,405.69
22-Oct-93	1,000,000.00
22-Dec-93	250,000.00
18-Feb-94	4,250,000.00
19-Apr-94	150,000.00
17-Jun-94	1,300,000.00
16-Aug-94	8,850,000.00
14-Oct-94	200,000.00
13-Dec-94	3,035,594.31
13-Feb-95	17,000,000.00
14-Apr-95	1,500,000.00
13-Jun-95	10,500,000.00
14-Aug-95	2,000,000.00
13-Oct-95	1,000,000.00
12-Dec-95	1,000,000.00
12-Feb-96	2,200,000.00
12-Apr-96	1,800,000.00
11-Jun-96	3,000,000.00
12-Aug-96	1,000,000.00
11-Oct-96	60,000,000.00
10-Dec-96	650,000.00
7-Feb-97	1,100,000.00
8-Apr-97	1,750,000.00
TOTAL	**159,500,000.00**

1325015-000-5857

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(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 4/14/97

To: Director, FBI **Attn:** Finance Division

From: ADIC, Washington Field Office
C-1/FAST

Approved By: SSA [redacted] b6 b7C

Drafted By: SA Roth Robert M:jmr

File Number(s): 29B-WF-171994 SUB FF-8 (Pending)
3920-97-F-0126

Title: U.S. v. $1,750,000.00 IN UNITED STATES CURRENCY

Entry (Check One): [X] New Case [ ] Change or Add

[X] CATS Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement

FOIMS

[redacted] SEIZURE LOG b6 b7C

[X] Other Subsequent Materials:
FACSIMILE DATED 4/10/97 FROM [redacted] TRUSTEE

1- Bureau, FSPU (ATTN: [redacted])
1- WFO (3920-97-F-0126)
*ATTACHMENTS

29B-WF-171994 (-3)
3920-97-F-0126 SUB FF b6 b7C

SEARCHED INDEXED
SERIALIZED DA FILED DA
APR 16 1997
FBI - WASH. METRO FIELD OFFICE

ROTH

1325015-000-5858

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920-97-F-0126	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:
	C-9

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
4/8/97	Other	10/04/88	

(15) Seizing Agent:	(16) Phone Number:
	(202)-324-9073

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b7C

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized:	(19) City:	(20) State:
Not Available	Not Available	DC

(21) Seizure: Judicial	(22) Processing: District	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1956

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
$1.75 million	Y		Cash/Currency	01	Criminal

(31) Asset Description: $1,750,000.00

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

97 5B

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:
USA		0.00

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI Holdings		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: Not Available
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name: DEPARTMENT OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From: N		(136) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(137) Address: Not Available		(138) City: Washington		
(139) State: DC	(140) Zip Code: 00000	(141) Country: USA	(142) NCIC Code: DOJ	(143) Sharing Possible: N
(144) Contact Name:			(145) Contact Phone Number:	

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b7C

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI Ho[redacted]gs	[redacted]		
(95) Address: Not Available		Owner	
(96) City: Not Available	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	Lienholder	
(100) Contact Name (if business): Not Available	(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated? N	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):	Victim	
(109) Institution Address:	Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:
(114) Represented by Counsel? N	(115) Attorney's Name (if any):
(116) Firm's Name:	(117) Attorney's Phone Number:
(118) Attorney's Address:
(119) City:	(120) State:	(121) Zip Code:	(122) Country:

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:	Owner	
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	Lienholder	
(100) Contact Name (if business):	(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):	Victim	
(109) Institution Address:	Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:
(114) Represented by Counsel?	(115) Attorney's Name (if any):
(116) Firm's Name:	(117) Attorney's Phone Number:
(118) Attorney's Address:
(119) City:	(120) State:	(121) Zip Code:	(122) Country:

Seizure Form

Asset ID: <A> | Date: <B>

Asset Description: <C>

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
	Federal Reserve Bank, New York	4/8/97

(149) Storage Facility Address:

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
New York	NY		$	

PREPARED BY

(154) Signature:	(155) Date:
	4-15-97
(156) Prepared By: Bob Roth	(157) Title: SA

ED BY

(158) Signature:	(159) Date: 4/15/97
(160) Approved	(161) Title: Supervisory Special Agent

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b7C

Probable Cause

<D> SEE ATTACHED

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from five criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. [redacted] Trustee has been appointed [redacted] b6 b7C listed in the five criminal BCCI forfeiture orders. On 04/08/97, [redacted] completed a $1,750,000.00 (one million seven hundred & fifty thousand dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fifth order of forfeiture.

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"). Amjad [redacted] b6 b7C of BCCI), and Capcom Financial Services, LTD. with [redacted] The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989.

[redacted] b7E

On January 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, BCCI) and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property

located in the United States, including without limitation, real property and all tangible and intangible personal property.

Four additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted] b6 b7C [redacted] Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

[redacted]
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

b6
b7C

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. [redacted] b6 b7C

DATE: Apr. 14, 1997

FIRM: Federal Bureau of Investigation

FAX NO.: (202) 324-6426

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Attached, please find a copy of the "Summary of Cumulative Distributions to the U.S. Marshal" as of April 8, 1997.

(4)
3920 - 97-F-0126
298-WF-171941 (FF-8)
SERIALIZED INDEXED
SEARCHED FILED
APR 2 2 1997
FBI - WASH. METRO FIELD OFFICE

1325015-000-5865

[redacted] 04/14/97 12:41 ☎213 622 2681 001/002 b6 b7C

002/002

[redacted] TRUSTEE

SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL

As of April 8, 1997

Forfeiture Order Date	19-Aug-93	21-Dec-94	20-Sep-96	21-Dec-94	03-Nov-95	
State	California	California	California	New York	New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	0	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	0	31,445
Other	0	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	0	74,519,724	164,149,037	310,867,141
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	28,867,634	0	0	801,082	3,583,525	33,252,241
Real Property	24,033,346	0	0	2,073,987	1,947,542	28,054,875
Miscellaneous Property	109,094	0	0	0	2,093	111,187
Other	124,228	0	0	863,342	199,276	1,186,846
Total Asset Conversions	87,513,945	3,647,571	9,512,823	23,738,410	54,732,437	179,145,186
Total Revenue Collection (1)	6,148,771	0	0	824,725	3,096,374	10,069,869
Total Sources of Funds	93,662,715	3,647,571	9,512,823	24,563,135	57,828,810	189,215,055
Uses of Funds						
Seller Financing and Cash Disbursements	(12,363,558)	0	0	(8,582,325)	(4,669,595)	(25,615,478)
Operating Account Balance	(764,720)	0	0	(933,339)	238,482	(1,459,577)
Special Reserve Account (2)	0	0	0	(137,303)	(2,502,697)	(2,640,000)
Surplus Balance	0	0	0	0	0	0
Total Uses of Funds	(13,128,278)	0	0	(9,652,966)	(6,933,810)	(29,715,055)
Net Remittances	80,534,437	3,647,571	9,512,823	14,910,168	50,895,000	159,500,000
Present Book Value Per Budget						
Cash	596,090	0	0	1,070,641	2,432,846	4,099,577
Loans	3,249,438	0	0	5,203,146	1,443,777	9,896,360
Real Property	813,988	0	0	775,000	13,387,288	14,976,276
Miscellaneous Property	0	0	0	0	0	0
Other Assets	5,668	0	0	17,370	2,744,323	2,767,361
Total Liabilities	(775,661)	0	0	(335,370)	(2,640,000)	(3,751,032)
Total PBV Per Budget	3,889,522	0	0	6,730,787	17,368,233	27,988,543

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $9,086,014.19.*

(2) Special reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and necessary capital improvements, and for New York Claims.

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04/14/97 12:41 213 622 2681

1325015-000-5866

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(5)

29B-WF-171994 Sub FF-8

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APR 29 1997

FBI - WASH. METRO FIELD OFFICE

RMR Roth

Seizure Form

ID: 97-FBI-001317 | Date: 04/24/97 15:09:59 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920970126	N

(7) Case Number: 29B-WF-171994

(8) Case Name: HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:

(10) Case Agent: b6 b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
04/08/97	Other	10/04/88	

(15) Seizing Agent:

(16) Phone Number: 202-324-9073 b6 b7C

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized: Not Available

(19) City: Not Available

(20) State: DC

(21) Judicial Seizure:	(22) District Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1956

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
1750000.00	Y		Cash/Currency	01	Criminal

(31) Asset Description: $1,750,000.00 in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

VEHICLE

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:
USA		0.00

Seizure Form

Ass[redacted] 97-FBI-001317 | Date/T[redacted] 04/24/97 15:09:59

Asset Description: $1,750,000.00 in U.S. Currency

(92) Name: BCCI Holdings			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address: Not Available				Owner	
(96) City: Not Available	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	Lienholder	
(100) Contact Name (if business): Not Available			(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated? N	(107) Prisoner ID:			Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:		
(114) Represented by Counsel? N	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

(92) Name:			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:				Owner	
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	Lienholder	
(100) Contact Name (if business):			(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:			Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:		
(114) Represented by Counsel?	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

Seizure Form

Ass[redacted] 97-FBI-001317 | Date/T[redacted] 04/24/97 15:09:59

Asset Description: $1,750,000.00 in U.S. Currency

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	U.S. vs. BCCI HOLDING		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: N/A
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name:			(134) Agency Case ID:	
DEPARTMENT OF JUSTICE				
(135) Adopted From? N			(136) Agency Type (Federal, State, Local, -or- Foreign): Federal	
(137) Address: Not Available			(138) City: Washington	
(139) State: DC	(140) Zip Code: 00000	(141) Country: USA	(142) NCIC Code: DOJ	(143) Sharing Possible? Y
(144) Contact Name: Stef Cassella			(145) Contact Phone Number: N/A	
(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	
(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Ass[redacted] 97-FBI-001317	Date/T[redacted] 04/24/97 15:09:59
Asset Description: $1,750,000.00 in U.S. Currency	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	Federal Reserve Bank, New York	04/08/97

(149) Storage Facility Address:
Not Available

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: Per:
New York	NY	00000	

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date: 04/08/97
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date: 04/15/97
(164) Prepared By: Bob Roth	(165) Title: SA

APPROVED BY

(166) Signature:	(167) Date: 04/15/97
(168) Approved By:	(169) Title: Supervisory Special Agent

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Asset ID: 97-FBI-001317
Asset Description: $1,750,000.00 in U.S. Currency

Probable Cause

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from five criminal orders of forfeiture in U.S. v Hidden Interests: Major case number 38 [redacted] Trustee has been appointed to [redacted] five criminal BCCI forfeiture orders. On 04/08/97 [redacted] completed a $1,750,000.00 (one million seven hundred & fifty thousand dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fifth order of forfeiture.

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See file for Complete Facts and Circumstances.

Asset ID: 97-FBI-001317
Asset Description: $1,750,000.00 in U.S. Currency

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	04/18/97
Headquarters Receipt Date:	04/15/97	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920970126
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			

Automated Serial Permanent Charge-Out
FD-5a (1-5-94)

Date: 09/30/97 Time: 15:05

Case ID: 29B-WF-171994-FF8 Serial: 6

Description of Document:

Type : OTHER
Date : 08/29/97
To : WASHINGTON FIELD
From : WASHINGTON FIELD
Topic: CERTIFIED MAIL P. 961362793 (97-F-186)

Reason for Permanent Charge-Out:

serialized into the wrong file

Employee: [redacted] b6 b7C

11/18/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 12/12/97. b6 b7C

3920-95-F-058 - 60
3920-95-F-097
3920-95-F-102
3920-96-F-023
3920-96-F-024
3920-96-F-097
3920-96-F-134
3920-96-F-186
3920-96-F-195
3920-97-F-042
3920-97-F-107
3920-97-F-117
3920-97-F-126
3920-97-F-127
3920-97-F-153

b6 b7C

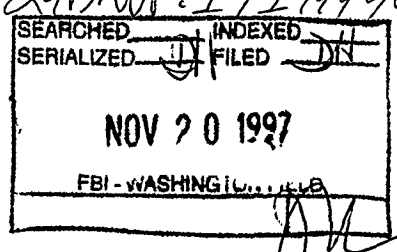
Thank you,

[redacted]

P.S. [redacted] I'm sorry if any of these aren't yours!!! Please have the appropriate person check on the status of each. Thank you in advance! b6 b7C

(7)

3920-97-F-126
29B-WF-177994 SUB M 6



[redacted] b6 b7C

1325015-000-5875 ROTH

Precedence: ROUTINE **Date:** 11/28/1997

To: Director, FBI **Attn:** Administrative Services Division/
Forfeiture/Seized Property Unit

From: ADIC, Washington Field Office
Squad C-1/FAST
Contact: SA Robert Roth, Ext. 2300

Approved By: A/SSA [redacted] b6 b7C

Drafted By: Roth Robert M:lh

File Number(s): **29B-WF-171994;**
273B-WF-207603;
273B-WF-207606;
[redacted] b3 b7E
273B-WF-207039;
29C-WF-205558;
196C-WF-201171

Title: **FORFEITURE MATTERS - STATUS UPDATE**

Details: Reference FSPU communication dated 11/18/97 requesting status updates for the following seizures:

3920-97-F-0076 -- Awaiting ruling on Comdisco petition (WFO\FAST sent petition investigation report to USAO-EDVA on 4/4/97).

3920-97-F-0086 -- [redacted] In Forma [redacted] request was accepted by FAST and forwarded to the USAO-DC on 5/28/97. Civil judicial forfeiture proceedings are pending. b6 b7C

3920-97-F-0089 -- [redacted] In Forma [redacted] request was accepted by FAST. FAST forwarded the Civil Forfeiture Report to the USAO-DC on 8/5/97.

3920-97-F-0090 -- Claim of ownership and cost bond filed by [redacted] on 5/22/97. FAST forwarded Civil Forfeiture Report to USAO-DC on 6/23/97. Judicial proceedings are pending.

3920-97-F-0100 - [redacted] jewelry forfeited pursuant to Final Decree of Forfeiture dated 7/24/97. Items were sold by USMS for $3,300.00. FAST will forward Sale Report to FSPU. This matter will now be closed out at WFO.

CC: 1-BUREAU, FSPU (ATTN: [redacted] b6 b7C
8-WFO
(29B-WF-171994 SUB FF SUB 8)
(273B-WF-207603)
(273B-WF-207606)
[redacted] b3 b7E
(273B-WF-207039)
(196C-WF-201171 SUB FF SUB 1)
(196C-WF-201171 SUB FF SUB 4)
(29C-WF-205558 SUB FF SUB 1)

8

CONTINUED -- OVER

29B-WF-171994 SUB 8
3920-97-F-0126

SEARCHED INDEXED
SERIALIZED FILED
NOV 2 8 1997
FBI - WASHINGTON FIELD

RR ROTH

LHQ73351. EC

1325015-000-5876

FEDERAL BUREAU OF INVESTIGATION

3920-97-F-0115 -- Vehicle forfeited pursuant to Decree of Forfeiture dated 11/4/97. FAST will forward copy of Decree to FSPU. This vehicle will be turned over to the Metropolitan Police Department in accordance with equitable sharing.

3920-97-F-0122 -- Claim of ownership and cost bond filed by [redacted] on 5/22/97. FAST forwarded Civil Forfeiture Report to USAO-DC on 6/23/97. Judicial proceedings are pending. b6 b7C

3920-97-F-0126 -- BCCI matter. FAST continues to await receipt of Final Order of Forfeiture.

Questions concerning the above may be directed to SA Robert M. Roth at 278-2300.

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/27/1998

To: FINANCE DIVISION **Attn:** [redacted] b6 b7C

From: WFO Forfeiture Team
Squad C-1
Contact: SA Robert M. Roth, x2300

Approved By: [redacted] b6 b7C

Drafted By: Roth Robert M.:jag

Case ID #: 66-WF-C206291

Title: FORFEITURE MATTER

Synopsis: JUDICIAL FORFEITURE STATUS UPDATE

Details: Per communication dated May 29, 1998, from Forfeiture Examiner [redacted] of the Forfeiture and Seized Property Unit (FSPU), the following status update is provided relative pending jucicial forfeiture actions assigned to WFO Special Agent Robert M. Roth. b6 b7C

SEIZURE #	STATUS	COMMENTS
3920-95-F-0102	PENDING	WILL SEND PROOF OF PUBLICATION & FINAL ORDER OF FORFEITURE
3920-96-F-0023	PENDING	WILL SEND PROOF OF PUBLICATION & FINAL ORDER OF FORFEITURE
3920-97-F-0089	PENDING	WILL SEND PROOF OF PUBLICATION & FINAL ORDER OF FORFEITURE
3920-97-F-0090	PENDING	EXTENDED COMPLAINT DEADLINE OF 9/1/98; BIDGELL HAS NOT YET WITHDRAWN CLAIM
3920-97-F-0122	PENDING	EXTENDED COMPLAINT DEADLINE OF 9/1/98; BIDGELL HAS NOT YET WITHDRAWN CLAIM
3920-97-F-0126	PENDING	FINAL ORDER OF FORFEITURE WILL NOT BE ISSUED UNTIL ALL ASSETS WITH FORFEITURE POTENTIAL ARE IDENTIFIED

9

3920-98-F-0044	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0045	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0046	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0047	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0048	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0049	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0050	PENDING	CLAIM & COST BOND NOT SUBMITTED; MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0051	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED

1325015-000-5879

3920-98-F-0053	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0054	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0055	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0056	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0057	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0058	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0059	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED
3920-98-F-0060	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED

1325015-000-5880

To: FINANCE DIVISION From: WFO Forfeiture Team
Re: 66-WF-C206291, 07/27/1998

3920-98-F-0063	PENDING	MOTION TO STRIKE 7/28/98; INDICTMENTS EXPECTED IN 9/98; CIVIL CASE WILL BE STAYED WHEN INDICTMENTS ARE RETURNED

If any additional information is required please contact SA Robert M. Roth at (202) 278-2300.

1-(3920-95-F-0102)
1-(3920-96-0023)
1-(3920-97-F-0089)
1-(3920-97-F-0090)
1-(3920-97-F-0122)
1-(3920-97-F-0126)
1-(3920-98-F-0044)
1-(3920-98-F-0045)
1-(3920-98-F-0046)
1-(3920-98-F-0047)
1-(3920-98-F-0048)
1-(3920-98-F-0049)
1-(3920-98-F-0050)
1-(3920-98-F-0051)
1-(3920-98-F-0053)
1-(3920-98-F-0054)
1-(3920-98-F-0055)
1-(3920-98-F-0056)
1-(3920-98-F-0057)
1-(3920-98-F-0058)
1-(3920-98-F-0059)
1-(3920-98-F-0060)
1-(3920-98-F-0063)
♦♦

1325015-000-5881

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)
[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. V. BCCI (Round 5)

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports

[ ] Other Subsequent Materials

CC: 4-BUREAU, ATTN: [redacted] b6 b7C
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126
(1) - WFO, 29B-WF-171994 - 113

Seizure Log
Foims (PFA) LT
CATS LT

LT990426.EC

[redacted] b6 b7C
10

29B-WF-171994 (FFS)

1325015-000-5882

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RECEIVED
96 SEP 26 P1:19
SOUTHERN NEW YORK
U.S. MARSHAL

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED
SEP 20 1996
CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

RECEIVED
SEP 23 9 12 AM '96
U.S. MARSHAL

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of

Forfeited Property, see Order of Forfeiture, July 29, 1992, a Third Supplemental List of Forfeited Property, see Order of Forfeiture, August 19, 1993, and a Fourth Supplemental List of Forfeited Property, see Order of Forfeiture, December 21, 1994.

The government has now identified additional assets of the corporate defendants that are forfeitable to the United States under the First Order of Forfeiture. These assets are described in Exhibit A to the government's motion which includes assets held in the names of the four corporate defendants, as well as assets nominally held by other persons and entities.

For the reasons set forth in the government's motion and the accompanying declarations and exhibits, the Court finds that the property listed in the government's Exhibit A is the property of the corporate defendants and that the property is located within the United States. Accordingly, it is hereby

1. ORDERED that the property listed on government's Exhibit A, including Addenda 1 through 3, is forfeited to the United States;

2. IT IS FURTHER ORDERED that the Order of Forfeiture of January 24, 1992, is hereby amended to include government's Exhibit A and the Addenda as a Fifth Supplemental List of Forfeited Property;

3. IT IS FURTHER ORDERED that the property listed on the Fifth Supplemental List shall be transferred to the United States as follows:

1325015-000-5884

A. All property on the Fifth Supplemental List that is described as being the excess of the liquidation of the agencies of BCCI S.A. in New York and California shall be managed by the Court-Appointed Trustee, Robb Evans, and transferred to the Marshals in accordance with this Court's Orders Appointing Trustee of March 5, 1993 (with respect to the California property) and July 20, 1994 (with respect to the New York property);

B. Any property on the Fifth Supplemental List that is now in the Court Registry Investment System shall be transferred to the Marshals Service forthwith along with any interest accrued since the funds were deposited in the Investment System;

C. With respect to the property referred to as One Pacific Plaza, Fremont, California, all interest in that property held by the Kuwait International Finance Company ("KIFCO") is forfeited to the United States, and Robb Evans, the court-appointed trustee, is authorized to liquidate the forfeited interest on behalf of the United States in conjunction with the on-going liquidation he has been previously been appointed to conduct, to satisfy any tax liens held by any taxing authority in the State of California, and to transfer the remaining proceeds of the liquidation to the United States Marshals Service in his next regular transfer of funds following the liquidation. The liquidation shall be completed in any event not later than December 31, 1997; unless due to exigent circumstances and based upon a sufficient showing, the Court extends such date by Order.

1325015-000-5885

D. With respect to the property described as a debenture issued by CCAH in favor of the Credit and Finance Corporation ("CFC"), the court finds that CFC was the alter ego of the BCCI defendants and that accordingly any amount due to be paid by CCAH to CFC is forfeited to the United States; accordingly, any funds that would be payable with respect to the debenture by Harry W. Albright Jr., the court-appointed trustee for First American Bank, in accordance with the Procedural Order issued December 21, 1994, shall be paid to the United States Marshals Service with accrued interest as soon as practicable;

E. With respect to the assets held in the names of BCC Argentina and BCCI (Lebanon) S.A.L., the court finds that the corporate form should be disregarded and the assets held by these entities are forfeited to the United States. The assets of BCC Argentina formerly at the Bank of New York are already in the possession of the Marshals Service. American Express Bank is directed to provide the Marshals Service with the account number and current balance of any account held by BCCI (Lebanon) S.A.L. within 10 days of the date of this order and to transfer said balance to the Marshals Service at that time.

F. With respect to the funds remaining from the sale of 2560 Skyfarm Drive, Hillsborough, Calif. the Marshals shall retain $269,791.56, plus accrued interest, as property forfeited to the United States, and shall return the balance, plus accrued interest, to the court-appointed fiduciaries in recognition of the fiduciaries' expenses in connection with the sale.

1325015-000-5886

G. The United States Marshals Service is directed to seize forthwith all other property listed on the Fifth Supplemental List that is not already in the possession of the Marshals Service;

4. IT IS FURTHER ORDERED, that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title or interest in all property subject to this Order pursuant to section 1963(l) with the following qualification: With respect to the excess funds from the liquidation of the California and New York agencies of BCCI S.A., the United States shall not be required to send notice of the ancillary proceeding to any person to whom it sent notice of the forfeiture of the first set of such funds pursuant to the Third and/or Fourth Order of Forfeiture and who did not file a claim;

5. IT IS FURTHER ORDERED, that with respect to the real property now held by Robb Evans as a consequence of the New York Superintendent of Banks' transfer to him of stock in corporations holding such property, the property forfeited to the United States pursuant to this Order and pursuant to the Fourth Order of Forfeiture shall include the corporations themselves, the stock in the corporations holding the real property, the real property, and all other corporate assets.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

September 20, 1996

United States District Court
for the District of Columbia
A TRUE COPY
NANCY MAYER-WHITTINGTON, Clerk
By Joel A. Wood, Jr.
Deputy Clerk

1325015-000-5887

FIFTH SUPPLEMENTAL LIST OF FORFEITED PROPERTY

Description	Approximate Value
Excess Assets from liquidation of New York Agency of BCCI S.A. Transferred to Trustee in Nov. 1995 (See Addendum 1: inventory filed 11/22/95)	$163,054,483.24
Excess Assets from liquidation of New York Agency of BCCI S.A. Transferred to Trustee in Jan. 1995, including Quality Inn LaGuardia, Elmhurst, NY	$15,200,000.00
Excess Assets from liquidation of California Agency of BCCI S.A. not in Third or Fourth Order of Forfeiture	$9,512,823.34
Assets Not Part of the New York Liquidation transferred to the Court Registry in July 1995 (See Addendum 2)	$1,053,486.30
January 1990 debenture issued by CCAH in favor of Credit and Finance Corporation	$18,000,000.00
One Pacific Plaza, Fremont, California	$2,500,000.00
BCCI (Overseas) Sri Lanka account at Fleet Bank, formerly National Westminster Bank	$48,500.00
Interest accrued in Escrow Account held by B.Gray Gibbs	$3,757.06
Funds in account no. 890-0054-603 at the Bank of New York in the name BCC Argentina	$140,117.94
Funds in account at American Express Bank in the name BCCI (Lebanon) S.A.L.	$600,000.00
Remainder of proceeds of sale of 2560 Skyfarm Drive, Hillsborough, California	$269,791.56
FDBP's owed to BCCI (Overseas) Seoul (see attached schedule)	$868,097.10
Total	$211,251,056.54

Exhibit A
Crim. No. 91-0655 (JHG)

1325015-000-5888

ADDENDUM I

ROBB EVANS, TRUSTEE
INVENTORY LIST
As of November 3, 1995

		Balance
Cash Assets:		
Deposits		$ 49,000,000.00

Sanwa Bank
601 South Figueroa Street
Los Angeles, CA 90017

Account Name and Number:
Robb Evans, Trustee, # 6506-40357

Union Bank
San Francisco Main Office
370 California Street
San Francisco, CA 94104

Account Name and Number:
Robb Evans, Trustee, # 1279180028

Republic Bank California N.A.
445 North Bedford Drive
Beverly Hills, CA 90210

Account Name and Number:
Robb Evans, Trustee, # 5300005588

First Interstate Bank
707 Wilshire Boulevard
Los Angeles, CA 90017

Account Name and Number:
Robb Evans, Trustee, # 149-249-058

		Principal Amount
Promissory Notes:	52 Items	$ 6,956,035.29
FICA Receivables from Ex-Staff of BCCI	10 Items	$ 5,498.19

1325015-000-5889

ROBB EVANS, TRUSTEE
INVENTORY LIST
As of November 3, 1995

		Book Value
Salary Advances to Ex-Staff	2 Items	$ 700.00
Claims on Other BCCI Offices and Affiliates	12 Items	$ 2,730,521.89
Judgments Awarded	4 Items	$ 103,053,064.85
Jewels, Utility Deposit and Payments, Real Estate Taxes and Insurance Paid on Collateral	9 Items	$ 116,388.44
Real Property	2 Items	$ 453,909.76

1. 88 acres of residential zoned land in Blooming Grove, Orange County, New York State (Exhibit A)

2. Residential property at 3006 Merrywood Drive, Edison, Middlesex County, New Jersey 08817 (Exhibit B)

		Book Value
Shares of Real Estate Holding Corporations	2 Items	$ 1,738,364.82

1. Fifty (50) shares in Saltex, Inc. holding 100% interest in real property at 7887 Katy Freeway, Houston, Texas 77024 (Exhibit C)

2. Ten (10) shares in Mor Properties, Inc. holding 100% interest in funds held currently by the New York Superintendent of Banks and in transit.

1325015-000-5890

SCHEDULE OF MISTAKEN FUNDS TRANSFER CLAIMS IN NEW YORK LIQUIDATION

CLAIMANT	*BANK*	*ACCOUNT*	*AMOUNT*	*DATE (CLAIM)*
(1) Khawaja Qadeer Ahmed	Bank of New York	8900049545	$400,000	3/7/91
(2) ABN Amro Bank, N.V.	Bank of New York	8900049545	$14,975	6/21/91
(3) Branch Banking & Trust Co.	Citibank, NY	36046852	$5,830.74	4/14/92
(4) Citibank, N.A. - Hong Kong	Bank of New York		$30,147.70	10/06/91
(5) ASLK - CGER Bank	Bank of New York		$10,178.00	6/19/91
(6) Union Bank of Switzerland	Citibank, N.A.	36046852	$10,000.00	2/25/92
(7) International Commercial Bank of China	Citibank, N.A.	36046852	$6,000.00	4/22/92
(8) Bank Leu	Security Pacific International Bank	BCCI Jordan	$10,000	7/9/92
(9) Congregation of the Holy Ghost Fathers	Bank of New York		$10,000	7/17/91
(10) Banco Nazionale del Lavoro	BankAmerica International	BCCI London	$100,500	7/8/91
(11) Commercial Bank of Kuwait	Bank of New York	8900049545	$13,757.97	8/20/91
(12) Monte Dei Paschi Di Siena	American Express Bank	BCCI London	$22,500.00	7/2/91
(13) Lawrence and Maria Fernandes	BankAmerica International	BCCI London	$10,000.00	7/ /91

1325015-000-5891

SCHEDULE OF MISTAKEN FUNDS TRANSFER CLAIMS IN NEW YORK LIQUIDATION

CLAIMANT	*BANK*	*ACCOUNT*	*AMOUNT (CLAIM)*	*DATE*
(14) Swiss Bank Corporation	Security Pacific International Bank	BCCI Limassol	$240,000.00	7/4/91 7/5/91
(15) Unity Stores	First American Bank of New York	BCCI Amsterdam	$13,043.50	8/20/91
(16) Chase Manhattan Bank	Security Pacific Bank of New York	BCCI Jordan BCCI Dubai	$3,523.70 $1,990.00	6/6/91 6/6/91
(17) Z-Laenderbank	Security Pacific Security Pacific	BCCI Jordan BCCI Limassol	$1,208.00 $35,360.10	2/5/92 1/22/92
(18) F. Mahmoud - AMEX	American Express Bank	52985	$60,000.00	7/5/91
(19) Bank of America	BankAmerica	BCCI N.Y.	$26,127.74	5/30/89
(20) Bank CIAL Schweiz	Bank of New York	8900049545	$14,344.00	5/13/93
(21) Lateef Adams	Citibank	BCCI London	$14,000	7/9/91

1325015-000-5892

Schedule of Foreign Documentary Bills Purchased
BCCI Seoul

count No.	Account Name	Approx. Balance	Comments
Holder: Amexco			
58-91	BCCI Seoul	46665.00	FDBP payable 6/5/91
S 1 **			
		46665.00	
Holder: Bank of California Intl			
5/904/0018/IMFAS	BCCI Seoul	131908.00	FDBP payable 6/11/91
Subtotal **			
		131908.00	
Holder: Habib Bank			
3418	BCCI Seoul	55500.00	FDBP payable 6/12/91
5779	BCCI Seoul	13504.00	FDBP payable 7/5/91
P/6300	BCCI Seoul	257503.00	FDBP payable 7/2/91
3397	BCCI Seoul	26849.10	FDBP payable 6/25/91
3418	BCCI Seoul	166500.00	FDBP payable 6/12/91
7539/34/KBK/91	BCCI Seoul	17600.00	FDBP payable 7/4/91
6948	BCCI Seoul	76300.00	FDBP payable 7/5/91
Su l **			
		613756.10	
Holder: State Bank of India			
/16/91-92	BCCI Seoul	14280.00	FDBP payable 6/29/91
Subtotal **			
		14280.00	
Holder: United Bank Limited			
50/IFL/757/91	BCCI Seoul	23760.00	FDBP payable 7/1/91
53/LC/7915/91	BCCI Seoul	21250.00	FDBP payable 7/2/91
7/982/91/DSM	BCCI Seoul	16478.00	FDBP payable 6/25/91

1325015-000-5893

Schedule of Foreign Documentary Bills Purchased
BCCI Seoul

ount No.	Account Name	Approx. Balance	Comments
Subtotal **		61488.00	
Tc [redacted] **		868097.10	

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/14/97

To: ADIC, WFO

From: SA [redacted]
C-1, NVMRA
Contact: DA [redacted] X9072

b6
b7C

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC: [redacted]

File Number(s): 29B-WF-171994 (FF) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Seizure log

Synopsis: **REQUEST TO OPEN 3920-97-F-0126**

Enclosures: Facsimile from [redacted], Trustee dated 4/10/97

b6
b7C

Details: The purpose of this memorandum is to request that a new SUB FILE (SUB FF-8) be opened based on the fact that $1,750,000.00 (one million seven hundred fifty thousand dollars) in U.S. currency from the fifth order of forfeiture was remitted to the United States Marshals Service (via wire transfer) on April 8, 1997.

DH 4-16-97

O&A
29B-WF-171994
Subfile C-1
DH
4/15/97

b6
b7C

1-WMFO
(3920-97-F-0126)

3920-97-F-0126
29B-WF-171994 (FF-8) -1

SEARCHED INDEXED
SERIALIZED FILED
APR 14 1997
FBI OFFICE

1325015-000-5853

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 29
Page 24 ~ Duplicate;
Page 25 ~ Duplicate;
Page 26 ~ Duplicate;
Page 27 ~ Duplicate;
Page 28 ~ Duplicate;
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Asset ID: 97-FBI-000770
Asset Description: $1,100,000.00 in U.S. Currency

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/18/97
Headquarters Receipt Date:	02/14/97	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920970075
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/12/97

To: ADIC, WFO

From: SA [redacted] b6 b7C
C-1, NVMRA
Contact: DA JOE SCHULTE, X9072

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC:js

File Number(s): 29B-WF-171994 (FF) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Synopsis: OPENING MEMO

Enclosures: Wire transfer confirmation, fund schedule sent to USMS, summary of cumulative distributions, and schedule of distributions to the USMS.

Details: The purpose of this memorandum is to request that a new SUB FILE (SUB FF-7) be opened based on the fact that $1,100,000.00 (one million one hundred thousand dollars) in U.S. currency from the fifth order of forfeiture was remitted to the United States Marshals Service (via wire transfer) on February 5, 1997.

OPA
29B-WF-171994 SUB FF SUB 7 2-21 MA
TO [redacted] b6 b7C
2/13/97

(1)-WMFO
(3920-97-F-0075)

29B-WF-171994 (FF-7)
SEARCHED INDEXED
SERIALIZED FILED
FEB 13 1997
FBI - WASH. METRO FIELD OFFICE

1325015-000-5712

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/12/97

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, WFO
C-1/FAST

Approved By: SSA [redacted] b6 b7C

Drafted By: SA [redacted] AC:js

File Number(s): 29B-WF-171994 (Pending) FOIMS

Title: U.S. v $1,100,000.00 IN US CURRENCY

Entry (Check One): [X] New Case [ ] Change or Add

[X] CATS Record of Seized Property	[ ] Warrant of Arrest in Rem
[ ] FD-302	[ ] Complaint for Forfeiture
[ ] In Forma Pauperis	[ ] Search Warrant [redacted] Sent 2/19/97 b6 b7C
[ ] Settlement Statement/Agreement	[ ] Affidavit
[ ] Indemnity Agreement	[ ] Seizure Warrant seizure log
[ ] Final Decree	[ ] Plea Agreement
[ ] Receipt for Transfer/ Disposition of Funds/Property	[ ] Sharing Request [ ] Dag-71 [ ] Dag-72
[ ] Petition	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] Claim & Cost Bond
[ ] Order of Forfeiture	[ ] Petition Investigation

[X] Other Subsequent Materials

1-Bureau, FSPU (ATTN: [redacted]) b6 b7C
1 - 3920-97-F-0075

29B-WF-171994 (FF-7)
SEARCHED INDEXED
SERIALIZED FILED
FEB 13 1997
FBI - WASH. METRO FIELD OFFICE

1325015-000-5713

Seizure Form

Asset ID: <A> | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920		05		3920-97-F-0075	N

(7) Case Number: 29B-WF-171994

(8) Case Name: Hidden Interests; Major Case #38

(9) Operation Name:

(10) Case Agent: SA

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b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
2/5/97	Other	10/4/88	

(15) Seizing Agent: SA

(16) Phone Number: 02-324-9072

(17) Seized From: BCCI HOLDINGS

(18) Place/Address Where Seized: Not Available

(19) City: Not Available

(20) State:

(21) Seizure: DC | Judicial District

(22) Processing: DC

(23) Forfeiture Statute: 18 USC 982

(24) Violation Statute: 18 USC 1956

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
1,100,000	Y		Cash/Currency	01	Criminal

(31) Asset Description: $1,100,000.00 In US Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

Asset ID: <A> | Date: <B> | Page 2

Asset Description: <C>

Seizure Form

(92) Name: BCCI HOLDINGS

(93) Phone Number:

(94) Party Type (Select 1 -or- More)

(95) Address: Not available

(96) City:

(97) State:

(98) Zip Code:

(99) Country:

(100) Contact Name (if business): Not Available

(101) Phone Number:

(102) Lien Amount Held By Party ($):

(103) Quick Release Recipient?

(104) Quick Release Date:

(105) Expenses Reimbursed ($):

(106) Incarcerated? N

(107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City:

(111) State:

(112) Zip Code:

(113) Country:

(114) Represented by Counsel? N

(115) Attorney's Name (if any):

(116) Firm's Name:

(117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City:

(120) State:

(121) Zip Code:

(122) Country:

Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	X
Institution Seized From	
Occupant	
Victim	
Other	

(92) Name:

(93) Phone Number:

(94) Party Type (Select 1 -or- More)

(95) Address:

(96) City:

(97) State:

(98) Zip Code:

(99) Country:

(100) Contact Name (if business):

(101) Phone Number:

(102) Lien Amount Held By Party ($):

(103) Quick Release Recipient?

(104) Quick Release Date:

(105) Expenses Reimbursed ($):

(106) Incarcerated?

(107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City:

(111) State:

(112) Zip Code:

(113) Country:

(114) Represented by Counsel?

(115) Attorney's Name (if any):

(116) Firm's Name:

(117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City:

(120) State:

(121) Zip Code:

(122) Country:

Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	
Institution Seized From	
Occupant	
Victim	
Other	

Seizure Form

Asset ID: <A> | Date: <B>

Asset Description: <C>

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91 91-065	US v BCCI HOLDINGS		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: Department of Justice		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(137) Address:		(138) City:		
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code: DOJ	(143) Sharing Possible? N
(144) Contact Name: [redacted] Trial Attorney			(145) Contact Phone Number:	

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(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: <A>	Date: <B>
Asset Description: <C>	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
	Federal Reserve Bank, NY	2/5/97

(149) Storage Facility Address:

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
NY	NY		$	

ARED BY

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(154) Signature:

(155) Date: 2/13/97

(156) Prepared

(157) Title: SA

PROVED BY

(158) Signatur

(159) Date: 2/13/97

(160) Approve

(161) Title: SSA

Probable Cause

<D> SEE ATTACHED

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from five criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. [redacted] Trustee has been appointed to oversee the complex assets listed in the five criminal BCCI forfeiture orders. On 02/05/97, [redacted] completed a $1,100,000.00 (one million one hundred thousand dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fifth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"). [redacted] (all officers of BCCI), and Capcom Financial Services, LTD. with conspiracy (18 U.S.C. Section 371), money laundering (18 U.S.C. Section 1956 (a) (1) & (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted], were indicted on May 4, 1989. b6 b7C

This indictment resulted from [redacted] b7E

[redacted]

On January 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, BCCI) and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property

located in the United States, including without limitation, real property and all tangible and intangible personal property.

Four additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted] Trial Attorney, Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

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WIRE INQUIRY DETAIL

WEBS NO WF03897084010000214 GFTS NO 038581356 FED NO L1QWFI4A0230102070953
CREATING AU 0840 DEBIT ACCT RAU 0607
CREATED BY [redacted] GROUP 021 b6
TIME 09:38 DATE 02/07/97 BALANCE $ 1,100,057.71 b7C
STATUS AT CREATE SATISFACTORY
NSF REASON
RSN/CONFRM NUM

APPROVAL BY [redacted] GROUP 023 APPROVER AU 0840
TIME 09:48 DATE 02/07/97 BALANCE $ 57.71
APPROVER NOTES
STATUS AT APPROVE SATISFACTORY

APPROVAL BY [redacted] GROUP 066 APPROVER AU 1524
TIME 09:53 DATE 02/07/97 BALANCE $ 57.71
APPROVER NOTES
STATUS AT APPROVE SATISFACTORY
WIRE STATUS PROCESSED GFTS

PRESS ENTER TO RETURN TO SELECT SCREEN OR PF5 TO GO TO ENTRY SCREEN
BAL. FROM WD SYSTEM MAY NOT MATCH WEBS. CALL BASC 243-7744 WITH QUES.

[redacted]

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[redacted] TRUSTEE

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RECORD OF SURPLUS FUNDS TRANSFERRED TO U.S. MARSHAL

As of February 7, 1997
(Amount in Dollars)

DATE TRANSFERRED	AMOUNT TRANSFERRED
26-Aug-93	35,964,405.69
22-Oct-93	1,000,000.00
22-Dec-93	250,000.00
18-Feb-94	4,250,000.00
19-Apr-94	150,000.00
17-Jun-94	1,300,000.00
16-Aug-94	8,850,000.00
14-Oct-94	200,000.00
13-Dec-94	3,035,594.31
13-Feb-95	17,000,000.00
14-Apr-95	1,500,000.00
13-Jun-95	10,500,000.00
14-Aug-95	2,000,000.00
13-Oct-95	1,000,000.00
12-Dec-95	1,000,000.00
12-Feb-96	2,200,000.00
12-Apr-96	1,800,000.00
11-Jun-96	3,000,000.00
12-Aug-96	1,000,000.00
11-Oct-96	60,000,000.00
10-Dec-96	650,000.00
7-Feb-97	1,100,000.00
TOTAL	**157,750,000.00**

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213 622 2681
02/10/97 16:16

[redacted] TRUSTEE

SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL

As of February 7, 1997

Forfeiture Order Date / State	19-Aug-93 California	21-Dec-94 California	20-Sep-96 California	21-Dec-94 New York	03-Nov-95 New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	0	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	0	31,445
Other	0	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	0	74,519,724	164,149,037	310,867,141
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	28,867,634	0	0	738,981	1,857,578	31,464,192
Real Property	24,033,346	0	0	2,073,987	1,722,673	27,830,006
Miscellaneous Property	109,094	0	0	0	2,093	111,187
Other	124,228	0	0	863,342	199,276	1,186,846
Total Asset Conversions	87,513,945	3,647,571	9,512,823	23,676,309	52,781,620	177,132,268
Total Revenue Collection (1)	6,148,771	0	0	804,601	3,012,113	9,965,485
Total Sources of Funds	93,662,715	3,647,571	9,512,823	24,480,910	55,793,733	187,097,753
Uses of Funds						
Seller Financing and Cash Disbursements	(12,363,558)	0	0	(8,590,121)	(4,342,099)	(25,295,778)
Operating Account Balance	(764,720)	0	0	(647,255)	0	(1,411,975)
Special Reserve Account (2)	0	0	0	(388,366)	(2,251,634)	(2,640,000)
Surplus Balance	0	0	0	0	0	0
Total Uses of Funds	(13,128,278)	0	0	(9,625,742)	(6,593,733)	(29,347,753)
Net Remittances	80,534,437	3,647,571	9,512,823	14,855,168	49,200,000	157,750,000
Present Book Value Per Budget						
Cash	764,720	0	0	1,035,621	2,251,634	4,051,975
Loans	3,197,783	0	0	6,882,037	2,720,816	12,800,636
Real Property	813,988	0	0	600,000	13,525,640	14,939,628
Miscellaneous Property	0	0	0	0	0	0
Other Assets	5,668	0	0	22,648	2,748,923	2,777,240
Total Liabilities	(780,461)	0	0	(360,135)	(2,640,000)	(3,780,597)
Total PBV Per Budget	4,001,698	0	0	8,180,171	18,607,013	30,788,882

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $9,079,860.20.*

(2) Special reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and necessary capital improvements, and for New York Claims.

1325015-000-5722

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02/10/97 16:16 213 622 2681

[redacted] TRUSTEE

SCHEDULE OF DISTRIBUTIONS TO US MARSHAL

From: May 5, 1993 to February 7, 1997

From Account	Date Sent	Dollar Amount	Comments
First Interstate Bank: 149-2-40134	26-Aug-93	35,964,405.69	By Order of August 19, 1993
First Interstate Bank: 149-2-40134	22-Oct-93	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	17-Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	16-Aug-94	8,850,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Oct-94	200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Dec-94	3,035,594.31	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Feb-94	17,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Dec-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Feb-96	2,200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Apr-96	1,800,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	11-Jun-96	3,000,000.00	60 Day Remittance
Wells Fargo Bank: 6607-394-962	12-Aug-96	1,000,000.00	60 Day Remittance
Wells Fargo Bank: 6607-394-962	11-Oct-96	60,000,000.00	60 Day Remittance
Wells Fargo Bank: 6607-394-962	10-Dec-96	650,000.00	60 Day Remittance
Wells Fargo Bank: 6607-394-962	05-Feb-97	1,100,000.00	60 Day Remittance
Total		157,750,000.00	

1325015-000-5723

296-WF-171994 Sub FF Sub 7

SEARCHED INDEXED
SERIALIZED FILED
MAR 6 1997
FBI - WASH. METRO FIELD OFFICE

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Seizure Form

Ass[redacted]97-FBI-000770 | Date/Tim[redacted]2/25/97 09:01:25 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920970075	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38
(9) Operation Name:	(10) Case Agent:

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
02/05/97	Other	10/04/88	

(15) Seizing Agent:	(16) Phone Number:
	(202)-324-9072

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized:	(19) City:	(20) State:
Wire Transfer	Washington	DC

(21) Seizure Judicial District:	(22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1956

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
1100000.00	Y		Cash/Currency	01	Criminal

(31) Asset Description: $1,100,000.00 in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:
USA		0.00

Seizure Form

Asset Description: $1,100,000.00 in U.S. Currency

(92) Name: BCCI Holdings			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address: Not Available				Owner	
(96) City: Not Available	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	Lienholder	
(100) Contact Name (if business): Not Available			(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated? N	(107) Prisoner ID:			Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:		
(114) Represented by Counsel? N	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

(92) Name:			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:				Owner	
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	Lienholder	
(100) Contact Name (if business):			(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:			Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:		
(114) Represented by Counsel?	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-065	U.S. v BCCI Holdings		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: Not Available
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name:			(134) Agency Case ID:	
DEPARTMENT OF JUSTICE				
(135) Adopted From? N		(136) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(137) Address: Not Available			(138) City: Washington	
(139) State: DC	(140) Zip Code: 00000	(141) Country: USA	(142) NCIC Code: DOJ	(143) Sharing Possible? N
(144) Contact Name: [redacted] (Trial Attorney)			(145) Contact Phone Number:	

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(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: [redacted]7-FBI-000770	Date/Time: [redacted]/25/97 09:01:25
Asset Description: $1,100,000.00 in U.S. Currency	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	Federal Reserve Bank, NY	02/05/97

(149) Storage Facility Address:
Not Available

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
Not Available	NY	00000		

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date:
	02/05/97
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date:
	02/13/97
(164) Prepared By: [redacted]	(165) Title: SA

b6
b7C

APPROVED BY

(166) Signature:	(167) Date:
	02/13/97
(168) Approved By: [redacted]	(169) Title: SSA

b6
b7C

Asset ID: 97-FBI-000770
Asset Description: $1,100,000.00 in U.S. Currency

Probable Cause

29B-WF-171994

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from five criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. [redacted] Trustee has been appointed to oversee the complex assets listed in the five criminal BCCI forfeiture orders. On 02/05/97 [redacted] completed a $1,100,000.00 (one million one hundred thousand dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fifth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI Holdings (Luxembourg) S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"). [redacted] (all officers of BCCI), and Capcom Financial Services, LTD. with conspiracy (18 U.S.C Section 371), money laundering (18 U.S.C. Section 1956 (a) (1) & (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

This indictment resulted from [redacted] b7E

On January 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four

corporate defendants (collectively, BCCI) and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Four additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted] Trial Attorney, Criminal Division has advised until all potentially forfeiture assets have been identified that no final orders of forfeiture will be issued by the court.

b6
b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/ 9/97

To: ADIC, WFO

From: SA [redacted] b6 b7C
Contact: DA JOE SCHULTE, X9072

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC: [redacted]

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Synopsis: **CLOSURE OF SEIZURE NUMBER 3920-97-F-0075 U.S. v $1,100,000.00 IN U.S. CURRENCY**

Details: The purpose of this memorandum is to request that seizure number 3920-97-F-0075 (FF-7) be closed based on the fact that $1,100,000 in U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Trial Attorney, Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

MAINTAIN AS TOP SERIAL

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FS-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FS-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FS-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FS-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FS-5	3920-97-F-0028	$60,000,000	US CURRENCY
SUB FF-6	3920-97-F-0052	$650,000	US CURRENCY
SUB FF-7	**3920-97-F-0075**	**$1,100,000**	**US CURRENCY**

1- 29B-WF-171994 (SUB FS)
1- 3920-97-F-0075

Close #4
5/12/97

DH 5-12-97

3920-97-F-0075
29B-WF-171994 (Sub 7)

SEARCHED INDEXED
SERIALIZED FILED
MAY 9 1997
FBI - WASH. METRO FIELD OFFICE

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 40
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 14 ~ Referral/Consult;
Page 15 ~ Referral/Consult;
Page 38 ~ Duplicate;
Page 39 ~ Duplicate;
Page 40 ~ Duplicate;
Page 41 ~ Duplicate;
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Page 63 ~ Referral/Consult;
Page 64 ~ Referral/Consult;
Page 65 ~ Referral/Consult;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/03/97

To: ADIC, WFO

From: SA [redacted] C-1 b6 b7C
Contact: DA JOE SCHULTE, X9072

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC:js

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Synopsis: **CLOSURE OF SEIZURE NUMBER 3920-97-F-0052 U.S. v $650,000 IN U.S. CURRENCY**

Details: The purpose of this memorandum is to request that seizure number 3920-97-F-0052 be closed based on the fact that the $650,000 in U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Trial Attorney, Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

MAINTAIN AS TOP SERIAL

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FS-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FS-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FS-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FS-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FS-5	3920-97-F-0028	$60,000,000	US CURRENCY
SUB FS-6	**3920-94-F-0052**	**$650,000**	**US CURRENCY**

1- [redacted] FSPU
1- 29B-WF-171994
1- 3920-97-F-0052

Close #4 2/4/97 1

29B-WF-171994-FF b6 b7C
3920-97-F-0052
SEARCHED INDEXED
SERIALIZED FILED
FEB 0 4 1997
FBI

1325015-000-5710

Seizure Form

Asset [redacted]97-FBI-000409 | Date/Tim[redacted]01/13/97 09:53:24

Asset Description: $650,000.00 in U.S. Currency

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI Holdings			
(95) Address: Not Available		Owner	
(96) City: Not Available	(97) State: DC / (98) Zip Code: 00000 / (99) Country: USA	Lienholder	
(100) Contact Name (if business): Not Available	(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated: N	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):		Victim	
(109) Institution Address:		Other	
(110) City:	(111) State: / (112) Zip Code: / (113) Country:		
(114) Represented by Counsel: N	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City:	(120) State: / (121) Zip Code: / (122) Country:		

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:		Owner	
(96) City:	(97) State: / (98) Zip Code: / (99) Country:	Lienholder	
(100) Contact Name (if business):	(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):		Victim	
(109) Institution Address:		Other	
(110) City:	(111) State: / (112) Zip Code: / (113) Country:		
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City:	(120) State: / (121) Zip Code: / (122) Country:		

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI Holdings		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: Not Available
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name:		(134) Agency Case ID:		
DEPARTMENT OF JUSTICE				
(135) Adopted From: N		(136) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(137) Address: Not Available		(138) City: Washington		
(139) State: DC	(140) Zip Code: 00000	(141) Country: USA	(142) NCIC Code: DOJ	(143) Sharing Possible? N
(144) Contact Name:			(145) Contact Phone Number:	

b6
b7C

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset [redacted]97-FBI-000409	Date/Ti[redacted]1/13/97 09:53:24
Asset Description: $650,000.00 in U.S. Currency	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	Federal Reserve Bank, New York	12/10/96

(149) Storage Facility Address:
Not Available

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
New York	NY	00000		

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date:
	12/10/96
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date:
	12/18/96
(164) Prepared By:	(165) Title:
	SA

b6
b7C

APPROVED BY

(166) Signature:	(167) Date:
	12/20/96
(168) Approved By:	(169) Title:
	SSA

Asset ID: 97-FBI-000409
Asset Description: $650,000.00 in U.S. Currency

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	12/30/96
Headquarters Receipt Date:	12/20/96	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920970052
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			

Asset ID: 97-FBI-000409
Asset Description: $650,000.00 in U.S. Currency

Probable Cause

29B-WF-171994

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from five criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. [redacted] has been appointed to oversee the complex assets listed in the five criminal BCCI forfeiture orders. On 12/10/96, [redacted] completed a $650,000.00 (six hundred fifty thousand) wire transfer to the Untied States Marshals Service, New York representing the liquidation of cash assets from the fifth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] b6 b7C

BCCI), and Capcom Financial Services, LTD. with conspiracy (18 U.S.C. Section 371), money laundering (18 U.S.C. Sections 1956 (a) (1) & (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI [redacted] and two narco-traffickers [redacted] were indicted on May 4, 1989.

This indictment resulted from [redacted] b7E

[redacted]

On Jan. 24, 1992, the United States District Court for the

District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

[redacted] Trial Attorney, Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court.

b6
b7C

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)

[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted]

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. V. BCCI (Round 5)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports

[ ] Other Subsequent Materials

CC: 4-BUREAU, ATTN: [redacted] b6 b7C
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126
(1) - WFO, 29B-WF-171994 - 113

Seizure Log
Foims (PFA) LT
CATS LT

LT990426.EC

[redacted] b6

1325015-000-5666

296-WF-171994 (FF-6)

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RECEIVED
96 SEP 26 P1:19
SOUTHERN NEW YORK
U.S. MARSHAL

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED
SEP 20 1996
CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

RECEIVED
SEP 23 9 12 AM '96
U.S. MARSHAL'S OFFICE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of

Forfeited Property, see Order of Forfeiture, July 29, 1992, a Third Supplemental List of Forfeited Property, see Order of Forfeiture, August 19, 1993, and a Fourth Supplemental List of Forfeited Property, see Order of Forfeiture, December 21, 1994.

The government has now identified additional assets of the corporate defendants that are forfeitable to the United States under the First Order of Forfeiture. These assets are described in Exhibit A to the government's motion which includes assets held in the names of the four corporate defendants, as well as assets nominally held by other persons and entities.

For the reasons set forth in the government's motion and the accompanying declarations and exhibits, the Court finds that the property listed in the government's Exhibit A is the property of the corporate defendants and that the property is located within the United States. Accordingly, it is hereby

1. ORDERED that the property listed on government's Exhibit A, including Addenda 1 through 3, is forfeited to the United States;

2. IT IS FURTHER ORDERED that the Order of Forfeiture of January 24, 1992, is hereby amended to include government's Exhibit A and the Addenda as a Fifth Supplemental List of Forfeited Property;

3. IT IS FURTHER ORDERED that the property listed on the Fifth Supplemental List shall be transferred to the United States as follows:

1325015-000-5668

A. All property on the Fifth Supplemental List that is described as being the excess of the liquidation of the agencies of BCCI S.A. in New York and California shall be managed by the Court-Appointed Trustee, Robb Evans, and transferred to the Marshals in accordance with this Court's Orders Appointing Trustee of March 5, 1993 (with respect to the California property) and July 20, 1994 (with respect to the New York property);

B. Any property on the Fifth Supplemental List that is now in the Court Registry Investment System shall be transferred to the Marshals Service forthwith along with any interest accrued since the funds were deposited in the Investment System;

C. With respect to the property referred to as One Pacific Plaza, Fremont, California, all interest in that property held by the Kuwait International Finance Company ("KIFCO") is forfeited to the United States, and Robb Evans, the court-appointed trustee, is authorized to liquidate the forfeited interest on behalf of the United States in conjunction with the on-going liquidation he has been previously been appointed to conduct, to satisfy any tax liens held by any taxing authority in the State of California, and to transfer the remaining proceeds of the liquidation to the United States Marshals Service in his next regular transfer of funds following the liquidation. The liquidation shall be completed in any event not later than December 31, 1997; unless due to exigent circumstances and based upon a sufficient showing, the Court extends such date by Order.

1325015-000-5669

D. With respect to the property described as a debenture issued by CCAH in favor of the Credit and Finance Corporation ("CFC"), the court finds that CFC was the alter ego of the BCCI defendants and that accordingly any amount due to be paid by CCAH to CFC is forfeited to the United States; accordingly, any funds that would be payable with respect to the debenture by Harry W. Albright Jr., the court-appointed trustee for First American Bank, in accordance with the Procedural Order issued December 21, 1994, shall be paid to the United States Marshals Service with accrued interest as soon as practicable;

E. With respect to the assets held in the names of BCC Argentina and BCCI (Lebanon) S.A.L., the court finds that the corporate form should be disregarded and the assets held by these entities are forfeited to the United States. The assets of BCC Argentina formerly at the Bank of New York are already in the possession of the Marshals Service. American Express Bank is directed to provide the Marshals Service with the account number and current balance of any account held by BCCI (Lebanon) S.A.L. within 10 days of the date of this order and to transfer said balance to the Marshals Service at that time.

F. With respect to the funds remaining from the sale of 2560 Skyfarm Drive, Hillsborough, Calif., the Marshals shall retain $269,791.56, plus accrued interest, as property forfeited to the United States, and shall return the balance, plus accrued interest, to the court-appointed fiduciaries in recognition of the fiduciaries' expenses in connection with the sale.

1325015-000-5670

G. The United States Marshals Service is directed to seize forthwith all other property listed on the Fifth Supplemental List that is not already in the possession of the Marshals Service;

4. IT IS FURTHER ORDERED, that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title or interest in all property subject to this Order pursuant to section 1963(l) with the following qualification: With respect to the excess funds from the liquidation of the California and New York agencies of BCCI S.A., the United States shall not be required to send notice of the ancillary proceeding to any person to whom it sent notice of the forfeiture of the first set of such funds pursuant to the Third and/or Fourth Order of Forfeiture and who did not file a claim;

5. IT IS FURTHER ORDERED, that with respect to the real property now held by Robb Evans as a consequence of the New York Superintendent of Banks' transfer to him of stock in corporations holding such property, the property forfeited to the United States pursuant to this Order and pursuant to the Fourth Order of Forfeiture shall include the corporations themselves, the stock in the corporations holding the real property, the real property, and all other corporate assets.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

September 20, 1996

United States District Court
for the District of Columbia
A TRUE COPY
NANCY MAYER-WHITTINGTON, Clerk
By Jon A. Wood, Jr.
Deputy Clerk

1325015-000-5671

FIFTH SUPPLEMENTAL LIST OF FORFEITED PROPERTY

Description	Approximate Value
Excess Assets from liquidation of New York Agency of BCCI S.A. Transferred to Trustee in Nov. 1995 (See Addendum 1: inventory filed 11/22/95)	$163,054,483.24
Excess Assets from liquidation of New York Agency of BCCI S.A. Transferred to Trustee in Jan. 1995, including Quality Inn LaGuardia, Elmhurst, NY	$15,200,000.00
Excess Assets from liquidation of California Agency of BCCI S.A. not in Third or Fourth Order of Forfeiture	$9,512,823.34
Assets Not Part of the New York Liquidation transferred to the Court Registry in July 1995 (See Addendum 2)	$1,053,486.30
January 1990 debenture issued by CCAH in favor of Credit and Finance Corporation	$18,000,000.00
One Pacific Plaza, Fremont, California	$2,500,000.00
BCCI (Overseas) Sri Lanka account at Fleet Bank, formerly National Westminster Bank	$48,500.00
Interest accrued in Escrow Account held by [redacted]	$3,757.06 b6 b7C
Funds in account no. 890-0054-603 at the Bank of New York in the name BCC Argentina	$140,117.94
Funds in account at American Express Bank in the name BCCI (Lebanon) S.A.L.	$600,000.00
Remainder of proceeds of sale of 2560 Skyfarm Drive, Hillsborough, California	$269,791.56
FDBP's owed to BCCI (Overseas) Seoul (see attached schedule)	$868,097.10
Total	$211,251,056.54

Exhibit A
Crim. No. 91-0655 (JHG)

1325015-000-5672

ADDENDUM I

[redacted]

b6
b7C

INVENTORY LIST
As of November 3, 1995

		Balance
Cash Assets:		
Deposits		$ 49,000,000.00

Sanwa Bank
601 South Figueroa Street
Los Angeles, CA 90017

Account Name and Number: [redacted]

Union Bank
San Francisco Main Office
370 California Street
San Francisco, CA 94104

Account Name and Number: [redacted]

Republic Bank California N.A.
445 North Bedford Drive
Beverly Hills, CA 90210

Account Name and Number: [redacted]

First Interstate Bank
707 Wilshire Boulevard
Los Angeles, CA 90017

Account Name and Number: [redacted]

		Principal Amount
Promissory Notes:	52 Items	$ 6,956,035.29
FICA Receivables from Ex-Staff of BCCI	10 Items	$ 5,498.19

1325015-000-5673

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b7C

[redacted]

INVENTORY LIST
As of November 3, 1995

		Book Value
Salary Advances to Ex-Staff	2 Items	$ 700.00
Claims on Other BCCI Offices and Affiliates	12 Items	$ 2,730,521.89
Judgments Awarded	4 Items	$ 103,053,064.85
Jewels, Utility Deposit and Payments, Real Estate Taxes and Insurance Paid on Collateral	9 Items	$ 116,388.44
Real Property	2 Items	$ 453,909.76

1. 88 acres of residential zoned land in Blooming Grove, Orange County, New York State (Exhibit A)

2. Residential property at 3006 Merrywood Drive, Edison, Middlesex County, New Jersey 08817 (Exhibit B)

		Book Value
Shares of Real Estate Holding Corporations	2 Items	$ 1,738,364.82

1. Fifty (50) shares in Saltex, Inc. holding 100% interest in real property at 7887 Katy Freeway, Houston, Texas 77024 (Exhibit C)

2. Ten (10) shares in Mor Properties, Inc. holding 100% interest in funds held currently by the New York Superintendent of Banks and in transit.

1325015-000-5674

SCHEDULE OF MISTAKEN FUNDS TRANSFER CLAIMS IN NEW YORK LIQUIDATION

CLAIMANT	*BANK*	*ACCOUNT*	*AMOUNT*	*DATE (CLAIM)*
[redacted]	Bank of New York	[redacted]	$400,000	3/7/91
(2) ABN Amro Bank, N.V.	Bank of New York	8900049545	$14,975	6/21/91
(3) Branch Banking & Trust Co.	Citibank, NY	36046852	$5,830.74	4/14/92
(4) Citibank, N.A. - Hong Kong	Bank of New York		$30,147.70	10/06/91
(5) ASLK - CGER Bank	Bank of New York		$10,178.00	6/19/91
(6) Union Bank of Switzerland	Citibank, N.A.	36046852	$10,000.00	2/25/92
(7) International Commercial Bank of China	Citibank, N.A.	36046852	$6,000.00	4/22/92
(8) Bank Leu	Security Pacific International Bank	BCCI Jordan	$10,000	7/9/92
(9) Congregation of the Holy Ghost Fathers	Bank of New York		$10,000	7/17/91
(10) Banco Nazionale del Lavoro	BankAmerica International	BCCI London	$100,500	7/8/91
(11) Commercial Bank of Kuwait	Bank of New York	8900049545	$13,757.97	8/20/91
[redacted]	American Express Bank	BCCI London	$22,500.00	7/2/91
	BankAmerica International	BCCI London	$10,000.00	7/ /91

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1325015-000-5675

SCHEDULE OF MISTAKEN FUNDS TRANSFER CLAIMS IN NEW YORK LIQUIDATION

CLAIMANT	*BANK*	*ACCOUNT*	*AMOUNT (CLAIM)*	*DATE*
(14) Swiss Bank Corporation	Security Pacific International Bank	BCCI Limassol	$240,000.00	7/4/91 7/5/91
(15) Unity Stores	First American Bank of New York	BCCI Amsterdam	$13,043.50	8/20/91
(16) Chase Manhattan Bank	Security Pacific Bank of New York	BCCI Jordan BCCI Dubai	$3,523.70 $1,990.00	6/6/91 6/6/91
[redacted]	Security Pacific Security Pacific	BCCI Jordan BCCI Limassol	$1,208.00 $35,360.10	2/5/92 1/22/92
[redacted]	American Express Bank	[redacted]	$60,000.00	7/5/91
(19) Bank of America	BankAmerica	BCCI N.Y.	$26,127.74	5/30/89
(20) Bank CIAL Schweiz	Bank of New York	8900049545	$14,344.00	5/13/93
[redacted]	Citibank	BCCI London	$14,000	7/9/91

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Schedule of Foreign Documentary Bills Purchased
BCCI Seoul

count No.	Account Name	Approx. Balance	Comments
Holder: Amexco			
58-91	BCCI Seoul	46665.00	FDBP payable 6/5/91
S[redacted]l **		46665.00	
Holder: Bank of California Intl			
5/904/0018/IMFAS	BCCI Seoul	131908.00	FDBP payable 6/11/91
Subtotal **		131908.00	
Holder: Habib Bank			
3418	BCCI Seoul	55500.00	FDBP payable 6/12/91
5779	BCCI Seoul	13504.00	FDBP payable 7/5/91
P/6300	BCCI Seoul	257503.00	FDBP payable 7/2/91
3397	BCCI Seoul	26849.10	FDBP payable 6/25/91
3418	BCCI Seoul	166500.00	FDBP payable 6/12/91
7539/34/KBK/91	BCCI Seoul	17600.00	FDBP payable 7/4/91
6948	BCCI Seoul	76300.00	FDBP payable 7/5/91
Su[redacted]l **		613756.10	
Holder: State Bank of India			
/16/91-92	BCCI Seoul	14280.00	FDBP payable 6/29/91
Subtotal **		14280.00	
Holder: United Bank Limited			
50/IFL/757/91	BCCI Seoul	23760.00	FDBP payable 7/1/91
53/LC/7915/91	BCCI Seoul	21250.00	FDBP payable 7/2/91
7/982/91/DSM	BCCI Seoul	16478.00	FDBP payable 6/25/91

1325015-000-567

Schedule of Foreign Documentary Bills Purchased
BCCI Seoul

ount No.	Account Name	Approx. Balance	Comments
Subtotal **		61488.00	
To ***		868097.10	

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)

[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted]

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. V. BCCI (Round 5)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports

[ ] Other Subsequent Materials

CC: 4-BUREAU, ATTN [redacted]
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126
(1) - WFO, 29B-WF-171994

Seizure Log
Foims (PFA) LT
CATS LT

LT990426.ec

[redacted] b6 b7C

29B-WF-171994 FF-6

1324015-000-

5th
order
of
fact

9/20/96

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/ 9/97

To: ADIC, WFO

From: SA [redacted] b6 b7C
Contact: DA JOE SCHULTE, X9072

Approved By: SSA [redacted]

Drafted By: SA [redacted] AC:jd

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
00:WMFO

Synopsis: **CLOSURE OF SEIZURE NUMBER 3920-97-F-0075 U.S. v $1,100,000.00 IN U.S. CURRENCY**

Details: The purpose of this memorandum is to request that seizure number 3920-97-F-0075 (FF-7) be closed based on the fact that $1,100,000 in U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Trial Attorney, Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

MAINTAIN AS TOP SERIAL

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FS-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FS-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FS-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FS-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FS-5	3920-97-F-0028	$60,000,000	US CURRENCY
SUB FF-6	3920-97-F-0052	$650,000	US CURRENCY
SUB FF-7	**3920-97-F-0075**	**$1,100,000**	**US CURRENCY**

① 29B-WF-171994 (SUB FS)
1- 3920-97-F-0075

29B-WF-171994 (SUB FS)
SEARCHED INDEXED
SERIALIZED FILED JDA
MAY 09 1997
FBI - WASH. METRO FIELD OFFICE

1325015-000-5709

29B-WF-171994 -FF6-2

SEARCHED INDEXED
SERIALIZED FILED
JAN 27 1997
FBI - WASH. METRO FIELD OFFICE

b6
b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: U.S. v $650,000.00 IN U.S CURRENCY

FOIMS

Entry (Check One): [X] New Case [ ]

[X] CATS Record of Seized Property	[ ] Warrant of Arrest in Rem
[ ] FD-302	[ ] Complaint for Forfeiture
[ ] In Forma Pauperis	[ ] Search Warrant
[ ] Settlement Statement/Agreement	[ ] Affidavit
[ ] Indemnity Agreement	[ ] Seizure Warrant
[ ] Final Decree	[ ] Plea Agreement
[ ] Receipt for Transfer/ Disposition of Funds/Property	[ ] Sharing Request [ ] Dag-71 [ ] Dag-72
[ ] Petition	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] Claim & Cost Bond
[ ] Order of Forfeiture	[ ] Petition Investigation

[X] Other Subsequent Materials:
Facsimile dated 12/10/96 from [redacted] Chief Financial Officer.

1-Bureau, FSPU (ATTN: [redacted]
1-WMFO 3920-97-F-0052
**ATTACHMENTS

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b7C

29B-WF-171994-FF6-1

SEARCHED INDEXED
SERIALIZED FILED
DEC 1 9 1996
FBI - WASH. METRO FIELD OFFICE

1325015-000-5647

Seizure Form

Asset ID: <A> ... | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/C	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3920		05		3920-97-F-0052	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	SA

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
12/10/96	CRIMINAL ORDER		

(15) Seizing Agent:		(16) Phone Number:
SA		202-324-9073

(17) Seized From: BCCI HOLDINGS

(18) Place/Address Where Seized:	(19) City:
	(20) State:

(21) Seizure: Judicial District	(22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
$650,000	Y		CURRENCY	BANK ACCT	JUDICIAL

(31) Asset Description: $650,000 in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	N
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:	
(83) Airframe Flying Hours:	(84) # of Engines:
(85) Air Worthiness Certificate?	(86) Log Books?

ENGINES

(79) #	(80) Serial Number	(81) Size	(82) Flying Hours

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

Seizure Form

Asset [redacted] <A> | Date: [redacted] | Page 2

Asset Description: <C>

(92) Name: BCCI HOLDINGS	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:		Owner	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Lienholder	
(100) Contact Name (if business):	(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):		Victim	
(109) Institution Address:		Other	
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:		Owner	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Lienholder	
(100) Contact Name (if business):	(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):		Victim	
(109) Institution Address:		Other	
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI HOLDINGS		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: DEPARTMENT OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From? NO		(136) Agency Type (Federal, State, Local, -or- Foreign): FEDERAL		
(137) Address:		(138) City: WASHINGTON		
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:	(143) Sharing Possible? N
(144) Contact Name:		TRIAL ATTORNEY	(145) Contact Phone Number:	

b6
b7C

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:		(134) Agency Case ID:		
(135). Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: <A>	Date: <B>	Page 4
Asset Description: <C>		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name: FEDERAL RESERVE BANK, NEW YORK	(148) Storage Date: 12/10/96
(149) Storage Facility Address:		

(150) City: NY	(151) State: NY	(152) Zip Code:	(153) Storage Rate: $	Per:

PREPARED BY

(154) S[redacted]	(155) Date: 12/18/96
(156) Prepared By: SA[redacted]	(157) Title: SA

APPROVED BY

(158) Signature: [redacted]	(159) Date: 12/20/96
(160) Approved [redacted]	(161) Title: SSA

b6
b7C

Probable Cause

SEE ATTACHED

<D>

Seizure Form

A[illegible]: 97-FBI-000409 | Date/T[illegible]01/13/97 09:53:24 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920970052	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
12/10/96	Other	10/04/88	

(15) Seizing Agent:	(16) Phone Number:
	(202)-324-9073

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized:	(19) City:	(20) State:
Not Available	Not Available	DC

(21) Judicial Seizure:	District (22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1956

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
650000.00	Y		Cash/Currency	01	Criminal

(31) Asset Description: $650,000.00 in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:					
(78) Airframe Flying Hours:	(79) # of Engines:	ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:
USA		0:00

[redacted] Trial Attorney, Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court.

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: [redacted] b6 b7C

DATE: Dec. 11, 1996

FIRM: Federal Bureau of Investigation

FAX NO.: (202) 324-6426

FROM: [redacted]

NO. OF PAGES: two (2)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

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MESSAGE

Attached, please find the details of the $650,000 distribution.

cc : [redacted] b6 b7C
U.S. Marshals Service

1325015-000-5654
12/11/96 15:54 ☎213 622 2681 ROBB EVANS ☑001/002

ROBB EVANS, TRUSTEE
SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL
As of December 10, 1996

Forfeiture Order Date	19-Aug-93	21-Dec-94	20-Sep-96	21-Dec-94	03-Nov-95	
State	California	California	California	New York	New York	Total
Forfeiture Orders						
Cash	34,379,642	3,647,571	0	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	0	31,445
Other	0	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	0	74,519,724	164,149,037	310,867,141
Net Remittance To The US Marshal						
Sources of Funds						
Asset Conversions:						
Cash	34,379,642	3,647,571	9,512,823	20,000,000	49,000,000	116,540,036
Loans	28,864,003	0	0	678,920	1,836,215	31,379,139
Real Property	21,478,818	0	0	2,071,827	1,722,599	25,273,245
Miscellaneous Property	49,094	0	0	0	2,093	51,187
Other	124,228	0	0	862,845	157,090	1,144,163
Total Asset Conversions	84,895,786	3,647,571	9,512,823	23,613,592	52,717,998	174,387,771
Total Revenue Collection (1)	6,015,282	0	0	774,869	2,935,023	9,725,173
Total Sources of Funds	90,911,068	3,647,571	9,512,823	24,388,461	55,653,021	184,112,944
Uses of Funds						
Seller Financing and Cash Disbursements	(10,762,343)	0	0	(8,518,265)	(4,087,442)	(23,368,049)
Operating Account Balance	(714,288)	0	0	(684,345)	(56,262)	(1,454,895)
Special Reserve Account (2)	0	0	0	(330,683)	(2,309,317)	(2,640,000)
Surplus Balance	0	0	0	0	0	0
Total Uses of Funds	(11,476,631)	0	0	(9,533,293)	(6,453,021)	(27,462,944)
Net Remittances	79,434,437	3,647,571	9,512,823	14,855,168	49,200,000	156,650,000
Present Book Value Per Budget						
Cash	714,288	0	0	1,015,028	2,365,579	4,094,895
Loans	0	0	0	7,725,124	2,309,151	10,034,275
Real Property	3,232,254	0	0	270,000	13,400,640	16,902,894
Miscellaneous Property	0	0	0	0	0	0
Other Assets	5,668	0	0	27,888	2,753,524	2,787,080
Total Liabilities	(651,461)	0	0	(300,085)	(2,640,000)	(3,591,547)
Total PBV Per Budget	3,300,749	0	0	8,737,954	18,188,893	30,227,596

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $8,591,062.86.*
(2) Special reserve to settle liabilities of real property holding corporations, to fund deferred maintenance and necessary capital improvements, and for New York Claims.

12/11/96 15:54 213 622 2681 ROBB EVANS 002/002

ROBB EVANS, TRUSTEE

RECORD OF SURPLUS FUNDS TRANSFERRED TO U.S. MARSHAL

As of December 10, 1996
(Amount in Dollars)

DATE TRANSFERRED	AMOUNT TRANSFERRED
26-Aug-93	35,964,405.69
22-Oct-93	1,000,000.00
22-Dec-93	250,000.00
18-Feb-94	4,250,000.00
19-Apr-94	150,000.00
17-Jun-94	1,300,000.00
16-Aug-94	8,850,000.00
14-Oct-94	200,000.00
13-Dec-94	3,035,594.31
13-Feb-95	17,000,000.00
14-Apr-95	1,500,000.00
13-Jun-95	10,500,000.00
14-Aug-95	2,000,000.00
13-Oct-95	1,000,000.00
12-Dec-95	1,000,000.00
12-Feb-96	2,200,000.00
12-Apr-96	1,800,000.00
11-Jun-96	3,000,000.00
12-Aug-96	1,000,000.00
11-Oct-96	60,000,000.00
10-Dec-96	650,000.00
TOTAL	**156,650,000.00**

1325015-000-5656
12/10/96 17:13 ☎213 622 2681 ROBB EVANS 002/003

WIRE INQUIRY DETAIL

WEBS NO WF3459608401000011B GFTS NO 34557696G FED NO L1QWFI4A0194412101000
CREATING AU 0840 DEBIT ACCT RAU 0607
CREATED BY [redacted] GROUP 022 b6 b7C
TIME 08:54 DATE 12/10/96 BALANCE $ 650,000.00
STATUS AT CREATE SATISFACTORY
NSF REASON
RSN/CONFRM NUM

APPROVAL BY [redacted] GROUP 023 APPROVER AU 0840
TIME 08:56 DATE 12/10/96 BALANCE $ 0.00
APPROVER NOTES
STATUS AT APPROVE SATISFACTORY

APPROVAL BY [redacted] GROUP 023 APPROVER AU 0840
TIME 10:00 DATE 12/10/96 BALANCE $ 0.00
APPROVER NOTES
STATUS AT APPROVE SATISFACTORY
WIRE STATUS PROCESSED GFTS

PRESS ENTER TO RETURN TO SELECT SCREEN OR PF5 TO GO TO ENTRY SCREEN
BAL. FROM WD SYSTEM MAY NOT MATCH WEBS. CALL BASC 243-7744 WITH QUES.

1325015-000-5657

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from five criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. Robb Evans, trustee has been appointed to oversee the complex assets listed in the five criminal BCCI forfeiture orders. On 12/10/96, Evans completed a $650,000.00 (six hundred fifty thousand) wire transfer to the United States Marshals Service, New York representing the liquidation of cash assets from the fifth order of forfeiture.

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] BCCI), and Capcom Financial Services, LTD. with conspiracy (18 U.S.C. Section 371), money laundering (18 U.S.C. Sections 1956 (a) (1) & (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

This indictment resulted from [redacted] b7E

On Jan 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI) and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 46
Page 4 ~ Duplicate;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Duplicate;
Page 9 ~ Duplicate;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 14 ~ Referral/Consult;
Page 15 ~ Referral/Consult;
Page 16 ~ Referral/Consult;
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Page 37 ~ Referral/Consult;
Page 38 ~ Referral/Consult;
Page 39 ~ Referral/Consult;
Page 40 ~ Referral/Consult;
Page 41 ~ Referral/Consult;
Page 50 ~ Duplicate;
Page 53 ~ Duplicate;
Page 67 ~ Duplicate;
Page 68 ~ Duplicate;
Page 69 ~ Duplicate;
Page 70 ~ Duplicate;
Page 71 ~ Duplicate;
Page 72 ~ Duplicate;
Page 73 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXXX

Asset ID: 96-FBI-003688
Asset Description: BCCI Holdings (Round 5)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960097
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/06/1999

To: Washington Field

From: Washington Field
Squad C-1
Contact: SSA [redacted] Ext. 2295

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. v. BCCI Holdings

Synopsis: CLOSING COMMUNICATION

Details: The purpose of this communication is to summarize recent events surrounding the 63 seizure files associated with the BCCI investigation. On 2/1/99, several members of DOJ, USMS, and FBI met to determine how to close out the BCCI seizures entered in the CATS database as the Sixth and Final Order of Forfeiture had been entered into as of 12/22/98. A summary of this meeting is attached as reference. In brief, it was decided that the 63 BCCI individual seizures entered into CATS would be deleted in exchange for 6 seizures entered into CATS corresponding to each of the six orders of forfeiture. The following CATS ID numbers and corresponding seizure numbers were utilized for the respective orders of forfeiture.

92-FBI-000460 (3920-92-F-0115; 1st Order - 1/24/92 & 1/31/92)
92-FBI-000461 (3920-92-F-0116; 2nd Order - 7/29/92)
92-FBI-000462 (3920-92-F-0117; 3rd Order - 8/19/93)
95-FBI-003535 (3920-95-F-0097; 4th Order - 12/21/94)
96-FBI-003688 (3920-96-F-0097; 5th Order - 9/20/96)
99-FBI-000970 (3920-99-F-0092; 6th Order - 12/22/98)

The USMS has taken the responsibility for associating each of the 63 individual seizures with the 6 seizures for each order of forfeiture. Attached for reference is a spreadsheet which correlates each of the 63 seizures with the appropriate order of forfeiture. The USMS will make entries to the itemized list in CATS which will detail the total amount received for each

(7)

LI99W71.cc

29B-WF-171994-FBI

132-HQ-1325015-000-5370

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/28/1996

To: DIRECTOR, FBI

From: ADIC, WMFO
SQUAD C-1 FORFEITURE ASSET SEIZURE TEAM
Contact: (SA) [redacted] b6 b7C

Approved By: (SSA) [redacted]

Drafted By: (SA) [redacted] :js

File Number(s): 29B-WF-171994 (Pending)
3920-97-F-0028

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO:WMFO

Synopsis: OPENING MEMO

Details: The purpose of this memorandum is to request that a new sub file (Sub FF-5) be opened based on the fact that $60,000,000.00 (sixty million) in U. S. Currency from the fifth order of forfeiture has been remitted to the United States Marshals Service (via wire transfer) in the above cited case.

[redacted] b6 b7C

Set 1 for 11/19 w/ 11/22 deadline to report seizure to HQ.

◆◆
1-WMFO
(3920-97-F-0028)

10-30-96
OEA
29B-WF-171994 Sub FF Sub 5 New
1
29B-WF-171994 [redacted]
TO
10/29/96

29B-WF-171994-FF-5-1

[redacted] b6 b7C

1325015-000-5372

3920-97-F-00283
29B-WF-171994

SEARCHED INDEXED
SERIALIZED FILED
DEC 13 1995
FBI - WASH. METRO FIELD OFFICE

b6
b7C

Seizure Form

Asset ID: 97-FBI-000105 | Date/Time: 11/18/96 09:24:10 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920970028	N

(7) Case Number: 29B-WF-171994

(8) Case Name: Hidden Interests; Major Case #38

(9) Operation Name:

(10) Case Agent: SA

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
10/11/96	Other	12/21/94	

(15) Seizing Agent: SA

(16) Phone Number: (202)-324-9073

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized: Not Available

(19) City: Washington

(20) State: DC

(21) Judicial District Seizure:	(22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 981

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
60000000.00	Y		Financial Instrument	04	Criminal

(31) Asset Description: BCCI Assets Totaling 60 Million in U.S. Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name: Trustee

(83) Account Number: 149-240-134

FOREIGN CURRENCY

(84) Nationality:

(85) Date Converted:

(86) Exchange Rate:

b6 b7C

b6 b7C

1325015-000-5410

Seizure Form

Asset Description: BCCI Assets Totaling 60 Million in U.S. Currency

(92) Name: BCCI Holdings			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address: Not Available				Owner	
(96) City: Not Available	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	Lienholder	
(100) Contact Name (if business): Not Available			(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated? N	(107) Prisoner ID:			Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:		
(114) Represented by Counsel? N	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

(92) Name:			(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:				Owner	
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	Lienholder	
(100) Contact Name (if business):			(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:			Occupant	
(108) Institution Name (if incarcerated):				Victim	
(109) Institution Address:				Other	
(110) City:	(111) State:	(112) Zip Code:	(113) Country:		
(114) Represented by Counsel?	(115) Attorney's Name (if any):				
(116) Firm's Name:			(117) Attorney's Phone Number:		
(118) Attorney's Address:					
(119) City:	(120) State:	(121) Zip Code:	(122) Country:		

Seizure Form

Asset ID: 97-FBI-000105 | Date/Time: 11/18/96 09:24:10

Asset Description: BCCI Assets Totaling 60 Million in U.S. Currency

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI Holdings		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: Not Available
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name: DEPARTMENT OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From? N		(136) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(137) Address: Not Available		(138) City: Washington		
(139) State: DC	(140) Zip Code: 00000	(141) Country: USA	(142) NCIC Code: DOJ	(143) Sharing Possible? N
(144) Contact Name: [redacted] Trial Attorney			(145) Contact Phone Number:	

b6
b7C

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	
(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Asset ID: 97-FBI-000105	Date/Time: 11/18/96 09:24:10	Page 4 of 7
Asset Description: BCCI Assets Totaling 60 Million in U.S. Currency		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	Federal Reserve Bank, New York	10/11/96

(149) Storage Facility Address:
Not Available

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: Per:
New York	NY	00000	

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date:
	10/11/96
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date:
	10/16/96
(164) Prepared By: SA [redacted]	(165) Title: SA

b6
b7C

APPROVED BY

(166) Signature:	(167) Date:
	10/29/96
(168) Approved By: Not Legible	(169) Title: CDC

Asset ID: 97-FBI-000105
Asset Description: BCCI Assets Totaling 60 Million in U.S. Currency

Probable Cause

29B-WF-171994

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from five criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. [redacted] trustee has been appointed to oversee the complex assets listed in the five criminal BCCI forfeiture orders. On 10/11/96, [redacted] completed a $60,000,000.00 (sixty million dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets form the fifth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] (all officers of BCCI), and Capcom Financial Service, LTD. with conspiracy (18 U.S.C. Section 371), money laundering (18 U.S.C. Sections 1956 (a) (1) & (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-trafficking, [redacted] were indicted on May 4, 1989. b6 b7C

This indictment resulted from [redacted] b7E

1325015-000-5414

On Jan. 24, 1992, the United States District Court for the

District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively "BCCI") and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agrement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Asset ID: 97-FBI-000105
Asset Description: BCCI Assets Totaling 60 Million in U.S. Currency

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	11/12/96
Headquarters Receipt Date:	10/31/96	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:	C-1		
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920970028
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/3/1997

To: Director, FBI **Attn:** [redacted] (FSPU) b6 b7C

From: WFO
Squad C-1 (FAST)

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 209B-WF-198831 SUB FF SUB 2 (Pending)

Title: U.S. v. $96,801.25 IN U.S. CURRENCY

Synopsis: To advise FSPU of the status of certain WFO cases.

Reference: Reference is made to a 1/3/97 communication from FSPU to WFO requesting status of seizure files.

Enclosures: Enclosed for FSPU is a 10/9/96 Consent Order of Forfeiture pertaining to WFO seizures 3920-F-94-151 & 155.

Details: Referenced FSPU communication requested a status update on several WFO forfeiture cases. These cases are updated below by seizure number:

1) 3920-F-94-151 &155: The Consent Order of Forfeiture is attached. The final order will not be issued until after further legal proceedings are concluded in April, 1997.

2) 3920-95-F-021: AFO DOJ is still in the process of ruling on the petitions. The latest estimate of completion is sometime in March, 1997.

3) 3920-95-F-058-60, 95-91, 95-97, 96-024, 96-134, 96-186, 96-195, 97-28 and 97-52: These are all seizure files regarding the BCCI case. There have been several criminal forfeiture orders, but no final orders of forfeiture will be signed until all assets have been identified and turned over.

4) 3920-95-102 & 96-023: Subject [redacted] was recently sentenced to twenty-five months in jail. AFO has yet to rule on the petitions and no final forfeiture order has been received from the U.S. Attorney's Office. b6 b7C

5) 3920-96-F-053: Three separate Petitions for Remission have been filed in this case. WFO's Petition Investigation was submitted on 2/28/97.

5
Sub FF-5
29B-WF-171994

3920-97-0028

SEARCHED INDEXED
SERIALIZED FILED
MAR 07 1997
FBI-WASH. METRO FIELD OFFICE

1325015-000-5418

To: Director, FBI From: WFO
Re: 209B-WF-198831 SUB FF SUB 2, 03/03/1997

Should you have any questions regarding these cases, please contact DA [redacted] or SSA [redacted] at (202) 252-7118. b6 b7C

CC: 17 - FSPU [redacted]
17 - WFO
1 - 3920-94-F-151
1 - 3920-94-F-155
1 - 3920-95-F-021
1 - 3920-95-F-050
1 - 3920-95-F-059
1 - 3920-95-F-060
1 - 3920-95-F-091
1 - 3920-95-F-097
1 - 95-102
1 - 96-23
1 - 96-24
1 - 96-53
1 - 96-134
1 - 96-186
1 - 96-195
1 - 97-28
1 - 97-52

♦♦

1325015-000-5419

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300) [redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. V. BCCI (Round 5)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports

[ ] Other Subsequent Materials

CC: 4-BUREAU, ATTN: [redacted] b6 b7C
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126
(1) - WFO, 29B-WF-171994 - 113

Seizure Log
Foims (PFA) LT
CATS LT

LT990426.EC

[redacted] b6 b7C

29B-WF-171994(FF-5)

1325015-000-542

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RECEIVED
UNITED STATES MARSHAL
SOUTHERN NEW YORK
96 SEP 26 P1:19

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED
SEP 20 1996
CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

RECEIVED
SEP 23 9 12 AM '96
EASTERN DISTRICT OF NEW YORK

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of

Forfeited Property, see Order of Forfeiture, July 29, 1992, a Third Supplemental List of Forfeited Property, see Order of Forfeiture, August 19, 1993, and a Fourth Supplemental List of Forfeited Property, see Order of Forfeiture, December 21, 1994.

The government has now identified additional assets of the corporate defendants that are forfeitable to the United States under the First Order of Forfeiture. These assets are described in Exhibit A to the government's motion which includes assets held in the names of the four corporate defendants, as well as assets nominally held by other persons and entities.

For the reasons set forth in the government's motion and the accompanying declarations and exhibits, the Court finds that the property listed in the government's Exhibit A is the property of the corporate defendants and that the property is located within the United States. Accordingly, it is hereby

1. ORDERED that the property listed on government's Exhibit A, including Addenda 1 through 3, is forfeited to the United States;

2. IT IS FURTHER ORDERED that the Order of Forfeiture of January 24, 1992, is hereby amended to include government's Exhibit A and the Addenda as a Fifth Supplemental List of Forfeited Property;

3. IT IS FURTHER ORDERED that the property listed on the Fifth Supplemental List shall be transferred to the United States as follows:

1325015-000-5423

A. All property on the Fifth Supplemental List that is described as being the excess of the liquidation of the agencies of BCCI S.A. in New York and California shall be managed by the Court-Appointed Trustee, Robb Evans, and transferred to the Marshals in accordance with this Court's Orders Appointing Trustee of March 5, 1993 (with respect to the California property) and July 20, 1994 (with respect to the New York property);

B. Any property on the Fifth Supplemental List that is now in the Court Registry Investment System shall be transferred to the Marshals Service forthwith along with any interest accrued since the funds were deposited in the Investment System;

C. With respect to the property referred to as One Pacific Plaza, Fremont, California, all interest in that property held by the Kuwait International Finance Company ("KIFCO") is forfeited to the United States, and Robb Evans, the court-appointed trustee, is authorized to liquidate the forfeited interest on behalf of the United States in conjunction with the on-going liquidation he has been previously been appointed to conduct, to satisfy any tax liens held by any taxing authority in the State of California, and to transfer the remaining proceeds of the liquidation to the United States Marshals Service in his next regular transfer of funds following the liquidation. The liquidation shall be completed in any event not later than December 31, 1997; unless due to exigent circumstances and based upon a sufficient showing, the Court extends such date by Order.

1325015-000-5424

D. With respect to the property described as a debenture issued by CCAH in favor of the Credit and Finance Corporation ("CFC"), the court finds that CFC was the alter ego of the BCCI defendants and that accordingly any amount due to be paid by CCAH to CFC is forfeited to the United States; accordingly, any funds that would be payable with respect to the debenture by Harry W. Albright Jr., the court-appointed trustee for First American Bank, in accordance with the Procedural Order issued December 21, 1994, shall be paid to the United States Marshals Service with accrued interest as soon as practicable;

E. With respect to the assets held in the names of BCC Argentina and BCCI (Lebanon) S.A.L., the court finds that the corporate form should be disregarded and the assets held by these entities are forfeited to the United States. The assets of BCC Argentina formerly at the Bank of New York are already in the possession of the Marshals Service. American Express Bank is directed to provide the Marshals Service with the account number and current balance of any account held by BCCI (Lebanon) S.A.L. within 10 days of the date of this order and to transfer said balance to the Marshals Service at that time.

F. With respect to the funds remaining from the sale of 2560 Skyfarm Drive, Hillsborough, Calif. the Marshals shall retain $269,791.56, plus accrued interest, as property forfeited to the United States, and shall return the balance, plus accrued interest, to the court-appointed fiduciaries in recognition of the fiduciaries' expenses in connection with the sale.

1325015-000-5425

G. The United States Marshals Service is directed to seize forthwith all other property listed on the Fifth Supplemental List that is not already in the possession of the Marshals Service;

4. IT IS FURTHER ORDERED, that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title or interest in all property subject to this Order pursuant to section 1963(l) with the following qualification: With respect to the excess funds from the liquidation of the California and New York agencies of BCCI S.A., the United States shall not be required to send notice of the ancillary proceeding to any person to whom it sent notice of the forfeiture of the first set of such funds pursuant to the Third and/or Fourth Order of Forfeiture and who did not file a claim;

5. IT IS FURTHER ORDERED, that with respect to the real property now held by Robb Evans as a consequence of the New York Superintendent of Banks' transfer to him of stock in corporations holding such property, the property forfeited to the United States pursuant to this Order and pursuant to the Fourth Order of Forfeiture shall include the corporations themselves, the stock in the corporations holding the real property, the real property, and all other corporate assets.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

September 20, 1996

United States District Court
for the District of Columbia
A TRUE COPY
NANCY MAYER-WHITTINGTON, Clerk
By Deputy Clerk

1325015-000-5426

FIFTH SUPPLEMENTAL LIST OF FORFEITED PROPERTY

Description	Approximate Value
Excess Assets from liquidation of New York Agency of BCCI S.A. Transferred to Trustee in Nov. 1995 (See Addendum 1: inventory filed 11/22/95)	$163,054,483.24
Excess Assets from liquidation of New York Agency of BCCI S.A. Transferred to Trustee in Jan. 1995, including Quality Inn LaGuardia, Elmhurst, NY	$15,200,000.00
Excess Assets from liquidation of California Agency of BCCI S.A. not in Third or Fourth Order of Forfeiture	$9,512,823.34
Assets Not Part of the New York Liquidation transferred to the Court Registry in July 1995 (See Addendum 2)	$1,053,486.30
January 1990 debenture issued by CCAH in favor of Credit and Finance Corporation	$18,000,000.00
One Pacific Plaza, Fremont, California	$2,500,000.00
BCCI (Overseas) Sri Lanka account at Fleet Bank, formerly National Westminster Bank	$48,500.00
Interest accrued in Escrow Account held by B.Gray Gibbs	$3,757.06
Funds in account no. 890-0054-603 at the Bank of New York in the name BCC Argentina	$140,117.94
Funds in account at American Express Bank in the name BCCI (Lebanon) S.A.L.	$600,000.00
Remainder of proceeds of sale of 2560 Skyfarm Drive, Hillsborough, California	$269,791.56
FDBP's owed to BCCI (Overseas) Seoul (see attached schedule)	$868,097.10
Total	$211,251,056.54

1325015-000-5427

ADDENDUM I

ROBB EVANS, TRUSTEE
INVENTORY LIST
As of November 3, 1995

		Balance
Cash Assets:		
Deposits		$ 49,000,000.00

Sanwa Bank
601 South Figueroa Street
Los Angeles, CA 90017

Account Name and Number:
Robb Evans, Trustee, # 6506-40357

Union Bank
San Francisco Main Office
370 California Street
San Francisco, CA 94104

Account Name and Number:
Robb Evans, Trustee, # 1279180028

Republic Bank California N.A.
445 North Bedford Drive
Beverly Hills, CA 90210

Account Name and Number:
Robb Evans, Trustee, # 5300005588

First Interstate Bank
707 Wilshire Boulevard
Los Angeles, CA 90017

Account Name and Number:
Robb Evans, Trustee, # 149-249-058

		Principal Amount
Promissory Notes:	52 Items	$ 6,956,035.29
FICA Receivables from Ex-Staff of BCCI	10 Items	$ 5,498.19

1325015-000-5428

ROBB EVANS, TRUSTEE
INVENTORY LIST
As of November 3, 1995

		Book Value
Salary Advances to Ex-Staff	2 Items	$ 700.00
Claims on Other BCCI Offices and Affiliates	12 Items	$ 2,730,521.89
Judgments Awarded	4 Items	$ 103,053,064.85
Jewels, Utility Deposit and Payments, Real Estate Taxes and Insurance Paid on Collateral	9 Items	$ 116,388.44
Real Property	2 Items	$ 453,909.76

1. 88 acres of residential zoned land in Blooming Grove, Orange County, New York State (Exhibit A)

2. Residential property at 3006 Merrywood Drive, Edison, Middlesex County, New Jersey 08817 (Exhibit B)

		Book Value
Shares of Real Estate Holding Corporations	2 Items	$ 1,738,384.82

1. Fifty (50) shares in Saltex, Inc. holding 100% interest in real property at 7887 Katy Freeway, Houston, Texas 77024 (Exhibit C)

2. Ten (10) shares in Mor Properties, Inc. holding 100% interest in funds held currently by the New York Superintendent of Banks and in transit.

1325015-000-5429

SCHEDULE OF MISTAKEN FUNDS TRANSFER CLAIMS IN NEW YORK LIQUIDATION

CLAIMANT	*BANK*	*ACCOUNT*	*AMOUNT*	*DATE (CLAIM)*
(1) Khawaja Qadeer Ahmed	Bank of New York	8900049545	$400,000	3/7/91
(2) ABN Amro Bank, N.V.	Bank of New York	8900049545	$14,975	6/21/91
(3) Branch Banking & Trust Co.	Citibank, NY	36046852	$5,830.74	4/14/92
(4) Citibank, N.A. - Hong Kong	Bank of New York		$30,147.70	10/06/91
(5) ASLK - CGER Bank	Bank of New York		$10,178.00	6/19/91
(6) Union Bank of Switzerland	Citibank, N.A.	36046852	$10,000.00	2/25/92
(7) International Commercial Bank of China	Citibank, N.A.	36046852	$6,000.00	4/22/92
(8) Bank Leu	Security Pacific International Bank	BCCI Jordan	$10,000	7/9/92
(9) Congregation of the Holy Ghost Fathers	Bank of New York		$10,000	7/17/91
(10) Banco Nazionale del Lavoro	BankAmerica International	BCCI London	$100,500	7/8/91
(11) Commercial Bank of Kuwait	Bank of New York	8900049545	$13,757.97	8/20/91
(12) Monte Dei Paschi Di Siena	American Express Bank	BCCI London	$22,500.00	7/2/91
(13) Lawrence and Maria Fernandes	BankAmerica International	BCCI London	$10,000.00	7/ /91

SCHEDULE OF MISTAKEN FUNDS TRANSFER CLAIMS IN NEW YORK LIQUIDATION

CLAIMANT	*BANK*	*ACCOUNT*	*AMOUNT (CLAIM)*	*DATE*
(14) Swiss Bank Corporation	Security Pacific International Bank	BCCI Limassol	$240,000.00	7/4/91 7/5/91
(15) Unity Stores	First American Bank of New York	BCCI Amsterdam	$13,043.50	8/20/91
(16) Chase Manhattan Bank	Security Pacific Bank of New York	BCCI Jordan BCCI Dubai	$3,523.70 $1,990.00	6/6/91 6/6/91
(17) Z-Laenderbank	Security Pacific Security Pacific	BCCI Jordan BCCI Limassol	$1,208.00 $35,360.10	2/5/92 1/22/92
(18) F. Mahmoud - AMEX	American Express Bank	52985	$60,000.00	7/5/91
(19) Bank of America	BankAmerica	BCCI N.Y.	$26,127.74	5/30/89
(20) Bank CIAL Schweiz	Bank of New York	8900049545	$14,344.00	5/13/93
(21) Lateef Adams	Citibank	BCCI London	$14,000	7/9/91

Schedule of Foreign Documentary Bills Purchased
BCCI Seoul

count No.	Account Name	Approx. Balance	Comments
Holder: Amexco			
58-9[redacted]	BCCI Seoul	46665.00	FDBP payable 6/5/91
S[redacted]tal **		46665.00	
Holder: Bank of California Intl			
5/904/0018/IMFAS	BCCI Seoul	131908.00	FDBP payable 6/11/91
Subtotal **		131908.00	
Holder: Habib Bank			
3418	BCCI Seoul	55500.00	FDBP payable 6/12/91
5779	BCCI Seoul	13504.00	FDBP payable 7/5/91
P/6300	BCCI Seoul	257503.00	FDBP payable 7/2/91
3397	BCCI Seoul	26849.10	FDBP payable 6/25/91
3418	BCCI Seoul	166500.00	FDBP payable 6/12/91
7539/34/KBK/91	BCCI Seoul	17600.00	FDBP payable 7/4/91
6948[redacted]	BCCI Seoul	76300.00	FDBP payable 7/5/91
Su[redacted]l **		613756.10	
Holder: State Bank of India			
/16/91-92	BCCI Seoul	14280.00	FDBP payable 6/29/91
Subtotal **		14280.00	
Holder: United Bank Limited			
50/IFL/757/91	BCCI Seoul	23760.00	FDBP payable 7/1/91
53/LC/7915/91	BCCI Seoul	21250.00	FDBP payable 7/2/91
1/982/91/DSM	BCCI Seoul	16478.00	FDBP payable 6/25/91

1325015-000-5432

Schedule of Foreign Documentary Bills Purchased
BCCI Seoul

ount No.	Account Name	Approx. Balance	Comments
Subtotal **		61488.00	
To ***		868097.10	

1325015-000-5433

Seizure Form

Asset ID: 96-FBI-003688 | Date/Time: 04/01/99 14:50:06 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960097	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:
	[redacted]

b6
b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
09/20/96				Indictment	11/24/91	

(18) Seizing Agent:	(19) Phone Number:
[redacted]	(202) 324-9072

(20) Seized From: BCCI

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Given	Not Given	NY

(24) Judicial District Seizure:	(25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
211251056.69	Y		Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 5)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	**(40) Forfeiture-Dependent Award?**	**(41) Quick Release Performed?**	**(42) Intra-Agency Assistance?**
N	N	N	N
(43) Suitable for Official Use?	**(44) OCDETF Case?**	**(45) Sharing Anticipated?**	**(46) Additional Agencies?**
N	N	N	Y

(Complete if Applicable)

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

VEHICLE

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):

(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

1325015-000-5441

Seizure Form

Asset Description: BCCI Holdings (Round 5)

(95) Name: (Party ID 395749) BCCI			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No. 1) NOT GIVEN				Owner
(99) City: NOT GIVEN	(100) State: DC	(101) Zip Code: 00000	(102) Country: USA	Lienholder
(103) Contact Name (if business): UNKNOWN UNKNOWN			(104) Phone Number:	Seized From X
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated? N	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No. 1)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No. 1)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(95) Name: (Party ID)			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No.)				Owner
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	Lienholder
(103) Contact Name (if business):			(104) Phone Number:	Seized From
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From
(109) Incarcerated?	(110) Prisoner ID:			Occupant
(111) Institution Name (if incarcerated):				Victim
(112) Institution Address: (Seq No.)				Other
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No.)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	U.S. V. BCCI HOLDINGS (ROUND 5)		
(128) AUSA Name:		(129) Judicial District: DC	(130) Phone Number: 202-514-1263
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

b6
b7C

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name:			(137) Agency Case ID:	
US CUSTOMS HQ				
(138) Adopted From?			(139) Agency Type (Federal, State, Local, -or- Foreign):	
N			Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible? N
(147) Contact Name:			(148) Contact Phone Number:	

(136) Agency Name:			(137) Agency Case ID:	
DRUG ENFORCEMENT ADMINISTRATION				
(138) Adopted From?			(139) Agency Type (Federal, State, Local, -or- Foreign):	
N			Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible? N
(147) Contact Name:			(148) Contact Phone Number:	

(136) Agency Name:			(137) Agency Case ID:	
INTERNAL REVENUE SERVICE				
(138) Adopted From?			(139) Agency Type (Federal, State, Local, -or- Foreign):	
N			Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code: IRS	(146) Sharing Possible? N
(147) Contact Name:			(148) Contact Phone Number:	

Seizure Form

Asset ID: [redacted]6-FBI-003688	Date/Time: [redacted]/01/99 14:50:06
Asset Description: BCCI Holdings (Round 5)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	09/20/96

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate: Per:
NEW YORK	NY	10007	

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	09/20/96
(163) Received By:	(164) Title:
	AFU Chief

PREPARED BY

(165) Signature:	(166) Date:
	09/20/96
(167) Prepared By:	(168) Title:
	SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	09/20/96
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 96-FBI-003688
Asset Description: BCCI Holdings (Round 5)

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. [redacted] TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS. b6 b7C

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI"), [redacted] (ALL OFFICERS OF BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH CONSPIRACY (18 U.S.C. SECTION 371, MONEY LAUNDERING (18 U.S.C. SECTION 1956 (A) (A) & (2), AND DRUG CONSPIRACY (21 U.S.C. SECTION 846). THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI OFFICERS, [redacted] AND TWO NARCO-TRAFFICKERS, [redacted] WERE INDICTED ON MAY 4, 1989. b6 b7C

THIS INDICTMENT RESULTED FROM [redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Asset ID: 96-FBI-003688
Asset Description: BCCI Holdings (Round 5)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	L Claim American Express Bank	570332.29
		FI	
2	1	L Claim State of New York	400000.00
		FI	
3	1	L Claim State of New York	13757.97
		FI	
4	1	L Claim Bank of New York-Security Pacific	1208.00
		FI	
5	1	L Claim Bank of New York-Security Pacific	35360.10
		FI	
6	1	Worldwide Victims Fund	45102850.61
		FI	
7	1	Amount Forfeited	45102850.60
		FI	
8	1	Balance of Account	8237861.10
		FI	

X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 24
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 13 ~ Referral/Consult;
Page 27 ~ Duplicate;
Page 28 ~ Duplicate;
Page 29 ~ Duplicate;
Page 30 ~ Duplicate;
Page 31 ~ Duplicate;
Page 32 ~ Duplicate;
Page 33 ~ Duplicate;
Page 34 ~ Duplicate;
Page 35 ~ Duplicate;
Page 36 ~ Duplicate;
Page 37 ~ Duplicate;
Page 38 ~ Duplicate;
Page 39 ~ Duplicate;
Page 40 ~ Duplicate;

XXXXXXXXXXXXXXXXXXXXXXX
X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXX

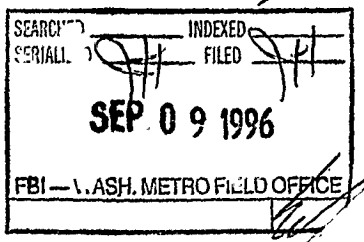
Asset ID: 95-FBI-003535
Asset Description: BCCI Holdings (Round 4)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920950097
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

29BWF-171994-FF4-3

3920-96-0195



b6
b7C

1325015-000-5327

Seizure Form

Asset [redacted] 96-FBI-002351 | Date/Time [redacted]/29/96 09:27:48 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960195	N

(7) Case Number:	(8) Case Name:
29B-WF-371994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	[redacted] b6 b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
08/12/96	Seizure Warrant	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
[redacted]	202-324-9073 b6 b7C

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized:	(19) City:	(20) State:
Not Available	Not Available	DC

(21) Seizure: Judicial District	(22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1957

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
1000000.00	Y		Financial Instrument	04	Criminal

(31) Asset Description: BCCI Assets Totaling $1,000,000.00 in U.S.Currency

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	N

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:
Robb Evans, Trustee	149-240-134!

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:

Seizure Form

Asset ID: [redacted]6-FBI-002351 | Date/Time: [redacted]/29/96 09:27:48

Asset Description: BCCI Assets Totaling $1,000,000.00 in U.S.Currency

(92) Name: BCCI Holdings			(93) Phone Number:	(94) Party Type (Select 1 -or- More)
(95) Address: Not Available				Owner:
(96) City: Not Available	(97) State: DC	(98) Zip Code: 00000	(99) Country: USA	Lienholder:
(100) Contact Name (if business): Not Available			(101) Phone Number:	Seized From: X
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From:
(106) Incarcerated? N	(107) Prisoner ID:			Occupant:
(108) Institution Name (if incarcerated):				Victim:
(109) Institution Address:				Other:
(110) City:	(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel? N	(115) Attorney's Name (if any):			
(116) Firm's Name:			(117) Attorney's Phone Number:	
(118) Attorney's Address:				
(119) City:	(120) State:	(121) Zip Code:	(122) Country:	

(92) Name:			(93) Phone Number:	(94) Party Type (Select 1 -or- More)
(95) Address:				Owner:
(96) City:	(97) State:	(98) Zip Code:	(99) Country:	Lienholder:
(100) Contact Name (if business):			(101) Phone Number:	Seized From:
(102) Lien Amount Held By Party ($):	(103) Quick Release Recipient?	(104) Quick Release Date:	(105) Expenses Reimbursed ($):	Institution Seized From:
(106) Incarcerated?	(107) Prisoner ID:			Occupant:
(108) Institution Name (if incarcerated):				Victim:
(109) Institution Address:				Other:
(110) City:	(111) State:	(112) Zip Code:	(113) Country:	
(114) Represented by Counsel?	(115) Attorney's Name (if any):			
(116) Firm's Name:			(117) Attorney's Phone Number:	
(118) Attorney's Address:				
(119) City:	(120) State:	(121) Zip Code:	(122) Country:	

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI Holdings		
(125) AUSA Name: Not Available		(126) Judicial District: DC	(127) Phone Number: 202-514-7736
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:				(145) Contact Phone Number:
(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:				(145) Contact Phone Number:
(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:				(145) Contact Phone Number:

Seizure Form

Asset ID: [redacted]6-FBI-002351	Date/Time: [redacted]/29/96 09:27:48
Asset Description: BCCI Assets Totaling $1,000,000.00 in U.S.Currency	

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
Seizing Agency	Federal Reserve Bank, New York	08/12/96

(149) Storage Facility Address:
Not Available

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
New York	NY	00000		

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date: 08/12/96
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date: 08/26/96
(164) Prepared By:	(165) Title: Special Agent

b6
b7C

APPROVED BY

(166) Signature:	(167) Date: 08/26/96
(168) Approved By:	(169) Title: SSA

Asset ID: 96-FBI-002351
Asset Description: BCCI Assets Totaling $1,000,000.00 in U.S.Currency

Probable Cause

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. [redacted] trustee has been appointed to oversee the complex assets listed in the four criminal BCCI forfeiture orders. On 08/12/96, [redacted] completed a $1,000,000.00 (one million dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] (all officers of BCCI), and Capcom Financial Services, LTD. with conspiracy (18 U.S.C. Section 371), money laundering (18 U.S.C. Sections 1956 (a) (1) & (2), and drug conspiracy (21 U.S.C. Section 846). The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

This indictment resulted from [redacted] b7E

On Jan 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including

without limitation, real property and all tangible and intangible personal property.

Asset ID: 96-FBI-002351
Asset Description: BCCI Assets Totaling $1,000,000.00 in U.S.Currency

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	08/29/96
Headquarters Receipt Date:	08/27/96	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960195
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1/FAST, NVMRA
Contact: SA [redacted] x9072

Approved By: [redacted] (SSA)

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Trial Attorney, Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court. b6 b7C

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

◆◆
1- 29B-WF-171994
1- All seizure files

[redacted] b6 b7C

Close #4
12/20/96
Seizure log
29B-WF-171994 FF4 - 4

SEARCHED INDEXED
SERIALIZED FILED
DEC 1 9 1996
FBI - WASH. METRO FIELD OFFICE

[redacted] b6 b7C

1325015-000

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/3/1997

To: Director, FBI **Attn:** [redacted] (FSPU) b6 b7C

From: WFO
Squad C-1 (FAST)

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 209B-WF-198831 SUB FF SUB 2 (Pending)

Title: U.S. v. $96,801.25 IN U.S. CURRENCY

Synopsis: To advise FSPU of the status of certain WFO cases.

Reference: Reference is made to a 1/3/97 communication from FSPU to WFO requesting status of seizure files.

Enclosures: Enclosed for FSPU is a 10/9/96 Consent Order of Forfeiture pertaining to WFO seizures 3920-F-94-151 & 155.

Details: Referenced FSPU communication requested a status update on several WFO forfeiture cases. These cases are updated below by seizure number:

1) 3920-F-94-151 &155: The Consent Order of Forfeiture is attached. The final order will not be issued until after further legal proceedings are concluded in April, 1997.

2) 3920-95-F-021: AFO DOJ is still in the process of ruling on the petitions. The latest estimate of completion is sometime in March, 1997.

3) 3920-95-F-058-60, 95-91, 95-97, 96-024, 96-134, 96-186, 96-195, 97-28 and 97-52: These are all seizure files regarding the BCCI case. There have been several criminal forfeiture orders, but no final orders of forfeiture will be signed until all assets have been identified and turned over.

4) 3920-95-102 & 96-023: Subject [redacted] was recently sentenced to twenty-five months in jail. AFO has yet to rule on the petitions and no final forfeiture order has been received from the U.S. Attorney's Office. b6 b7C

5) 3920-96-F-053: Three separate Petitions for Remission have been filed in this case. WFO's Petition Investigation was submitted on 2/28/97.

5

209B-WF-147994 FF-4

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 07 1997
FBI-WASH. METRO FIELD OFFICE

3920-96-0195

152-HQ-1279000-5336

To: Director, FBI From: WFO
Re: 209B-WF-198831 SUB FF SUB 2, 03/03/1997

Should you have any questions regarding these cases, please contact DA [redacted] or SSA [redacted] at (202) 252-7118. b6 b7C

CC: 17 - FSPU [redacted] b6 b7C
17 - WFO
1 - 3920-94-F-151
1 - 3920-94-F-155
1 - 3920-95-F-021
1 - 3920-95-F-050
1 - 3920-95-F-059
1 - 3920-95-F-060
1 - 3920-95-F-091
1 - 3920-95-F-097
1 - 95-102
1 - 96-23
1 - 96-24
1 - 96-53
1 - 96-134
1 - 96-186
1 - 96-195
1 - 97-28
1 - 97-52

♦♦

1325015-000-5337

1/3/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 3/3/97. b6 b7C

3920-94-F-151 - Trial held 10/96? - need copy of final order issued
3920-94-F-155 - " "
3920-95-F-021
3920-95-F-058-60 - Claims ruled on yet? Need final order.
3920-95-F-091
3920-95-F-097 - Claims ruled on yet? Need final order.
3920-95-F-102 - Need letter from AUSA to proceed administratively.
3920-96-F-023
3920-96-F-024
3920-96-F-053 - Was a claim received? If so, please provide FSPU with a copy.
3920-96-F-134 - Claims ruled on yet? Need final order.
3920-96-F-186
3920-96-F-195
3920-97-F-028
3920-97-F-052

Thank you,

[redacted] b6 b7C

[redacted] b6 b7C

Sgt T for 3/13/97

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: FSPU (NP300)

[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case [X] Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log ____
Foims (PFA) ____
CATS ____

CC: 9-BUREAU, ATTN: [redacted]
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994 112

[redacted] b6 b7C

LT990425.EC

1325015-000-5339

29B-WF-171994 (FF-4)

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/06/1999

To: Washington Field

From: Washington Field
Squad C-1
Contact: SSA [redacted] Ext. 2295

b6
b7C

Approved By: [redacted]

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. v. BCCI Holdings

Synopsis: CLOSING COMMUNICATION

Details: The purpose of this communication is to summarize recent events surrounding the 63 seizure files associated with the BCCI investigation. On 2/1/99, several members of DOJ, USMS, and FBI met to determine how to close out the BCCI seizures entered in the CATS database as the Sixth and Final Order of Forfeiture had been entered into as of 12/22/98. A summary of this meeting is attached as reference. In brief, it was decided that the 63 BCCI individual seizures entered into CATS would be deleted in exchange for 6 seizures entered into CATS corresponding to each of the six orders of forfeiture. The following CATS ID numbers and corresponding seizure numbers were utilized for the respective orders of forfeiture.

92-FBI-000460 (3920-92-F-0115; 1st Order - 1/24/92 & 1/31/92)
92-FBI-000461 (3920-92-F-0116; 2nd Order - 7/29/92)
92-FBI-000462 (3920-92-F-0117; 3rd Order - 8/19/93)
95-FBI-003535 (3920-95-F-0097; 4th Order - 12/21/94)
96-FBI-003688 (3920-96-F-0097; 5th Order - 9/20/96)
99-FBI-000970 (3920-99-F-0092; 6th Order - 12/22/98)

The USMS has taken the responsibility for associating each of the 63 individual seizures with the 6 seizures for each order of forfeiture. Attached for reference is a spreadsheet which correlates each of the 63 seizures with the appropriate order of forfeiture. The USMS will make entries to the itemized list in CATS which will detail the total amount received for each

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29B-WF-171994 FF-4

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order of forfeiture and how such amount will be distributed (i.e., claims, Worldwide Victims Fund, etc.).

As WFO has only been involved with the BCCI forfeiture files in an administrative capacity and as WFO has no means other than relying on the CATS database of determining when income has been received and how income will be distributed for each of the orders of forfeiture, WFO is closing its seizure files associated with the BCCI investigation (specifically, 3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060, 3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097, 3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195, 3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075, and 3920-97-F-0126). Attached are printouts from the CATS database for each of the six seizures which reflect income and distribution of seized funds as of 4/1/99.

Attachments

CC: 13 - Bureau (Attn: [redacted] FSPU) b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126 (w/o attachments)
1 - WFO, 29B-WF-171994 SUB FS [with all six CATS forms]
13 - WFO, 29B-WF-171994 FF-21 (3920-95-F-0058),
FF-22 (3920-95-F-0059), FF-23 (3920-95-F-0060),
FF-24 (3920-95-F-0097), FF-26 (3920-96-F-0024),
FF-1 (3920-96-F-0097), FF-2 (3920-96-F-0134),
FF-3 (3920-96-F-0186), FF-4 (3920-96-F-0195) [each with CATS form for 4th Order of Forfeiture];
FF-5 (3920-97-F-0028), FF-6 (3920-97-F-0052),
FF-7 (3920-97-F-0075), and FF-8 (3920-97-F-0126) [each with CATS form for 5th Order of Forfeiture]

♦♦

1325015-000-5355

BCCI Meeting: February 1, 1999

Purpose

To discuss the problems in entering the BCCI case into CATS and to identify a resolution for entering the information into CATS.

Background

The meeting started with [redacted] providing the background to some of the complexities of the BCCI case and the problems associated with recording the case in CATS. Essentially, there are six forfeiture orders, otherwise called "rounds" that state specific assets to be forfeited. Additionally disbursement orders identify a sum of money to be disbursed to the Department of Justice or the Worldwide Victims Fund. There are several L-claims that exist on each of the rounds. b6 b7C

The difficulty in recording these cases into CATS is that the orders identify aggregate dollar figures showing who should receive funds. For instance, an order identifies that "the Marshals have taken possession of approximately $199,717,526.71 in liquid funds" and goes on to identify how much should be disbursed to various entities. However, the total sum held in custody by the Marshal Service is made up of hundreds of assets. There is no way in CATS to enter a lump sum disposal to correspond to multiple assets. Additionally, it will be difficult to dispose of each asset individually and make decisions as to how each asset should be disposed when no specific disposal instructions exist for each asset.

Goal

The objective of the session was two fold:

1) To identify how to enter the assets in CATS so that the financial reports accurately show the dollars remaining on hand and the dollars disbursed.
2) To begin entering the assets in CATS and establish a time frame for its completion.

Resolution

After much discussion on the level of detail required in CATS, it was decided that CATS entries need only provide the essential information to ensure accuracy of the financial reports. It was agreed that file folders and other spreadsheets available in the USMS Southern District of New York would provide the required details for this case. CATS would not have to duplicate the details found in other systems. b6 b7C

The following resolutions were agreed to, to ensure that BCCI assets and financials were entered into CATS.

1) Enter one asset per Forfeiture Round. (FBI to enter into CATS by 02/01/99)

- The FBI will use case number 19B-WF-171994.
- The asset description will include the words "Round" and the corresponding round number.

[redacted]

2/9 2/11/99

- Attached documents received at 2/1/99 mtg. from USMS.

1325015-000-5356

- The seizure date will equal the forfeiture date.
- FBI will provide the asset IDs to the [redacted] of EOUSA. b6 b7C

2) USAO will enter their judicial forfeiture screens. (EOUSA to enter into CATS by 02/02/99)
   - A dummy USAO number will be entered since the case was actually handled by the Criminal Division. However, the USAO number is a required field in CATS.
   - [redacted] will inform [redacted] of the USMS when the forfeiture information is completed. b6 b7C

3) USMS will enter items to each asset as identified by disposal records. (USMS to enter into CATS by 02/15/99)
   - [redacted] formally of the USMS S/NY, who handled the BCCI case in the Marshals Service will provide the documentation required for [redacted] (USMS-HQ) to enter the items and disposal transactions into CATS. b6 b7C
   - In order to enter multiple dispositions for each asset [redacted] will create items for each asset, (or round) that identify a separate disposal action.
   - [redacted] will then enter the corresponding disposal action into CATS.
   - If part of the asset remains on hand, then one item will equal the remaining balance.
   - Should the Marshals Service receive an additional asset that corresponds to a specific round, [redacted] will enter the asset as an item for the appropriate round.

4) All attenders agreed to have the old BCCI assets deleted in CATS. Not only will the seizure forms be deleted, but so will any other transaction that corresponds to the assets, such as disposal and custody. These 63 assets in CATS are identified by case number 29B-WF-171994. Upon request from the FBI, these assets will not be deleted until February 8, 1999, at the earliest.

Data Entry and Financial Reports

The first asset, corresponding to the first round, was entered into CATS as described above. The Analysis of Change/Forfeited Property report was run for the first round, (first asset entered). The report provided the information required, thus confirming that the proposed method of entering the BCCI cases into CATS was correct.

Attachments

- List of attenders, phone and fax numbers.
- Spreadsheet provided by [redacted] b6 b7C
- List of 63 assets identified in CATS already and corresponding signatures agreeing to delete these assets.

Attenders

Name	Agency	Phone
[redacted]	AFMS	[redacted]
	EOUSA	
	FBI	202-324-9700

b6 b7C

[redacted]

FBI 202-324-9700
FBI 202-278-2314
KPMG [redacted]
KPMG
USMS
USMS
USMS
Base 2

b6
b7C

Notes prepared by [redacted] *February 01, 1999*

b6
b7C

SEIZURE NUMBER	CASE NUMBER	DATE SEIZED	DESCRIPTION	APPRAISED VALUE	DISPOSITION/ DISPOSITION DATE
WASHINGTON					
J 3920-92-F-0115	WF-0171994/029B	03/27/92	Capital Bank Accounts #85	— 4,024,324	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000405					
J 3920-92-F-0116	WF-0171994/029B	03/27/92	Bank of California Corp A	— 1,283,092	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000406					
J 3920-92-F-0117	WF-0171994/029B	03/27/92	Doha Bank LTD Account #55	— 500,308	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000407					
J 3920-92-F-0118	WF-0171994/029B	03/27/92	Bank of New York Accounts	— 15,789,646	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000408					
J 3920-92-F-0119	WF-0171994/029B	03/27/92	Kemper Security Account #	— 583,305	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000409					
J 3920-92-F-0120	WF-0171994/029B	03/27/92	Citibank, N.A. Accounts #	— 12,786,950	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000410					
J 3920-92-F-0121	WF-0171994/029B	03/27/92	Oppenheimer & Company Inc	— 2,991,107 2,992,107	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000411					
J 3920-92-F-0122	WF-0171994/029B	03/27/92	Court Registry Investment	— 65,093,027	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000412					
J 3920-92-F-0123	WF-0171994/029B	03/27/92	Manufacturers Hanover Tru	— 40,240	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000413					
J 3920-92-F-0124	WF-0171994/029B	03/27/92	American Express Bank LTD	— 150,111,348	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000414					
J 3920-92-F-0125	WF-0171994/029B	03/27/92	Security Pacific Internat	— 25,363,313	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000415					
J 3920-92-F-0126	WF-0171994/029B	03/27/92	Mabon Securities Inc. Acc	— 2,641,808 266,808	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000416					
J 3920-92-F-0127	WF-0171994/029B	03/27/92	First National Bank of Lo	— 3,727,520	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000417					
J 3920-92-F-0128	WF-0171994/029B	03/27/92	First Forida Account #440	— 15,299,703	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000418					
J 3920-92-F-0129	WF-0171994/029B	03/27/92	Hufstedler, Kaus & Etting	— 487,448	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000419					
J 3920-92-F-0130	WF-0171994/029B	03/27/92	Security Pacific National	— 46,285,845	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
92-FBI-000420					

SEIZURE NUMBER	CASE NUMBER	DATE SEIZED	DESCRIPTION	APPRAISED VALUE	DISPOSITION/ DISPOSITION DATE
J 3920-92-F-0131 92-FBI-000421	WF-0171994/029B	03/27/92	Paine Webber Account #DN-	- 73,000	PROCEEDS/CASH DEPOSITED 5042 11/13/92 (1st order)
J 3920-92-F-0231 92-FBI-000377	WF-0171994/029B	07/29/92	$4,060,293.91	- 4,060,293	PENDING (2nd order)
J 3920-92-F-0232 92-FBI-000378	WF-0171994/029B	07/29/92	$15,220,667.63 IN U.S. CU	- 15,220,667	PENDING (2ND order)
J 3920-92-F-0233 92-FBI-000379	WF-0171994/029B	07/29/92	$34,891,523.00 IN U.S. CU	- 34,891,523	PENDING (2ND order)
J 3920-92-F-0234 92-FBI-000380	WF-0171994/029B	07/29/92	$ 991,174.19 IN U.S. CURR	- 991,174	PENDING (2nd order)
J 3920-92-F-0235 92-FBI-000381	WF-0171994/029B	07/29/92	$ 4,925,000.00 IN U.S. CU	- 4,925,000	PENDING (2ND order)
J 3920-92-F-0236 92-FBI-000382	WF-0171994/029B	07/29/92	$68,919.87 IN U.S. CURREN	- 68,919	PENDING (2nd order)
J 3920-92-F-0237 92-FBI-000383	WF-0171994/029B	07/29/92	$140,478.46 IN U.S. CURRE	- 140,478	PENDING (2ND order)
J 3920-92-F-0238 92-FBI-000384	WF-0171994/029B	07/29/92	$360,602.60 IN U.S. CURRE	- 360,602	PENDING (2ND order)
J 3920-92-F-0239 92-FBI-000385	WF-0171994/029B	07/29/92	$20,241,169.59 IN U.S. CU	- 20,241,169	PENDING (2ND order)
J 3920-92-F-0240 92-FBI-000386	WF-0171994/029B	07/29/92	$257,119.09 IN U.S. CURRE	- 257,119	PENDING (2nd order)
J 3920-92-F-0241 92-FBI-000387	WF-0171994/029B	07/29/92	$ 23,329,555.00 IN U.S. C	- 23,329,555	PENDING (2ND order)
J 3920-92-F-0242 92-FBI-000388	WF-0171994/029B	07/29/92	$151.39 IN U.S. CURRENCY	- 151	PENDING (2nd order)
J 3920-92-F-0243 92-FBI-000389	WF-0171994/029B	07/29/92	$ 1,668.00 IN U.S. CURREN	- 1,668	PENDING (2nd order)
J 3920-93-F-0195 93-FBI-000602	WF-0171994/029B	08/19/93	AMREICAN EXPRESS BANK, NE	- 1,238,712	PROCEEDS/CASH DEPOSITED 5042 12/05/95 (3rd order)
J 3920-93-F-0196 93-FBI-000570	WF-0171994/029B	08/19/93	BANCO BILBAO VIZCAYA, NEW	- 58,000	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0197 93-FBI-000571	WF-0171994/029B	08/19/93	BANK OF TOKYO TRUST CO. N	- 1,464	PENDING (3rd order)
J 3920-93-F-0198 93-FBI-000572	WF-0171994/029B	08/19/93	BANKERS TRUST CO., NEW YO	- 54,781	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0199 93-FBI-000573	WF-0171994/029B	08/19/93	CAPITAL BANK MINAI $746,1	- 746,194	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0200 93-FBI-000574	WF-0171994/029B	08/19/93	CHASE MANHATTAN BANK NEW	- 13,527	PENDING (3rd order)
J 3920-93-F-0201 93-FBI-000575	WF-0171994/029B	08/19/93	CITIBANK NEW YOUK $ 74,25	- 74,250	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)

1325015-000-5360

SEIZURE NUMBER	CASE NUMBER	DATE SEIZED	DESCRIPTION	APPRAISED VALUE	DISPOSITION/ DISPOSITION DATE
J 3920-93-F-0202 93-FBI-000576	WF-0171994/029B	08/19/93	COMMERCIAL BANK OF KOREA	118,552	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0203 93-FBI-000577	WF-0171994/029B	08/19/93	COURT REGISTRY INVESTMENT	17,763,910	PENDING (3rd order)
J 3920-93-F-0205 93-FBI-000578	WF-0171994/029B	08/19/93	FIRST AMERICAN BANK OF N	2,576,824	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0206 93-FBI-000579	WF-0171994/029B	08/19/93	FIRST INTERSTATE BANK INT	35,169	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0207 93-FBI-000580	WF-0171994/029B	08/19/93	BANK ACCOUNT FOR $100,000	100,000	PENDING (3rd order)
J 3920-93-F-0208 93-FBI-000581	WF-0171994/029B	08/19/93	$68,550,807.67 BANK ACCOU	68,550,807	PENDING (3rd order)
J 3920-93-F-0209 93-FBI-000582	WF-0171994/029B	08/19/93	NORTH AMERICAN INVESTMENT	78,473	PENDING (3rd order)
J 3920-93-F-0210 93-FBI-000583	WF-0171994/029B	08/19/93	HOLLAND & KNIGHT, MIAMI F	220,500	PENDING (3rd order)
J 3920-93-F-0211 93-FBI-000585	WF-0171994/029B	08/19/93	JANIS SCHUELKE & WECHSLER	63,454	PENDING (3rd order)
J 3920-93-F-0212 93-FBI-000586	WF-0171994/029B	08/19/93	KOREA FIRST BANK NEW YORK	40,000	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0213 93-FBI-000587	WF-0171994/029B	08/19/93	$ 100,000.00 BANK ACCOUNT	30,800	PROCEEDS/CASH DEPOSITED 5042 08/19/93 (3rd order)
J 3920-93-F-0214 93-FBI-000588	WF-0171994/029B	08/19/93	NORTH AMERICAN INVESTMENT	6,122,965	PENDING (3rd order)
J 3920-93-F-0215 93-FBI-000589	WF-0171994/029B	08/19/93	$3,414,077.28 U.S. CURREN	3,414,077	PENDING (3rd order)
J 3920-95-F-0058 95-FBI-000816	WF-0171994/029B	12/21/94	U.S. V. $82,156.99 IN U.S	82,156	PENDING (4th order)
J 3920-95-F-0059 95-FBI-000817	WF-0171994/029B	12/21/94	U.S. V. $10,430.00 IN U.S	10,430	PENDING (4th order)
J 3920-95-F-0060 95-FBI-000818	WF-0171994/029B	12/21/94	U.S. V. $4,545.47 IN U.S.	4,545	PENDING (4th order)
J 3920-95-F-0097 95-FBI-001472	WF-0171994/029B	02/13/95	B.C.C.I. ASSETS TOTALING	17,000,000	PENDING (4th order)
J 3920-96-F-0024 95-FBI-002726	WF-0171994/029B	08/14/95	$2,000,000.00 IN U.S. CUR	2,000,000	PENDING (4th order)
J 3920-96-F-0097 96-FBI-000829	WF-0171994/029B	02/12/96	$2,200,000.00 U.S. CURREN	2,200,000	PENDING (4th order)
J 3920-96-F-0134 96-FBI-001504	WF-0171994/029B	04/12/96	FINANCIAL INSTRUMENT - RO	1,800,000	PENDING (4th order)
J 3920-96-F-0186 Not Rcvd at HQ	WF-0171994-FF-3/029B	06/11/96	BCCI ASSETS TOTALING $3,0	3,000,000	PENDING (4th Order)
J 3920-96-F-0195 96-FBI-002351	WF-0171994/029B	08/12/96	1,000,000.00 IN U.S. CURR	1,000,000	PENDING (4th Order)

1325015-000-5361

SEIZURE NUMBER	CASE NUMBER	DATE SEIZED	DESCRIPTION	APPRAISED VALUE	DISPOSITION/ DISPOSITION DATE
J 3920-97-F-0028 97-FBI-000105	WF-0171994/029B	10/11/96	$60,000,000.00 U.S. CURRE	- 60,000,000	PENDING (5th order)
J 3920-97-F-0052 97-FBI-000409	WF-0171994/029B	12/10/96	$650,000.00 IN U.S. CURRE	- 650,000	PENDING (5th order)
J 3920-97-F-0075 97-FBI-000770	WF-0171994/029B	02/05/97	$1,100,000.00 U.S. CURREN	- 1,100,000	PENDING (5th order)
J 3920-97-F-0126 97-FBI-001317	WF-0171994/029B	04/08/97	$1,750,000.00 U.S. CURREN	- 1,750,000	PENDING (5th order)
**. TOTAL 00 SEIZURES FOR WASHINGT	63	641,095,892 TOTAL VALUE			

REPORT TOTAL: 63 SEIZURES FOR WASHINGTON VALUED AT 641,095,892

(6) - 3920-99-F-0092

Mar-25-98 02:43P FSPU
202 324 9098
P.06
1325015-000-5362

Seizure Form

Asset ID: 95-FBI-003535 | Date/Time: 04/01/99 14:55:21 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920950097	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38

(9) Operation Name:	(10) Case Agent:
	b6 b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
12/21/94				Indictment	11/24/91	

(18) Seizing Agent:	(19) Phone Number:
	(202) 324-9072 b6 b7C

(20) Seized From: BCCI

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Given	Not Given	NY

(24) Judicial Seizure:	District (25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
371041959.20	Y	02/06/99	Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 4)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	**(40) Forfeiture-Dependent Award?**	**(41) Quick Release Performed?**	**(42) Intra-Agency Assistance?**
N	N	N	N
(43) Suitable for Official Use?	**(44) OCDETF Case?**	**(45) Sharing Anticipated?**	**(46) Additional Agencies?**
N	N	N	Y

(Complete if Applicable)

VEHICLE

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):
(67) Number of Cylinders:	**(68) Four Wheel Drive?**	**(69) Salvage Certificate?**

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN, UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

Seizure Form

Asset Description: BCCI Holdings (Round 4)

(95) Name: (Party ID 395744) BCCI			(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
(98) Address: (Seq No. 1) NOT GIVEN				Owner	
(99) City: NOT GIVEN	(100) State: DC	(101) Zip Code: 00000	(102) Country: USA	Lienholder	
(103) Contact Name (if business): UNKNOWN UNKNOWN			(104) Phone Number:	Seized From	X
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From	
(109) Incarcerated? N		(110) Prisoner ID:		Occupant	
(111) Institution Name (if incarcerated):				Victim	
(112) Institution Address: (Seq No. 1)				Other	
(113) City:		(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):				
(119) Firm's Name:			(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No. 1)					
(122) City:	(123) State:	(124) Zip Code:	(125) Country:		

(95) Name: (Party ID)			(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
(98) Address: (Seq No.)				Owner	
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	Lienholder	
(103) Contact Name (if business):			(104) Phone Number:	Seized From	
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From	
(109) Incarcerated?		(110) Prisoner ID:		Occupant	
(111) Institution Name (if incarcerated):				Victim	
(112) Institution Address: (Seq No.)				Other	
(113) City:		(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):				
(119) Firm's Name:			(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No.)					
(122) City:	(123) State:	(124) Zip Code:	(125) Country:		

Seizure Form

Asset Description: BCCI Holdings (Round 4)

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655 (JHG)	U.S. V. BBI HOLDINGS (ROUND 4)		
(128) AUSA Name:		(129) Judicial District: DC	(130) Phone Number:
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

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INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name:			(137) Agency Case ID:	
US CUSTOMS HQ				
(138) Adopted From?			(139) Agency Type (Federal, State, Local, -or- Foreign):	
N			Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible? N
(147) Contact Name:			(148) Contact Phone Number:	

(136) Agency Name:			(137) Agency Case ID:	
DRUG ENFORCEMENT ADMINISTRATION				
(138) Adopted From?			(139) Agency Type (Federal, State, Local, -or- Foreign):	
N			Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible? N
(147) Contact Name:			(148) Contact Phone Number:	

(136) Agency Name:			(137) Agency Case ID:	
INTERNAL REVENUE SERVICE				
(138) Adopted From?			(139) Agency Type (Federal, State, Local, -or- Foreign):	
N			Federal	
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code: IRS	(146) Sharing Possible? N
(147) Contact Name:			(148) Contact Phone Number:	

Seizure Form

Asset ID: 95-FBI-003535	Date/Time: 04/01/99 14:55:21
Asset Description: BCCI Holdings (Round 4)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	12/21/94

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate: Per:
NEW YORK	NY	10007	

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	12/21/94
(163) Received By: [redacted]	(164) Title: AFU Chief

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PREPARED BY

(165) Signature:	(166) Date:
	05/15/95
(167) Prepared By: [redacted]	(168) Title: SA

APPROVED BY

(169) Signature:	(170) Date:
	05/18/95
(171) Approved By: UNKNOWN UNKNOWN	(172) Title: CDC

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. [redacted] TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS. b6 b7C

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI"), [redacted] (ALL OFFICERS OF BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH CONSPIRACY (18 U.S.C. SECTION 371, MONEY LAUNDERING (18 U.S.C. SECTION 1956 (A) (A) & (2), AND DRUG CONSPIRACY (21 U.S.C. SECTION 846). THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI OFFICERS, [redacted] AND TWO NARCO-TRAFFICKERS, [redacted] WERE INDICTED ON MAY 4, 1989. b6 b7C

THIS INDICTMENT RESULTED FROM [redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Seizure Form

Asset ID: 95-FBI-003535
Asset Description: BCCI Holdings (Round 4)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	L Claim Carlson Farm, Sherman, Connecticut FI	298825.60
2	1	L Claim BCCI New York Agency FI	292429.99
3	1	Worldwide Victims Fund FI	99696863.05
4	1	Amount Forfeited FI	99696863.06
5	1	Worldwide Victims Fund FI	12856667.22
6	1	Amount Forfeited FI	12856667.22
7	1	Balance of Account FI	96327584.23

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/26/96

To: ADIC, WMFO

From: SA [redacted]
C-1, NVMRA
Contact: SA [redacted] X9073

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Approved By: SSA [redacted]

Drafted By: [redacted] AC:js

File Number(s): 29B-WF-171994 (FS) (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE # 38;
OO:WMFO

Synopsis: OPENING MEMO

Details: The purpose of this memorandum is to request that a new sub-file (Sub FF-4) be opened based on the fact that $1,000,000.00 (one million dollars) in US Currency from the fourth order of forfeiture has been remitted to the United States Marshals Service (via wire transfer) in the above cited case. The fifth order of forfeiture is due in the fall of 1996.

1-WMFO
(3920-96-F-0195)

OEA
29B-WF-171994 Sub FF Sub #4
8/26/96
to [redacted]

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1

29B-WF-171994 Sub FF 4-1
AUG 2 1996

1325015-000-5316

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 42
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
Page 15 ~ Duplicate;
Page 16 ~ Duplicate;
Page 38 ~ Duplicate;
Page 41 ~ Duplicate;
Page 42 ~ Duplicate;
Page 43 ~ Duplicate;
Page 44 ~ Duplicate;
Page 45 ~ Duplicate;
Page 46 ~ Duplicate;
Page 47 ~ Duplicate;
Page 48 ~ Duplicate;
Page 49 ~ Duplicate;
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Page 54 ~ Duplicate;
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Page 60 ~ Duplicate;
Page 61 ~ Duplicate;
Page 62 ~ Duplicate;
Page 63 ~ Duplicate;
Page 64 ~ Duplicate;
Page 65 ~ Duplicate;
Page 66 ~ Duplicate;
Page 67 ~ Duplicate;
Page 68 ~ Duplicate;
Page 69 ~ Duplicate;
Page 70 ~ Duplicate;

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X Deleted Page(s) X
X No Duplication Fee X
X For this Page X
XXXXXXXXXXXXXXXXXXXXXXXX

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 04/06/1999

To: Washington Field

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From: Washington Field
Squad C-1
Contact: SSA [redacted] Ext. 2295

Approved By: [redacted]

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Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, 3920-96-F-0195,
3920-97-F-0028, 3920-97-F-0052, 3920-97-F-0075,
and 3920-97-F-0126

Title: U.S. v. BCCI Holdings

Synopsis: CLOSING COMMUNICATION

Details: The purpose of this communication is to summarize recent events surrounding the 63 seizure files associated with the BCCI investigation. On 2/1/99, several members of DOJ, USMS, and FBI met to determine how to close out the BCCI seizures entered in the CATS database as the Sixth and Final Order of Forfeiture had been entered into as of 12/22/98. A summary of this meeting is attached as reference. In brief, it was decided that the 63 BCCI individual seizures entered into CATS would be deleted in exchange for 6 seizures entered into CATS corresponding to each of the six orders of forfeiture. The following CATS ID numbers and corresponding seizure numbers were utilized for the respective orders of forfeiture.

92-FBI-000460 (3920-92-F-0115; 1st Order - 1/24/92 & 1/31/92)
92-FBI-000461 (3920-92-F-0116; 2nd Order - 7/29/92)
92-FBI-000462 (3920-92-F-0117; 3rd Order - 8/19/93)
95-FBI-003535 (3920-95-F-0097; 4th Order - 12/21/94)
96-FBI-003688 (3920-96-F-0097; 5th Order - 9/20/96)
99-FBI-000970 (3920-99-F-0092; 6th Order - 12/22/98)

The USMS has taken the responsibility for associating each of the 63 individual seizures with the 6 seizures for each order of forfeiture. Attached for reference is a spreadsheet which correlates each of the 63 seizures with the appropriate order of forfeiture. The USMS will make entries to the itemized list in CATS which will detail the total amount received for each

9

LT990971.ec

29B-WF-171994 FF-3

1325015-000-4447

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/3/1997

To: Director, FBI **Attn:** [redacted] (FSPU) b6 b7C

From: WFO
Squad C-1 (FAST)

Approved By: [redacted] b6 b7C

Drafted By:

Case ID #: 209B-WF-198831 SUB FF SUB 2 (Pending)

Title: U.S. v. $96,801.25 IN U.S. CURRENCY

Synopsis: To advise FSPU of the status of certain WFO cases.

Reference: Reference is made to a 1/3/97 communication from FSPU to WFO requesting status of seizure files.

Enclosures: Enclosed for FSPU is a 10/9/96 Consent Order of Forfeiture pertaining to WFO seizures 3920-F-94-151 & 155.

Details: Referenced FSPU communication requested a status update on several WFO forfeiture cases. These cases are updated below by seizure number:

1) 3920-F-94-151 &155: The Consent Order of Forfeiture is attached. The final order will not be issued until after further legal proceedings are concluded in April, 1997.

2) 3920-95-F-021: AFO DOJ is still in the process of ruling on the petitions. The latest estimate of completion is sometime in March, 1997.

3) 3920-95-F-058-60, 95-91, 95-97, 96-024, 96-134, 96-186, 96-195, 97-28 and 97-52: These are all seizure files regarding the BCCI case. There have been several criminal forfeiture orders, but no final orders of forfeiture will be signed until all assets have been identified and turned over.

4) 3920-95-102 & 96-023: Subject [redacted] was recently sentenced to twenty-five months in jail. AFO has yet to rule on the petitions and no final forfeiture order has been received from the U.S. Attorney's Office. b6 b7C

5) 3920-96-F-053: Three separate Petitions for Remission have been filed in this case. WFO's Petition Investigation was submitted on 2/28/97.

3

29B-WF-171994 Sub FF-3

SEARCHED PP INDEXED PP
SERIALIZED PP FILED PP
MAR 07 1997
FBI-WASH. METRO FIELD OFFICE

3920-96-0186

132-HQ-000-4406

6/30/97

Mr. [redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted], by COB 8/29/97. b6 b7C

3920-92-F-231 - 243 - Has a final order been issued yet?
3920-93-F-196 - 203 - Has a final order been issued yet?
3920-93-F-205 - 215 - Has a final order been issued yet?
3920-96-F-023
3920-96-F-024
3920-96-F-186 CLOSED 12-23-96
3920-96-F-195
3920-97-F-028
3920-97-F-042
3920-97-F-047
3920-97-F-048
3920-97-F-052
3920-97-F-075
3920-97-F-076
3920-97-F-086
3920-97-F-089
3920-97-F-093
3920-97-F-095
3920-97-F-096
3920-97-F-098
3920-97-F-099
3920-97-F-104
3920-97-F-126
3920-97-F-129

Thank you.

[redacted] b6 b7C

4

29B-WF-171994 Sub MF3

SEARCHED INDEXED
SERIALIZED FILED
JUL 01 1997
FBI/WASH METRO FIELD OFFICE

b6 b7C

[redacted]

09

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] b6 b7C by COB 8/29/97.

3920-97-F-044
3920-97-F-094
3920-97-F-097
3920-97-F-100
3920-97-F-101
3920-97-F-102
3920-97-F-103
3920-97-F-116
3920-97-F-131

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b7C

Thank you,

[redacted]

SEARCHED_____INDEXED_____
SERIALIZED_____FILED_____
JUL 0 1 97
FBI - WASH METRO FIELD OFFICE

6/30/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 8/29/97. b6 b7C

3920-92-F-115 - 131 - Need order of forfeiture
3920-95-F-135
3920-96-F-007
3920-96-F-008
3920-97-F-054
3920-97-F-055
3920-97-F-056
3920-97-F-057

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b7C

Thank you,

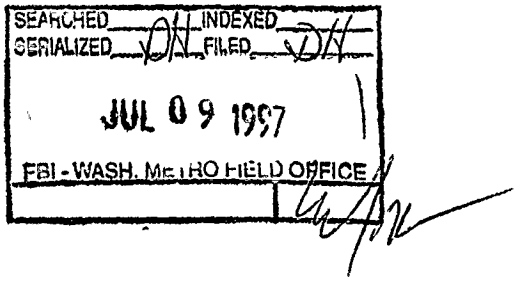
[redacted]

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
JUL 0 1 '97
FBI - WASH METRO FIELD OFFICE

29B-WF-
171994
SUB IF-3

(5)

29B-WF-171994 Sub FF3



3920-96-F-0186

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/09/1997

To: FSPU **Attn:** [redacted] b6 b7C
Property Procurement & Management Unit
Finance Division

From: WFO, FAST
Squad C-1
Contact: SA [redacted] Ext. 7118 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :saf

Case ID #: 29B-WF-171994 Sub FF3 (Closed)

Title: CASE STATUS

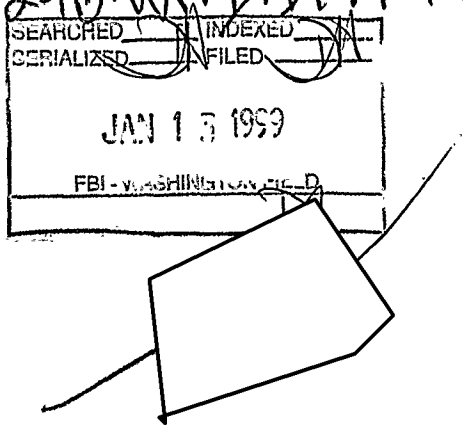
Synopsis: As requested, an update on the above captioned case.

Reference: 3920-96-F-0186

Details: The case was closed 12-23-96.

♦♦

29B-WF-171194 FF3 (6)



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Seizure Form

As[redacted] 96-FBI-003685 | Date/Ti[redacted]1/08/99 12:03:54 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960186	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	b6 b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
06/11/96				Other		

(18) Seizing Agent:	(19) Phone Number:
	202-324-9073 b6 b7C

(20) Seized From: BCCI Holdings

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Available	New York City	NY

(24) Seizure: Judicial District	(25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYE	DC	18 USC 982	18 USC 1957

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
3000000.00	Y		Financial Instrument	13	Civil/Judicial

(34) Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

VEHICLE

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:
(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?		
(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?
(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?			
(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):			
(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?			

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

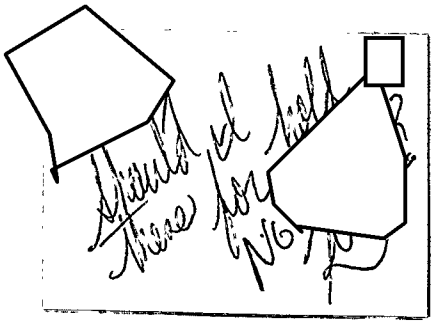
FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
	149-240-134 b6 b7C

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

1325015-000-1416



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Seizure Form

Ass[redacted] 96-FBI-003685 | Date/T[redacted] 01/08/99 12:03:54

Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

(95) Name: (Party ID 387822) BCCI Holdings				(96) Phone Number:
(98) Address: (Seq No. 1) Not Available				
(99) City: New York City	(100) State: NY	(101) Zip Code: 00000	(102) Country: USA	
(103) Contact Name (if business):				(104) Phone Number:
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	
(109) Incarcerated? N	(110) Prisoner ID:			
(111) Institution Name (if incarcerated):				
(112) Institution Address: (Seq No. 1)				
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):			
(119) Firm's Name:				(120) Attorney's Phone Number:
(121) Attorney's Address: (Seq No. 1)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(97) Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	X
Institution Seized From	
Occupant	
Victim	
Other	

(95) Name: (Party ID)				(96) Phone Number:
(98) Address: (Seq No.)				
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	
(103) Contact Name (if business):				(104) Phone Number:
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	
(109) Incarcerated?	(110) Prisoner ID:			
(111) Institution Name (if incarcerated):				
(112) Institution Address: (Seq No.)				
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):			
(119) Firm's Name:				(120) Attorney's Phone Number:
(121) Attorney's Address: (Seq No.)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(97) Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	
Institution Seized From	
Occupant	
Victim	
Other	

Seizure Form

Asset I[redacted]6-FBI-003685 | Date/Tim[redacted]1/08/99 12:03:54

Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	U.S. vs. BCCI HOLDINGS		
(128) AUSA Name: Not Available		(129) Judicial District: DC	(130) Phone Number: N/A
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name: DEPARTMENT OF JUSTICE		(137) Agency Case ID:		
(138) Adopted From? N		(139) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(140) Address: Not Available		(141) City: Washington		
(142) State: DC	(143) Zip Code: 00000	(144) Country: USA	(145) NCIC Code: DOJ	(146) Sharing Possible? N
(147) Contact Name:			(148) Contact Phone Number:	

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b7C

(136) Agency Name:		(137) Agency Case ID:		
(138) Adopted From?		(139) Agency Type (Federal, State, Local, -or- Foreign):		
(140) Address:		(141) City:		
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code:	(146) Sharing Possible?
(147) Contact Name:			(148) Contact Phone Number:	

(136) Agency Name:		(137) Agency Case ID:		
(138) Adopted From?		(139) Agency Type (Federal, State, Local, -or- Foreign):		
(140) Address:		(141) City:		
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code:	(146) Sharing Possible?
(147) Contact Name:			(148) Contact Phone Number:	

Seizure Form

Asset [redacted]6-FBI-003685	Date/Tim[redacted]/08/99 12:03:54
Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
Pnd Invty Verif	Turned over USMS	06/11/96

(152) Storage Facility Address:

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate: Per:

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	06/11/96
(163) Received By:	(164) Title:

PREPARED BY

(165) Signature:	(166) Date:
	07/17/96
(167) Prepared By: [redacted]	(168) Title: SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	07/20/96
(171) Approved By: [redacted]	(172) Title: CDC

b6
b7C

Asset ID: 96-FBI-003685
Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

Probable Cause

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. vs. Hidden Interests; Major case number 38. [redacted] has been appointed [redacted] listed in the four criminal BCCI forfeiture orders. On 06/11/96, Evans completed a $3,000,000.00 (three million dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI") [redacted] b6 b7C

[redacted] or BCCI), and Capcom Financial Services, LTD. with [redacted] The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers [redacted] and two narco-traffickers [redacted] were indicted on May 4, 1989.

[redacted] b7E

On Jan 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI) and the plea agreement forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United

States, including without limitation, real property and all tangible and intangible personal property.

Three additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted], Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court. [redacted] anticipates a fifth order of forfeiture will be forthcoming in the Summer of 1996

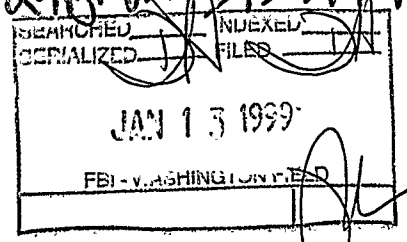
b6
b7C

Asset ID: 96-FBI-003685
Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	01/08/99
Headquarters Receipt Date:	03/30/98	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:	C-1		
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960186
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	C-Civil/Judicial	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

298 WFO 172994 FF3 (7)



b6
b7C

1325015-000-4424

Seizure Form

Ass[redacted] 96-FBI-003685 | Date/Tim[redacted] 1/08/99 13:45:29 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960186	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	b6 b7C

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
06/11/96				Other		

(18) Seizing Agent:	(19) Phone Number:
b6 b7C	202-324-9073

(20) Seized From: BCCI Holdings

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Available	New York City	NY

(24) Seizure Judicial District	(25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYE	DC	18 USC 982	18 USC 1957

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
3000000.00	Y		Financial Instrument	13	Civil/Judicial

(34) Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

VEHICLE

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):

(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:		ENGINES	(82) #	(83) Serial Number	(84) Size	(85) Flying Hours
(86) Airframe Flying Hours:	(87) # of Engines:					
(88) Air Worthiness Certificate?	(89) Log Books?					

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
b6 b7C	149-240-134

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

(95) Name: (Party ID 387822)	(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
BCCI Holdings		Owner	
(98) Address: (Seq No. 1) Not Available		Lienholder	
(99) City: New York City / (100) State: NY / (101) Zip Code: 00000 / (102) Country: USA		Seized From	X
(103) Contact Name (if business):	(104) Phone Number:	Institution Seized From	
(105) Lien Amount Held By Party ($): / (106) Quick Release Recipient? / (107) Quick Release Date: / (108) Expenses Reimbursed ($):		Occupant	
(109) Incarcerated? N	(110) Prisoner ID:	Victim	
(111) Institution Name (if incarcerated):		Other	
(112) Institution Address: (Seq No. 1)			
(113) City: / (114) State: / (115) Zip Code: / (116) Country:			
(117) Represented by Counsel? N	(118) Attorney's Name (if any):		
(119) Firm's Name:	(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No. 1)			
(122) City: / (123) State: / (124) Zip Code: / (125) Country:			

(95) Name: (Party ID)	(96) Phone Number:	(97) Party Type (Select 1 -or- More)	
(98) Address: (Seq No.)		Owner	
(99) City: / (100) State: / (101) Zip Code: / (102) Country:		Lienholder	
(103) Contact Name (if business):	(104) Phone Number:	Seized From	
(105) Lien Amount Held By Party ($): / (106) Quick Release Recipient? / (107) Quick Release Date: / (108) Expenses Reimbursed ($):		Institution Seized From	
(109) Incarcerated?	(110) Prisoner ID:	Occupant	
(111) Institution Name (if incarcerated):		Victim	
(112) Institution Address: (Seq No.)		Other	
(113) City: / (114) State: / (115) Zip Code: / (116) Country:			
(117) Represented by Counsel?	(118) Attorney's Name (if any):		
(119) Firm's Name:	(120) Attorney's Phone Number:		
(121) Attorney's Address: (Seq No.)			
(122) City: / (123) State: / (124) Zip Code: / (125) Country:			

Seizure Form

Asset I[redacted]26-FBI-003685 | Date/Tim[redacted]1/08/99 13:45:29

Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	U.S. vs. BCCI HOLDINGS		
(128) AUSA Name: Not Available		(129) Judicial District: DC	(130) Phone Number: N/A
(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:		(135) Agent's Phone Number:	
(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:		(135) Agent's Phone Number:	

OTHER AGENCY

(136) Agency Name: DEPARTMENT OF JUSTICE		(137) Agency Case ID:		
(138) Adopted From? N		(139) Agency Type (Federal, State, Local, -or- Foreign): Federal		
(140) Address: Not Available		(141) City: Washington		
(142) State: DC	(143) Zip Code: 00000	(144) Country: USA	(145) NCIC Code: DOJ	(146) Sharing Possible? N
(147) Contact Name:		(148) Contact Phone Number:		

b6
b7C

(136) Agency Name:		(137) Agency Case ID:		
(138) Adopted From?		(139) Agency Type (Federal, State, Local, -or- Foreign):		
(140) Address:		(141) City:		
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code:	(146) Sharing Possible?
(147) Contact Name:		(148) Contact Phone Number:		

(136) Agency Name:		(137) Agency Case ID:		
(138) Adopted From?		(139) Agency Type (Federal, State, Local, -or- Foreign):		
(140) Address:		(141) City:		
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code:	(146) Sharing Possible?
(147) Contact Name:		(148) Contact Phone Number:		

Seizure Form

Asset ID: [redacted]6-FBI-003685	Date/Time: [redacted]/08/99 13:45:29
Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
Pnd Invty Verif	Turned over USMS	06/11/96

(152) Storage Facility Address:

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate: Per:

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	06/11/96
(163) Received By:	(164) Title:

PREPARED BY

(165) Signature:	(166) Date:
	07/17/96
(167) Prepared By: [redacted]	(168) Title: SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	07/20/96
(171) Approved By: [redacted]	(172) Title: CDC

b6
b7C

Asset ID: 96-FBI-003685
Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

Probable Cause

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. vs. Hidden Interests; Major case number 38. [redacted] has been appointed [redacted] listed in the four criminal BCCI forfeiture orders. On 06/11/96, Evans completed a $3,000,000.00 (three million dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] of BCCI), and Capcom Financial Services, LTD, with [redacted]. The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

[redacted] b7E

On Jan 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI) and the plea agreement forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United

Asset ID: 96-FBI-003685
Asset Description: BCCI ASSETS TOTALING $3,000,000.00 IN U.S. CURRENCY

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	01/08/99
Headquarters Receipt Date:	03/30/98	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:	C-1		
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960186
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	C-Civil/Judicial	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999

To: FINANCE Attn: ESPU (NP300)
[redacted] b6 b7C

From: WASHINGTON FIELD
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226 b6 b7C

Approved By: [redacted]

Drafted By: [redacted] :llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log ___
Foims (PFA) ___
CATS ___

CC: 9-BUREAU, ATTN: [redacted] b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994 -112

[redacted] b6 b7C

LT990425.ec

29B-WF-171994 (FF3)

1325015-000-4432

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1/FAST, NVMRA
Contact: SA [redacted] x9072

Approved By: [redacted] (SSA) b6 b7C

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court. b6 b7C

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

♦♦ b6 b7C
1- 29B-WF-171994
1- All seizure files

Close #4
12/20/96
[redacted]
Seizure log
29B-WF-171994 FF-3

SEARCHED INDEXED
SERIALIZED FILED
DEC 19 1996
FBI - WASH. METRO FIELD OFFICE

[redacted] b6 b7C

2

1228015-000

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 07/17/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: SSA [redacted] b6 b7C

Drafted By: SA [redacted] :ac

File Number(s): 29B-WF-171994 (FS) (Pending)
3920-96-F-0186

Title: U.S. v $3,000,000.00

Entry (Check One): [X] New Case [ ] Change or Add

[X] CATS Seizure Form
[ ] FD-302
[ ] Investigative Insert
[ ] Affidavit
[ ] Seizure Warrant
[ ] FD-597 (Receipt)
[ ] Settlement Statement
[ ] Claim & Cost Bond
[ ] Title Documentation
[ ] Appraisal Report
[ ] In Forma Pauperis
[ ] Order of Forfeiture

[ ] Complaint for Forfeiture
[ ] Search Warrant
[ ] Request for Adoption
[ ] Indemnity Agreement
[ ] Final Decree
[ ] Sharing Request
[ ] Dag 71 [ ] Dag 72
[ ] Petition
[ ] Petition Investigation
[ ] Civil Forfeiture Report
[ ] FD-783 (Expedited Release)
[ ] Plea Agreement
[ ] Police Reports

b6 b7C

[redacted]

FOIMS Sut 8/27/96

08/2/96

[X] Other Subsequent Materials
Facsimile dated 6/13/96 from [redacted]

1- Bureau, FSPU (ATTN: [redacted]) b6 b7C
1- WMFO (29B-WF-171994) (FS)
1-SA [redacted]
ATTACHMENTS

O&A
New Sub
file to
6/17/96

29B-WF-171994 FF-3-1

SEARCHED INDEXED
SERIALIZED FILED
JUL 26 1996
FBI-WASH. METRO FIELD OFFICE

1325015-000-4395

Seizure Form

Asset ID: <A> Date: <B>

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
39ZN		05		96-F-0186	N

(7) Case Number:	(8) Case Name:
39A-WF-217934	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	SA [redacted] /SA [redacted]

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
6/11/96	CRIMINAL ORDER	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
SA [redacted] /C-1	202-324-9073

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b7C

(17) Seized From:	
BCCI NOTEHOLDERS	

(18) Place/Address Where Seized:	(19) City:	(20) State:
		DC

(21) Seizure: DC	Judicial District (22) Processing: DC	(23) Forfeiture Statute: 18 USC 982	(24) Violation Statute: 18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($): $3 Million	(26) Above Minimum Threshold Value? Y	(27) Appraisal Date:	(28) Asset Type: CURRENCY	(29) Asset Sub-Type: BANK ACCT	(30) Forfeiture Type: JUDICIAL

(31) Asset Description:
BCCI ASSETS CONTAINING $3 MILLION IN US CURRENCY

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	N

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLES

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:
ROBB EVANS, TRUSTEE	149-240-134

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

Seizure Form

Asset ID: <A> | Date: <B> | Page 2

Asset Description: <C>

(92) Name: BCCI HOLDINGS | (93) Phone Number: | (94) Party Type (Select 1 -or- More)

(95) Address:

(96) City: | (97) State: | (98) Zip Code: | (99) Country:

(100) Contact Name (if business): | (101) Phone Number:

(102) Lien Amount Held By Party ($): | (103) Quick Release Recipient? | (104) Quick Release Date: | (105) Expenses Reimbursed ($):

(106) Incarcerated? | (107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City: | (111) State: | (112) Zip Code: | (113) Country:

(114) Represented by Counsel? | (115) Attorney's Name (if any):

(116) Firm's Name: | (117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City: | (120) State: | (121) Zip Code: | (122) Country:

Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	X
Institution Seized From	
Occupant	
Victim	
Other	

(92) Name: | (93) Phone Number: | (94) Party Type (Select 1 -or- More)

(95) Address:

(96) City: | (97) State: | (98) Zip Code: | (99) Country:

(100) Contact Name (if business): | (101) Phone Number:

(102) Lien Amount Held By Party ($): | (103) Quick Release Recipient? | (104) Quick Release Date: | (105) Expenses Reimbursed ($):

(106) Incarcerated? | (107) Prisoner ID:

(108) Institution Name (if incarcerated):

(109) Institution Address:

(110) City: | (111) State: | (112) Zip Code: | (113) Country:

(114) Represented by Counsel? | (115) Attorney's Name (if any):

(116) Firm's Name: | (117) Attorney's Phone Number:

(118) Attorney's Address:

(119) City: | (120) State: | (121) Zip Code: | (122) Country:

Party Type (Select 1 -or- More)	
Owner	
Lienholder	
Seized From	
Institution Seized From	
Occupant	
Victim	
Other	

Seizure Form

Asset ID: <A>	Date: <B>	Page 3
Asset Description: <C>		

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI HOLDINGS		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:		(132) Agent's Phone Number:	

OTHER AGENCY

(133) Agency Name: DEPARTMENT OF JUSTICE			(134) Agency Case ID:	
(135) Adopted From? NO			(136) Agency Type (Federal, State, Local, -or- Foreign): FEDERAL	
(137) Address:			(138) City: WASHINGTON	
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:	(143) Sharing Possible? N
(144) Contact Name:			(145) Contact Phone Number:	

b6
b7C

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:			(134) Agency Case ID:	
(135). Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

JUN 11 '96 12:20 FR FIB LA [redacted]IN #149 213 614 4986 TO 99558[redacted] P.01/01

WIRE - Wire Transfer Entry Screen 210149 1612 11-JUN-96 12:14:36
Resolved; Received by TR/MN Arizona Time
Wire Transfer Type - Outgoing FEDWIRE Item Status RCONFR

Repetitive Number NONE Item No 1504-11JUN96 Send Date 11-JUN-96

Waive Charge Y Dollar Amt 3,000,000.00/USD Testkey 98 45639
Seq # 00000000 FED Ref # 163025248 Release Time 092739 Ack Time 121142
Debit Acct Type/# CAD/149240134 Req By ROBB EVANS, TRUSTEE
Add1 725 S FIGUEROA STREET Add2 SUITE 2260
City LOS ANGELES ST CA ZIP 90017

Dest Bank ABA 021030004 Bank Name US TREASURY FRB NEW YORK
Addr City NEW YORK ST NY ZIP

Payable To U S TREASURY Account Number ALC# 00008154

Notification Type LTR Notification Info REF NO CRIMINAL NO 91-0655 (JHG)

Additional Information
U S MARSHAL DISTRICT OFFICE SDNY ATTN: [redacted] (212)637-6000 b6 b7C

actn p1 p2 memo

** TOTAL PAGE.01 **

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. Robb Evans, trustee has been appointed to oversee the complex assets listed in the four criminal BCCI forfeiture orders. On 06/11/96, Evans completed a $3,000,000.00 (three million dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture.

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI") [redacted] BCCI), and Capcom Financial Services, LTD. with [redacted]. The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted], and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

[redacted] b7E

On Jan 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI) and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Three additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted], Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court. [redacted] anticipates a fifth order of forfeiture will be forthcoming in the Summer of 1996.

b6
b7C

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. [redacted] b6 b7C

DATE: June 13, 1996

FIRM: Federal Bureau of Investigation

FAX NO.: (202) 324-6426

FROM: [redacted]

NO. OF PAGES: three (3)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear [redacted] b6 b7C

It is time to say hello again.

Attached, please find a copy of the Cash Distribution Schedule and wire confirmation sent to the U.S. Marshals on June 11, 1996. The source of the $3 million distribution is from the California Portfolio. I will fax you the details of the Cash Flow on Monday.

Best regards,

[redacted]

cc: Mr. [redacted] b6 b7C
U.S. Marshals Service

1325015-000-4402

ROBB EVANS, TRUSTEE

RECORD OF SURPLUS FUNDS TRANSFERRED TO U.S. MARSHAL

As of June 11, 1996

(Amount in Dollars)

DATE TRANSFERRED	AMOUNT TRANSFERRED
26-Aug-93	35,964,405.69
22-Oct-93	1,000,000.00
22-Dec-93	250,000.00
18-Feb-94	4,250,000.00
19-Apr-94	150,000.00
17-Jun-94	1,300,000.00
16-Aug-94	8,850,000.00
14-Oct-94	200,000.00
13-Dec-94	3,035,594.31
13-Feb-95	17,000,000.00
14-Apr-95	1,500,000.00
13-Jun-95	10,500,000.00
14-Aug-95	2,000,000.00
13-Oct-95	1,000,000.00
12-Dec-95	1,000,000.00
12-Feb-96	2,200,000.00
12-Apr-96	1,800,000.00
11-Jun-96	3,000,000.00
TOTAL	**95,000,000.00**

Seizure Form

Asset ID: [redacted]	Date: <B> [redacted]	Page 4
Asset Description: <C>		

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name: FEDERAL RESERVE BANK, NEW YORK	(148) Storage Date: 6/11/96
(149) Storage Facility Address:		

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: $	Per:
NY	NY			

PREPARED BY

(154) Signature:	(155) Date: 7/17/96
(156) Prepared By: SA	(157) Title: SA

b6
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b6
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(158) Signature:	(159) Date: 7/26/96
(160) Approved By:	(161) Title:

Probable Cause

SEE ATTACHED

<D>

E [redacted] (1)

b6
b7C

29B-WF-171994 (FF-27)

ST PFA (4/1/99)

From: [redacted]
To:
Date: 4/1/99 11:19AM
Subject: BCCI (SEIZURE # 3920-99-F-0092)

[redacted]

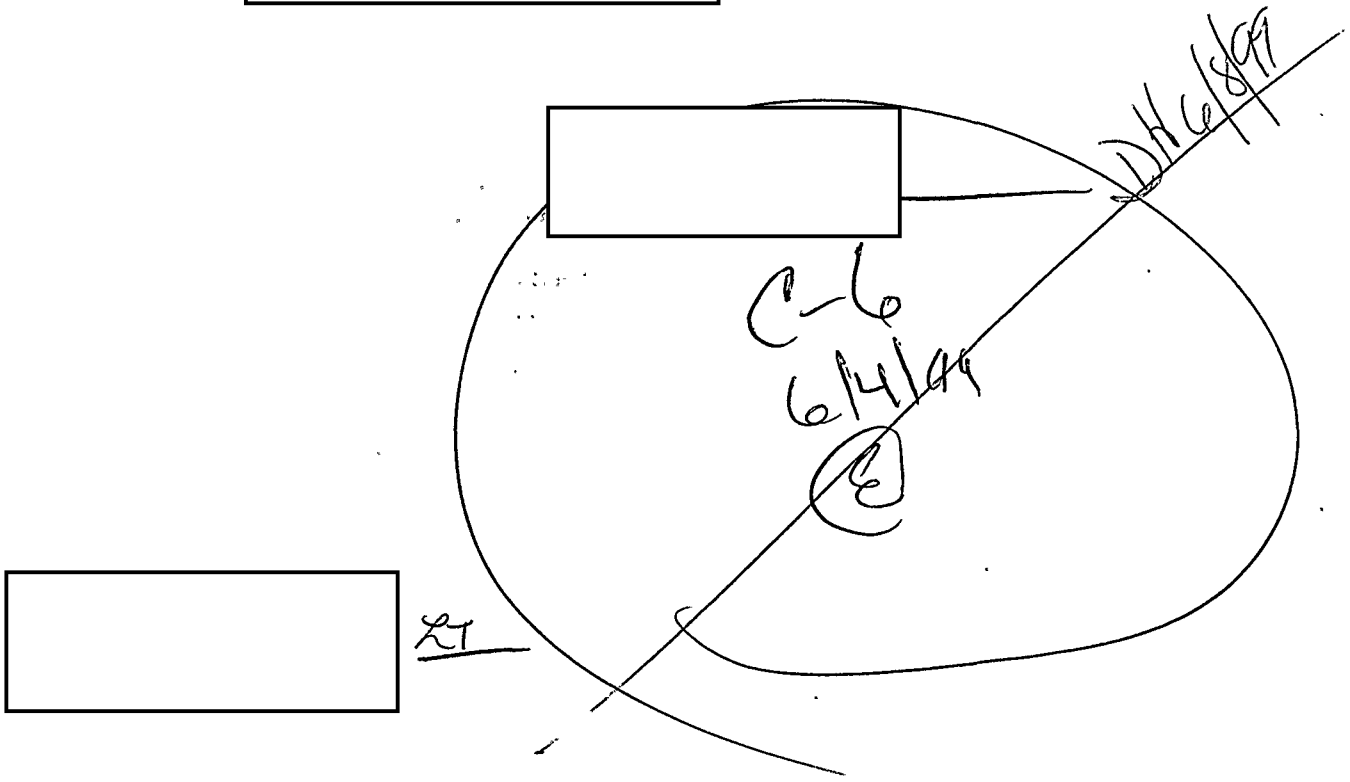
Pursuant to your March 26, 1999 request, I have entered the above seizure into PFA. As I mentioned when we spoke, I only had limited information for that seizure but would follow the information which had been entered into PFA for the other orders of forfeiture. Seizure number 3920-99-F-0092 is for the 6th Order of Forfeiture dated 12/22/98.

Would you please let me know when you are closing out your BCCI seizure files so that I may do the same here? If either you [redacted] have any additional information on the BCCI cases that WFO should place into the seizure files, would you let me know, as I have heard nothing further regarding this matter since the last meeting I attended in early February. Since I do not have contact with the USMS-NY regarding receipt of funds, the only means I have to determine if the alloted amounts of currency for each order of forfeiture have been received is through CATS. b6 b7C

Thank you.

[redacted] b6 b7C
DynCorp, WFO C-1

CC: [redacted]



b6 b7C

3

[redacted] 9B-WF-171994 (FF-27)
3920-99-F-0092
1325015-000-8107

Seizure Form

Asset Description: BCCI Holdings (Round 6)

(95) Name: (Party ID 395752) BCCI			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No. 1) NOT GIVEN				Owner:
(99) City: NOT GIVEN	(100) State: DC	(101) Zip Code: 00000	(102) Country: USA	Lienholder:
(103) Contact Name (if business): UNKNOWN UNKNOWN			(104) Phone Number:	Seized From: X
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From:
(109) Incarcerated? N	(110) Prisoner ID:			Occupant:
(111) Institution Name (if incarcerated):				Victim:
(112) Institution Address: (Seq No. 1)				Other:
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel? N	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No. 1)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

(95) Name: (Party ID)			(96) Phone Number:	(97) Party Type (Select 1 -or- More)
(98) Address: (Seq No.)				Owner:
(99) City:	(100) State:	(101) Zip Code:	(102) Country:	Lienholder:
(103) Contact Name (if business):			(104) Phone Number:	Seized From:
(105) Lien Amount Held By Party ($):	(106) Quick Release Recipient?	(107) Quick Release Date:	(108) Expenses Reimbursed ($):	Institution Seized From:
(109) Incarcerated?	(110) Prisoner ID:			Occupant:
(111) Institution Name (if incarcerated):				Victim:
(112) Institution Address: (Seq No.)				Other:
(113) City:	(114) State:	(115) Zip Code:	(116) Country:	
(117) Represented by Counsel?	(118) Attorney's Name (if any):			
(119) Firm's Name:			(120) Attorney's Phone Number:	
(121) Attorney's Address: (Seq No.)				
(122) City:	(123) State:	(124) Zip Code:	(125) Country:	

Seizure Form

Asset Description: BCCI Holdings (Round 6)

U.S. ATTORNEY

(126) Court Case Number:	(127) Case Name:		
91-0655	U.S. V. BCCI HOLDINGS (ROUND 6)		
(128) AUSA Nam[redacted]		(129) Judicial District: DC	(130) Phone Number: [redacted]

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(126) Court Case Number:	(127) Case Name:		
(128) AUSA Name:		(129) Judicial District:	(130) Phone Number:

INTRA-AGENCY OFFICE

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

(131) Office ID:	(132) Sub-Office ID:	(133) Agency Case ID:	
(134) Agent's Name:			(135) Agent's Phone Number:

OTHER AGENCY

(136) Agency Name:			(137) Agency Case ID:	
US CUSTOMS HQ				
(138) Adopted From?		(139) Agency Type (Federal, State, Local, -or- Foreign):		
N		Federal		
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DCUSC0000	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Name:			(137) Agency Case ID:	
DRUG ENFORCEMENT ADMINISTRATION				
(138) Adopted From?		(139) Agency Type (Federal, State, Local, -or- Foreign):		
N		Federal		
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(145) NCIC Code: DEA	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

(136) Agency Nam[redacted]			(137) Agency Case ID:	
(138) Adopted From?		(139) Agency Type (Federal, State, Local, -or- Foreign):		
N		Federal		
(140) Address:			(141) City:	
(142) State:	(143) Zip Code:	(144) Country:	(1452) NCIC Code: [redacted]	(146) Sharing Possible? N
(147) Contact Name:				(148) Contact Phone Number:

b7E

Seizure Form

Asset ID: [redacted]9-FBI-000970	Date/Time: [redacted]/29/99 11:03:20
Asset Description: BCCI Holdings (Round 6)	

CUSTODY/STORAGE

(149) Custody Code:	(150) Storage Facility Name:	(151) Storage Date:
USMS	FEDERAL RESERVE BANK	12/22/98

(152) Storage Facility Address:
33 LIBERTY STREET

(153) City:	(154) State:	(155) Zip Code:	(156) Storage Rate:	Per:
NEW YORK	NY	10007		

RELEASED BY

(157) Signature:	(158) Date:
(159) Released By:	(160) Title:

RECEIVED BY

(161) Signature:	(162) Date:
	12/22/98
(163) Received By:	(164) Title:
Bob Johnson	AFU Chief

PREPARED BY

(165) Signature:	(166) Date:
	12/22/98
(167) Prepared By: [redacted]	(168) Title: SA

b6
b7C

APPROVED BY

(169) Signature:	(170) Date:
	12/22/98
(171) Approved By:	(172) Title:
UNKNOWN UNKNOWN	CDC

Asset ID: 99-FBI-000970
Asset Description: BCCI Holdings (Round 6)

Probable Cause

THE WASHINGTON FIELD OFFICE (WFO) HAS BEEN ACTING PRIMARILY AS AN ADMINISTRATIVE PROCESSOR MONITORING AND REPORTING TO FSPU ASSETS SEIZED FROM SEVERAL CRIMINAL ORDERS OF FORFEITURE IN U.S. VS. HIDDEN INTERESTS; MAJOR CASE NUMBER 38. ROBB EVANS, TRUSTEE HAS BEEN APPOINTED TO OVERSEE THE COMPLEX ASSETS LISTED IN THE CRIMINAL BCCI FORFEITURE ORDERS.

ON OCTOBER 4, 1988, A SIXTEEN-COUNT INDICTMENT WAS RETURNED CHARGING BCCI HOLDINGS (LUXEMBOURG) S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL S.A., BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED (COLLECTIVELY, "BCCI"), [redacted] b6 b7C BCCI), AND CAPCOM FINANCIAL SERVICES, LTD. WITH CONSPIRACY (18 U.S.C. SECTION 371, MONEY LAUNDERING (18 U.S.C. SECTION 1956 (A) (A) & (2), AND DRUG CONSPIRACY (21 U.S.C. SECTION 846). THE FIRST SUPERSEDING INDICTMENT WAS FILED AND UNSEALED ON OCTOBER 11, 1988. TWO ADDITIONAL BCCI [redacted] WERE INDICTED ON MAY 4, 1989.

[redacted] b7E

ON JANUARY 24, 1992, THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ACCEPTED THE PLEAS OF GUILTY OF THE THE FOUR CORPORATE DEFENDANTS (COLLECTIVELY, "BCCI) AND THE PLEA AGREEMENT BETWEEN THEM AND THE UNITED STATES OF AMERICA. AN ORDER OF FORFEITURE WAS ENTERED AS PART OF THE PLEA AGREEMENT WHICH PROVIDED THAT THE FOUR CORPORATE DEFENDANTS NAMES SHALL FORFEIT TO THE UNITED STATES OWNERSHIP INTERESTS IN ALL PROPERTY LOCATED IN THE UNITED STATES, INCLUDING WITHOUT LIMITATION, REAL PROPERTY AND ALL TANGIBLE AND INTANGIBLE PERSONAL PROPERTY.

Seizure Form

Asset ID: 99-FBI-000970
Asset Description: BCCI Holdings (Round 6)

Item Seq. No.	Count	Item Description/Serial Number/Item Type	Item Value
1	1	Balance of Account	151487578.58
		FI	

Asset ID: 99-FBI-000970
Asset Description: BCCI Holdings (Round 6)

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	02/01/99
Headquarters Receipt Date:		**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:			
Sub File:			
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920990092
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			
Judgment Asset ID:			

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 01/26/1999

To: WFO

From: WFO
(C-1)
Contact: SA [redacted] (703) 762-3226 b6 b7C

Approved By: [redacted] SSA

Drafted By: [redacted]

Case ID #: 29B-WF-171994 (FF) (Pending) 2

Title: BCCI;
MC# 29;

Synopsis: Sixth and final order of forfeiture.

Enclosures: 12/22/98, sixth and final order of forfeiture.

Details: On 1/19/99, [redacted] Trial Attorney, Asset Forfeiture and Money Laundering Section Criminal Division, Department of Justice advised all assets have been identified in the BCCI case. [redacted] anticipates the BCCI investigation will reach final disposition in the near future. The sixth order of forfeiture identifies $158,310,927.71 in assets. b6 b7C

ROUTING & REQUEST

Please...
- ☐ Read
- ☐ Handle
- ☐ Approve

And...
- ☐ Forward
- ☐ Return
- ☐ Keep or Toss
- ☐ Review with Me

To: [redacted] b6 b7C

I checked his assets not claimed by FAST. I would like to get returned # passed $9158 million

From: [redacted]

Post-it ® 7664 © 3M 1994

Date: 1/19/99

over

2/10/99

99-92

[redacted] b6 b7C

2/8/99 ERG/mc 26awc03.ec

1325015-000-8097

12/22/98

6th order of Jdgt.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	
BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED,	)	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04
	)	
Defendants	)	

FILED

DEC 22 1998

Clerk, U.S. District Court
District of Columbia

ORDER OF FORFEITURE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a

1325015-000-8099

Second Supplemental List of Forfeited Property, *see* Order of Forfeiture, July 29, 1992, a Third Supplemental List of Forfeited Property, *see* Order of Forfeiture, August 19, 1993, a Fourth Supplemental List of Forfeited Property, *see* Order of Forfeiture, December 21, 1994, and a Fifth Supplemental List of Forfeited Property, *see* Order of Forfeiture, September 20, 1996.

The Government has now identified additional assets of the corporate defendants that are forfeitable to the United States under the First Order of Forfeiture. These assets are described in the Government's motion and include assets held in the names of the four corporate defendants, as well as assets nominally held by other persons and entities.

For the reasons set forth in the Government's motion and the accompanying exhibits, the Court finds that the property listed in the Government's Motion is the property of the corporate defendants and that the property is located within the United States. Accordingly, it is hereby

1. ORDERED that the property listed on Sixth and Final Supplemental List of Forfeited Property is forfeited to the United States;

2. IT IS FURTHER ORDERED that the Order of Forfeiture of January 24, 1992, is hereby amended to include the Sixth and Final Supplemental List of Forfeited Property;

3. IT IS FURTHER ORDERED that the property listed on the Sixth and Final Supplemental List shall be transferred to the United States as follows:

1325015-000-8100

A. All property on the Sixth and Final Supplemental List that is described as being the excess of the liquidation of the agencies of BCCI S.A. in New York shall be managed by the Court-Appointed Trustee, Robb Evans, and transferred to the Marshals in accordance with this Court's Order Appointing Trustee of July 20, 1994 and subsequent orders; the amount still held in reserve by the Superintendent of Banks of the State of New York is forfeited to the United States and shall be transferred by Mr. Evans to the Marshals as soon as he receives it from the Superintendent;

B. With respect to the property in Harrisonville, Missouri, all interest in that property held by the Kuwait International Finance Company ("KIFCO") is forfeited to the United States, and Robb Evans, the court-appointed trustee, is authorized to liquidate the forfeited interest on behalf of the United States in conjunction with the on-going liquidation he has been previously been appointed to conduct, to satisfy any tax liens held by any taxing authority, and to transfer the remaining proceeds of the liquidation to the United States Marshals Service in his next regular transfer of funds following the liquidation;

C. With respect to the set-off claimed by the Bank of New York, the sum of $1,112,288.60, which is presently in the possession of the Bank of New York, is forfeited to the United States. Within 5 days of receipt of notice of entry of this Order, the Bank of New York shall transfer to the United States Marshals Service the sum of $487,578.58 and shall retain possession of the balance pending the Court's consideration of the Bank of New York's L-claim and the tentative settlement of that claim that is described in the Notice to the Court filed December 1, 1998.

1325015-000-8101

D. With respect to BCCI's interest in the real properties referred to on the Sixth and Final Supplement List as the "V4 Enterprises Property" and the "Alam Property," any legal interest that BCCI may have in that property is forfeited to the United States, and Robb Evans, the court-appointed trustee, is authorized, pursuant to the Stipulation entered into by the Court-Appointed Fiduciaries and the United States, to perfect the forfeited interest through litigation or otherwise, to liquidate the forfeited interest on behalf of the United States in conjunction with the on-going liquidation he has been previously been appointed to conduct, and to transfer the remaining proceeds of the liquidation to the United States Marshals Service in his next regular transfer of funds following the liquidation;

4. IT IS FURTHER ORDERED, that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title or interest in all property subject to this Order pursuant to section 1963(l). In light of the Government's compliance with § 1963(l)(1) on five prior occasions in which the Government, at considerable expense, published notice of the Order of Forfeiture in 11 newspapers of general circulation, and in light of the nature of the additional property listed in the Sixth and Final List of Forfeited Property, the United States may comply with the notice requirements as follows:

A. The Government shall publish notion of this Order in one newspaper of general circulation in the State of New York;

B. The Government shall provide written notice of this Order (1) to the Bank of New York, (2) to any person on entity known to the Government to have a potential

1325015-000-8102

interest in any of the parcels of real property listed on the Sixth and Final Supplemental List of Forfeited Property, (3) to any person or entity whose claim was still pending in the New York liquidation proceeding at the time the *Fifth* Order of Forfeiture was entered in 1996, and who therefore may not yet have had an opportunity to challenge the forfeiture of the surplus of the New York liquidation in this Court, and (4) to the Superintendent of Banks of the State of New York;

5. IT IS FURTHER ORDERED that as soon as the ancillary proceeding following the issuance of this Order is complete, or if no further L-claims are filed, as soon as the 30-day period for filing such claims has expired, the United States shall file a motion and proposed Final Order of Forfeiture that sets forth a procedure for dividing the remaining liquid and non-liquid assets held by the Marshals Service and/or Robb Evans in accordance with the Plea Agreement, terminates the role of Robb Evans as court-appointed trustee, provides for the allocation of any future distributions by the court's other trustee, Harry Albright, and addresses what rights the United States may have in any other property of BCCI that is identified after the Final Order of Forfeiture is entered.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

December 22, 1998
(Date)

1325015-000-8103

SIXTH AND FINAL SUPPLEMENTAL LIST OF FORFEITED PROPERTY

Property	Approximate Value
Surplus Assets from the New York Liquidation	$151,000,000.00
Surplus Assets from the New York Liquidation still held in reserve by the Superintendent of Banks	$1,800,000.00
Set-off taken by the Bank of New York	$1,112,288.60
All interests of KIFCO in:	
a) Parcel #57-13-0746800, Harrisonville, Missouri, described in Attachment A	$250,000.00
b) Parcel #60-13-1770100, Harrisonville, Missouri, described in Attachment B	$50,000.00
24 Acres of undeveloped land held in the name of V4 Enterprises, Inc. in Sacramento, CA (APNs 209-0720-003 ("Parcel J"), 004,007, 010, 011, 012	$3,848,639.11
Property of Khurshid Alam located at 87-38 Kingston Place, Queens, NY	$250,000.00
	Total: $158,310,927.71

1325015-000-8104

EXHIBIT A

PARCEL # 57-13-0746800
(APPROXIMATELY 112 ACRES IN HARRISONVILLE, CASS COUNTY, MISSOURI)

PROPERTY DESCRIPTION

All of Lot 4 of the Northeast Quarter, except the West 1560 feet Thereof; and all of Lot 3 of the Northeast Quarter, all in Section 3, Township 44, Range 31, in CASS COUNTY, MISSOURI.

EXHIBIT B

PARCEL # 60-13-17770100
(APPROXIMATELY 49 ACRES IN HARRISONVILLE, CASS COUNTY, MISSOURI)

PROPERTY DESCRIPTION

A part of the East half of the East half of the Southwest Quarter and part of the West half of the West half of the Southeast Quarter of Section 33, Township 45, Range 31, in CASS COUNTY, MISSOURI, described as follows:
Beginning at the center of said Section 33 and running thence West 661.98 feet to the Northwest corner of the East half of the East half of the Southwest Quarter of said Section 33; thence South 0 degrees 19 minutes 30 seconds East, along the West line of said East half of the East half of the Southwest Quarter, 2438.88 feet to a point 30 feet South of the North line of Hargus and Henderson Addition to the City of Harrisonville, CASS COUNTY, MISSOURI; thence North 89 degrees

43 minutes East, 460.29 feet to a point 30 feet South of the Northwest corner of Lot 2, in said Addition; thence South 0 degrees 17 minutes East, 170 feet to the Southwest corner of said Lot 2; thence North 89 degrees 43 minutes East 100 feet to the Southeast corner of Lot 2 aforesaid; thence North 0 degrees 17 minutes West, 270 feet; thence North 89 degrees 43 minutes East, 300 feet; thence South 0 degrees 17 minutes East 270 feet; thence North 89 degrees 43 minutes East, 66.91 feet; thence North 1 degree 01 minute 53 seconds West, 2604.68 feet to a point in the North line of the West half of the Southeast Quarter of Section 33, aforesaid; thence West 232.99 feet to the Point of Beginning.

Seizure Form

Asset [redacted]99-FBI-000970 | Date/Tim[redacted]3/29/99 11:03:20 |

b6
b7C

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920990092	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	Hidden Interests; Major Case #38
(9) Operation Name:	(10) Case Agent:

SEIZURE

(11) Seizure Date:	(12) FIRE Begin Date:	(13) FIRE End Date:	(14) FIRE Type:	(15) Seizure Method:	(16) Indictment Date:	(17) Adoption Date:
12/22/98				Indictment	11/24/91	

(18) Seizing Agent:	(19) Phone Number:
	(202) 324-9072

(20) Seized From: BCCI

(21) Place/Address Where Seized:	(22) City:	(23) State:
Not Given	Not Given	NY

(24) Judicial Seizure:	District (25) Processing:	(26) Forfeiture Statute:	(27) Violation Statute:
NYS	DC	18 USC 982	18 USC 892

ALL ASSET TYPES

(28) Asset Value at Seizure ($):	(29) Abve Min Thrshld?	(30) Appraisal Date:	(31) Asset Type:	(32) Asset Sub-Type:	(33) Forfeiture Type:
158310927.71	Y		Financial Instrument	04	Criminal

(34) Asset Description: BCCI Holdings (Round 6)

(35) Lien Exists?	(36) Hold as Evidence after Forfeiture?	(37) Expedited Release Notice Served?	(38) Special Handling Code(s)?
N	N	N	
(39) Expenses Incurred?	(40) Forfeiture-Dependent Award?	(41) Quick Release Performed?	(42) Intra-Agency Assistance?
N	N	N	N
(43) Suitable for Official Use?	(44) OCDETF Case?	(45) Sharing Anticipated?	(46) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(47) Make:	(48) Model:	(49) Style:	(50) Year Manufactured:	(51) Color/Finish:

(52) VIN/Serial Number/Fiscal Control #:	(53) Condition Code:	(54) NCIC Search Results Positive?

(55) License Number:	(56) Year:	(57) State:	(58) Country:	(59) Concealed Compartment?	(60) Photos?

(61) Special Equipment or Accessories?	(62) Damages Present?	(63) Caliber?

VEHICLE

(64) Odometer Reading (include units):	(65) Size:	(66) Weight (including units):

(67) Number of Cylinders:	(68) Four Wheel Drive?	(69) Salvage Certificate?

VESSEL

(70) Vessel Name/Coast Guard No.:	(71) Hull Type:	(72) Length:	(73) Engine Size (including units):

(74) Trailer Included?	(75) License Number:	(76) Year:	(77) State:	(78) Country:	(79) # of Engines:	(80) Mounting Type:

AIRCRAFT

(81) Tail Number:	
(86) Airframe Flying Hours:	(87) # of Engines:
(88) Air Worthiness Certificate?	(89) Log Books?

ENGINES

(82) #	(83) Serial Number	(84) Size	(85) Flying Hours

FINANCIAL INSTRUMENTS

(90) Account Name:	(91) Account Number:
UNKNOWN	UNKNOWN

FOREIGN CURRENCY

(92) Nationality:	(93) Date Converted:	(94) Exchange Rate:

FEDERAL BUREAU OF INVESTIGATION
FOI/PA
DELETED PAGE INFORMATION SHEET
Civil Action# 15-cv-01303-LL

Total Deleted Page(s) = 26
Page 3 ~ Referral/Consult;
Page 4 ~ Referral/Consult;
Page 5 ~ Referral/Consult;
Page 6 ~ Referral/Consult;
Page 7 ~ Referral/Consult;
Page 8 ~ Referral/Consult;
Page 9 ~ Referral/Consult;
Page 10 ~ Referral/Consult;
Page 11 ~ Referral/Consult;
Page 12 ~ Referral/Consult;
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Page 54 ~ Referral/Consult;
Page 55 ~ Referral/Consult;

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X For this Page X
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related to the use, operation, sale, conversion or other disposition (voluntary or involuntary) of the Real Property or the improvements or tangible property located thereon or the rents and incomes arising therefrom, or any interest therein or combination thereof, including without limitation, all permits, licenses, governmental approvals, insurance policies, rights of action and other choses in action.

h. All proceeds of the conversion, voluntary or involuntary, of any of the collateral described above into cash or other liquidated claims, or proceeds that are otherwise payable for injury or loss to, or the taking, conversion, requisitioning or destruction of, any and all such property, including all awards or payments, including interest thereon, resulting from the exercise of any right of eminent domain or the alteration of the grade of any street, and further including all right, title and interest of Defendants in and to all unearned premiums under any and all insurance policies now or hereafter existing with respect to, and all proceeds and sums payable for the loss of or damage to, the Real Property, the collateral described above, and the rents, revenues, income, profits and proceeds from leases, franchises, concessions or licenses of or on any part of the foregoing.

i. All of Defendants' right, title and interest in and to all names, trademark or tradenames under or by which the improvements constructed or to be constructed on the Real Property or any part thereof may at any time be known or operated.

OFF. REC. BK. 8563 PG. 254 PINELLAS COUNTY, FLA.

CIRCUIT COURT PINELLAS COUNTY FLORIDA

STATE OF FLORIDA - PINELLAS COUNTY
I hereby certify that the foregoing is a true copy as the same appears among the files and records of this court.
This 16th day of November, 19 94
KARLEEN F. DeBLAKER
Clerk of Circuit Court
By: Sharon McCarthy
Deputy Clerk

1325015-000-4378

Seizure Form

[redacted]: 96-FBI-001504 | Date: [redacted]06/04/96 09:29:30 |

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Szr Event/Exhibit #:	(6) Delay Forfeiture?
3920		05		3920960134	N

(7) Case Number:	(8) Case Name:
29B-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	[redacted] b6 b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
04/12/96	Other	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
[redacted] b6 b7C	(202)-324-9073

(17) Seized From: BCCI Holdings

(18) Place/Address Where Seized:	(19) City:	(20) State:
Not Available	Not Available	DC

(21) Seizure: Judicial / District	(22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1956

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
1800000.00	Y		Financial Instrument	13	Criminal

(31) Asset Description: BCCI Assets Totaling 1.8 Million in Account # 149-240-134

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	

(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N

(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

(Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number/Fiscal Control #:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

VEHICLE

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):

(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSEL

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(A.) Year:	(B.) State:	(C.) Country:	(73) # of Engines:	(74) Mounting Type:

AIRCRAFT

(75) Tail Number:		ENGINES	(76) #	(A.) Serial Number	(B.) Size	(77) Flying Hours
(78) Airframe Flying Hours:	(79) # of Engines:					
(80) Air Worthiness Certificate?	(81) Log Books?					

FINANCIAL INSTRUMENTS

(82) Account Name:	(83) Account Number:
[redacted] b6 b7C	149-240-134

FOREIGN CURRENCY

(84) Nationality:	(85) Date Converted:	(86) Exchange Rate:

Seizure Form

Ass[redacted]96-FBI-001504 | Date/T[redacted]06/04/96 09:29:30

Asset Description: BCCI Assets Totaling 1.8 Million in Account # 149-240-134

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
BCCI Holdings		Owner	
(95) Address: NOT AVAILABLE		Lienholder	
(96) City: NOT AVAILABLE / (97) State: DC / (98) Zip Code: 00000 / (99) Country: USA		Seized From	X
(100) Contact Name (if business): NOT AVAILABLE	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated: N / (107) Prisoner ID:		Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel: N	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
		Owner	
(95) Address:		Lienholder	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Seized From	
(100) Contact Name (if business):	(101) Phone Number:	Institution Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Occupant	
(106) Incarcerated? / (107) Prisoner ID:		Victim	
(108) Institution Name (if incarcerated):		Other	
(109) Institution Address:			
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

Seizure Form

Ass[redacted]96-FBI-001504 | Date/T[redacted]06/04/96 09:29:30

Asset Description: BCCI Assets Totaling 1.8 Million in Account # 149-240-134

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	U.S. v BCCI HOLDINGS		
(125) AUSA Name: NOT AVAILABLE		(126) Judicial District: DC	(127) Phone Number: NOT AVAILABLE
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name:			(134) Agency Case ID:	
DEPT OF JUSTICE				
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
N			Federal	
(137) Address:			(138) City:	
NOT AVAILABLE			Washington	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
DC	00000	USA	DCDOJ0000	N
(144) Contact Name:			(145) Contact Phone Number:	
			NOT AVAILABLE	

b6
b7C

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:			(134) Agency Case ID:	
(135) Adopted From?			(136) Agency Type (Federal, State, Local, -or- Foreign):	
(137) Address:			(138) City:	
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

Seizure Form

Ass[redacted]96-FBI-001504 | Date/T[redacted]6/04/96 09:29:30

Asset Description: BCCI Assets Totaling 1.8 Million in Account # 149-240-134

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:		(148) Storage Date:
Seizing Agency	Federal Reserve Bank, New York		04/12/96
(149) Storage Facility Address:			
(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate: Per:

RELEASED BY

(154) Signature:	(155) Date:
(156) Released By:	(157) Title:

RECEIVED BY

(158) Signature:	(159) Date: 04/12/96
(160) Received By:	(161) Title:

PREPARED BY

(162) Signature:	(163) Date: 05/14/96
(164) Prepared By: [redacted]	(165) Title: SA

b6
b7C

APPROVED BY

(166) Signature:	(167) Date: 05/21/96
(168) Approved By: [redacted]	(169) Title: SSA

b6
b7C

Asset ID: 96-FBI-001504
Asset Description: BCCI Assets Totaling 1.8 Million in Account # 149-240-134

Probable Cause

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. [redacted] has been appointed [redacted] listed in the four criminal BCCI forfeiture orders. On 04/12/96, [redacted] completed a $1,800,000.00 (ome million eight hundred thousand dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] of BCCI), and Capcom Financial Services, LTD. with [redacted] The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

[redacted] b7E

On January 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI") and the plea agreement between them and the United States of America. An order of forfeiture was entered as art of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States

ownership interested in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Three additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted] Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court. [redacted] anticipated a fifth order of forfeiture will be forthcoming in the Summer of 1996.

b6
b7C

Asset ID: 96-FBI-001504
Asset Description: BCCI Assets Totaling 1.8 Million in Account # 149-240-134

Additional Processing Details:

Seizure Form Status:	C (Complete)		
Pre-seizure Plan?:	N	**Seizure Form Entry Date:**	06/03/96
Headquarters Receipt Date:	05/31/96	**Forwarded to Legal Date:**	
Analyst ID:		**Returned from Legal Date:**	
Squad / Team:	C-1		
Scheduled Ad Date:			
Dea Ad Code:		**Szr Event/Exhibit #:**	3920960134
Prior Ad Codes:		**Prior Seizure Number(s):**	
Forfeiture Type:	D-Criminal	**Date Changed:**	
Prior Forfeiture Types:			

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/18/96

To: ADIC, WMFO

From: SA [redacted] b6 b7C
C-1/FAST, NVMRA
Contact: SA [redacted], x9072

Approved By: [redacted] (SSA) b6 b7C

Drafted By: [redacted] (SA) AC:js

File Number(s): 29B-WF-171994 (Pending)

Title: HIDDEN INTERESTS;
MAJOR CASE #38;
OO: WMFO

Synopsis: **CLOSURE OF SEIZURE FILES**

Details: The purpose of this memorandum is to request that the corresponding seizure files be closed based on the fact that the U.S. Currency has been remitted to the United States Marshals Service, New York (via wire transfer) pursuant to five criminal orders of forfeiture.

[redacted] Criminal Division b6 b7C has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the court.

SUB FS-21	3920-95-F-0058	$82,156.99	US CURRENCY
SUB FS-22	3920-95-F-0059	$10,430.00	US CURRENCY
SUB FS-23	3920-95-F-0060	$4,545.47	US CURRENCY
SUB FS-24	3920-95-F-0097	$17,000,000	US CURRENCY
SUB FS-26	3920-96-F-0024	$2,000,000	US CURRENCY
SUB FF-1	3920-96-F-0097	$2,200,000	US CURRENCY
SUB FF-2	3920-96-F-0134	$1,800,000	US CURRENCY
SUB FF-3	3920-96-F-0186	$3,000,000	US CURRENCY
SUB FF-4	3920-96-F-0195	$1,000,000	US CURRENCY
SUB FF-5	3920-97-F-0028	$60,000,000	US CURRENCY

♦♦
1- 29B-WF-171994
1- All seizure files

[redacted] b6 b7C

Close #4
12/20/96
1
seizure log.
29B-WF-171994 FF-2-5
132396

SEARCHED INDEXED
SERIALIZED FILED
DEC 19 1996
FBI - WASH. METRO FIELD OFFICE

[redacted] b6 b7C

1325015-000-4

(12/31/1995)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/3/1997

To: Director, FBI **Attn:** [redacted] (FSPU) b6 b7C

From: WFO
Squad C-1 (FAST)

Approved By: [redacted] b6 b7C

Drafted By: [redacted]

Case ID #: 209B-WF-198831 SUB FF SUB 2 (Pending)

Title: U.S. v. $96,801.25 IN U.S. CURRENCY

Synopsis: To advise FSPU of the status of certain WFO cases.

Reference: Reference is made to a 1/3/97 communication from FSPU to WFO requesting status of seizure files.

Enclosures: Enclosed for FSPU is a 10/9/96 Consent Order of Forfeiture pertaining to WFO seizures 3920-F-94-151 & 155.

Details: Referenced FSPU communication requested a status update on several WFO forfeiture cases. These cases are updated below by seizure number:

1) 3920-F-94-151 &155: The Consent Order of Forfeiture is attached. The final order will not be issued until after further legal proceedings are concluded in April, 1997.

2) 3920-95-F-021: AFO DOJ is still in the process of ruling on the petitions. The latest estimate of completion is sometime in March, 1997.

3) 3920-95-F-058-60, 95-91, 95-97, 96-024, 96-134, 96-186, 96-195, 97-28 and 97-52: These are all seizure files regarding the BCCI case. There have been several criminal forfeiture orders, but no final orders of forfeiture will be signed until all assets have been identified and turned over.

4) 3920-95-102 & 96-023: Subject [redacted] was recently sentenced to twenty-five months in jail. AFO has yet to rule on the petitions and no final forfeiture order has been received from the U.S. Attorney's Office. b6 b7C

5) 3920-96-F-053: Three separate Petitions for Remission have been filed in this case. WFO's Petition Investigation was submitted on 2/28/97.

4

209B-WF-171994 FF-2

SEARCHED [redacted] INDEXED [redacted]
SERIALIZED [redacted] FILED [redacted]
MAR 07 1997
FBI-WASH. METRO FIELD OFFICE

3980 - 96-0134

152-HQ-1236600-4361

To: Director, FBI From: WFO
Re: 209B-WF-198831 SUB FF SUB 2, 03/03/1997

Should you have any questions regarding these cases please contact DA JOSEPH SCHULTE or SSA [redacted] at (202) 252-7118. b6 b7C

CC: 17 - FSPU (Ms. [redacted]) b6 b7C
17 - WFO
1 - 3920-94-F-151
1 - 3920-94-F-155
1 - 3920-95-F-021
1 - 3920-95-F-050
1 - 3920-95-F-059
1 - 3920-95-F-060
1 - 3920-95-F-091
1 - 3920-95-F-097
1 - 95-102
1 - 96-23
1 - 96-24
1 - 96-53
1 - 96-134
1 - 96-186
1 - 96-195
1 - 97-28
1 - 97-52

♦♦

1325015-000-4362

1/3/97

[redacted] b6 b7C

Please contact the appropriate United States Attorney's Office to obtain the status of each of the below-listed cases. Subsequently, provide the status of each in a written communication to the FSPU, Property Procurement and Management Section, Finance Division, Attention: [redacted] by COB 3/3/97. b6 b7C

3920-94-F-151 - Trial held 10/96? - need copy of final order issued
3920-94-F-155 - " "
3920-95-F-021
3920-95-F-058-60 - Claims ruled on yet? Need final order.
3920-95-F-091
3920-95-F-097 - Claims ruled on yet? Need final order.
3920-95-F-102 - Need letter from AUSA to proceed administratively.
3920-96-F-023
3920-96-F-024
3920-96-F-053 - Was a claim received? If so, please provide FSPU with a copy.
3920-96-F-134 - Claims ruled on yet? Need final order.
3920-96-F-186
3920-96-F-195
3920-97-F-028
3920-97-F-052

Thank you.

[redacted] b6 b7C

[redacted] b6 b7C

Set T for 2/15/97

(01/26/1998)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 2/10/1999 b6 b7C

To: FINANCE Attn: FSPU (NP300) [redacted]

From: WASHINGTON FIELD b6 b7C
C-1 (WFO FORFEITURE TEAM)
Contact: [redacted] NVRA X 3226

Approved By: [redacted] b6 b7C

Drafted By: [redacted] llt

Case ID #: 29B-WF-171994
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195

Title: U.S. V. BCCI (Round 4)

Entry (Check One): [ ] New Case **[X]** Change or Add

[ ] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit **(RELATED)**	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[X] Order of Forfeiture	[ ] Police Reports
[ ] Other Subsequent Materials	

Seizure Log
Foims (PFA)
CATS

CC: 9-BUREAU, ATTN: [redacted] b6 b7C
3920-95-F-0058, 3920-95-F-0059, 3920-95-F-0060,
3920-95-F-0097, 3920-96-F-0024, 3920-96-F-0097,
3920-96-F-0134, 3920-96-F-0186, and 3920-96-F-0195
(1) - WFO, 29B-WF-171994 112

[redacted] b6 b7C

LT990425.EC

29B-WF-171994(FF-2)

5

1325019-000-4364

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA v. BCCI HOLDINGS (LUXEMBOURG), S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL, S.A.; BANK OF CREDIT AND COMMERCE INTERNATIONAL (OVERSEAS) LIMITED; and INTERNATIONAL CREDIT AND INVESTMENT COMPANY (OVERSEAS) LIMITED, Defendants.	CRIMINAL NUMBER 91-0655 (JHG) Defendants 01-04

FILED

DEC 21 1994

CLERK U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

ORDER OF FORFEITURE

This matter came before the Court on the Motion of the United States to amend the Order of Forfeiture of January 24, 1992 ("First Order of Forfeiture"), to include additional property on the schedule of property subject to forfeiture. The First Order of Forfeiture provides that all property of the corporate defendants located within the United States, with certain identified exceptions, is subject to forfeiture to the United States. Exhibit A to the First Order of Forfeiture contains a list of specific assets that were forfeited on January 24, 1992, and were to be seized by the United States Marshals on that date.

On January 31, 1992, the Court amended the First Order of Forfeiture to include a First Supplemental List of Forfeited Property and directed the Marshals to seize the assets listed therein. Since that time, the Court has amended the First Order of Forfeiture at various times to include additional assets including property set forth on a Second Supplemental List of Forfeited Property, see Order of Forfeiture, July 29, 1992, and

1325015-000-4365

on a Third Supplemental List of Forfeited Property, see Order of Forfeiture Property, see Order of Forfeiture, August 19, 1993.

The government has now identified additional assets of the corporate defendants that are forfeitable to the United States under the First Order of Forfeiture. These assets are described in Exhibit A to the government's motion which includes assets held in the names of the four corporate defendants, as well as assets nominally held by other persons and entities.

For the reasons set forth in the government's motion and the accompanying declarations and exhibits, the Court finds that the property listed in the government's Exhibit A is the property of the corporate defendants and that the property is located within the United States. Accordingly, it is hereby

1. ORDERED that the property listed on government's Exhibit A is forfeited to the United States;

2. IT IS FURTHER ORDERED that the Order of Forfeiture of January 24, 1992, is hereby amended to include government's Exhibit A as a Fourth Supplemental List of Forfeited Property;

3. IT IS FURTHER ORDERED that the property listed on the Fourth Supplemental List shall be transferred to the United States as follows:

A. All property on the Fourth Supplemental List that is described as being the excess of the liquidation of the agencies of BCCI S.A. in New York and California shall be managed by the Court-Appointed Trustee, Robb Evans, and transferred to the Marshals in accordance with this Court's Orders Appointing Trustee of March 5, 1993 (with respect to the California property) and July 20, 1994 (with respect to the New York

1325015-000-4366

property). The Trustee's inventory of the excess property transferred to him by the New York Superintendent of Banks, which the Trustee is required to file within 20 days of the transfer in accordance with the Order Appointing Trustee, shall be appended to and considered a part of the Fourth Supplemental List of Forfeited Property as soon as it is filed with the Court;

B. All property on the Fourth Supplemental List that is described as payable to any of the defendants from a bankruptcy proceeding, including the funds described as available for distribution on BCCI's claims in the Fastrax bankruptcy case, shall be transferred to the Marshals Service forthwith by the person in possession of said funds, unless the funds have previously been transferred to the Marshals Service or to the Court Registry Investment System;

C. Any property on the Fourth Supplemental List that is now in the Court Registry Investment System, including the funds described as being derived from interest on bonds issued by the Republic of Venezuela and the funds described as representing a distribution from the American Mills bankruptcy estate, shall be transferred to the Marshals Service forthwith along with any interest accrued since the funds were deposited in the Investment System;

D. In the case of any property on the Fourth Supplemental List that is under the control of the Court-Appointed Fiduciaries, including the remittance of the contempt fine paid to the United States District Court for the Southern District of Florida and the net proceeds of the sale of the Willow Hollow Townhouse Complex, the Fiduciaries shall arrange

1325015-000-4367

for the orderly transfer of the property to the United States Marshals Service as soon as practicable;

E. The property described on the Fourth Supplemental List as "Carlson Farm" shall be posted with a copy of this Order of Forfeiture by the United States Marshals Service and a lis pendens referencing this Order shall be filed in accordance with Connecticut law. The Marshals, however, shall not seize the real property at this time. If no one files a claim to Carlson Farm in accordance with 18 U.S.C. § 1963(l) within the period prescribed by the statute, the Marshals shall seize the property and liquidate it through normal commercial means without further Order of this Court;

F. The proceeds of the sale of the assets of First American Bankshares, Inc. (FAB) and First American Corporation (FAC) shall remain under the direct or indirect control of the Court-appointed Trustee, Harry W. Albright, Jr., as provided in the Order Appointing Trustee of June 23, 1992 and the Procedural Order entered December 21, 1994,

G. The United States Marshals Service is directed to seize forthwith all other property listed on the Fourth Supplemental List that is not already in the possession of the Marshals Service;

4. IT IS FURTHER ORDERED, that it shall be the responsibility of the United States to notify all interested parties of their right to file a claim asserting legal right, title or interest in all property subject to this Order pursuant to section 1963(l) with the following qualifications:

1325015-000-4368

A. With respect to the excess funds from the liquidation of the California agency of BCCI S.A., the United States shall not be required to send notice of the ancillary proceeding to any person to whom it sent notice of the forfeiture of the first set of such funds pursuant to the Third Order of Forfeiture (August 19, 1993) and who did not file a claim;

B. The United States shall send notice of the ancillary proceeding to any person appearing to have, or asserting, a shareholder's interest in CCAH, so that such person might have an opportunity to file a claim asserting that his or her ownership interest in CCAH is greater than the interest described in the determination submitted July 11, 1994, by the Department of Justice and the Federal Reserve, and that the defendants' ownership interest is correspondingly less than the 61.156 per cent described in that determination. The United States, however, shall not be required to send notice of the ancillary hearing to any creditor or lienholder of CCAH, CCAI, FAC or FAB. Because this Order of Forfeiture provides only for the forfeiture of 61.156 percent of the funds distributable to CCAH shareholders, and such distribution will not occur before payment or provision for all liabilities of CCAH, CCAI, FAC and FAB, creditors and lienholders of CCAH, CCAI, FAC and FAB have no legal interest in the property subject to the ancillary hearing.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

December 21, 1994

United States District Court
for the District of Columbia
A TRUE COPY
NANCY MAYER-WHITTINGTON, Clerk
By Joe A. Wood, Jr.

1325015-000-4369

Fourth Supplemental List of Forfeited Property

Description	Approx. Value
Excess funds from liquidation of New York agency of BCCI S.A.	$ 77,000,000.00
Excess funds from liquidation of California agency of BCCI S.A. not included in Third Supplemental List of Forfeited Property	$ 3,647,571.00
Funds at Chase Manhattan Bank representing interest owed to BCCI S.A. on bonds issued by the Republic of Venezuela: Account No. C20135 B	$ 5,086.56
Account of BCCI, S.A. Dubai at Bank of New York: (transferred to Court Registry Investment System)	$ 3,600.00
Accounts of BCCI (Overseas) Bombay at New York agency of BCCI S.A.: Account Nos. 2044100105 and 2044100207 (transferred to Court Registry Investment System)	$ 45,163.04
[redacted] Carlson Farm, Sherman, Connecticut	$ 2,000,000.00
Assets of BCCI Nigeria at American Express Bank, Account No. 3/52977 ("BCCI (Overseas) Nairobi")	$ 82,156.99
Bankruptcy distributions to BCCI:	
American Mills (transferred to Court Registry Investment System)	$ 7,000.00
Domino Investments, Ltd.	$ 23,673.14
Fastrax, Inc.	$ 197,500.00
Remittance of funds paid in contempt proceeding in the U.S. District Court for the Southern District of Florida, including interest (held by Nussbaum & Wald)	$ 165,233.00
61.156 percent of the amount distributable to CCAH shareholders as a consequence of the liquidation or other disposition of their indirect interest in First American Corporation.	$ 287,000,000.00

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b7C

Exhibit A -- Cr. No. 91-0655 (JHG)

1325015-000-4370

Willow Hollow, Houston TX — AFO will serve — $850,000.00

95-60

Bank of America National Trust and Savings Ass'n			
Acct No. 6599-09995	BCCI Overseas - Bombay	Recd 2/22/95 $4,545.47	-134-1
Acct No. 6597-09996	BCCI Overseas - Sri Lanka	" $10,430.00	-134-2

95-59

1325015-000-4371

ROBB EVANS, TRUSTEE
INVENTORY LIST
As of November 16, 1994

		Balance
Cash Assets:		
Deposits		$20,000,000.00

Republic Bank California N.A.
445 N. Bedford Drive
Beverly Hills, CA 90210

Account Names and Numbers:
Robb Evans, Trustee, #7030011486
Robb Evans, Trustee, #9030008321

Republic National Bank of New York
452 Fifth Avenue
New York, NY 10018

Account Name and Number:
Robb Evans, Trustee, #02FR43

First Liberty Bank
201 Second Street
Macon, GA 31297-4699

Account Name and Number:
Robb Evans, Trustee, #88290177

Cash Collateral in Transit		$10,547.61
		Principal Amount
Promissory Notes, Unpaid Acceptances and Claims on Banks:	26 Items	$28,696,394.54
		Book Value
Shares of Real Estate Holding Corporations:		$10,617,379.69

1. Ten (10) shares in SalMor Holdings Inc. holding 100% interest in real properties at 243 Hancock Street, Brooklyn, New York and 244 Carlton Street, Brooklyn, New York (Exhibit A1 and A2)

2. Fifty (50) shares in Receivership Hotel Holdings, Inc. holding 100% interest in Radisson Inn Macon at 108 First Street, Macon, Georgia (Exhibit B)

3. One hundred (100) shares in Receivership Hotel Holdings of Florida Inc. holding 100% interest in Days Inn at 40050 U.S. Hwy. 19, Tarpon Springs, Florida (Exhibit C)

ADDENDUM I

EXHIBIT A1

Real Property at
243 Hancock Street, Brooklyn, New York
(Block: 1834 ; Lot: 72)

All that certain plot, piece or parcel of land with the buildings and improvements thereon erected, situate, lying and being in the Borough of Brooklyn, County of Kings, City and State of New York, bounded and described as follows:

BEGINNING at a point on the northerly side of Hancock Street, distant 87 feet 6 inches easterly from the northeasterly corner of Marcy Avenue and Hancock Street;

RUNNING THENCE northerly parallel with Marcy Avenue and part of the distance through a party wall, 100 feet;

THENCE easterly parallel with Hancock Street, 21 feet 6 inches;

THENCE southerly again parallel with Marcy Avenue, 100 feet to the northerly side of Hancock Street;

THENCE westerly along said northerly side of Hancock Street, 21 feet 6 inches to the point or place of BEGINNING.

EXHIBIT A2

Real Property at
244 Carlton Street, Brooklyn, New York
(Block: 2089 ; Lot: 57)

LEGAL DESCRIPTION

ALL THAT CERTAIN PLOT, PIECE OR PARCEL OF LAND, LYING AND BEING IN THE CITY AND STATE OF NEW YORK, COUNTY OF KINGS BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE WESTERLY SIDE OF CARLTON AVENUE, DISTANT 264 FEET 2 1/2 INCHES NORTHERLY FROM THE CORNER FORMED BY THE INTERSECTION OF DEKALB AVENUE;

RUNNING THENCE NORTHERLY ALONG THE WESTERLY SIDE OF CARLTON AVENUE 21 FEET 5 INCHES;

THENCE WESTERLY AT RIGHT ANGLES TO CARLTON AVENUE, 100 FEET;

THENCE SOUTHERLY PARALLEL WITH CARLTON AVENUE, 21 FEET 5 INCHES;

THENCE EASTERLY AT RIGHT ANGLES TO CARLTON AVENUE AND PART OF THE DISTANCE THROUGH A PARTY WALL, 100 FEET TO THE POINT OR PLACE OF BEGINNING.

EXHIBIT B

Property Description of
Radisson Inn Macon
108 First Street, Macon, Georgia 31201

ALL THAT TRACT or parcel of land lying and being in the City of Macon, Bibb County, Georgia, being Lots 13 through 18, Academy Square, being more particularly described as follows:

Begin at the intersection of the southeastern right-of-way of First Street and the northeastern right-of-way of Walnut Street, and from said point of beginning run thence north 33 degrees 53 minutes 25 seconds east along the southeastern right-of-way of First Street a distance of 497.00 feet to a drill point set along the southwestern right-of-way of Riverside Drive; thence leaving said right-of-way of First Street and running thence south 56 degrees 05 minutes 00 seconds east along the southwestern right-of-way of Riverside Drive a distance of 165.70 feet to an iron pin set; thence continuing along said right-of-way of Riverside Drive south 57 degrees 01 minute 02 seconds east a distance of 39.72 feet to a drill point set; thence leaving said right-of-way of Riverside Drive and running thence south 33 degrees 37 minutes 00 seconds west a distance of 215.70 feet to an iron pin set; running thence south 03 degrees 20 minutes 00 seconds west a distance of 22.00 feet to an iron pin set; running thence north 56 degrees 06 minutes west a distance of 25.00 feet to a nail found; running thence south 33 degrees 54 minutes 00 seconds west a distance of 262.10 feet to an iron pin found along the northeastern right-of-way of Walnut Street; running thence north 56 degrees 05 minutes 00 seconds west along the northeastern right-of-way of Walnut Street a distance of 190.90 feet to a drill point set and the true point of beginning. As more particularly described on that as-built survey for Zurich Corporation, Macon Hilton Hotel, by Ralph A. True, of Tribble & Richardson, Inc., Georgia Registered Land Surveyors, dated June 27, 1989.

GEORGIA, Bibb County, Clerk's Office Superior Court
Filed for Record JUL 7 1992 at 11:47 AM
Recorded JUL 8 1992
Dep. Clerk

1325015-000-4375

EXHIBIT C

Property Description of
Days Inn
40050 U.S. Hwy. 19, Tarpon Springs, Florida 34689

The North 250 feet of the following described parcel:

Tracts 49 and 50, Less the North 540 feet of each and Less also that portion of Tract 49 within the right-of-way of the Gulf Coast Highway (U.S. Highway 19) of TAMPA & TARPON SPRINGS LAND COMPANY SUBDIVISION, of Section 18, Township 27 South, Range 16 East, according to the plat thereof as recorded in Plat Book 1, Page 116, in public records of Hillsborough County, Florida, of which Pinellas County was formerly a part, and being more particularly described as follows:

To find the point of beginning, begin at a concrete monument set by Pinellas County at the center of Section 18, Township 27 South, Range 16 East, Pinellas County, Florida and thence run along the centerline of U.S. Highway #19 (State Route 55-a 200 foot right of way) South 00° 03' 04" East a distance of 540.00 feet to a point thence leave said centerline and run North 89° 50' 38" West a distance of 100 feet to a concrete monument found on the western right-of-way of U.S. Highway #19 which concrete monument is the TRUE POINT OF BEGINNING; from said true point of beginning thance running along the western right-of-way of U.S. Highway #19 South 00° 03' 04" East, a distance of 250 feet(to an iron rod; thence leaving said right-of-way and running North 89° 50' 38" West a distance of 766.27 feet to an iron rod; thence running North 00° 12' 43" West a distance of 250 feet to an iron rod set; thence running South 89° 50' 38" East a distance of 766.97 feet to a concrete monument on the western right-of-way of U.S. Highway #19 and the POINT OF BEGINNING; containing 4.38 acres as per plat of survey prepared by Lloveras, Baur & Stevens, dated November 6, 1985, (the "Real Property").

a. All right, title and interest of Defendants in and to the minerals, soil, flowers, shrubs, crops, trees, timber and other emblements now or hereafter located or existing on the Real Property.

b. All Defendants' rights, title and interest in and to all water, sanitary sewer, storm sewer and other public or private utility systems and connections and appurtenances which are now or hereafter located on, over or under the Real Property, together with all

OFF. REC. BK 8553 PG 252 PINELLAS COUNTY, FLA.

1325015-000-4376

additions, replacements, proceeds and accessions thereto.

c. All paving for streets, roads, walkways, entrance ways and parking now or hereafter located on the Real Property.

d. All of Defendants' right, title and interest in and to all fixtures, equipment and other tangible personal property of any nature whatsoever that is now or hereafter attached or affixed to the Real Property or the improvements thereon or used or intended to be used, regardless of where situated, by Defendants in connection with its use of or operations on the Real Property; together with all proceeds, additions, replacements and accessions to any of the foregoing.

e. All rents, room receipts, issues, royalties, bonuses, income and profits in any manner arising from the Real Property and the improvements and tangible property located thereon, including without limitation, all Defendants' interest in and to all leases, licenses, franchises (including, without limitation, the franchise agreement between Defendants and Days Inn of America Franchising, Inc.) and concessions of, or relating to, the possession, use, operation or occupancy of all or any portion of the Real Property or the improvements or tangible property located thereon, including any and all amendments, modifications, replacements, substitutions, extensions, renewals or consolidations now or hereafter made.

f. All of Defendants' right, title and interest in and to any and all contracts, written or oral, express or implied, now existing or hereafter entered into, in any manner related to the improvement, use, operation, sale, conversion or disposition (voluntary or involuntary) of the Real Property or the improvements and tangible property located thereon or the rents and other income arising therefrom, or any combination thereof, including without limitation, any and all deposits, prepaid items, and payments due and to become due thereunder, and further including construction contracts, service contracts, purchase contracts, repurchase agreements, management agreements, development agreements, marketing agreements, labor agreements, advertising contracts, purchase orders and equipment leases.

g. All of Defendants' right, title and interest in and to any and all general intangibles, as defined in the Florida Uniform Commercial Code, in any manner

ORF REC. BK 8563 PG 253
PINELLAS COUNTY, FLA.

1325015-000-4377

3920-96-R-0134 (RF-2)

~~296-WF-191994~~

SEARCHED INDEXED
SERIALIZED FILED
JUN 06 1996
FBI-WASH. METRO FIELD OFFICE

[redacted]

b6
b7C

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/15/96

To: Director, FBI **Attn:** Administrative Services Division
Forfeiture/Seized Property Unit

From: ADIC, Washington Metropolitan Field Office
C-1/FAST

Approved By: ASSA [redacted] b6 b7C

Drafted By: SA [redacted] :ac

File Number(s): 29B-WF-171994 (FF) (Pending)

Title: U.S. v HIDDEN INTERESTS; MAJOR CASE #38
3920-96-F-0134

Entry (Check One): [X] New Case [X] Change or Add

[X] CATS Seizure Form	[ ] Complaint for Forfeiture
[ ] FD-302	[ ] Search Warrant
[ ] Investigative Insert	[ ] Request for Adoption
[ ] Affidavit	[ ] Indemnity Agreement
[ ] Seizure Warrant	[ ] Final Decree
[ ] FD-597 (Receipt)	[ ] Sharing Request [ ] Dag 71 [ ] Dag 72
[ ] Settlement Statement	[ ] Petition
[ ] Claim & Cost Bond	[ ] Petition Investigation
[ ] Title Documentation	[ ] Civil Forfeiture Report
[ ] Appraisal Report	[ ] FD-783 (Expedited Release)
[ ] In Forma Pauperis	[ ] Plea Agreement
[ ] Order of Forfeiture	[ ] Police Reports

FOIMS [redacted] b6 b7C

[X] Other Subsequent Materials
Facsimile dated April 30, 1996 from [redacted] b6 b7C

(1) 3920-96-F-0134
1- Bureau, FSPU (ATTN: [redacted]
(1-) WMFO (29B-WF-171994) (FS)
ATTACHMENTS

29B-WF-171994 Sub FF-2
3920-96-F-0134

SERIALIZED Kaw INDEXED FILED Kaw
MAY 22 1996
FBI—WASH. METRO FIELD OFFICE

1325015-000-4342

Seizure Form

Asset ID: <A> | Date: <B> | Page 1

CASE

(1) Office ID:	(2) Sub-Office/Group:	(3) Program Code:	(4) GDEP:	(5) Seizure Event:	(6) Delay Forfeiture?
3938		05		96-0134	N

(7) Case Number:	(8) Case Name:
288-WF-171994	HIDDEN INTERESTS; MAJOR CASE #38

(9) Operation Name:	(10) Case Agent:
	SA [redacted]

b6
b7C

SEIZURE

(11) Seizure Date:	(12) Seizure Method:	(13) Indictment Date:	(14) Adoption Date:
4/12/96	CRIMINAL ORDER	12/21/94	

(15) Seizing Agent:	(16) Phone Number:
SA [redacted] /C-1	202-324-9073

(17) Seized From:
BCCI HOLDINGS

(18) Place/Address Where Seized:	(19) City:	(20) State:

(21) Seizure: Judicial District	(22) Processing:	(23) Forfeiture Statute:	(24) Violation Statute:
DC	DC	18 USC 982	18 USC 1963

ALL ASSET TYPES

(25) Asset Value ($):	(26) Above Minimum Threshold Value?	(27) Appraisal Date:	(28) Asset Type:	(29) Asset Sub-Type:	(30) Forfeiture Type:
1.8 mil	Y		CURRENCY	BANK ACCT	JUDICIAL

(31) Asset Description:
BCCI ASSETS TOTALING 1.8 MILLION IN US CURRENCY

(32) Lien Exists?	(33) Hold as Evidence after Forfeiture?	(34) Expedited Release Notice Served?	(35) Special Handling Code(s)?
N	N	N	N
(36) Expenses Incurred?	(37) Forfeiture-Dependent Award?	(38) Quick Release Performed?	(39) Intra-Agency Assistance?
N	N	N	N
(40) Suitable for Official Use?	(41) OCDETF Case?	(42) Sharing Anticipated?	(43) Additional Agencies?
N	N	N	Y

VEHICLES (Complete if Applicable)

(44) Make:	(45) Model:	(46) Style:	(47) Year Manufactured:	(48) Color/Finish:

(49) VIN/Serial Number:	(50) Condition Code:	(51) NCIC Search Results Positive?

(52) License Number:	(53) Year:	(54) State:	(55) Country:	(56) Concealed Compartment?	(57) Photos?

(58) Special Equipment or Accessories?	(59) Damages Present?	(60) Caliber?

(61) Odometer Reading (include units):	(62) Size:	(63) Weight (including units):
(64) Number of Cylinders:	(65) Four Wheel Drive?	(66) Salvage Certificate?

VESSELS

(67) Vessel Name/Coast Guard No.:	(68) Hull Type:	(69) Length:	(70) Engine Size (including units):

(71) Trailer Included?	(72) License Number:	(73) Year:	(74) State:	(75) Country:	(76) # of Engines:	(77) Mounting Type:

AIRCRAFT

(78) Tail Number:		ENGINES	(79) #	(80) Serial Number	(81) Size	(82) Flying Hours
(83) Airframe Flying Hours:	(84) # of Engines:					
(85) Air Worthiness Certificate?	(86) Log Books?					

FINANCIAL INSTRUMENTS

(87) Account Name:	(88) Account Number:
ROBB EVANS, TRUSTEE	149-240-134

FOREIGN CURRENCY

(89) Nationality:	(90) Date Converted:	(91) Exchange Rate:

1325015-000-4343

Asset ID: <A> | Date: <B>

Asset Description: <C>

Seizure Form

(92) Name: BCCI HOLDINGS	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:		Owner	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Lienholder	
(100) Contact Name (if business):	(101) Phone Number:	Seized From	X
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):		Victim	
(109) Institution Address:		Other	
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

(92) Name:	(93) Phone Number:	(94) Party Type (Select 1 -or- More)	
(95) Address:		Owner	
(96) City: / (97) State: / (98) Zip Code: / (99) Country:		Lienholder	
(100) Contact Name (if business):	(101) Phone Number:	Seized From	
(102) Lien Amount Held By Party ($): / (103) Quick Release Recipient? / (104) Quick Release Date: / (105) Expenses Reimbursed ($):		Institution Seized From	
(106) Incarcerated?	(107) Prisoner ID:	Occupant	
(108) Institution Name (if incarcerated):		Victim	
(109) Institution Address:		Other	
(110) City: / (111) State: / (112) Zip Code: / (113) Country:			
(114) Represented by Counsel?	(115) Attorney's Name (if any):		
(116) Firm's Name:	(117) Attorney's Phone Number:		
(118) Attorney's Address:			
(119) City: / (120) State: / (121) Zip Code: / (122) Country:			

Seizure Form

Asset ID: <A> Date: <B>

Asset Description: <C>

U.S. ATTORNEY

(123) Court Case Number:	(124) Case Name:		
91-0655	US v BCCI HOLDINGS		
(125) AUSA Name:		(126) Judicial District: DC	(127) Phone Number:
(123) Court Case Number:	(124) Case Name:		
(125) AUSA Name:		(126) Judicial District:	(127) Phone Number:

INTRA-AGENCY OFFICE

(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:
(128) Office ID:	(129) Sub-Office ID:	(130) Agency Case ID:	
(131) Agent's Name:			(132) Agent's Phone Number:

OTHER AGENCY

(133) Agency Name: DEPARTMENT OF JUSTICE		(134) Agency Case ID:		
(135) Adopted From? NO		(136) Agency Type (Federal, State, Local, -or- Foreign): FEDERAL		
(137) Address:		(138) City: WASHINGTON		
(139) State: DC	(140) Zip Code:	(141) Country: USA	(142) NCIC Code:	(143) Sharing Possible? N
(144) Contact Name:			(145) Contact Phone Number:	

b6
b7C

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

(133) Agency Name:		(134) Agency Case ID:		
(135) Adopted From?		(136) Agency Type (Federal, State, Local, -or- Foreign):		
(137) Address:		(138) City:		
(139) State:	(140) Zip Code:	(141) Country:	(142) NCIC Code:	(143) Sharing Possible?
(144) Contact Name:			(145) Contact Phone Number:	

ROBB EVANS, TRUSTEE

SUMMARY OF CUMULATIVE DISTRIBUTIONS TO THE US MARSHAL

As of April 12, 1996

Forfeiture Order Date State	19-Aug-93 California	21-Dec-94 California	21-Dec-94 New York	03-Nov-95 New York	Total
Forfeiture Orders					
Cash	34,379,642	3,647,571	20,000,000	49,000,000	107,027,213
Loans	20,245,041	0	28,696,395	7,050,589	55,992,025
Real Property	13,894,680	0	25,817,380	2,035,184	41,747,244
Miscellaneous Property	31,445	0	0	0	31,445
Other	0	0	5,950	106,063,264	106,069,214
Total Forfeiture Orders	68,550,808	3,647,571	74,519,724	164,149,037	310,867,141

Net Remittance To The US Marshal

Sources of Funds

Asset Conversions:					
Cash	34,379,642	3,647,571	20,000,000	1,000,000	59,027,213
Loans	24,376,781	0	503,880	598,640	25,479,300
Real Property	21,143,370	0	2,044,071	0	23,187,441
Miscellaneous Property	49,094	0	0	0	49,094
Other	124,228	0	22,845	157,090	304,163
Total Asset Conversions	80,073,116	3,647,571	22,570,796	1,755,730	108,047,212
Total Revenue Collection (1)	5,479,402	0	532,037	1,136,475	7,147,914
Total Sources of Funds	85,552,517	3,647,571	23,102,833	2,892,205	115,195,126

Uses of Funds

Seller Financing and Cash Disbursements	(10,527,546)	0	(8,334,896)	(1,833,108)	(20,695,549)
Operating Account Balance	(1,378,310)	0	(62,169)	(59,098)	(1,499,577)
Special Reserve Account (2)	0	0	0	(1,000,000)	(1,000,000)
Surplus Balance	0	0	0	0	0
Total Uses of Funds	(11,905,856)	0	(8,397,065)	(2,892,206)	(23,195,126)
Net Remittances	73,646,662	3,647,571	14,705,768	(0)	92,000,000

Present Book Value Per Budget

Cash	1,378,310	0	62,169	49,059,098	50,499,577
Loans	2,833,637	0	11,499,944	3,226,215	17,559,796
Real Property	3,232,254	0	12,790,640	1,490,000	17,512,894
Miscellaneous Property	0	0	0	0	0
Other Assets	5,668	0	53,276	2,731,522	2,790,466
Total Liabilities	(255,030)	0	(275,445)	(1,000,000)	(1,530,475)
Total PBV Per Budget	7,194,838	0	24,130,584	55,506,835	86,832,258

Notes: *(1) Excluding gains on sale of FF&E of $49,094.36 (not in use by the Trustee) and gains on sale of REO of $8,0989,162.74.*

(2) Special Reserve for New York claims.

FACTS AND CIRCUMSTANCES

The Washington Metropolitan Field Office (WMFO) has been acting primarily as an administrative processor monitoring and reporting to FSPU assets seized from four criminal orders of forfeiture in U.S. v Hidden Interests; Major case number 38. Robb Evans, trustee has been appointed to oversee the complex assets listed in the four criminal BCCI forfeiture orders. On 04/12/96, Evans completed a $1,800,000.00 (one million eight hundred thousand dollars) wire transfer to the United States Marshals Service in New York representing the liquidation of cash assets from the fourth order of forfeiture. b6 b7C

On October 4, 1988, a sixteen-count indictment was returned charging BCCI holdings (Luxembourg) S.A., Bank of Credit and Commerce International S.A., Bank of Credit and Commerce International (Overseas) Limited (collectively, "BCCI"), [redacted] BCCI), and Capcom Financial Services, LTD. with [redacted]. The first superseding indictment was filed and unsealed on October 11, 1988. Two additional BCCI Officers, [redacted] and two narco-traffickers, [redacted] were indicted on May 4, 1989. b6 b7C

[redacted] b7E

On Jan 24, 1992, the United States District Court for the District of Columbia accepted the pleas of guilty of the four corporate defendants (collectively, "BCCI) and the plea agreement between them and the United States of America. An order of forfeiture was entered as part of the plea agreement which provided that the four corporate defendants named shall forfeit to the United States ownership interests in all property located in the United States, including without limitation, real property and all tangible and intangible personal property.

Three additional supplemental orders of forfeiture have been issued by Judge Joyce Green, United States District Court, District of Columbia concerning BCCI. [redacted] b6 b7C [redacted] Criminal Division has advised until all potentially forfeitable assets have been identified that no final orders of forfeiture will be issued by the Court. [redacted] anticipates a fifth order of forfeiture will be forthcoming in the Summer of 1996.

Robb Evans
Trustee for
The United States of America
725 South Figueroa Street, Suite 2260
Los Angeles, California 90017-5422

Telephone
(213) 955-8305

Facsimile
(213) 955-8344

Electronic Mail
CompuServe
76011,3375
Internet
76011.3375@compuserve.com

FACSIMILE COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGES TO:

ATTN: Mr. [redacted] b6 b7C

DATE: Apr. 30, 1996

FIRM: Federal Bureau of Investigation

FAX NO.: (202) 324-6426

FROM: [redacted]

NO. OF PAGES: three (3)
(INCLUDING THIS COVER)

If there are any transmission problems, please call (213) 955-8305

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank you.

MESSAGE

Dear [redacted] b6 b7C

How are you? Hope everything's going well with you since the last time we spoke.

Attached, please find the Analysis of the Cash Distribution to U.S. Marshals. If you have any questions, please give me a call.

With warm regards,

[redacted] b6 b7C

ROBB EVANS, TRUSTEE
SCHEDULE OF DISTRIBUTION TO US MARSHAL
From: May 5, 1993 to April 12, 1996

From Account	Date Sent	Payment Sent	Comments
First Interstate Bank: 149-2-40134	26-Aug-93	35,964,405.69	By Order of August 19, 1993
First Interstate Bank: 149-2-40134	22-Oct-93	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	22-Dec-93	250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	18-Feb-94	4,250,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	19-Apr-94	150,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	17-Jun-94	1,300,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	16-Aug-94	8,850,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Oct-94	200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Dec-94	3,035,594.31	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Feb-94	17,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Apr-95	1,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Jun-95	10,500,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	14-Aug-95	2,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	13-Oct-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Dec-95	1,000,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Feb-96	2,200,000.00	60 Day Remittance
First Interstate Bank: 149-2-40134	12-Apr-96	1,800,000.00	60 Day Remittance
Total		92,000,000.00	

1325015-000-4350

Seizure Form

Asset: <A> Date: Page 4

Asset Description: <C>

CUSTODY/STORAGE

(146) Custody Code:	(147) Storage Facility Name:	(148) Storage Date:
	FEDERAL RESERVE BANK, NEW YORK	4/12/96

(149) Storage Facility Address:

(150) City:	(151) State:	(152) Zip Code:	(153) Storage Rate:	Per:
NY	NY		$	

PREPARED BY

(154) Signature:	(155) Date:
	5.14.96
(156) Prepared By: SA	(157) Title: SA

APPROVED BY

(158) Signature:	(159) Date:
	5/21/96
(160) Approved By:	(161) Title:

b6
b7C

b6
b7C

Probable Cause

SEE ATTACHED

<D>